

Lichfield District Council



Consultation on Local Plan Allocations - Summary of Representations

Public Consultation Period: 8th January – 19th February 2018

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Introduction

This document outlines the representations received in response to the consultation on the publication version of the Local Plan Allocations Focused Changes Development Plan Document (Regulation 19).

Background

Lichfield District Council adopted its Local Plan Strategy (LPS) in February 2015. The LPS set out the strategy for the overall approach towards providing new homes, jobs, infrastructure and community facilities to 2029. It contains the broad policies for steering and shaping development as well as defining areas where development should be limited and sets out detailed development policies.

The Local Plan Allocations document is the second part of the District's Development Plan and aims to assist in encouraging appropriate development in Lichfield District which will contribute to sustainable and economic growth.

The Council consulted on the scope and nature of the Local Plan Allocations document (Regulation 18) from August 2016 – October 2016. The consultation document set out the key issues / questions. A total of 98 responses were received and a summary of representations and the Council's response to these is available [online via the District Council's website](#).

Regulation 19 Consultation

Consultation on the Local Plan Allocations Document Publication Stage commenced on 20th March 2017 and ran for a seven week period until 12th May 2017. This consultation was undertaken in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations and sought representations on the soundness and legal compliance of the Local Plan Allocations Document. In total approximately 5,000 responses (including generic responses and petitions) were received.

The Spatial Policy and Delivery Team reviewed the representations received and consequently amended inaccuracies, considered the responses to the draft policy and made amendments where appropriate. In addition, the Council reviewed its housing supply position. This resulted in major modifications to the document and a further round of consultation on a modified version of the document, named Local Plan Allocations Focused Changes, took place between 8th January and 19th February 2018.

The Local Plan Allocations (Regulation 19) and its supporting evidence base is available [online via the District Council's website](#).

This document outlines the key responses / themes arising from the Focused Changes consultation. A full set of responses is appended to this report.

Overview of the Representations Received

There have been a total of 271 individual representations received in response to the Local Plan Allocations Focused Changes consultation.

One comment was submitted after the deadline. Whilst this comment is not formally taken into consideration it has been noted and summarised for completeness.

Summary of Representations

The summary table below shows the breakdown of individual responses received in relation to each chapter¹. Notably, where a representation is linked to one or more points it is only counted as one comment and is listed under the primary area the comment related to.

Table 1: Individual representations received in relation to each chapter by number

Chapter	Comments Received
Introduction	7
Infrastructure	2
Sustainable Transport	0
Homes for the Future	5
Economic Development & Enterprise	4
Natural Resources	2
Built & Historic Environment	1
Lichfield City (inc Streethay)	7
Burntwood	46
North of Tamworth	4
East of Rugeley	42
Key Rural Settlements	69
Other Rural	4
Appendix A Schedule of Deleted Policies	1
Appendix B Changes to Local Plan Strategy	0
Appendix C Implementation & Monitoring	0
Appendix D Housing Trajectory	0
Appendix E Rugeley Power Station Concept Statement	2
Glossary	0

The above highlights that the majority of comments were received in relation to Key Rural Settlements, followed by Burntwood and then East of Rugeley. These areas received significantly more responses than any other chapter.

Figure 1 overleaf goes on to highlight the percentage of individual representations received based on each topic. It is not surprising that the just over a third of comments (34%) are related to Key Rural Settlements given that there are six in total. This percentage represents the responses received in total for the Key Rural Settlements, not for the individual settlements or sites.

¹This does not include any comments which related to the whole document as they are categorised separately

Figure 1: Representations received in response to each chapter by percentage

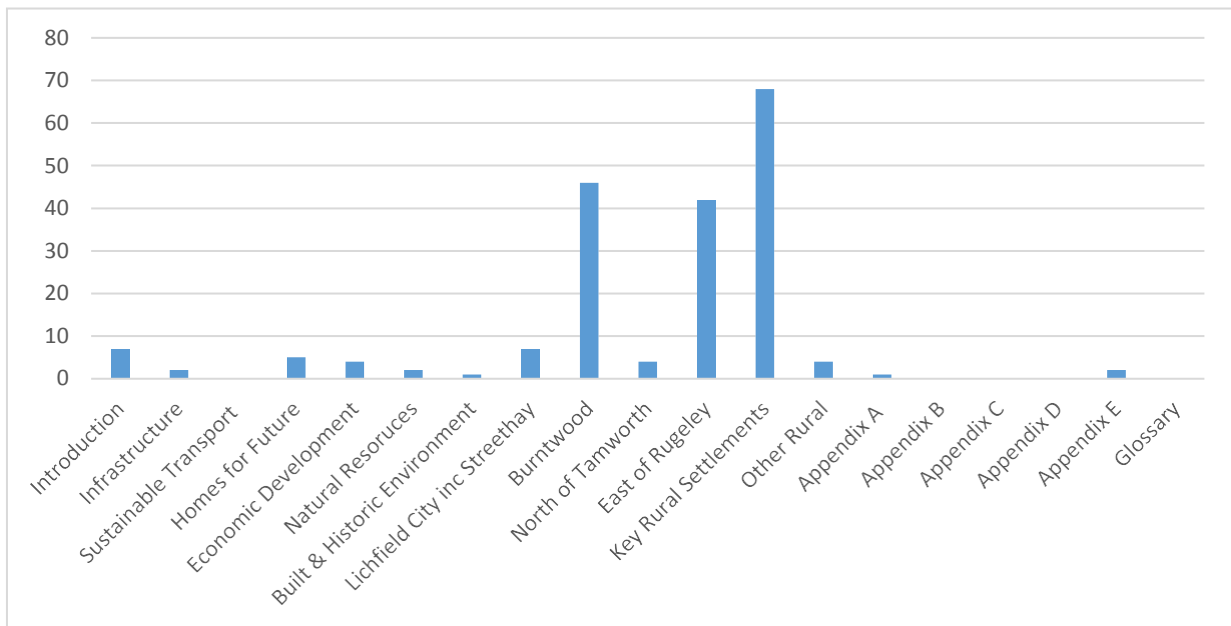
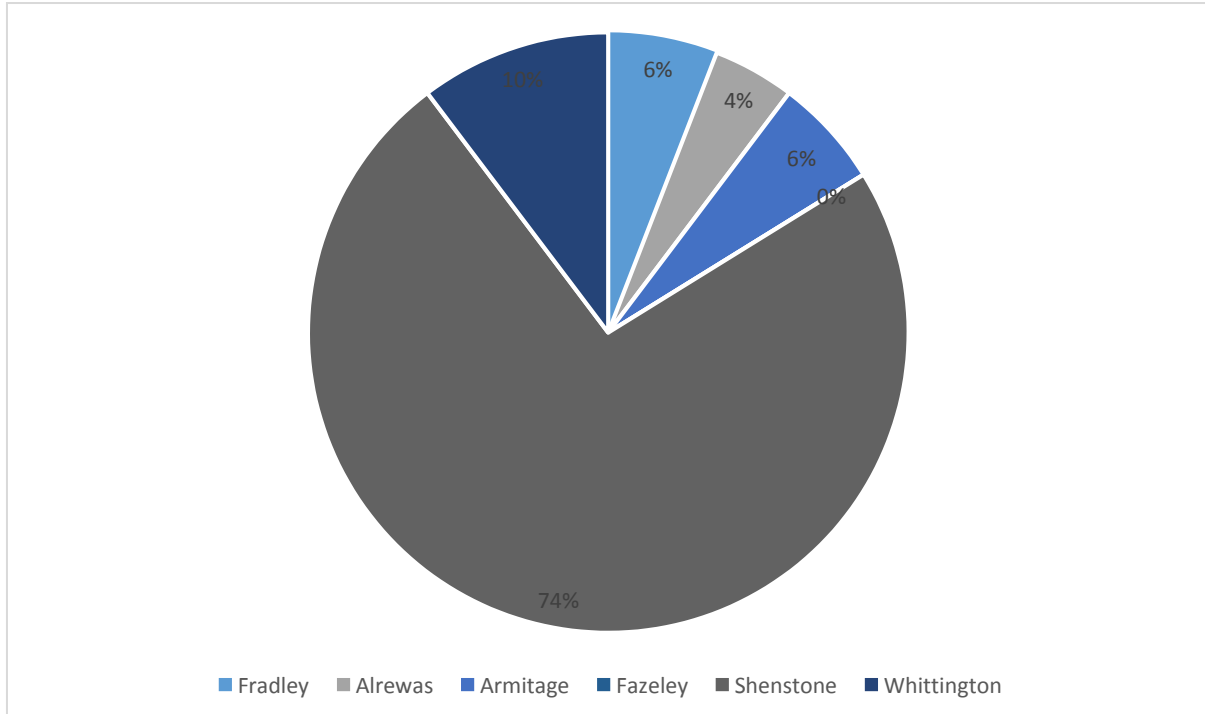


Figure 2 below goes on to break down the responses received in relation to each of the Key Rural Settlements to show that the majority representations were received in relation to Shenstone (74%). Followed by Whittington (10%), Fradley (6%), Armitage with Handscare (6%) Alrewas (4%), Fazeley, Mile Oak & Bonehill (0%).

Figure 2: Breakdown of response received in relation to Key Rural Settlements



Gypsy and Traveller Site Allocations

The Local Plan Allocations Documents identifies one site, Site GT1: Land at Bonehill Road, Mile Oak for one pitch. No comments were received during this consultation in relation to the allocation.

Late Responses

Within the representations received, 1 comment was submitted after the deadline. Whilst this comment has not formally taken into consideration it has been noted by the Council.

Content of Representations Received

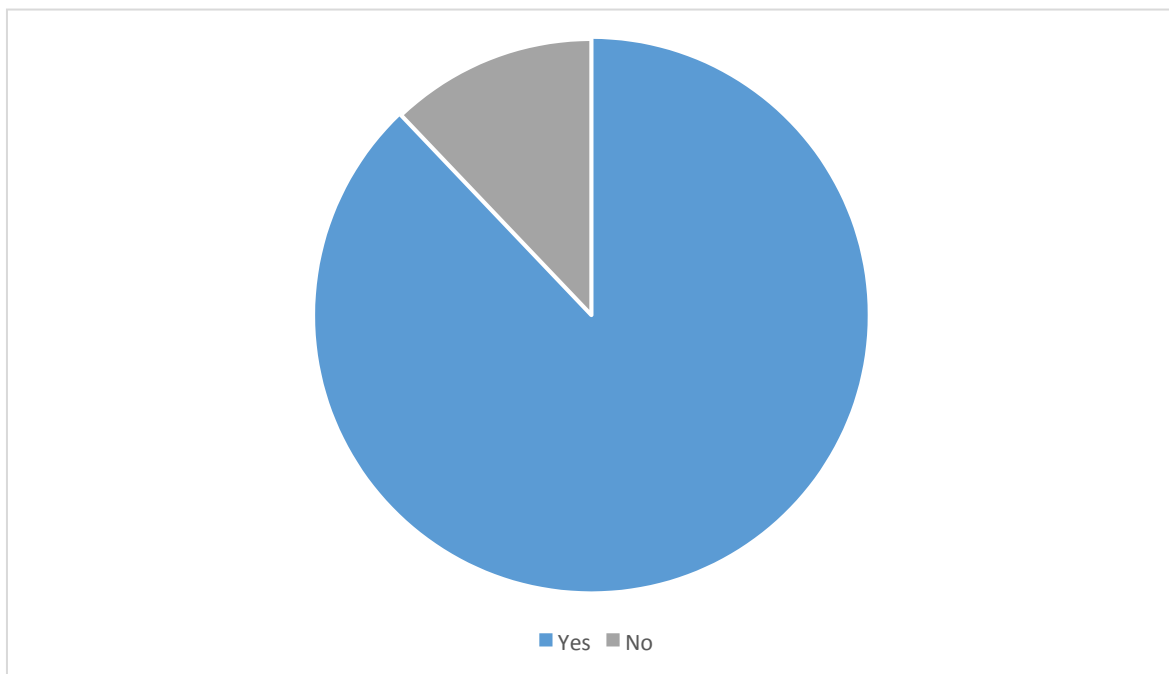
The Regulation 19 consultation sought representations on the soundness and legal compliance of the Local Plan Allocations Document.

The representation form asked directly whether the consultee considered the plan is compliant with the Duty to Co-operate, meets the legal and procedural requirements, positively prepared, justified, effective and consistent with the National Planning Policy Framework. Whilst not every consultee submitted comments via the representation form, of those who responded, the responses are outlined below.

Duty to Co-operate

Question 1 of the response form asks 'Do you consider that the Local Plan Allocations document complies with the Duty to Cooperate?' Of those who directly responded to this question, Figure 3 below shows that just the majority (88%) consider that the plan meets with the duty to co-operate.

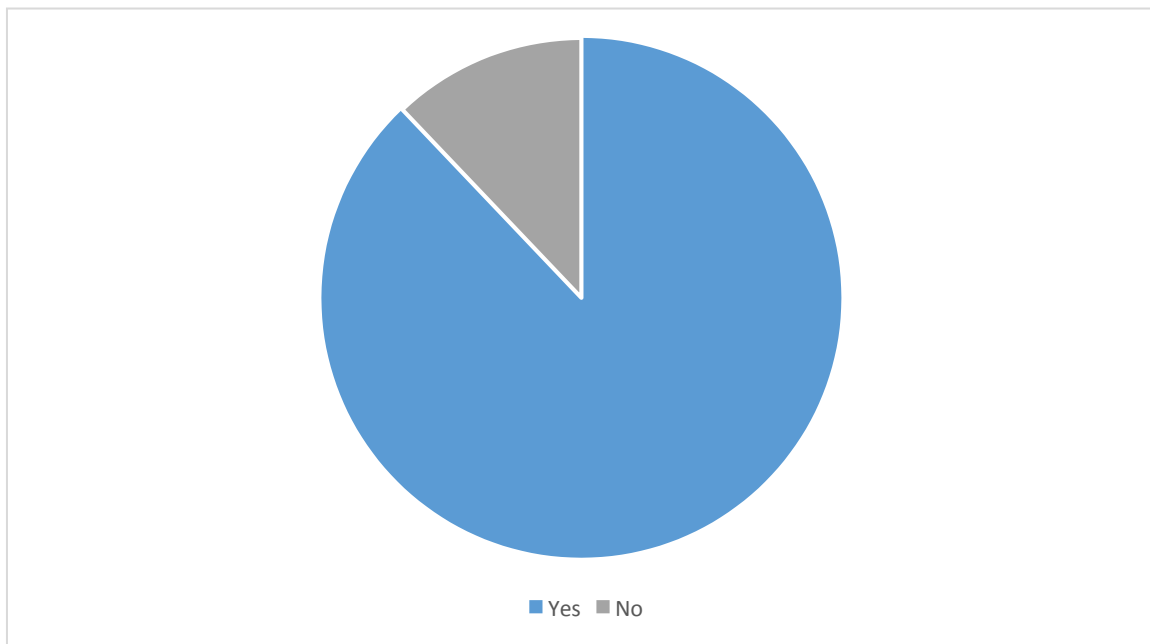
Figure 3: Duty to Cooperate Compliant



Legal and Procedural Requirements

Question 2 of the response form asks 'Do you consider that the Local Plan Allocations document meets the legal and procedural requirements.' Of those who directly responded to this question, 137 consultees agreed the plan meets the legal and procedural requirements compared with only 19 consultees who disagreed.

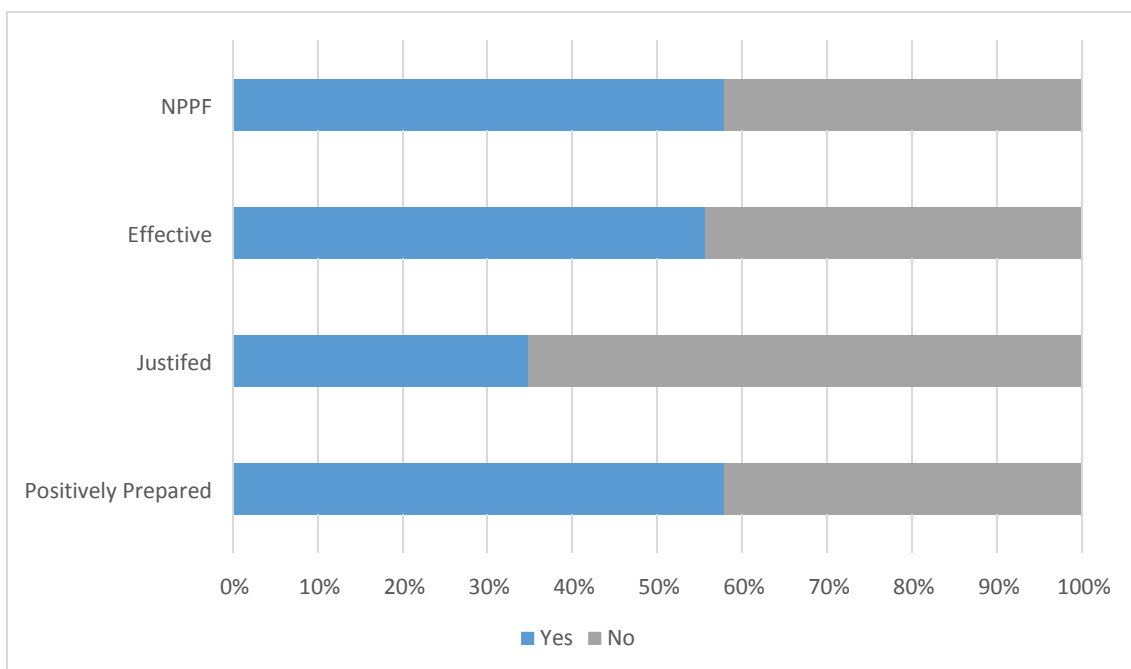
Figure 4: Legal and Procedural



Soundness

Questions 3 to 6 of the response form seek to establish whether the plan is considered sound, i.e. positively prepared, justified, effective and compliant with the NPPF. Figure 5 shows the percentage split of those who responded directly to each question. This highlights over half of those who responded considered the plan to be positively prepared, effective and compliant with the NPPF, with just over a third considered the plan to be justified.

Figure 5: Soundness Tests



Key Issues Raised

Each of the consultation responses received has been summarised in Appendix A and all responses are available to view in full, via the [consultation portal](#).

The key issues raised during the consultation are set out below along with officer analysis.

Table 2: Key Issues and responses to Regulation 19 Focused Changes consultation

Key Issue	Response
The Allocations is not in conformity with the Local Plan Spatial Strategy as there is a significant over provision of dwellings attributed to 'Other Rurals', and under provision in other settlements including Burntwood, Shenstone, Whittington and Fazeley.	The Allocations document meets the overall dwelling requirement set out in the Local Plan Strategy.
Development industry challenge the removal of green belt sites within the Local Plan Allocations and question that the document is reactive as opposed to proactive in allocating development sites.	Further analysis of the housing supply was undertaken, taking into account any potential windfalls to re-assess the need for Green Belt release. This is in line with emerging Government policy of exploring all options before releasing designated Green Belt land. The Allocations document meets the overall dwelling requirement set out in the Local Plan Strategy without the need to remove Green Belt land.
Policy BE2: Heritage Assets is in conflict with National Policy	Officers have made changes seeking compliance with NPPF.
Development industry questioned the deliverability of a number of the allocations, such as Rugeley Power Station and Arkall Farm.	The proposed allocated sites are being promoted through the Local Plan process and are considered deliverable within the plan period. In relation to Rugeley Power Station, the Council has worked closely with the landowner to prepare a Development Brief SPD to guide the future redevelopment of the site. With regards to Arkall Farm, the Council is awaiting the outcome of the planning inquiry. The Local Plan Allocations includes flexibility in terms of housing supply to support any unanticipated under delivery.
Development industry challenged the approach to calculating housing supply, such as allocations with permission.	The approach towards calculating supply is considered consistent across the District and as such all sites with permission have been included within the allocations as they are intended to come forward within the plan period and contribute towards meeting the housing provision

Key Issue	Response
	of 10, 030 dwellings set out in the Local Plan Strategy.
Need to deal with neighbouring authority's shortfall in housing provision within the allocations rather than review	The Council is committed to reviewing its Plan in full to address housing shortfall issues within the Greater Birmingham Housing Market Area as set out within both the Local Plan Strategy and reaffirmed in the Local Plan Allocations document. The Local Development Scheme sets out that the Council will consult on its Scope, Issues & Options document in April 2018.
Comments relating to saved policies being deleted but not replaced, namely Saved Policy C9 and Saved Policy EMP5.	The District Council undertook a review of all saved policies in these circumstances it was not considered appropriate to carry these policies forward.
The proposal to protect the Borrowpit at Rugeley Power Station is challenged given its allocation in the Local Plan Strategy.	Rugeley Power Station is allocated to deliver a minimum of 80 dwellings within the plan period. Whilst the Borrowpit is allocated as part of the Local Plan Strategy, the Council consider it is worthy of retention as a landscape / water feature and acknowledge within the document there will be a net gain of 350 units on the former Power Station site.
The lack of provision for self-build sites was cited by a number of respondents.	The Allocations document meets the overall dwelling requirement set out in the Local Plan Strategy. The Local Plan Allocations does not include site specific allocations for self-build purposes. The Council maintains a self-build register.

In addition to the above, notable support was received from local residents for the retention of the Borrowpit as a key landscape / water feature within the Rugeley Power Station site and residents were supportive of the Plan not allocating Green Belt sites within the Local Plan Allocations, particularly at Burntwood and Shenstone.

Appendix A

Summary of Responses and Officers Response

Lichfield District Council - Summary of Representations (Focused Changes consultation January - February 2018)

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC1	Mr Robert Roberts	Para 12.5	No	Yes	No	Yes	No	Representation was made regarding the Policy A1 Alrewas Housing Land Allocation, that the Allocation should be of sites of 5 or more dwellings. This has not been included in the wording which should read, 'The following sites of five or more dwellings, shown on the adopted local plan policies map. It ignores the provisions of the neighbourhood plan.	None	Sites with extant planning permission for five or more dwellings at the base date of the evidence are proposed for allocation within the document. The Alrewas neighbourhood plan is at an emerging stage, however the plan as drafted makes no proposals for site allocations.
FC2	Coal Authority (Melanie Lindsey)	Whole document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	The Coal Authority has no specific comments to make.	None	None required. Representation noted.
FC3	Samuel Finnikin	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC4	Anthony Marks	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC5	Mrs S Miller	Policy S1	Yes	Yes	Yes	No	No	The Local Plan Allocations document shows compliance with the duty to co-operate, by working together with the residents of Shenstone.	None	None required. Representation noted.
FC6	Robin Stubbs	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC7	Yvonne Stubbs	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC8	Sarah Williams	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC9	Robert Shelley	Para 1.12	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[LDC Note - no commented made by consultee]	None	Representation submitted online and is blank.
FC10	Peter Hedges	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC11	Mrs S Miller	Para 12.14	Yes	Yes	Yes	Yes	No	The LPA document shows compliance with the duty to co-operate by working together with the general public.	None	None required. Representation noted.
FC12	Mrs S Miller	Para 12.15	Yes	Yes	Yes	Yes	No	[LDC Note - no commented made by consultee]	None	Representation submitted online and is blank.
FC13	Mrs S Miller	Para 12.16	Yes	Yes	Yes	Yes	No	[LDC Note - no commented made by consultee]	None	Representation submitted online and is blank.
FC14	Michael Fletcher	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC15	David Morris	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC16	Tim Johnson	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC17	Ian Tucker	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC18	Pauline Davies	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC19	Duplicate comment deleted - no representation made using this reference							No representation made using this reference	N/A	N/A
FC20	Duplicate comment deleted - no representation made using this reference							No representation made using this reference	N/A	N/A
FC21	Duplicate comment deleted - no representation made using this reference							No representation made using this reference	N/A	N/A
FC22	David Davies	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC23	Joyce Ruscoe	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 23	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC24	Peter Ruscoe	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 23	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC25	Paul Malone	Para E.4	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[LDC Note - no commented made by consultee]	None	Representation submitted online and is blank.
FC26	National Grid (Spencer Jefferies)/Hannah Bevins (AMEC)	Whole Plan	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	National Grid owns and operates the high voltage electricity system in England, Wales and Scotland. Sites R1 (Former Rugeley power Station) and OR6 (Land east of A38) are in close proximity or crossed by National Grid infrastructure. National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the line route should be used to make a positive contribution to the development of the site. Potential developers should be aware that it is National Grid Policy to retain existing overhead lines in-situ. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.	None	Comments noted. Rugeley Power Station SPD provide detailed consideration of infrastructure within and in proximity to the site (Site R1). Local Plan Allocations states that development of site should have consideration and accord to the SPD. Access to site OR6 impacted by gas transmission pipeline, no development is anticipated in this part of the site which acts as the access to the existing employment use.
FC27	Thelma Brookes	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 23	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC28	Roy Brookes	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 23	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC29	Derek Lever	Site R1	Yes	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Concern regarding the Borrow Pit lake at Rugeley Power Station. Area is one of great beauty with examples of flora and fauna and many species of fish and other creatures. The decommissioning of the Power Station has given the opportunity to develop the whole Borrow Pit site and this is to be welcomed. The lake is an environmental asset. Keep and use the lake.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC30	Derek Lever	11.3	Yes	[Left blank]	[Left blank]	[Left blank]	[Left blank]	I have added comments previously regarding my specific aspirations for the Borrow Pit Lake. In have noted in the Rugeley Power Station Concept Statement Section E4 that Point 3 reads thus: "Natural assets within the site should be retained. This should ideally include the retention of existing sports facilities to the centre of the site (excluding the respective buildings), the Borrow Pit as a landscape/water feature and the mature tree belt along the Rugeley Bypass." I hope "must ideally" is eventually changed to "must." I have opined my view that the Rugeley Power Station Angling Club is an ideal partner to meet your aspiration. We have many years experience, knowledge and understanding of the water and its environs and we also have a deep wish to use this for the benefit of anyone and everyone who stands to gain from a decision to retain what is.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC31	Richard Smith	12.16	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.

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FC32	Richard Smith	12.14	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC33	Richard Smith	12.15	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC34	Richard Smith	12.16	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC35	Jo Smith	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC36	William Allen	Site R1	Yes	Yes	Yes	Yes		Local Plan Allocations is effective but would like more stress on the retention of the borrow pit as a reserve/leisure opportunity so it can continue in use much as it has until the power stations closure.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC37	Diane Davies	E.5	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Borrow Pit lake is of immense value. If lost this would impact upon peoples ability to enjoy using the lake. The Borrow Pit must be retained.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC38	Paul Pike	Para 1.3	No	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[LDC Note - no commented made by consultee]	N/A	N/A
FC39	John Machin	Para 11.3	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Retention of the Borrow Pit as a landscape/water feature is to be supported. However, the lake has been in the stewardship of the Angling Club for 40 years. The incidence of serious injury or fatality has been nil, The operation of the lake in a similar manner is an important aspect.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC40	John Machin	E.3	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	To ensure the protection and enhancement of ecological interests including the management and future maintenance of landscape and important recreation features. This is to be supported as The Borrow Pit has been maintained in this way for in excess of 40+ Years by the Angling Club.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC41	John Machin	E.4	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Natural assets within the site should be retained. This should ideally include the retention of existing sports facilities to the centre of the site (excluding the respective buildings), the Borrow Pit as a landscape/water feature and the mature tree belt along the Rugeley Bypass. This is to be supported, however, the wording is not strong enough. "Should" and "Ideally" should be replaced with the words "Must". It is Essential that these assets are not lost within the wider development.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC42	Phillip Smith	Site R1	Yes	Yes	Yes	Yes	No	[LDC Note - no commented made by consultee]	N/A	N/A
FC43	Robert Ptirchard	Site R1	Yes	Yes	Yes	Yes	No	[LDC Note - no commented made by consultee]	N/A	N/A
FC44	Robert Ptirchard	Site R1	Yes	Yes	Yes	Yes	No	I was delighted to find that the area once known as the borrow pit is to be retained for the benefit of its beauty, the sake of the wildlife and generations to follow.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC45	Paul Malone	E.4	Yes	Yes	No	No	No	Support the retention of the Borrow Pit and the recreational facilities that it provides to many.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC46	Alan Davenport	Para 11.3	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Borrow Pit lake is a resource that does not need developing. Borrow Pit fulfils other benefits to nature.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC47	Alan Davenport	E.3	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Support the retention of the Borrow Pit. This is to be supported as The Borrow Pit has been maintained in this way for in excess of 40+ Years by the Angling Club.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC48	Alan Davenport	E.4	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Natural assets within the site should be retained. This should ideally include the retention of existing sports facilities to the centre of the site (excluding the respective buildings), the Borrow Pit as a landscape/water feature and the mature tree belt.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC49	Jeff Rhodes	Para 11.3	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Strongly support the requirement for the redevelopment of the Power Station to include the retention of the Borrow Pit. This is also consistent with the draft neighbourhood plan. Retaining the lake would help deliver social and environmental elements of sustainable development.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC50	Jeff Rhodes	Site R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Strongly support the requirement for the redevelopment of the Power Station to include the retention of the Borrow Pit. This is also consistent with the draft neighbourhood plan. Retaining the lake would help deliver social and environmental elements of sustainable development.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC51	Jeff Rhodes	E.3	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Strongly support the requirement for the redevelopment of the Power Station to include the retention of the Borrow Pit. The lake is a valued local asset.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC52	Jeff Rhodes	E.4	[Left blank]	[Left blank]	[Left blank]	Yes	[Left blank]	Strongly support the retention of the Borrow Pit lake and recreation facilities. However this should be more definitively worded, making the lakes retention a specific requirement rather than a recommendation.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC53	Paul Wiltshaw	E.4	Yes	Yes	Yes	No	No	[LDC Note - no commented made by consultee]	None	N/A
FC54	Paul Wiltshaw	E.4	Yes	Yes	Yes	No	No	Consultation gives everyone an opportunity to consider local planning.	None	Comments noted.
FC55	Paul Wiltshaw	E.4	Yes	Yes	Yes	No	No	Support removal of Borrow Pit and sports field from previous plan. The pool 30 gallons of water per minute into the Trent and is a haven for wildlife.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC56	Robert Pearson	Para 1.4	Yes	Yes	No	Yes	No	Allocations now represent a negative imbalance with many small sustainable sites scrapped in favour of one large site. Offers no opportunities for self build and custom build.	None	Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. The Local Plan Allocations document does not include specific site allocations of self-build or custom build proposals, this will be considered comprehensively through the review of the Local Plan. The District Council maintains a self-build register.
FC57	Ian Betts	E.3	Yes	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Stress that it is essential that the Borrow Pit is retained as it is essential to the ecology and environmental aspect of the site.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.

Lichfield District Council - Summary of Representations (Focused Changes consultation January - February 2018)

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC58	Neil Vyse	Table A.1	Yes	Yes	Yes	Yes	No	Saved Policy C9 would appear to be deleted. Can find no explanation for this within the Plan document. Without protection from Policy C9 valuable and informal space will become windfall development sites. Longdon is identified as being deficient in open space provision yet the proposed saved policy deletion will lead to the loss of an area of protected open space within the village contrary to District and neighbourhood plan policy.	None	The District Council undertook a review of all saved policies and where appropriate replaced these. It was not considered appropriate to maintain Policy C9. There are other possible routes for such local policies with regards to the protection of green spaces for example through neighbourhood plans.
FC59	Karen Wisniewski	Site R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	This should remain as landscape water feature. It has been there many years and is a site of beauty and full of nature this would be a crime to take this away and build on it.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC60	Karen Wisniewski	Appendix E	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	This the Borrow Pit has been used for the Power station Angling club for many years. It is a nature reserve of great beauty and has been looked after and maintained for the anglers. It should not be given over to be built on it is a great injustice when there are so many brown belt sites that could be used rather than this.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC61	Karen Wisniewski	E.3	No	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Angling Club has maintained the Borrow Pit for 40 years and could still do so. The Club would retain the site as a feature of great beauty. There has already been a huge Amazon warehouse build for additional jobs so this site should be retained for natural beauty rather than more brick walls. There are many brownfield sites in the area.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC62	Robert Baker	E.3	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Borrow pit and clubhouse should be maintained as an asset for fishing club members and as a nature educational facility. The fishing club has maintained this facility for over forty years and is willing to continue doing so using membership funding and volunteers.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC63	Robert Baker	Site R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Borrow pit is a mature, natural lake that has been carefully maintained by the fishing club. Combined with the surrounding wood it represents a key environmental asset.	None	Comments noted. Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC64	Derrick Morrison	Site R1	[Left blank]	[Left blank]	No	[Left blank]	[Left blank]	Main interest is the angling and Borrow Pit fishery being lost plus the natural habitat for all the wildlife that lives around the area. Need open spaces to look at and enjoy.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted..
FC65	Edmund Bennett	Para 11.3	Yes	Yes	Yes	No	No	Feels that the Borrow Pit is of immense value as a natural space in the heart of new housing. It is an exceptional resources for fishing. It is a unique resource and once lost will not be re-established.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC66	Edmund Bennett	E.3	Yes	Yes	Yes	No	No	Borrow Pit is a unique resource which can be the focus of walking, cycling and other routes around and through new development.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC67	Edmund Bennett	E.4	Yes	Yes	Yes	No	No	Borrow Pit is a unique feature of a site. The opportunity of whole-site development gives the opportunity to develop all of the features of the site to create a mature and successful community. Opportunities to embrace all of the leisure and recreational opportunities should not be lost.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC68	Kenneth Leadbeater	Whole document	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific. The number of new homes to be built in Burntwood will be close to the 1050 quoted in the adopted Local Plan Strategy. Burntwood's housing need can be met without the need to remove land from the Green Belt. The Green Belt boundary will be drawn tightly around the St Matthews Estate. Plans to prioritise brownfield sites are more strongly endorsed.	None	Comments noted.
FC69	David Nicholls	Policy R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Concern regarding the filling and closure of the Borrow Pit lake which is an important and special habitat the sustains a varied variety of flora and fauna. Lichfield Council retaining the Borrow Pit Lake will be greatly appreciated. There is enough brownfield land in the immediate area.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC70	Simon Winner (Charlton Haynes) on behalf of Matthews Construction	Whole document	No	Yes	No	Yes	No	<p>Promotes Cranebrook Quarry as a suitable and deliverable site for employment and leisure facilities.</p> <p>Duty to Co-operate: Significant housing pressures within WM region. Council commits to review the Plan however the commitment is insufficient as it is devoid of specific timeframes or triggers.</p> <p>Soundness: LPA should be updated to include the unmet housing needs from the great Birmingham area, without addressing this the plan is not positively prepared. It should identify 'reserve sites' and it is considered land at Cranebrook Quarry provides a sustainable and deliverable opportunity. Plan fails to allocated Cranebrook Quarry as a future mixed-use site for employment and leisure facilities. Demonstrates benefits of the site compared to the two employment led developments within the District.</p> <p>Plan not considered effective due to uncertainties over deliverability of key strategic employment sites.</p>	None	Comments noted. The District Council considers that Local Plan Allocations document provides sufficient land to meet the employment land requirements as set out in the Local Plan Strategy. Paragraphs 4.7 & 4.8 commit the Council to undertaking a review of the Local Plan and in accordance with the Local Development Scheme the Council intends on consulting on the Local Plan Review Scope, Issues & Options in April 2018
FC71	Roy Edge	Policy R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Support retention of Borrow Pit lake for recreational purposes fore the benefit of local people.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC72	Clare Eggington on behalf of Cannock Chase District Council	Whole Document	[Left blank]	Yes	[Left blank]	[Left blank]	Yes - if required	<p>Ensure previous representation submitted to Reg 19 consultation are considered as part of the process.</p> <p>By way of update - CCDC and LDC intend to adopt Rugeley Power Station SPD towards the end of February 2018. CCDC is now proposing to cease work on Local Plan Part 2 to enable a Local Plan Review to be progresses instead.</p>	None	Representation noted.
FC73	Barbara Hood	Policy R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Borrow Pit facility must be saved for future generations, not just for fishing but also for environmental importance of the site.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC74	Roger Bailey	Policy R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Supports the retention of the Borrow Pit and its outbuildings because of its importance as a nature area and a vital recreational area for RPS angling	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC75	Sandy Miller	Para 12.14	Yes	Yes	Yes (positively prepared, effective and consistent with NPPF) No (justified)	[Left blank]	No	[LDC Note - no commented made by consultee]	None	N/A
FC76	Sandy Miller	Para 12.14	Yes	Yes	Yes (positively prepared, effective and consistent with NPPF) No (justified)	[Left blank]	No	[LDC Note - no commented made by consultee]	None	N/A
FC77	Sandy Miller	Para 12.14	Yes	Yes	Yes (positively prepared, effective and consistent with NPPF) No (justified)	[Left blank]	No	LPA could have explored the potential of the whole of the Shenstone Business Park being "developable", but there is no evidence this has been considered for the LPA Focused Changes Document. As part of the justification for the site S1, the Shenstone Neighbourhood Plan did research the whole Business Park vacancy rates & short term letting of the B2 industrial units showing the potential for a change of use to housing & deployment of affected units to vacant units.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and considered all sites within village settlement boundaries including Shenstone Business Park.
FC78	Peter Stockton	Site R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Supports the retention of Borrow Pit as a landscape / water feature within any development for the power station as per Power Statement Section E4 point 3. It is essential to protect species / habitats that exist in and around the pit. The pit must be retained for recreational use not only for present but for future locals and visitors.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC79	William Brearley (CT Planning) on behalf of Mr D Burton	Policies Map - Inset 19	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Confirms the amended settlement boundary in the vicinity of Tufton Cottage, Roman Road, Little Aston is accurate, logical and reflects submissions under the SHLAA and through the Little Aston Neighbourhood Plan.	None	None required. Representation noted.
FC80	Philippa Kreuser (CT Planning) on behalf of South Staffordshire Water	Site L10	Yes	Yes	Yes	[Left blank]	Yes	Supports the allocation of Site L10: Land off Burton Road (West), Streethay. Confirms the site is suitable, available, achievable and deliverable for housing and the South Staffordshire Water are committed to bringing forward the development within the next five years.	None	None required. Representation noted.
FC81	(CT Planning) on behalf of Mr R Cork	Policy LC1 Site L9	Yes	Yes	Yes	No	No	Supports allocation of Site L9: Land off Burton Road (East), Streethay. Confirms there are no known technical or environmental constraints and the site is in a sustainable location and can be safely accessed.	None	None required. Representation noted.

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FC82	Philippa Kreuser (CT Planning) on behalf of Mr P Smith	Policy AH1	Yes	Yes	No	Yes	Yes	LPA does not meet the local needs for housing arising from Armitage with Handsacre. Policy AH1 provides only one site in Armitage and that does not achieve the minimum housing requirement identified in the LPS Policy Arm4. Therefore further sites should be allocated as part of Policy AH1 to ensure housing requirement is fully met and there is a choice of available sites. Promotes land at Church Farm, Church Lane Armitage for up to 25 dwellings.	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. Armitage is identified as a Key Rural Settlement capable of accommodating between 120 - 220 dwellings. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. Policy AH1 allocates land adjacent Hayes Meadow School for 200 dwellings and therefore the allocation of Site AH1 is in conformity with the requirements of LPS Policy Arm4. Evidence which has informed the Local Plan Allocations document indicates that the dwelling requirement for the village has been met.
FC83	Richard Smith	Para 12.14	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC84	Richard Smith	Para 12.15	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC85	Richard Smith	para 12.16	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC86	Richard Smith	Policy S1	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC87	Jeffrey Newman	Site R1	[Left blank]	[Left blank]	No	No	No	The borrow pit has been used as a fishing club for many years. It is tranquil and a wonderful resource, it must be retained as a beneficial ecological site and not built on.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC88	Jeffrey Newman	Site R1	[Left blank]	[Left blank]	No	No	No	The borrow pit has been used as a fishing club for many years. It is tranquil and a wonderful resource, it must be retained as a beneficial ecological site and not built on.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC89	Cllr Susan Woodward (Lichfield District Council Labour Group)	Burntwood	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Representation is made on behalf of the Labour Opposition Group at Lichfield District Council. Oppose Green Belt development with particular focus on sites B14 and B15. Do not believe there is any justification for allocations at Coulter Lane and Highfields Road. The Burntwood community supports Green Belt policy and in the spirit of localism residents should be listened too. Do not believe that all brown field sites within the District have been considered or that evidence showing brownfield sites to be 'unstable' has not been provided or tested. Urge that all brown field sites are thoroughly investigated across the whole District. Green Belt around Burntwood is considered to be particularly sensitivity because of its proximity to the West Midlands conurbation.	None	Sites B14 and B15 which are the subject of much of the representation are no proposed for allocation within the Local Plan Allocations document. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.
FC90	Amanda Corbould	Policy R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Recommends the Council retain the Borrow Pit lake for trout fishing. It is important to have valuable sites such as this lake for education and discovery for local people, children and adults. The Borrow Pit would enhance any future redevelopment to provide a healthy, green place for outdoor pursuits.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC91	Colin Muller/Laura McCombe (Aspbury Planning)	Whole document	Yes	Yes	No	[Left blank]	Yes	Seeking to promote land to the north of Alrewas Road in Kings Bromley for residential development of approximately 60 dwellings. Previous representations stated the assessment of Kings Bromley for Core Policy 1 is out of date and the settlement is now sustainable. The Council has adopted a minimalist approach to allocating sites and placed emphasis on the delivery of larger allocated sites. Consider the five year supply to be over optimistic.	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. Kings Bromley is identified as an 'other rural' settlement and as such not a focus for significant growth. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. With regards to Five Year Supply the Council considers it can demonstrate a robust supply of sites to provide 5.77 Years supply as set out in the Five Year Housing Land Supply Paper 2017.

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FC92	James Beynon (Quod) on behalf of Evans Property Group	Site F2 Policy EMP1	Yes	Yes	No	Yes	Yes	<p>Reiterate previous representations made in October 2016 & May 2017.</p> <p>Policy text to Site Allocation F2 should be more explicit than non-B Use Class operations are acceptable, particularly given the areas historical allocation for a hotel (in part).</p> <p>Draft Policy EMP1 should be amended to support non-B Use Class operations within 'Existing Employment Areas', and to ensure flexible use of land is consistent with NPPF.</p> <p>'Midland Karting Site' should be included within Fradley 'Existing Employment Area'. It is brownfield and functions as part of Fradley Business Park.</p> <p>The Council should commit to a review of their Local Plan every 5 years to ensure it is kept up to date in line with recommendations of the Housing White Paper.</p>	None	The Local Plan Allocations document meets the employment land requirements as set out within the Local Plan Strategy. It is considered that the wording of Policy EMP1 (Employment Areas & Allocations) is sufficiently flexible and would allow for development outside of the traditional employment use classes where these are demonstrated to complement the existing employment offer and where such uses would not be at the detriment of the employment area and its intended use. The Council are commencing work on a Local Plan Review and an initial Scope, Issues & Options consultation is due to commence in April 2015.
FC93	Douglas Hough	Policy R1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Supports the retention of the Borrow Pit and the recreational facilities it provides. It must be retained as it is essential for the ecology of the area.</p>	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC94	Philippa Kreuser (CT Planning) on behalf of Friel Homes	Policy LC1	Yes	Yes	No (positively prepared, justified, effective) Yes (NPPF compliant)	Yes	Yes	<p>Promotes land to rear of Angel Croft Hotel and Westgate House. Site considered as part of Urban Capacity Assessment and is in a sustainable location and can assist with meeting the housing for the District.</p>	None	The Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.
FC95	Philippa Kreuser (CT Planning) on behalf of South Staffordshire Water	Policy S1	Yes	Yes	No	Yes	Yes	<p>The policies for the allocation of sites in the Rural Areas is not consistent with the strategy contained in the LPS. The LPA does not allocate the right amount of land, in the most appropriate sites for the locational strategy with which it is dealing.</p> <p>Housing figures for Key Rural Settlements will not deliver the quantum of growth originally envisaged in the LPS. The LPS housing requirement is a minimum and Key Rural should provide for the upper housing levels as planned in the strategy.</p> <p>Promotes land at Shenstone Pumping Station. The site is well located, represents a logical extension to the development boundary. Confirms the site is capable of accommodating up to 40 dwellings and deliverable within the next 5 years.</p>	None	Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement.
FC96	Philippa Kreuser (CT Planning) on behalf of Mr P Smith	Policy AH1	Yes	Yes	No	Yes	Yes	<p>The policies for the allocation of sites in the Rural Areas is not consistent with the strategy contained in the LPS. The LPA does not allocate the right amount of land, in the most appropriate sites for the locational strategy with which it is dealing.</p> <p>Housing figures for Key Rural Settlements will not deliver the quantum of growth originally envisaged in the LPS. The LPS housing requirement is a minimum and Key Rural should provide for the upper housing levels as planned in the strategy.</p> <p>Scale and location of development for Armitage with Handsacre in LPA is not sufficient to be consistent with LPS. It should be modified to provide a minimum of 220 houses in Armitage with Handsacre and this should include land at Church Farm.</p>	None	Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. Armitage is identified as a Key Rural Settlement capable of accommodating between 120 - 220 dwellings. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. Policy AH1 allocates land adjacent Hayes Meadow School for 200 dwellings and therefore the allocation of Site AH1 is in conformity with the requirements of LPS Policy Arm4. SM
FC97	Roy Young	Policy S1 Para 12.14 Para 12.15 Para 12.16	Yes	Yes	Yes (Positively prepared, effective, compliant with NPPF) No (Justified)	Yes	No	<p>LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered.</p>	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC98	Margaret Saner	Whole document Policy W1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Concerned there is no provision for any custom build dwellings and therefore fail to meet identified demand. Registered on self-build registered and aware there is demand for a site at Whittington. Land at Common Lane was previously allocated and promoted as custom build site and has been omitted in this document. There are no current plot buying opportunities available. Need to reconsider the omission of land at Common Lane.</p>	None	Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. The Local Plan Allocations document does not include specific site allocations of self-build or custom build proposals, this will be considered comprehensively through the review of the Local Plan. The District Council maintains a self-build register.

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FC99	Philippa Kreuser (CT Planning) on behalf of Mr J Duncan	Policy W1	Yes	Yes	No	Yes	Yes	<p>The policies for the allocation of sites in the Rural Areas is not consistent with the strategy contained in the LPS. The LPA does not allocate the right amount of land, in the most appropriate sites for the locational strategy with which it is dealing.</p> <p>Housing figures for Key Rural Settlements will not deliver the quantum of growth originally envisaged in the LPS. The LPS housing requirement is a minimum and Key Rural should provide for the upper housing levels as planned in the strategy.</p> <p>It is not clear why the range of sites in Policy W1 have been chosen and others rejected. Site Reference W3 has not been actively promoted since 2011. A better strategy would be to delete Site W3 and replace it with Land East of Common Lane, Whittington and land at Church Farm, Church Lane Whittington.</p> <p>Confirms land east of Common Lane is suitable, available and achievable to deliver 21 dwellings within the plan period.</p>	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. Armitage is identified as a Key Rural Settlement capable of accommodating between 120 - 220 dwellings. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. Policy AH1 allocates land adjacent Hayes Meadow School for 200 dwellings and therefore the allocation of Site AH1 is in conformity with the requirements of LPS Policy Arm4. Evidence which has informed the Local Plan Allocations document indicates that the dwelling requirement for the village has been met.
FC100	Philippa Kreuser (CT Planning) on behalf of Mr N Misselke	Policy W1	Yes	Yes	No	Yes	Yes	<p>The policies for the allocation of sites in the Rural Areas is not consistent with the strategy contained in the LPS. The LPA does not allocate the right amount of land, in the most appropriate sites for the locational strategy with which it is dealing.</p> <p>Housing figures for Key Rural Settlements will not deliver the quantum of growth originally envisaged in the LPS. The LPS housing requirement is a minimum and Key Rural should provide for the upper housing levels as planned in the strategy.</p> <p>It is not clear why the range of sites in Policy W1 have been chosen and others rejected. Site Reference W3 has not been actively promoted since 2011. A better strategy would be to delete Site W3 and replace it with Land East of Common Lane, Whittington and land at Church Farm, Church Lane Whittington.</p> <p>Confirms land at Church Farm is suitable, available and achievable to deliver 50 dwellings within the plan period.</p>	None	Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. The Local Plan Allocations document does not include specific site allocations of self-build or custom build proposals. The District Council maintains a self-build register.
FC101	Nick Misselke (Elford Homes)	Policy LC1	Yes	Yes	No	Yes	Yes	<p>LPA does not allocate self build and custom build house sites.</p> <p>Promotes land at Fosseyway Lane, Lichfield for self build and custom build dwellings. Confirms there are no known technical, ecological or heritage reasons to prevent site from being developed.</p> <p>Confirms the site is available and deliverable.</p>	None	Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. The Local Plan Allocations document does not include specific site allocations of self-build or custom build proposals, this will be considered comprehensively through the review of the Local Plan. The District Council maintains a self-build register.
FC102	Rueben Bellamy	Policy BE2	[Left blank]	[Left blank]	No (positively prepared, compliant with NPPF)	Yes	No	<p>Policy BE2 does not comply with paragraphs 133 and 134 of the NPPF. The 'substantial public benefits test' only applies in cases where a proposed development will lead to substantial harm or total loss of significance of a designated heritage asset. As set out in paragraph 134 of the NPPF, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, that harm should be weighed against the public benefits of the proposal. In those cases where the harm is less than substantial it is not necessary to demonstrate that substantial public benefits are achieved that outweigh the harm. Policy should be reworded set out the two tests as per the NPPF</p>	Yes	Representation noted. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.
FC103	Rueben Bellamy	Table A.1	[Left blank]	[Left blank]	No (positively prepared, justified, NPPF compliant)	Yes	Yes	<p>The Local Plan Strategy sets out that the saved policies of the previous local plan are to be replaced by the subject Local Plan Allocations Plan. Saved Policy C9 - Protected Open Space - has simply been deleted and not replaced. Paragraph 76 of the NPPF states that local communities, through local and neighbourhood plans, should be able to identify for special protection green areas of particular importance to them. Simply deleting this policy in its entirety without replacement is not positively planning to protect open spaces that have already been identified as important in an adopted local plan. In particular, land at the corner of the A513/The Shrubbery in Elford, is proposed to be designated as a Local Green Space in the draft Neighbourhood Plan, following an assessment against the open space against the tests set out in paragraph 77 of the NPPF. The open spaces protected under policy C9, in particular land at the corner of the Shrubbery, Elford, should be designated as Local Green Spaces.</p>	None	The District Council undertook a review of all saved policies and where appropriate replaced these. It was not considered appropriate to maintain Policy C9. There are other possible routes for such local policies with regards to the protection of green spaces for example through neighbourhood plans.
FC104	Ian Garfield	East of Rugeley	Yes	Yes	Yes	Yes	No	<p>The fishing lake is a valuable community resource that needs to be retained and managed by the Rugeley Power Station committee who have demonstrated over the years that they can run a thriving and successful fishing club based in the community and used by the community.</p>	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC105	Ian Garfield	11.1	Yes	Yes	Yes	Yes	No	<p>The fishing lake is a valuable community resource. There is no other such resource in the area and urges that it is retained and developed for the local community</p>	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.

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FC106	Ian Garfield	Policy R1	Yes	Yes	Yes	Yes	No	Fished in the lake for many years. It was a well run community resource that should be retained as a valuable part of the local community.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC107	Ian Garfield	11.1	Yes	Yes	Yes	Yes	No	Please keep the fishing lake. I miss going fishing there as do many other previous members of the Rugeley Power Station Angling Club.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC108	Ian Garfield	Para 11.3	Yes	Yes	Yes	Yes	No	The fishing lake should be retained as a valuable community resource.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC109	Ian Garfield	Site R1	Yes	Yes	Yes	Yes	No	Urges to retain and develop the fishing lake, a valuable and unique local community resource.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC110	Stephen Skuce	Para 11.3	Yes	Yes	Yes (Postively prepared) No (effective)	Yes	No	It is essential not just ideal that the Borrow Pit is retained. The lake has been cared and managed by Rugeley Power Station Angling Club for over 40 years. The water has been excellent managed by a group that gain pleasure from its existence and have a strong sense of responsibility in managing this part of the environment. The Pit must be retained and the Angling Club allowed to continue their activities.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC111	Stephen Skuce	Para E.4	Yes	Yes	Yes (Postively Prepared) No (justified, effective)	Yes	No	It is essential to retain natural assets including the Borrow Pit as a landscape / water feature and the mature tree belt along the Rugeley Bypass. The mature tree belt provides biodiversity which is essential in a ecological environmental and a natural balance of organisms has developed over the years. The RPS Angling Club is committed to greater involvement with the local community and retention of existing buildings is vital to the foreseeable opportunities provided by the retention of the sites natural features	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC112	Richard Wain (Hawksmoor Property Services)	Table A.1	Yes	No	No	[Left blank]	No	The Local Plan Strategy sets out that the saved policies of the previous local plan are to be replaced by the subject Local Plan Allocations Plan. Saved Policy C9 - Protected Open Space - has simply been deleted and not replaced. Paragraph 76 of the NPPF states that local communities, through local and neighbourhood plans, should be able to identify for special protection green areas of particular importance to them. Simply deleting this policy in its entirety without replacement is not positively planning to protect open spaces that have already been identified as important in an adopted local plan. In particular, land at the corner of the A513/The Shrubbery in Elford, is proposed to be designated as a Local Green Space in the draft Neighbourhood Plan, following an assessment against the open space against the tests set out in paragraph 77 of the NPPF.	None	The District Council undertook a review of all saved policies and where appropriate replaced these. It was not considered appropriate to maintain Policy C9. There are other possible routes for such local policies with regards to the protection of green spaces for example through neighbourhood plans.
FC113	Michael McNally	Para 9.1 Para 9.6 - 9.8 Policy Burntwood 3	Yes	Yes	Yes	[Left blank]	No	LDC have made changes in response to the 4000+ representations from Burntwood and Hammerwich residents. The document has been developed and reviewed to achieve ambitious yet realistic targets for housing development, a consensus of local opinion on the siting of new homes and a plan built on a large evidence base.	None	None required. Representation noted.
FC114	Philippa Kreuser (CT Planning)	Para 1.3	Yes	Yes	No	Yes	Yes	The LPA makes no provision for "infill" boundaries for Green Belt villages as provided for Core Policy 1 of the Local Plan Strategy nor does it explain its omission. The Allocations document should be modified: 1. Chorley, Wall, Little Hay and Hints should be identified as "infill villages" 2. That a policy be introduced that allows for the filling of a gap with an otherwise built-up frontage, by the erection of up to two dwellings within "infill" villages.	None	The Allocations document does not make provision for "infill" boundaries. The Local Plan Allocations Supplementary Green Belt Report concluded that the identification of such boundaries was not required and should be considered as part of the Local Plan Review. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options in April 2018.

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FC115	Philippa Kreuser (CT Planning)	Whole Document	Yes	Yes	No	Yes	Yes	<p>The LPA allocation of sites in the Rural Areas is not consistent with the LPS. The Allocations document does not allocated the right amount of land, in the most appropriate sites for the locational strategy with which it is dealing.</p> <p>Core Policy 1 states rural housing will be directed to five Key Rural Settlements. The housing figures identified in the LPA for the Key Rural Settlements will not deliver the quantum of growth originally envisaged in the Strategy, therefore it is not consistent with CP1 and CP6 and Policy Rural 1.</p> <p>LPA should provide the upper housing levels as planed in the LPS for the Key Rural Settlements. The housing requirement in the plan is a minimum not a maximum. The LPA should be modified to provide for: Alrewas - 180 dwellings Armitage - 220 dwellings Fazeley - 350 dwellings Shenstone - 150 dwellings Whittington - 110 dwellings</p>	None	Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement.
FC116	Paul Wiltshaw	East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Borrow Pit lake is a supported community facility. Also supports wildlife. It would be a disaster of the pool is not retained.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC117	Rebecca McLean (Severn Trent)	Whole Document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Provides detailed sewerage comments on each of the allocations.</p> <p>Categorises the following sites as low impact on sewerage infrastructure: L3, L4, L6, L7, L8, L9, L10, L16, L19, L20, L21, L25, L1, L22, L27, L29, L30, B1, B2, B4, B11, B16, B19, B20, B21, WT1, A1, A3, A4, A5, A6, FZ3, W2, W3, HR1, HR2, H1, OR4, OR5, OR7, OR8 & OR6</p> <p>Categorises the following sites as medium impact on sewerage infrastructure: L5, L12, L13, L14, L17, L18, L23, L24, L28, L31, L26, B3, B5, B7, B8, B10, B13, R1, F1, F2, A2, FZ2 & S1</p> <p>Categorises the following sites as high impact on sewerage infrastructure: L2 & AH1</p>	None	None required. Representation noted.
FC118	DJ Kettle	East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	The lake is an asset to Rugeley and its surrounding area and as such must be retained for existing and future generations.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC119	Denise Wheelton	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC120	John Wheelton	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC121	Vic Chamberlain (Burntwood Action Group)	Burntwood	Yes	Yes	Yes	[Left blank]	Yes	Welcome the changes in table 4.1, paragraphs 9.1, 9.6 to 9.8 and accompanying Inset Maps 3 and 23, which indicate that: Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	None required. Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. Further evidence will be prepared to the support the Local Plan Review.

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FC122	David Rathband	Burntwood	Yes	Yes	Yes	[Left blank]	Yes	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC123	Rob Duncan (Rob Duncan Planning Consultancy) on behalf of Mr J Bradshaw	Burntwood	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Promotes Bleak House Farm, Ironstone Road, Burntwood (Site Ref N1 within the Green Belt Review). Objects to Local Plan Allocations Document - it makes no provision for Birmingham's shortfall despite covering a similar plan period to the Birmingham Development Plan. Green Belt land will need to be released to accommodate Lichfield's proportion of this housing growth and Bleak House Farm is ideally suited for Green Belt release to meet this need. Submits supporting Green Belt matrix and confirms all other sites under consideration have a grater impact on the Green Belt than Bleak House Farm. Confirms the site offers a suitable location for development, is achievable and there are no known constraints that render the site unviable.	None	Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. 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.
FC124	Keith Allen	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC125	Adrian Scattergood	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC126	Jonathan Hart (Lingfield Assets) on behalf of Andrew Shallish (Shallish Associates Limited)	Site L30 Para 8.9	Yes	Yes	Yes (positively prepared, justified) No (effective, compliant with NPPF)	Yes	No	Supports allocation at Lichfield South Business Park. Confirms planning permission has been granted for the extension site's development for Class B1 buildings with no condition limiting use to any specific category within Class B1. In order for allocation of Site L30 to be effective and flexible to accommodate needs of employers it should fully reflect the planning permission / reserved matters approval. It is requested the details at paragraph 8.9 are amended to "Floorspace (m2) - 12,500 (B1)" as opposed to (B1a).	Yes	Representation noted. Planning permission for site are for 12,500sqm (B1) use - amend site information to reflect this established position.
FC127	Pauline Rathband	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC128	Pam Chamberlain	Burntwood	Yes	Yes	Yes	No	No	Welcome the changes in table 4.1, paragraphs 9.1, 9.6 to 9.8 and accompanying Inset Maps 3 and 23, which indicate that: Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.

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FC129	John Spurling (RPS) on behalf of Fradley West Consortium	Policy R1	Yes	Yes	Yes (positively prepared) No (justified, effective and NPPF compliant)	Yes	Yes	Objects to the quantum of residential dwellings assumed deliverable / developable during the plan period (particularly Rugeley Power Station). The SHLAA indicates the site is not available. CCDC Local Plan Part 2 Issues and Options recognises the site has 'very serious constraints' and potential implications of HS2 on the land supply position. It is unlikely permission will be secured until approximately 2022, with first completions 2023/24 it would indicate c.550 dwellings could be delivered during the plan period significantly less than the 800 assumed.	None	Rugeley Power Station SPD provides detailed consideration of the constraints within and in proximity to the site (Site R1). The SPD has been adopted by both Lichfield and Cannock Chase District Councils. Local Plan Allocations states that development of site should have consideration and accord to the SPD. It is considered the site can accommodate a minimum of 800 dwellings within the plan period.
FC130	Elaine Whitney	Policy S1	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	My only representation is I agree with the proposed changes.	None	None required. Representation noted.
FC131	John Spurling (RPS) on behalf of Fradley West Consortium	Policy F1	Yes	Yes	Yes (effective) No (positively prepared, justified, compliant with NPPF)	Yes	Yes	Promoted previously developed land at Fradley Junction for residential and employment for several years. FWC are now focused on delivery of smaller mixed-use development comprising c250 dwellings and employment land. Fradley Junction is in accordance with LPS Core Policy 1. The site should be allocated for 250 dwellings as it can contribute towards GBHMA unmet need and any shortfall from Rugeley Power Station. The SHLAA assessed the site as "developable" within the 6-10 year phase of the housing trajectory. In its current form Policy F1 is unsound as it does not allocate the identified land at Fradley Junction for residential dwellings and employment use.	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirement. Rugeley Power Station SPD provides detailed consideration of the constraints within and in proximity to the site (Site R1). Local Plan Allocations states that development of site should have consideration and accord to the SPD. It is considered the site can accommodate a minimum of 800 dwellings within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. Further evidence will be prepared to support the Local Plan Review.
FC132	John Spurling (RPS) on behalf of Fradley West Consortium	Table 4.1	Yes	Yes	Yes (effective) No (positively prepared, justified, compliant with NPPF)	Yes	Yes	The housing requirement is expressed as a 'minimum'. Table 4.1 provides a 15% increase over the LPS housing requirement. It is considered that this level of "buffer" is insufficient when the housing requirement is expressed as a minimum. The housing supply in the Allocations document should be maximised in readiness for the GBHMA Strategic Growth Study and to ensure that Lichfield provides an appropriate contribution to the HMAs unmet needs without the need for an immediate Local Plan review. The would be consistent with the LPS Core Policy 1. Table 4.1 includes a windfall allowance of 660 dwellings. This is a speculative supply category and it is acceptable to include a windfall allowance in five year supply assessment it should be offset in a local plan to avoid any double counting with proposed allocations. The windfall allowance should only be included from 2025/206 onwards, reducing the windfall allowance to 220 units. Objects to Policy R1 as the quantum of housing supply is over-optimistic and should be reduced to c550 dwellings. Fradley Junction should be allocated for 250 dwellings.	None.	The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance included is based upon evidence and does not include 'double counting'.
FC133	Victoria Smith (Gladmans Development Ltd)	Whole Plan and Policy BE: Heriatge Assets	[Left blank]	[Left blank]	[Left blank]	Yes	Yes	Local Plan Review - Plan identifies Birmingham growth. Although LDS incorporates a Local Plan Review concerned that the Local plan will quickly become out of sate. Review timetabled April 2018 adoption December 2020. Allocations adopted in December 2018 two year period in which wider housing needs will go unmet. Local Plan Allocations need to explain how these issues have been addressed through Duty to Cooperate. Policy BE2: Heritage Assets - Policy not in conformity with NPPF therefore unsound. Policy states that development will only be supported where it will not result in harm to the significance of a heritage asset or setting. Quotes Para 134 NPPF. Heritage assets are material to decision making, a balancing exercise for the level of harm and the public benefit needs to be undertaken. harm may be less than substantial, development outweigh the limited harm. As written t, the current policy does not reflect this until the final paragraph which in turn, conflicts with the sits. Recommend that the first para of the policy is amended to reflect para 134 of the NPPF, therefore accords with the aims of the final paragraph of the policy.	Yes	Comments noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Paragraph 4.7 and 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. Representation noted. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC134	John Spurling (RPS) on behalf of Fradley West Consortium	Para 1.10 Para 4.7 & 4.8	No	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Para 1.10, 4.7 & 4.8 reiterate para 4.6 from the LPS and state the Council is committed to review its Local Plan in full to address GBHMA shortfall.</p> <p>The GBHMA Strategic Growth Options report will be available to the Council before, or during examination. However, it is unclear how the Council proposes to respond to this evidence in preparing the Allocations document.</p> <p>The Council are proposing that the LPA is adopted to meet needs identified in the LPS and the review process be commenced thereafter to address unmet needs of the HMA. Contend this is unsound as there is an emerging Local Plan document which could address the District's contribution to HMA unmet needs through the provision of additional site allocations. The Council need to agree to its contribution to the HMA shortfall as soon as the Strategic Growth Study is completed and this is best achieved through the Allocations document.</p> <p>Allocations document should make provision for additional residential sites allocation to provide a sufficient level of "headroom" to contribute to HMA unmet needs. At the very least, a commitment to review the Local Plan must be delivered through a policy the Allocations document. This would provide a mechanism to clearly outline the events which will trigger the review and provide clear deadlines.</p>	None	Comments noted. The Local Plan Allocations meet the overall dwelling requirement as set out within the Local Plan Strategy. The Council is committed to preparing a Local Plan Review and as set out in the Local Development Scheme this will commence in April 2018 and will deal with the GBHMA housing shortfall.
FC135	Alex Yendole on behalf of Stafford Borough Council	Whole Plan	Yes	[Left blank]	[Left blank]	No	[Left blank]	<p>Stafford Borough neighbouring authority Focused changes allocation document has been assessed to consider development and infrastructure implications. No proposals adversely affect the Borough. Generally supports the consultation documents. Does not appear to have any strategic cross border issues significant development or infrastructure implications. Welcomes the housing and employment allocations, new retail and office developments and gypsies and travellers. Stafford Borough Plan adopted 2014 focuses majority of housing and employment provision at Stafford Town without Green belt release with development sites now being delivered. Borough Council has commenced review strategy beyond 2031. The Borough council will continue to work in partnership with Lichfield District with regards to mitigation projects on the Cannock Chase Special Area of Conservation. The Council notes the future requirements to meet the needs of the Birmingham Housing Market Areas (HMA) arising from any relevant shortfall and agrees that this issues should be considered through the wider HMA context as part of Lichfield District's Local Plan Review process. The Borough Council would welcome the opportunity to enter into a Statement of Common Ground/Duty to Co-operate Statement with Lichfield District Council as part of preparing for submission of the Local Plan Allocations, and looks forward to on-going dialogue in the near future.</p>	None	None required. Representations noted.
FC136	Vic Chamberlain	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwod 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	<p>Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.</p>	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC137	Susan Flethcer	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	<p>Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.</p>	None	None required. Representations noted.

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FC138	Jack Gillespie	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwood 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC139	Lisa Gillespie	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwood 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC140	Brian Buckley	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwood 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC141	Peter Button	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC142	Karen Button	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC143	John Brown (Burntwood Town Council)	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	It is clear that LDC has taken into account the responses of Burntwood residents and feel the revised allocations document is much enhanced because of it. Satisfied by the 9% of housing growth that the settlement is to accommodate and look forward to receiving additional housing and infrastructure in a strategic manner. The Town Council welcome the fully welcome the Burntwood Town Centre boundary to enable the creation of a vibrant and diverse town centre. Town Council welcome the removal if sites at Coulter Lane and Highfields Road from the plan. Recognise the removal of St Matthews estate from the Green Belt may be controversial, it is justifiable as the boundary follows the existing housing settlement.	None	Comments noted. The town centre boundary identified is consistent with existing evidence and the boundary identified within the Local Plan Strategy. The Local Plan Strategy commits to the removal of the St Matthews estate from the Green Belt.

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FC144	Janet Hodson (JVH Planning) on behalf of Mr & Mrs Hodgetts	Para 1.10 Chapter 4 Table 4.1 Para 7 Policy LC1 Policy BC1 Policy BE2 Policy NT1 Policy OR1	No	No	No	Yes	Yes	<p>Para 1.10: Plan commits to review the Plan to deal with GBHMA shortfall. Consider rather than undertake LPA the Council should review the whole plan as a Local Plan review. The Review should deal with GBHMA numbers and green belt boundaries in a single document and process. Confusing to the public and a waste of resources to do proceed with Allocations.</p> <p>Objects to Table 4.1 on the grounds that 5% discount rate applied to existing commitments is insufficient, net supply of dwelling not consider to include 15% flexibility, double counting of the windfall allowance, future delivery prospects of North of Tamworth are unreliable and gross to net calculations are not transparent. Consider additional allocations need to be made to the Plan to increase flexibility and provide additional choice for the housing market.</p> <p>Policy LC1, Policy BC1 & Policy OR1 - many of the sites have planning permission and are under construction. Unclear whether these are being double counted as commitments in the overall housing numbers. Questionable if sites with express planning permission should be counted as allocations in the Plan.</p> <p>Objects to BE2 and consider it goes beyond what is required by NPPF. The policy fails to reflect a proper balance to considerations regarding Heritage Assets.</p> <p>Policy NT1 principally allocates Arkall Farm. This has been subject to a public inquiry and the delivery of the site and final housing numbers remain uncertain until the outcome of the appeal process is known.</p> <p>Objection to Policy OR1 as it makes no provision in Elford for new housing development and omits SHLAA site 86. The Plan should increase land allocations for the rural area and SHLAA site 86 should be allocated. Confirms technical details have been worked through and a viable and sustainable mixed development can be achieved on the site.</p>	Yes	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance and discount rate used are based upon evidence and it is considered the windfall allowance does not include 'double counting'. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.
FC145	Brian Buckley	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC146	Shirley Sewell	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwood 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC147	Simon Cook	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwood 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.

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FC148	Mark Taylor	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC149	Joyce Marshall	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC150	Philip Metcalfe (on behalf of the National Forest Company)	Policy NR11: National Forest Paragraph 6.11	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Supports the inclusion of Policy NR11: National Forest following extensive consultation with the National Forest Company. The policy makes reference to the National Forest appendix of the Biodiversity and Development SPD and whilst considerable progress has been made on the content of the appendix, an update on the process and timescales for updating the SPD including the appendix.	None	None required. Representation noted.
FC151	Janet Hodson (JVH Planning) on behalf of Mr Bhagi	Para 1.10 Chapter 4 Table 4.1 Para 7 Policy LC1 Policy BC1 Policy NT1 Policy OR1	No	No	No	Yes	Yes	<p>Para 1.10: Plan commits to review the Plan to deal with GBHMA shortfall. Consider rather than undertake LPA the Council should review the whole plan as a Local Plan review. The Review should deal with GBHMA numbers and green belt boundaries in a single document and process. Confusing to the public and a waste of resources to do proceed with Allocations.</p> <p>Objects to Table 4.1 on the grounds that 5% discount rate applied to existing commitments is insufficient, net supply of dwelling not consider to include 15% flexibility, double counting of the windfall allowance, future delivery prospects of North of Tamworth are unreliable and gross to net calculations are not transparent. Consider additional allocations need to be made to the Plan to increase flexibility and provide additional choice for the housing market.</p> <p>Policy LC1, Policy BC1 & Policy OR1 - many of the sites have planning permission and are under construction. Unclear whether these are being double counted as commitments in the overall housing numbers. Questionable if sites with express planning permission should be counted as allocations in the Plan.</p> <p>Policy NT1 principally allocates Arkall Farm. This has been subject to a public inquiry and the delivery of the site and final housing numbers remain uncertain until the outcome of the appeal process is known.</p> <p>Objection to Policy OR1. The Plan makes no housing allocations in Little Aston and includes no provision for future development requirements beyond the Plan period. Promotes SHLAA site 380 land south of the Golf Course.</p>	Yes	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. Little Aston is one of the 'other rural' settlements which are not a focus for growth. The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance and discount rate used are based upon evidence and it is considered the windfall allowance does not include 'double counting'. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.
FC152	Gillian Taylor	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC153	Richard Jupp	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC154	Betty Barlow	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.

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FC155	Carlton Barlow	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC156	Hollie Giles	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC157	Luke Service	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC158	Rosemary Ann Jupp	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC159	Jean Hubbard	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC160	Lynn Service	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC161	Janet Hodson (JVH Planning) on behalf of Mr Bliss / Messers / Argyle	Para 1.10 Chapter 4 Table 4.1 Para 7 Policy LC1 Policy BC1 Policy NT1 Policy OR1	No	No	No	Yes	Yes	<p>Para 1.10: Plan commits to review the Plan to deal with GBHMA shortfall. Consider rather than undertake LPA the Council should review the whole plan as a Local Plan review. The Review should deal with GBHMA numbers and green belt boundaries in a single document and process. Confusing to the public and a waste of resources to do proceed with Allocations.</p> <p>Objects to Table 4.1 on the grounds that 5% discount rate applied to existing commitments is insufficient, net supply of dwelling not consider to include 15% flexibility, double counting of the windfall allowance, future delivery prospects of North of Tamworth are unreliable and gross to net calculations are not transparent. Consider additional allocations need to be made to the Plan to increase flexibility and provide additional choice for the housing market.</p> <p>Policy LC1, Policy BC1 & Policy OR1 - many of the sites have planning permission and are under construction. Unclear whether these are being double counted as commitments in the overall housing numbers. Questionable if sites with express planning permission should be counted as allocations in the Plan.</p> <p>Policy NT1 principally allocates Arkall Farm. This has been subject to a public inquiry and the delivery of the site and final housing numbers remain uncertain until the outcome of the appeal process is known.</p> <p>Objection to Policy OR1. The Plan makes no housing allocations in Hopwas and omits SHLAA site 1033 Land at Planation Lane Hopwas. Hope was is a sustainable settlement with a range of facilities and can accommodate a modest amount of growth. Technical details to support the site have been worked through and a viable and sustainable mixed development can be achieved.</p>	None	<p>The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. Hopwas is one of the 'other rural' settlements which are not a focus for growth.</p> <p>The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance and discount rate used are based upon evidence and it is considered the windfall allowance does not include 'double counting'.</p> <p>Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.</p>

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC162	Carrie Cook	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.
FC163	Philippa Kreuser (CT Planning) on behalf of Essington Park Ltd	Policy A1: Alrewas Housing Land Allocations	Yes	No	No	Yes	No	<p>The LPAD is not sound in the sense that its policies for the allocations of sites in the Rural Areas is not consistent with the Strategy in the LPS. The LPAD does not allocate the right amount of land, in the most appropriate sites, for the locational strategy it is dealing with.</p> <p>Policy Alr4 of the LPS anticipates whatever priority may be given to infill development or support for small-scale redevelopment, development will have to occur beyond the existing built form.</p> <p>The housing figures identified in the LPAD for Alrewas, Armitage with Handsacre, Fazeley, Shenstone and Whittington mean that LDC will not deliver the quantum of growth originally envisaged in the adopted LPS.</p> <p>Failure to deliver the number of planned dwellings planned in for the Key Rural Settlements means that they are at risk of not delivering appropriate levels and types of housing sought in Policy Rural 1.</p> <p>The proposed scale and location of development for Alrewas in the LPA is not sufficient to be consistent with LPS Core Policies 1, 6 and Policy Rural 1, nor is this shortfall justified. LPA should be modified to provide 180 homes in Alrewas within Policy A1. Submitted site (west of LPA Site A2: Land North of Alrewas) should be allocated for 20 houses. It is subject to a current planning application and is identified in the 2017 SHLAA as suitable, achievable, deliverable and developable for residential development.</p>	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. Alrewas is identified as a key rural settlement, it is considered the proposed allocations are sufficient.
FC164	Janet Hodson (JVH Planning) of behalf of Mr Gough	Para 1.10 Chapter 4 Table 4.1 Para 7 Policy LC1 Policy BC1 Policy NT1 Policy OR1	No	No	No	Yes	Yes	<p>Para 1.10: Plan commits to review the Plan to deal with GBHMA shortfall. Consider rather than undertake LPA the Council should review the whole plan as a Local Plan review. The Review should deal with GBHMA numbers and green belt boundaries in a single document and process. Confusing to the public and a waste of resources to do proceed with Allocations.</p> <p>Objects to Table 4.1 on the grounds that 5% discount rate applied to existing commitments is insufficient, net supply of dwelling not consider to include 15% flexibility, double counting of the windfall allowance, future delivery prospects of North of Tamworth are unreliable and gross to net calculations are not transparent. Consider additional allocations need to be made to the Plan to increase flexibility and provide additional choice for the housing market.</p> <p>Policy LC1, Policy BC1 & Policy OR1 - many of the sites have planning permission and are under construction. Unclear whether these are being double counted as commitments in the overall housing numbers. Questionable if sites with express planning permission should be counted as allocations in the Plan.</p> <p>Policy NT1 principally allocates Arkall Farm. This has been subject to a public inquiry and the delivery of the site and final housing numbers remain uncertain until the outcome of the appeal process is known.</p> <p>Objection to development boundary at Hill Ridware as land at Ridware House should be included in the settlement boundary. The area is contained by residential development in the north at Hawkhurst Drive in the east by the new development under construction and in the west by Wade Lane. The inclusion of the area within the development boundary would allow for the construction of two dwellings as infill development.</p>	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. Hill Ridware is one of the 'other rural' settlements which are not a focus for growth. The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance and discount rate used are based upon evidence and it is considered the windfall allowance does not include 'double counting'. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.
FC165	Ian Cook	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representation noted.

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC166	Jodie Taylor	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representations noted.
FC167	Richard Taylor	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representations noted.
FC168	Debbie Scattergood	Burntwood	Yes	Yes	Yes	[Left blank]	[Left blank]	Supports the revised version of the Document. Welcomes and supports the reduction by 300 of Burntwood's housing allocation back to the number quoted in the Strategy; the removal of plans to develop in the Green Belt South of Highfields Road and off Coulter Lane; changes to the Green Belt boundary now take no land from the Green Belt other than that which is already developed and the increased emphasis of plans and funding for the creation of a vibrant and diverse town centre.	None	None required. Representations noted.
FC169	Janet Hodson (JVH Planning) of behalf of Mr Neachell	Para 1.10 Chapter 4 Table 4.1 Para 7 Policy LC1 Policy BC1 Policy NT1 Policy OR1 Policy FZ1	No	No	No	Yes	Yes	<p>Para 1.10: Plan commits to review the Plan to deal with GBHMA shortfall. Consider rather than undertake LPA the Council should review the whole plan as a Local Plan review. The Review should deal with GBHMA numbers and green belt boundaries in a single document and process. Confusing to the public and a waste of resources to do proceed with Allocations.</p> <p>Objects to Table 4.1 on the grounds that 5% discount rate applied to existing commitments is insufficient, net supply of dwelling not consider to include 15% flexibility, double counting of the windfall allowance, future delivery prospects of North of Tamworth are unreliable and gross to net calculations are not transparent. Consider additional allocations need to be made to the Plan to increase flexibility and provide additional choice for the housing market.</p> <p>Policy LC1, Policy BC1 & Policy OR1 - many of the sites have planning permission and are under construction. Unclear whether these are being double counted as commitments in the overall housing numbers. Questionable if sites with express planning permission should be counted as allocations in the Plan.</p> <p>Policy NT1 principally allocates Arkall Farm. This has been subject to a public inquiry and the delivery of the site and final housing numbers remain uncertain until the outcome of the appeal process is known.</p> <p>Promotes SHLAA site 94 for 100 dwellings and site 95 for 60 dwellings in Fazeley. Objects to the allocations of FZ2 at Tolsons Mill as it is Grade II listed with planning consent which has remained unimplemented for many years. Considers FZ2 should be omitted from the allocations in favour of viable sites that are available and deliverable such as Site 94 and 95.</p>	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. Hopwas is one of the 'other rural' settlements which are not a focus for growth. The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance and discount rate used are based upon evidence and it is considered the windfall allowance does not include 'double counting'. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.
FC170	Cyril Wilson	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwood 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC171	Margaret Wilson	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwod 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC172	Barbara Boffy	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC173	Zoe Cook	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwod 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC174	Janet Hodson (JVH Planning) on behalf of Mrs Sketchley	Policy EMP1	No	No	No	Yes	Yes	Objects to EMP1 on the basis there is no employment allocation for Fazeley. Plan explains employment land will assist in meeting the employment needs of Tamworth, however the allocations in EMP1 make no provision for employment in close proximity to Tamworth at Fazeley / Mile Oak. The Plan makes no new allocations at Fazeley, only allocates land at Fradley and East of A38 at Alrewas which is existing premises. Promotes land west of Sutton Road, Mile Oak for the for expansion of existing commercial uses or additional complimentary uses. The land is well contained and has excellent linkages to the A5 and wider network. The existing allocations in Fazeley are existing employment areas and there is no allowance for future employment development that cannot reasonably be located with these two existing areas.	None	Comments noted. The District Council considers that Local Plan Allocations document provides sufficient land to meet the employment land requirements as set out in the Local Plan Strategy including provision to assist in meeting the needs of Tamworth Borough.

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FC175	Janet Hodson (JVH Planning) on behalf of Mr & Mrs Wiseman	Para 1.10 Chapter 4 Table 4.1 Para 7 Policy LC1 Policy BC1 Policy NT1 Policy OR1 Policy S1	No	No	No	Yes	Yes	<p>Para 1.10: Plan commits to review the Plan to deal with GBHMA shortfall. Consider rather than undertake LPA the Council should review the whole plan as a Local Plan review. The Review should deal with GBHMA numbers and green belt boundaries in a single document and process. Confusing to the public and a waste of resources to do proceed with Allocations.</p> <p>Objects to Table 4.1 on the grounds that 5% discount rate applied to existing commitments is insufficient, net supply of dwelling not consider to include 15% flexibility, double counting of the windfall allowance, future delivery prospects of North of Tamworth are unreliable and gross to net calculations are not transparent. Consider additional allocations need to be made to the Plan to increase flexibility and provide additional choice for the housing market.</p> <p>Policy LC1, Policy BC1 & Policy OR1 - many of the sites have planning permission and are under construction. Unclear whether these are being double counted as commitments in the overall housing numbers. Questionable if sites with express planning permission should be counted as allocations in the Plan.</p> <p>Policy NT1 principally allocates Arkall Farm. This has been subject to a public inquiry and the delivery of the site and final housing numbers remain uncertain until the outcome of the appeal process is known.</p> <p>Objects to the omission of Court Drive Site from Policy S1. Plan makes housing allocations but no provision for future development requirements beyond the Plan period. SHLAA Site 684 forms a natural extension to the settlement. Shenstone is a key rural settlement and only 50 dwellings are allocated which does not reflect the level of service and facility available in the settlement.</p>	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. Hopwas is one of the 'other rural' settlements which are not a focus for growth. The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance and discount rate used are based upon evidence and it is considered the windfall allowance does not include 'double counting'. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.
FC176	Janet Hodson (JVH Planning) on behalf of Shipley Estates / Baxter Estate	Para 1.10 Chapter 4 Table 4.1 Para 7 Policy LC1 Policy BC1 Policy NT1 Policy OR1 Policy FZ1	No	No	No	Yes	Yes	<p>Para 1.10: Plan commits to review the Plan to deal with GBHMA shortfall. Consider rather than undertake LPA the Council should review the whole plan as a Local Plan review. The Review should deal with GBHMA numbers and green belt boundaries in a single document and process. Confusing to the public and a waste of resources to do proceed with Allocations.</p> <p>Objects to Table 4.1 on the grounds that 5% discount rate applied to existing commitments is insufficient, net supply of dwelling not consider to include 15% flexibility, double counting of the windfall allowance, future delivery prospects of North of Tamworth are unreliable and gross to net calculations are not transparent. Consider additional allocations need to be made to the Plan to increase flexibility and provide additional choice for the housing market.</p> <p>Policy LC1, Policy BC1 & Policy OR1 - many of the sites have planning permission and are under construction. Unclear whether these are being double counted as commitments in the overall housing numbers. Questionable if sites with express planning permission should be counted as allocations in the Plan.</p> <p>Policy NT1 principally allocates Arkall Farm. This has been subject to a public inquiry and the delivery of the site and final housing numbers remain uncertain until the outcome of the appeal process is known.</p> <p>Objects to the omission of land west of the Robert Peel Hospital on the basis that Fazeley is a large sustainable settlement. The site was proposed to be allocation under reference FZ1 for 102 dwellings in the previous version of the plan. Current plan allocated 107 dwellings which is insufficient for given the scale and size of the settlement. Object to allocation of FZ2 at Tolsons Mill as it has had planning consent for many years which has remained unimplemented and should be omitted from the allocations in favour of viable sites that are available and deliverable.</p>	Yes	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. Armitage with Handsacre is identified as a key rural settlement, it is considered the proposed allocations are sufficient. The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance and discount rate used are based upon evidence and it is considered the windfall allowance does not include 'double counting'. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.

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FC177	Janet Hodson (JVH Planning) on behalf of Walton Homes	Para 1.10 Chapter 4 Table 4.1 Para 7 Policy LC1 Policy BC1 Policy NT1 Policy OR1 Policy AH1	No	No	No	Yes	Yes	<p>Para 1.10: Plan commits to review the Plan to deal with GBHMA shortfall. Consider rather than undertake LPA the Council should review the whole plan as a Local Plan review. The Review should deal with GBHMA numbers and green belt boundaries in a single document and process. Confusing to the public and a waste of resources to do proceed with Allocations.</p> <p>Objects to Table 4.1 on the grounds that 5% discount rate applied to existing commitments is insufficient, net supply of dwelling not consider to include 15% flexibility, double counting of the windfall allowance, future delivery prospects of North of Tamworth are unreliable and gross to net calculations are not transparent. Consider additional allocations need to be made to the Plan to increase flexibility and provide additional choice for the housing market.</p> <p>Policy LC1, Policy BC1 & Policy OR1 - many of the sites have planning permission and are under construction. Unclear whether these are being double counted as commitments in the overall housing numbers. Questionable if sites with express planning permission should be counted as allocations in the Plan.</p> <p>Policy NT1 principally allocates Arkall Farm. This has been subject to a public inquiry and the delivery of the site and final housing numbers remain uncertain until the outcome of the appeal process is known.</p> <p>Objects to the omission of Brick Kiln Farm site from Policy AH1. Objects to development boundary on Inset 5. The plan makes no provision for any alteration to the green belt boundary and provision of additional residential development or safeguarded land for the future. SHLAA site 92 known as Brick Kiln Farm forms a natural extension to the settlement. The site is well contained and there are no known technical constraints. Armitage with Handsacre is a key rural settlement and only 200 dwellings are allocated which does not reflect the services and facilities available in the settlement.</p>	Yes	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirements. Armitage with Handsacre is identified as a key rural settlement, it is considered the proposed allocations are sufficient. The 15% buffer included within the housing figures at table 4.1 is considered appropriate and provides sufficient flexibility within the plan period. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The windfall allowance and discount rate used are based upon evidence and it is considered the windfall allowance does not include 'double counting'. Propose minor modification to text of Policy BE2 to add clarity and reflect the NPPF. For text of modification please see schedule of minor modifications.
FC178	Anne Walker on behalf of Cannock Chase AONB Joint Committee	Policy NR10: Cannock Chase AONB Para 6.1 - 6.4 Para 6.5 - 6.8	[Left blank]	[Left blank]	[Left blank]	[Left blank]	No - unless required	Pleased to note this version is similar to the previous draft plan in terms of the treatment to Cannock Chase AONB. Welcome minor change to para 6.6 as a result of early comments and happy to support submission version of the Plan.	None	None required. Representation noted.
FC179	John Thompson on behalf of Lichfield Civic Society	Section 4 Para 4.1 - 4.8 Table 4.1	Yes	Yes	Yes (positively prepared, justified, compliant with NPPF) No (effective)	Yes	Yes	<p>Supports the Council's progression of the Allocations Focused Changes as it is consistent with the legal obligation to have an up-to-date Local Plan in place, it is essential to ensure there is an on-going 5 year supply, the Council has proactively participated with the GBSLEP over the housing shortfall and the Council's cabinet has approved progression of the Local Plan Review.</p> <p>Concerned about the deletion in Appendix A of 'saved policies' as there are some important issues that have not been carried forward into the Local Plan. The combined effect put at risk the heritage and character of the City centre for example policies L37 and L49. Previously expressed concerned that whilst there are detailed Conservation and Built Environment policies in the Local Plan the implementation of them in relation to new development in sensitive locations in the City's Conservation Area is relatively ineffective. Considers the Council should prepare an Area Action Plan for the City. Consideration needs to be given for additional public car parking and where it could be located.</p> <p>Removal of Green Belt sites confirms with the NPPF. The change to the Green Belt boundary at St Matthews Burntwood is justified.</p>	None	Comments noted. Policies relating to Heritage and Conservation are in line with the NPPF requirements and considered sufficient to guide development in sensitive locations. The Council is committed to undertaking a Local Plan Review and is due to consult on its Scope, Issues & Options in April 2018. The Local Plan Review provides an opportunity for the consideration of the preparation of Area Action Plans for specific locations. The District Council undertook a review of all saved policies and where appropriate replaced these. It was not considered appropriate to maintain Policies L37 and L49. There are other possible routes for such local policies with regards to the protection of green spaces for example through neighbourhood plans.
FC180	Ben Smith	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC181	Andrew Johnson on behalf of Hinckley & Bosworth Borough Council	Whole Document	Yes	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Confirms there are no concerns in relation to LDC meeting the Duty to Cooperate with HBBC. In particular in terms of shared priorities, the reference to the A5 Partnership is the Duty to Cooperate Statement is welcomed.</p> <p>With regards to the A5, HBBC are satisfied that the overall plan does afford appropriate focus on the A5 and its important role both in LDC and across the wider area.</p>	None	None required. Representation noted.

Representation Reference	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
FC182	Jeffrey Peacock	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC183	Liz Boden (Pegasus) on behalf of Robert Pearson (Czero Developments)	Policy W1	Yes	[Left blank]	No	Yes	Yes	<p>Promotes land west of Common Lane, Whittington for low carbon custom-build residential development. The site was previously allocated as Site Reference W4 in the Reg 19 consultation and removed as part of this development. This is considered to be a retrograde step resulting in the Plan being unsound.</p> <p>The LPAFC document makes no provision for any Custom build housing and thus fails to meet identified demand which is evidenced by the Council's own Self/Custom Build Register and the CZero Development Custom Build list. Consideration should be given to the inclusion of policy support for custom / self build dwellings bringing the plan in line with Government guidance.</p> <p>Considers the spatial strategy for Whittington and the District as proposed in the LPAFC document will not deliver the spatial strategy of the adopted LPS.</p> <p>Objects to the omission of Land West of Common Lane, Whittington. The site is highly sustainable and would assist in meeting objectively assessed housing development at Whittington.</p> <p>Considers the Council's evidence base which includes the sustainability appraisal is deficient and incorrect in its analysis of this site and fails to undertake a full assessment of reasonable alternatives to those sites proposed as allocations within the document. The under representation of the real position with regard to the site on a number of matters was raised in response to the consultation on the previous Plan and the Council have failed to rectify this. Consider the site forms part of the most appropriate strategy for the delivery of housing at Whittington. Exceptional circumstances to justify its release from the Green Belt have been demonstrated. Confirms the site is suitable, achievable and available for development.</p>	None	<p>Comments noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. The Local plan Allocations document does not include specific site allocations of self-build or custom build proposals, this will be considered comprehensively through the review of the Local Plan. The District Council maintains a self-build register. "The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation".</p>
FC184	Philippa Kreuser (CT Planning) on behalf of Essington Park Ltd	Whole Document	Yes	Yes	No	Yes	Yes	<p>The Focused Changes Document is not positively prepared as it fails to meet local needs for infrastructure particularly the need to provide for roadside service areas on the Strategic Road Network.</p> <p>A service area could replace Ivy Garage in Alrewas providing an opportunity to remove HGV traffic from the village. Such an allocation would be consistent with Policy Alr1 of the Core Strategy in that it would assist in reducing the impact on the A38 of the village.</p> <p>There is not a specific policy in the Local Plan Allocations (Focused Changes) Document that addresses road side services, therefore the Plan is not positively prepared.</p> <p>Proposes a road side service should be allocated to the north of Alrewas as shown on attached map, this could include provision for a petrol filling station, food outlet, hotel accommodation and 24 hour HGV parking.</p>	None	Representation noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy. The LPS and LPA are informed by an extensive evidence base including the Retail Centres report. The evidence base does not conclude that the LPA should make provision for road side series.
FC185	Philippa Kreuser (CT Planning) on behalf of Essington Park Ltd	Inset 4 Alrewas Site A2: Land north of Dark Lane	Yes	No	No	Yes	No	Support for the inclusion of Site A2 within the Allocations document, but objection to the boundary of Site A2 shown on Proposals Map for Alrewas. Respectfully submitted that the boundary of Site A2 should be amended to accord with the precise boundary to that which the planning permission 13/01175/FULM relates.	None	Representation noted. The village settlement boundary identified on the proposed policies maps reflects the likely built area of the development in this location.
FC186	Russell Capper	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC187	Sally Mackey	Table A.1	[Left blank]	[Left blank]	[Left blank] No (Effective, consistent with NPPF)	Yes	Yes	<p>LAP1 duplicates Saved Policy SA6 therefore stating that it is to be deleted is misleading. LAP1 is inappropriate and not in keeping with the NPPF.</p> <p>There are properties within LAP1 where development of the site would result in appropriate development. LAP1 should be replaced by a new policy without reference to subdivided plots being accommodated within plots of at least half an acre.</p> <p>Population of Little Aston is older and increasing and they tend to prefer maintaining smaller grounds. Possible to maintain the exclusive 'leafy' feel of Little Aston, whilst building innovative large family homes to encourage younger population.</p>	None	Policy LAP1 is within the 'made' Little Aston Neighbourhood Plan and not a policy within the Local Plan Allocations document.

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FC188	Karin Hartley (Delta Planning) on behalf of Richard Norgrove (Hortons' Estate Developments Ltd)	Policy EMP1	Yes	Yes	Yes (positively prepared, effective) No (justified and NPPF compliant)	Yes	No	<p>Proposal maps identifies Existing Employment Areas and delineates land to the north-east of Eastern Avenue as such an area.</p> <p>Consider that the preparation of the Allocations Plan should have been used as an opportunity to reassess 'Existing Employment Areas' and re-designate areas that no longer perform a traditional employment function. The area to north-east of Eastern Avenue has seen substantial change in recent times and is very mixed in character including traditional employment uses but also retail and sui generis uses. Consider mixed use areas have greater potential to accommodate uses outside the traditional employment use classes and this should be acknowledged in the Allocations Plan.</p> <p>Hortons Estate promoting the former Naturana site at Eastern Avenue. Site could offer an appropriate location for a restaurant/ cafe or takeaway/ drive- thru or leisure facilities. This would compliment the existing uses in this area. Consider it appropriate to be a mixed use area in order to facilitate the continued regeneration of this area. This could be achieved by removing the 'Existing Employment Area' designated or by specifically identifying it as a 'Mixed Use Area.'</p>	None	Comments noted. Policy EMP1 supports the use of traditional employment use classes but is considered flexible to enable other uses if it can be demonstrated that this would enhance or compliment the existing employment offer and it would not detrimentally affect the employment area. The District Council undertook a detailed assessment of employment land through the Employment Land Capacity Assessment, this made recommendations with regards to sites where re designation may be appropriate.
FC189	Maria Bailey (Maria Bailey Planning) on behalf of Mr & Mrs Hill	Whole document	No	[Left blank]	No	Yes	Yes	<p>Strategy adopted in the draft Allocations document fails to take full account of emerging housing needs in the area, and the overspill from Birmingham. Therefore the Local Plan is reactive rather than proactive in its approach., and falls short at making it possible for future housing needs in the District to be met.</p> <p>LDC needs to take a proper comprehensive review of Green Belt review so the relationship of a site to a sustainable settlement that is outside of Lichfield District does not preclude it being released for housing. It is noted that land to the south of the M6 Toll, between Burntwood and Brownhills was not assessed.</p> <p>Land should be allocated at the most sustainable and appropriate locations, LDC should take account of a sites relationship within settlements in adjoining districts. Development at land adjacent 59 White Horse Road, Walsall would be in accordance with guidance contained within the NPPF.</p>	None	Representations noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirement. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC190	Tim Plageron (Redrow Homes)	Whole Document	[Left blank]	[Left blank]	No	Yes	Yes	<p>Redrow land interest relates to 12ha of land, currently designated as Green Belt to the south of Highfields Road, Burntwood. The land was allocated for residential development for 250 dwelling in the previous draft Allocations document.</p> <p>Core Policy 1 & and the Spatial Strategy identifies Burntwood as a key settlement with 13% of residential growth to be located within Burntwood. Policy Burntwood 4 further emphasises Burntwood as a strategic location for growth and the previous version was in line with this. The Council have sought to remove allocations from the Plan which are no longer considered 'necessary' to meet the housing requirement for the plan period. The largest of the allocated sites removed is land south of Highfields Road, Burntwood. There is now significantly more development directed towards "Other Rural" with significantly less being directed towards Burntwood and slightly less towards Lichfield. The increase in "Other Rural" allocations has been a product of appeal decisions. The growth of the District is no longer being led through the Local Plan process, rather a result of sporadic and speculative applications which have been allowed at appeal.</p> <p>Burntwood - the Council's UCA has appraised available land within the area of Burntwood against the housing requirements set out in the LPS. The UCA identifies a shortfall of some 315 which would need to be accommodated on greenfield land outside the existing settlement boundary. Policy Burntwood 3: Burntwood Economy aspires to see increase and more diverse economic activity. There is evidence that Burntwood is a key settlement which requires inward investment to ensure the local economy and centre can grow. Highfields Road is identified through the Green Belt Report as being the most suitable parcel for release from the Green Belt to facilitate growth that cannot be accommodated in the existing urban area.</p> <p>Safeguarding land at Highfields Road, Burntwood would be an effective means for ensuring that future growth is in line with the adopted spatial strategy and what has been previously considered sustainable development. There is a clear need for land to be safeguarded at this stage to ensure that at the point of Local Plan Review, there is a robust portfolio of identified land to assist in delivering sustainable development in the next plan period.</p> <p>The Council make a commitment to review the Local Plan to address the needs of the GBHMA. Agree this review is wholly necessary however it is considered including text within the LPS is not effective and a specific policy committing the Council to review the plan, in accordance with an appropriate timeframe is necessary.</p>	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirements. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.

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FC191	Andre Dufaye	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC192	Vernon Leadbetter	Site R1: East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	LDC must do all in their power to retain existing recreational facilities at the Power Station site for the benefit of the whole community. The Borrowpit is a lake of outstanding national beauty and supports an abundance of wildlife, rare migratory birds and coarse fish.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC193	Paul Yeo	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC194	Gillean Yeo	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC195	Robert Tompkin	Site S3, Paragraphs 12.4-12.6	No	No	No	Yes	No	Objects to Site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Shenstone. Just fewer than 80% of residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.	None	Site S3 is not proposed for allocation within the draft Local Plan Allocations document. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. Representation is in response to the draft Local Plan Allocations document and not the Focused Changes document that is currently being consulted on.
FC196	Clr Diane Evans (Burntwood Town Council Labour Group)	Burntwood	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Appears LDC are taking note of the concerns of residents of Burntwood however there are some views that are not being taken fully into consideration. Delighted to see the removal of the proposals to develop the Green Belt on Coulter Lane and in nearby areas bordering the area around Chasetown, there is little reassurance these will not be placed back into the firing line should housing needs for the area increase further. Questions whether Focussed Changes document is realistic in the impression it gives that the areas of Green Belt no longer identified for future development will truly be safe from development in coming years. Need to ensure there is a robust case when protecting the Green Belt and this is a missed opportunity to emphasise its importance to the wellbeing of Burntwood as a whole. There needs to be a tangible commitment from LDC to ensure any future housing development is matched by a commensurate development in the towns infrastructure and public services. There needs to be a commitment in the plan that Burntwood will be developed in a way which maintains its position as a discrete town with its own identity and clear open space Green Belt borders between it and the adjacent areas of Cannock, Lichfield, Norton Canes and Brownhills. The local plan needs to ensure that there is adequate provision to ensure opportunities for local people to secure affordable housing, suitable for young, old and growing families in the town. Without this commitment being explicit in the plan, Burntwood faces the possibility of becoming a town with high property prices, executive homes and it could lose its character, becoming a commuter base joined seamlessly to and indiscernible from the West Midlands urban sprawl. Welcomes the formal recognition of the Town Centres and hopes LDC will be supportive in providing support for local businesses to ensure the Town Centre can be vibrant and effective focus for shopping and leisure activities. The Town Centre needs to be serviced by good transport links. Want to see a better Burntwood and not a bigger Burntwood and the Local Plan should be used as a tool to ensure Council's, at all levels, deliver to the people of this Town.	None	Comments noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Policy Burntwood 3 of the Local Plan Allocations document relates to the regeneration of Burntwood Town Centre, infrastructure and employment opportunities.

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FC197	Stuart Forrest	Site R1: East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Enjoyed the fishing on Borrow pit lake for several seasons it was any excellent fishery with very good water quality and fantastic place for wildlife. The borrow pit is an excellent recreational resource which must be retained to allow access to area which enhance the local area for people. The lake would also provide any excellent local nature reserve again enhancing people recreation opportunities. People need home but they also need open space , recreational facilities and wildlife needs a home.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC198	Andy Forrest	Site R1: East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Pleased to see that the Council is keen to retain the Borrow Pit pool as it supports a diverse range of wildlife as does the surrounding wildlife. Would urge the Council to allow the former fishing club to lease the pool once more as it was the committed maintenance that provided the diverse environment and not the power station owners. If it was fished on a daily basis it would reduce the risk of any accidents if left unattended.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC199	Andrew Tyzzer	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC200	Colin Craddock	Site R1: East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Opposes the development at the East of Rugeley site. The facilities are regularly used and a great source of entertainment and relaxation. It could also be further improved for the community drawing visitors to the area and spending money in villages which would disappear if the development continued. The Borrowpit and recreational facilities are essential to keep, and the Angling Club has managed the waterways and wildlife successfully for over 50 years. Urges the Council to prevent the beautiful countryside from being taken away.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC201	Adrian Oliver	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC202	Keith Jones	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	[LDC Note - no commented made by consultee]	None	N/A
FC203	Ian Hickenbotham	Site R1: East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Supports the Councils intention of leaving the Borrow Pit intact. Enjoyed fishing on the lake and appreciates the tranquility of the site and the abundance of local wildlife. Site was used regularly by the local education department to introduce young local children to the natural environment. Would be criminal if this water feature and its immediate surroundings were lost to future generations, essential that the Council do all it can to ensure its safekeeping.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC204	Robert Hollowood	Site R1: East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Been a member of RPS Fly Fishing Club for seven years and felt so lucky to access such a wonderful nature reserve. The site has been extremely well looked after by the current custodians and excellent management has encouraged an abundance of wildlife (otters, kingfishers, wildfowl, Osprey). Travesty if it was put to any other use, must be for future generations to enjoy. Because of its ease of access disabled friends have been able to enjoy hours of fishing there.	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.

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FC205	Philip Sharpe (Inland Waterways Association)	Policy IP2: Lichfield Canal	Yes	No	No Yes (consistent with NPPF)	Yes	Yes	<p>Reference to provision of essential canal infrastructure be developments adjacent to Lichfield Canal was agreed in 2014 as a Main Modification to the Strategy Plan Policy Lichfield 6: South of Lichfield, but was omitted due to clerical error by the Council.</p> <p>LPMM31 & LPMM37 proposed to include the additional words: "and provision of all necessary new bridges and associated canal channel infrastructure". Although since included in the Infrastructure Delivery Plan this does not carry the same weight as policy and developers are seeking to avoid these obligations. The Allocations Policy IP2: Lichfield Canal provides an opportunity to correct the earlier mistake by including appropriate text.</p> <p>IWA's response to LPA Open Consultation in 2016, correspondence with officers and Representations made at Publication stage in 2017 have all been ignored with no explanation.</p> <p>Inclusion of the infrastructure requirement by developers is a reasonable alternative to the previous failure to include this in the Strategy Plan and is needed to ensure the Lichfield Canal policy is effective and appropriate.</p> <p>After the first sentence of Policy IP2: Lichfield Canal "Development on or adjacent to the route should provide any infrastructure necessary to maintain the integrity of the route" should be added.</p> <p>Please also note that the Handsacre Link section of the HS2 Route is still incorrectly shown on the Policies Map (LPA114).</p>	None	Issue around modifications to the Local Plan Strategy has been discussed previously and the Council has responded to IWA in this regard (letter dated 12 June 2015). There is no scope to modify the Local Plan Strategy through the Allocations examination. The modifications to which this representation refers were not reported to Cabinet when the Local Plan Strategy document was reported to Council for adoption. The District Council considers the wording of Policy IP2 to be appropriate.
FC206	Tony Wisniewski	Site R1: East of Rugeley	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	Supports keeping the Borrow Pit Lake for recreational use for the foreseeable future. It would be a real shame to lose this wonderful facility for the future generations	None	Appendix E of the Local Plan Allocations document provides a concept statement for site R1. This includes reference for the desire to maintain the Borrow Pit as part of the open space network within the wider site. More detail is provided within the Rugeley Power Station SPD which has been adopted.
FC207	Cllr Helen Fisher (Lichfield District Council)	Burntwood	Yes	[Left blank]	Yes	[Left blank]	[Left blank]	<p>Encouraged that officers have heard the many voices of the residents of Burntwood and their views taken into account. New figures for Burntwood are acceptable as long as needs of residents, present and future are taken into consideration.</p> <p>Main causes for concern when seeing housing growth are health facilities, shopping opportunities, quality jobs, good education and leisure.</p> <p>Welcomes Highfields Road and Coulter Lane has been taken out of the document, also welcomes the proposed changes to the Green Belt around the St Matthews estate. Ideas for a town centre are long overdue, must strive to see this happen.</p>	None	None required. Representation noted,.
FC208	Graham Broome (Highways England)	Whole Document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Welcome that suggested changes related to site allocations L9, R1 and EMP1 have now been embodied.</p> <p>Current allocations are not supported by a robust transport evidence base, there remains uncertainty around the scope and cost of necessary transport infrastructure to deliver identified site allocations and how this will be delivered. Current IDP 2017 largely relies on historical information prepared at the Local Plan stage and cannot now be relied upon to support specific allocations put forward.</p> <p>Supportive of paragraph 4.12 related to working with partners and the timing of HS2, but request that paragraph 4.12 is updated to reflect that HS2 construction is now expected to be between 2019 and 2022.</p> <p>Consider that further technical analysis would lead to a more considered position in relation to infrastructure requirements.</p>	Yes	Representation noted. The Local Plan Allocations document is the second stage of the Local Plan and seeks to deliver growth in line with the Local Plan Strategy. This includes a detailed evidence base, including transport evidence which has previously been considered by Highways England. Paragraphs 7.9 and 7.10 of the Local plan Strategy require transport evidence to be prepared as part of the planning application process, specifically where those developments are located in proximity to trunk road network. This stance was reiterated by Highways England response (dated 04 October 2016) agreed that this position should be maintained and that case by case evidence would be required through the planning application process. With regards to the IDP the text relating to the Strategic Highway Network, specifically paragraphs 4.12 and 4.13 were provided and agreed by Highways England following the first regulation 19 consultation in October 2016. An update regarding commencement of HS2 will has requested be include within the submitted IDP.
FC209	Luke Walker (Lichfield & Hatherton Canals Restoration Trust)	Whole Document Policies Map Pages 3 & 4	Yes	Yes	Yes No (effective)	Yes	No	<p>Concerned about the route alignment shown for the short section of the Lichfield Canal protected route to the east of Lichfield between the A38 and Darnford Lane.</p> <p>Feel there is a drafting error when comparing the route shown on the present Plan Policies Map with the route shown in the WS Atkins report previously provided by LCHRT. See attached map to see the correct alignment for the canal in the area. The route proposed by LCHRT for this section of the canal respects the presence of an electricity pylon and fits with the topology of the land.</p>	Yes	The alignment is not as was agreed between LDC and the canal restoration trust. Modification proposed to Lichfield District Policies Map and Inset 1 to show correct line which varies only slightly to go around a pylon to the south of the A38. This change does not affect any development or other designation.

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FC210	Luke Walker (Lichfield & Hatherton Canals Restoration Trust)	Policy IP2: Lichfield Canal	Yes	No	No Yes (consistent with NPPF)	Yes	No	<p>Present document refers to minor amendments being needed to the wording of IP2, but does not present amended wording. We consider that the amending wording for IP2 should have been set out in full in the present consultation as the amendments place obligations on developers to provide infrastructure which is vital for the continuing programme for the restoration of the canal.</p> <p>Significant proposed wording in an amended version of Policy IP2 regarding the Lichfield Canal, which we have seen following the Publication Stage consultation in May 2017, has not been included in the Focused Changes document.</p> <p>The inclusion of items within the IDP does not place the developers under a clear obligation to construct these elements.</p>	None	The proposed wording in the FC document is correct. Not all the changes proposed by LHCRT were able to be supported by LDC. The LHCRT were sent revised policy wordings which did not include a requirement for developers to provide canal infrastructure in October 2017.
FC211	Clr Helen Fisher (Staffordshire County Council)	Burntwood	Yes	[Left blank]	Yes	[Left blank]	[Left blank]	<p>Duplicate representation received FC207</p> <p>Encouraged that officers have heard the many voices of the residents of Burntwood and their views taken into account. New figures for Burntwood are acceptable as long as needs of residents, present and future are taken into consideration.</p> <p>Main causes for concern when seeing housing growth are health facilities, shopping opportunities, quality jobs, good education and leisure.</p> <p>Welcomes Highfields Road and Coulter Lane has been taken out of the document, also welcomes the proposed changes to the Green Belt around the St Matthews estate. Ideas for a town centre are long overdue, must strive to see this happen.</p>	None	None required. Representation noted.
FC212	Jason Tait (Planning Prospects) on behalf of Wallace Strategic Land	Site AH1: Land adj. Hayes Meadow School	Yes	Yes	No	Yes	No	<p>Land adj Hayes Meadow School – the site has planning permission and should be treated as a commitment.</p>	None	Representation noted. The Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan and is consistent in its approach in allocating sites with permission which are deliverable within the plan period.
FC213	Jason Tait (Planning Prospects) on behalf of Wallace Strategic Land	Para 1.10, 4.7 and 4.8	Yes	Yes	No	Yes	Yes	<p>The Focused Changes to the Publication Plan remove all Green Belt allocations and place an even greater reliance upon sites coming forward as part of the current Strategy, and therefore the Council's commitment to a full and early review of the Local Plan and a full Green Belt Review to address the GBHMA issues is even more important.</p> <p>The commitment to review is supported to address the known challenged to the overall delivery of housing across the Birmingham HMA, but greater clarity could be provided as to the timing of the review and its principal terms.</p>	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options in April 2018.
FC214	Jason Tait (Planning Prospects) on behalf of Wallace Strategic Land	Para 4.1	Yes	Yes	No	Yes	Yes	<p>It is critical that the Allocation Plan makes sufficient land available in viable and deliverable locations which provide a choice and range of site sizes to support the significant step change in delivery which will be required in the District to meet the needs through the Plan period.</p> <p>The Plan confirms that in the nine years to 1 April 2016 the District has delivered 2331 net new homes at an average of only 259 dwellings per year; significantly below the average annual requirement of nearly 480 dwellings per annum needed to meet the Plan requirement (even more now per annum factoring the shortfall). The five year supply annual requirement on the Council's own calculation is some 784 dwellings per annum. Significant risks and challenges remain evident in the overall proposed trajectory. Addressing the shortfall and promoting a deliverable trajectory will require a broad range of sites.</p> <p>The Plan needs to ensure delivery of housing and as such the reliance on the SDA's and concentration at Lichfield have the potential to constrain delivery – greater reliance should be placed upon a wider range and choice of sites to promote delivery in order to provide for a trajectory of supply which is robust. Any failure to deliver against the trajectory should also be recognised as an aspect of supply needing to be addressed as part of the Review.</p>	None	Representation noted. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The District Council considers it can currently demonstrate a five year housing land supply. It should be noted this supply has been tested at appeal and the inspector concluded that the Council's position was robust.
FC215	Jason Tait (Planning Prospects) on behalf of Wallace Strategic Land	Policy B1: Burntwood Housing Allocations	Yes	Yes	No	Yes	Yes	<p>Burntwood represents a good and sustainable location for growth. Focused Changes has seen a significant shift in the scale of development to be directed to Burntwood where Allocations have been reduced from 728 to 382.</p> <p>Previous objections raised concerns about the range of sites put forward for allocation in Burntwood, but equally supported Burntwood as a sustainable location for growth.</p> <p>Burntwood's role in the Allocations document is now significantly diminished which must point to an enhanced role for the Town through the Local Plan Review.</p>	None	Representations noted. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.

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FC216	Jason Tait (Planning Prospects) on behalf of Wallace Strategic Land	Policy LC1: Lichfield Housing Allocations	Yes	Yes	No	Yes	Yes	<p>Representations and site specific objections and concerns were raised in respect of a number of sites as part of the previous Regulation 19 consultation and these remain valid.</p> <p>We remain concerned in respect of a significant number of the proposed allocations within Lichfield and whilst some amendments have been made, they are limited, reflect minor changes to commitments and do not remove considerable uncertainties to the supply relied upon in the City.</p> <p>The sites should be deleted or proposed yields reduced in line with these and previous objections raised.</p>	None	Representations noted. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.
FC217	Jason Tait (Planning Prospects) on behalf of Wallace Strategic Land	Policy NT1: North of Tamworth Housing Allocations	Yes	Yes	No	Yes	Yes	<p>Site NT1: Arkall Farm is allocated for 1000 dwellings however the full 1000 dwellings should not be allowed in this plan period. A detailed trajectory needs to be prepared in order to understand the likely realistic delivery on site given the likely need for new infrastructure given the likely need for new infrastructure, preparation of the site for development.</p> <p>Site proposal is currently pending the outcome of a Planning Inquiry and further consideration should be given to its contribution upon the outcome of that process.</p> <p>Potential yield from site NT1 in the plan period should be significantly reduced.</p>	None	Representations noted. Site NT1: Arkall Farm is pending the outcome of a Planning Inquiry, Should permission be granted it is considered the site is capable of delivering 1,000 units within the plan period.
FC218	Jason Tait (Planning Prospects) on behalf of Wallace Strategic Land	Policy OR1: Other Rural Housing Allocations	Yes	Yes	No	Yes	Yes	<p>Additional reliance has been placed upon additional sites identified within Other Rural Housing locations. Taken together they significantly challenge the overall spatial strategy even though it is accepted that the sites already have planning permission.</p> <p>In respect of Watery Lane, reliance is placed upon delivery from this site both within the five year supply and Local Plan trajectory. Site is more likely to be delivered later in the plan period.</p> <p>Proposed yields should be reduced in line with objections raised.</p>	None	Representation noted. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The District Council considers is can currently demonstrate a five year housing land supply. It should be noted this supply has been tested at appeal and the inspector concluded that the Councils position was robust.
FC219	Jason Tait (Planning Prospects) on behalf of Wallace Strategic Land	Policy R1: East of Rugeley Housing Allocations	Yes	Yes	No	Yes	Yes	<p>The land at the former Rugeley Power Station is not objected to and is in principle a significant brownfield site suitable for development. The site is allocated for 800 dwellings however the full 800 dwellings should not be allowed in this plan period due to the sites complexities such as its need for remediation and a specialist developer to bring it forward.</p> <p>It is not likely that the site will be remediated, readied for development, permission granted and development progressed such that 800 dwellings would be delivered within the remaining 10 years of the plan from adoption.</p> <p>Part of the site falls in an adjoining District and is not allocated for development and a consistent and co-operative approach needs to take place between the two Authorities.</p> <p>The potential yield from the site in the plan period should be significantly reduced.</p>	None	Representation noted. Lichfield District has worked jointly with Cannock Chase District Council to prepare and adopt the Rugeley Power Station Development Brief SPD. This SPD aims to guide the future redevelopment of the site and is informed by discussions with stakeholders and interested parties. The Council considers the site is capable of delivering a minimum of 800 dwellings within the plan period.

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FC220	Graeme Warriner (Barton Willmore) on behalf of Burton Hospital NHS Trust	Paragraph 12.11	[Left blank]	[Left blank]	No (positively prepared, justified, consistent with NPPF) Effective left blank	Yes	Yes	<p>Burton Hospitals NHS Foundation Trust is currently undertaking an appraisal of its hospital facilities and services to inform a healthcare and investment strategy for the future. This may include the disposal of property and land (to provide additional funding for reinvestment into the sites); development of new health facilities; and/or reconfiguration/refurbishment or extension of existing buildings, across its Estate, including the Sir Robert Peel Hospital in Fazeley.</p> <p>The previous iteration of the Local Plan Allocations document removed the Sir Robert Peel hospital (land parcel F6) from the Green Belt. This is supported as it will ensure that any development proposals at the hospital are not unduly fettered by policies that seek to constrain development.</p> <p>The Local Plan allocations (Focused Changes) document however has returned the site to the Green Belt. This is not considered 'positively prepared' as it fails to follow the recommendations of the Local Plan Allocations Supplementary Green Belt Report 2016 (Section 3.2), which states that the hospital should be released from the Green Belt; and could impose unnecessary restrictions on our client trying to plan healthcare provision to meet requirements in the future.</p> <p>Sir Robert Peel Hospital (Green Belt Parcel F6) should be removed from the Green Belt to ensure the planning policy context does not unnecessary constrain the delivery of new health facilities on the site and instead supports potential development opportunities for the hospital.</p>	None	Representations noted. The Local Plan Allocations document does not propose to release the Sir Robert Peel Hospital from the Green Belt.
FC221	David Bostock (Borrowcop and District Residents Association)	Whole document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Strongly supports the restoration of the Canal and urges Council to ensure that any development fringing it is unobtrusive and contributes to the green policies outlined in the document.</p> <p>Concerned about the continued policy of Southern Bypass onto London Road. Road is no longer a bypass since the development of three new housing estates and a business park at Cricket Lane. Suggests a route that skirts London Road to the south emerging close to Weeford Island. No development should take place at South Lichfield or Cricket Lane should take place before the new route and the A5127 have been built or upgraded since HS2 construction traffic will also be using the road.</p> <p>Site L17 - No objection to the site but concerned about the proposed access from Upper St Johns Street.</p> <p>Site L30 - Object to Business Park in principle as it is on Green Belt land. Questions need for it as Lichfield South Business Park is expanded and Liberty Park is currently vacant. Also questions need for housing development here given the large amount of windfall houses since the Plan which more then meet the target set by the Inspector.</p>	None	Representation noted. Policy ST3 safeguards land to assure the delivery of the Lichfield Southern Bypass. The Southern Bypass will required detailed planning permission which is supported by a range of technical documents. The bypass is to be funded by existing developer funds, public funds and contributions from future development such as schemes to the south of the Lichfield. Sites L17 & L30 both benefit from planning permission. Detailed design matters are considered as part of the application process.
FC222	Margaret Jones (Elford Parish Council)	Appendix A: Schedule of Deleted Policies	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Objects to the deletion of Policy C9 in Appendix A of the Allocations Document. Local Plan Strategy states that the saved policies of the previous Local Plan will be replaced by the Local Plan Allocations however it is noted that saved Policy C9: Protected Open Space has been deleted and not replaced.</p> <p>The Parish Council wishes to protect land near The Shrubbery in Elford which is proposed to be designated as Local Green Space in the draft Neighbourhood Plan.</p> <p>Deletion of the saved policy may affect the protection of this area of open space that Elford Parish Council through the Neighbourhood Plan wishes to preserve.</p>	None	The District Council undertook a review of all saved policies and where appropriate replaced these.

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FC223	Alice Fitton (Turley) on behalf of Legal & General UK Property Fund (L&G)	Fradley Section 12 Policy EMP1	[Left blank]	[Left blank]	[Left blank]	Yes	[Left blank]	<p>L&G own 83.06 ha of land at Fradley Park predominantly comprising storage and distribution. Welcomes allocation of the extension of Fradley Park employment site to the south.</p> <p>Section 12: Key Rural Settlements: Modification S12-M4 - do not object Modification S12-14 - positive that it seeks to address potential impacts on the Strategic Road Network, recommend wording is added to Policy ST5 that commits both SCC and HE to exploring a single solution for future proofing Hilliards Cross junction.</p> <p>Broad support the principle of Policy EMP1 however it is currently negatively worded stating that 'traditional use classes (B1, B2 and B2) will usually not be supported...'. Policy EMP1 should be modified so that it is positively worded and supports development proposals outside of traditional employment use classes where it can be demonstrated that the proposed use would enhance or complement the existing employment offer.</p>	None	The Local Plan Allocations document meets the employment land requirements as set out within the Local Plan Strategy. It is considered that the wording of Policy EMP1 (Employment Areas & Allocations) is sufficiently flexible and would allow for development outside of the traditional employment use classes where these are demonstrated to complement the existing employment offer and where such uses would not be at the detriment of the employment area and its intended use. Hillard Cross Junction is identified within the Infrastructure Delivery Plan, Section 4.10 Improvement to the Strategic Highway Network.
FC224	Stephen Stoney (Wardell Armstrong LLP) on behalf of The Leavesley Group of Companies	Chapter 12, Site F1, Site F2, Sustainability Appraisal Report	No	No	No	Yes	Yes	<p>Focused Changes document pays no respect to HMA wide duty to co-operate required by the Birmingham plan in order to meet the shortfall that cannot be met within its boundaries.</p> <p>Allocation of development in sites F1 and F2 is arbitrary, un evidenced and irrigational in that it differentiates 'Fradley Village' from the SDA. Sites F1 and F2 bears no relationship to the potential for development set out in the 'site allocations: Sa scoring matrix: settlement Fradley'. Site ID 436 is massively underscored whereas the sustainability credentials are more properly assessed by an Environmental Statement submitted under planning application ref: 18/60078/OUTME1, this will be referenced through an examination hearing statement.</p> <p>The plan/ development fails to properly reflect the Secretary of State's intentions to significantly boost the supply of housing development . This plan takes the opposite perspective in its assessments of development potential. The document relies on a totally out of date evidence base used to inform the local plan strategy 2005- 2027.</p> <p>The document should not proceed any further, in favour of the sounder approach of the local plan review process.</p>	None	<p>Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation.</p>
FC225	Alice Fitton (Turley) on behalf of Bovis Homes	Section 4: Homes for the Future	[Left blank]	[Left blank]	[Left blank]	Yes	Yes	<p>Promotes 14.85ha of land to the north of Gillway Lane, Tamworth. The site is suitable, available and developable for residential development.</p> <p>Table 4.1 demonstrates North of Tamworth will deliver 1,165 dwellings that provide approx. 10% of growth in the District, this includes 500 dwellings to meet Tamworth's needs. Beyond the Local Plan period, there is an agreement between LDC, TBC and NWBC that LDC and NWBC will share TBC residual shortfall of 825 dwellings. Neither Modification S4-M2 & Modification S4-M4 accommodate TBCs residual housing requirement. Considers the most appropriate strategy in accordance with the Local Plan Strategy is to address Tamworth's housing shortfall as part of the Local Plan Allocations.</p>	None	Comments noted. There is a MOU in place between TBC, LDC & NWDC which commits LDC to accommodating 500 dwellings to meet the needs arising within Tamworth Borough. The MOU does not commit LDC and NWBC to sharing the residual shortfall of 825 dwellings. This shortfall will be considered as part of the overall housing shortfall present within the Greater Birmingham Housing Market Area through the Local Plan Review.
FC226	FC226 - Michael Davies (Savills) on behalf of Barratt West Midlands	Whole document	Yes	Yes	No	Yes	Yes	<p>Allocations document is failing to meet the housing requirement set out in the Local Plan Strategy for Burntwood. LPS sets out that 13% of overall housing requirement would be delivered in Burntwood whereas the Focused Changes document states that Burntwood will only provide 9% of the Districts housing growth even though it is one of the most sustainable settlements.</p> <p>Do not consider the Allocations document is deliverable over the next 5 years because the proposed Housing Trajectory is not realistic or achievable. South Lichfield SDA, Cricket Lane, Enact of Lichfield, Fradley airfield developments delivery rates are unrealistic and over ambitious as well as Deanslade SDA and Watery Lane.</p> <p>Council's projected delivery rate over the next 5 years is not achievable. Proposes a site at Rugeley Road, Burntwood (SHLAA ID: 404) is a sustainable site which could be delivered in the next 5 years. The site should be reassessed in the SHLAA as evidence was submitted to the previous consultation showing it is developable.</p>	None	Representation noted. The Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan and is consistent in its approach in allocating sites with permission which are deliverable within the plan period.

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FC227	Steve Norman	Whole document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Good that effort has been made to find Brownfield sites and that Burntwood Town Centre is still protected for retail development.</p> <p>Concern that the application for housing on land North of Tamworth is awaiting public inquiry and if Tamworth Council's objections result in other land being found it will have a knock on effect for other areas in Lichfield. Concerned there is no anticipated of Birmingham's housing need. The Local Plan only considers housing and infrastructure needs for the time of the Plan but does not consider possible future requirements.</p> <p>Concerned by removing St Matthews from the Green Belt it is on a limb, separate from the rest of the rest of the town and vulnerable to being challenged by the same developers either at Local Plan stage or later, with the support of the SoS at an Appeal.</p> <p>Objects to the any loss of Green Belt around Burntwood because this would give greater protection to any housing development.</p>	None	Comments 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 Plan Strategy commits to the removal of the St Matthews estate from the Green Belt.
FC228	Ian Strachan	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC229	Elizabeth Strachan	Para's 12.14, 12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	No	Yes	No	LDC has accepted the democratic wishes of the residents of Shenstone as shown within the adopted neighbourhood plan. There is no evidence within the Local Plan Allocations document that the future role and function of the Shenstone employment area has been considered. Cricket Lane development site can be used as compensation for the loss of industrial land elsewhere.	None	Comments noted. The Urban Capacity Study is a published piece of evidence supporting the Local Plan and as such it is not considered appropriate to remove reference to this from the explanatory text.
FC230	Joanne Tyzzer	12.15, 12.16, Policy S1, Map Inset 22	Yes	Yes	Yes No (justified)	No	No	[LDC Note - no commented made by consultee]	None	N/A
FC231	John Francis (DPP) on behalf of FI Real Estate Management (Emily Armstrong)	EMP1	[Left blank]	[Left blank]	No	Yes	Yes	<p>Objects to the exclusion of Drayton Manor Business Park from the allocated Employment Areas within Policy EMP1. The site forms part of a larger area of Green Belt and is currently designated as a Major Developed Site in Green Belt through Saved Policy EMP5, the Allocations will see this policy deleted. The exclusion of the Business Park from the designated Employment Areas will prevent the growth of existing facilities on site. Its exclusion will not help in ensuring sufficient employment land and facilities can be provided within the plan period.</p> <p>Employment Land Review 2012 recognises the importance of Drayton Manor Business Park, with it being the 8th largest employment site (by site area) in Lichfield District. The 2012 Green Belt Review does not provide an assessment of the site and whether it performs the function of Green Belt.</p> <p>If the site is designated without any specific site allocation this would only serve to prevent investment in the site from both current and future businesses and in doing so failing to deliver Strategic Priorities 7 and 8 of the LPS.</p> <p>Drayton Manor Business Park should be designated as an Employment Area through Policy EMP1 and the proposals map.</p>	None	The Local Plan Allocations document meets the employment land requirements as set out within the Local Plan Strategy. It is considered that the wording of Policy EMP1 (Employment Areas & Allocations) is sufficiently flexible and would allow for development outside of the traditional employment use classes where these are demonstrated to complement the existing employment offer and where such uses would not be at the detriment of the employment area and its intended use.

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FC232	Gillian Brown (Nigel Gough Associates)	Whole Document	Yes	No	No	Yes	Yes	<p>Do not believe the Focused Changes document has considered Birmingham's housing overspill and an immediate review of the Local Plan is clearly going to be required. Concerned Lichfield are progressing its LPA document when revisions are being made to the NPPF and the GL Hearn report has not yet been made available to the public.</p> <p>Promotes site which forms part of an existing employment area for housing use, it is land locked on the employment side, assuming no access can be taken from A38 the only way to access the site is via existing residential development along the northern boundary. Policy EMP1 seeks traditional employment uses which is considered restrictive. Consider if access to the site is via the existing residential area it would be detrimental and inappropriate for traffic generated by an industrial use to access the site this way, this is supported by Para 6.18 explanatory text of saved Policy EMP2 but needs to be followed through in its succeeding policy. A particular proposal for the site could be in the form of a care home led development which in itself would generate significant levels of employment.</p> <p>Consideration of the release of smaller sites would be beneficial to the local authority. The local authority must continue to update the allocations fully taking into account emerging national Government consultations and emerging policies.</p>	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC233	Richard Shaw (Savills) on behalf of Barwood Strategic Land II	Policy NT1: North of Tamworth Housing Allocations	Yes	Yes	Yes	Yes	Yes	<p>Attempts at co-operation throughout the plan making process to address the strategic need for accommodating housing growth to meet the needs of adjacent authorities, most notably in relation to the needs of the adjacent Tamworth Borough Council have been highlighted through the latest Duty to Cooperate Paper (Jan 2018).</p> <p>Policy NT1 is justified, based on the Local Plan Strategy and the fact that the Council has resolved to grant outline planning permission for the development of this site at its meeting on 27 February 2017 (application 14/00516/OUTMEI). Application is subject of a call-in inquiry and for determination by the Secretary of State.</p> <p>The Infrastructure Delivery Plan notes (Para 5.45) the need for the infrastructure requirements to deliver development in the North of Tamworth BDL and that 'Details will be developed further through the Local Plan Allocations document and the IDP will be updated accordingly'. Supports a review of the IDP given the adopted CIL, noting the need or reflect on evidence of viability, to ensure deliverability.</p>	None	Representations noted. Amendments to the IDP in relation to North of Tamworth BDA have been included following evidence exchange at the call-in Inquiry. The IDP is set within the CIL developer obligation landscape. A full review of the IDP will be completed to support the Local Plan Review. Paragraph 4.7 of the LPA commits the Council to undertaking a Local Plan review. The Council has set out its timetable for the Local Plan review within its Local Development Scheme.
FC234	Chontal Buchanan (First City Ltd)	Paragraph 1.10	No	[Left blank]	No	Yes	Yes	<p>LDC have identified that they are committed to reviewing the Plan in full, however the Focused Changes document makes no reference to when the review will be, LDC need to show their commitment to review by setting out a timeframe for an anticipated submission to the SoS for examination.</p> <p>To comply with duty to cooperate in regards to the GBHMA, LDC have until 2020 to show they are making an appropriate contribution to Birmingham's Housing needs. Based on the length of time from start to examination and adoption consider that LDC will not have a review of the Local Plan in place by 2020.</p> <p>Focused Changes document is not providing sufficient housing to meet the needs of the District, in particular the settlement of Burntwood. By not allocating land south of Highfields Road, Burntwood they are not accommodating the housing deficit within the HMA.</p> <p>Document should identify a timeline of when Local Plan Review will take place, should also identify sufficient sites to assist with the shortfall within the HMA and Land south of Highfields Road should be allocated to assist with meeting the needs of Burntwood and wider HMA.</p>	None	Representations noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Paragraph 4.7 of the LPA commits the Council to undertaking a Local Plan Review. The Council has set out its timetable for the Local Plan Review within its Local Development Scheme.

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FC235	Mark Dauncey (Pegasus) on behalf of T/C Cooper Developments Ltd	Whole Document	No	[Left blank]	No	Yes	Yes	<p>Promoting land off London Road, Lichfield for housing.</p> <p>Does not consider LPA complies with Duty to Cooperate. Council has failed to demonstrate that satisfactory cooperation has taken place in relation to addressing smaller scale housing and employment of TBC.</p> <p>Council should focus on a Local Plan Review to address Birmingham's housing needs or at least commit to introduce a review mechanism policy. LPA was failing to deliver the spatial distribution strictly in accordance with Table 8.1 of the LPS - appears LPA merely allocated committed schemes and was not being used as a tool to deliver the housing strategy. There are few advantages in progressing an LPA document when circumstances have materially changed since the adoption of the LPS.</p> <p>Concerned with deliverability of sites including Policy NT1 - land at Arkall Farm. Consider additional sites should be identified to meet Tamworth's needs and land off London Road could assist in providing a readily available and sustainable site to meet the District's needs. The site could deliver approximately 150 units. Questions to SA scoring in relation to the site. Additional allocations including some smaller scale Green belt release will ensure a five year supply of housing land is maintained, particularly in the event that larger strategic sites continue to be slow to deliver.</p>	None	<p>Comments noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018. "The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation".</p>
FC236	Chontal Buchanan (First City Ltd)	Para 4.1, 4.3, 4.5, 4.8	No	[Left blank]	No	Yes	Yes	<p>There is no mention of meeting the GBHMA need within paragraph 4.1 despite LDC acknowledging the need to co-operate with neighbouring authorities, therefore Focused Changes does not comply with the Duty to Cooperate.</p> <p>Document is not positively prepared as Burntwood has been identified as one of the most sustainable locations within the District yet land south of Highfields Road has been removed in spite of the need to meet unmet requirement from neighbouring authorities mentioned in paragraphs 4.7 and 4.8. Does not consider removing a sustainable, deliverable and developable site such as the land south of Highfields Road in Burntwood would be justified based on the consideration of reasonable alternatives and proportionate evidence.</p> <p>The allocation for Burntwood has been reduced from 720 in the Allocations Document to 375 in the Focused Changes document. Clear that the housing requirement of Burntwood cannot be met within the urban area, and the same approach taken in Lichfield and Alrewas of releasing Green Belt has not been applied to Burntwood in the same way despite it being one of the larger and more sustainable settlements in the District.</p> <p>Noted that rural areas have been allocated 12.5% of the overall housing figure which is a significant increase from the 5% identified in the Allocations document. LDC is not justified as they have prepared the Allocations Plan in accordance with their adopted plan. Also consider this leaves LDC vulnerable to future ad hoc large applications being submitted in locations which is not in accordance with the settlement hierarchy due to a lack of sufficient sites being allocated.</p> <p>Land south of Highfields Road should be included in the housing figures in paragraphs 4.1 - 4.8 including table 4.1. There is also scope for additional housing to be incorporated on site assisting in boosting housing provision.</p>	None	<p>Representations noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Paragraph 4.7 of the LPA commits the Council to undertaking a Local Plan Review. The Council has set out its timetable for the Local Plan Review within its Local Development Scheme.</p>

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FC237	Chontal Buchanan (First City Ltd)	Para 4.1, 4.3, 4.5, 4.8	No	[Left blank]	No	Yes	Yes	<p>With an established housing shortage within the Housing Market Area the removal of sites that had the ability to provide over 300 dwellings is not considered to comply with the Duty to Cooperate, further failing to meet the requirements for Burntwood set out in the adopted Local Plan. Does not consider policy B1: Burntwood Housing Land Allocations and paragraphs 9.4 – 9.8 is identifying the most effective way of providing a sound Site Allocation Document in accordance with the adopted Local Plan. The premise of the releasing of land from the Green Belt potentially being required has already be acknowledged in the adopted Local Plan.</p> <p>To be positively prepared, the land south of Highfields Road should be allocated for residential development or at the least safeguarded to assist with the unmet need in the wider HMA as well as the housing requirement for Burntwood. Understands desire to regenerate brownfield sites however, in Burntwood's case it should not result in the land south of Highfields Road being removed from the document. Aware that issues can arise in connection to brownfield land which can delay and even prevent development coming to fruition even in the event of planning permission being granted and therefore consider it would be prudent for the Council to maintain additional sites to ensure there are options and development will be achieved during the plan period.</p> <p>The housing requirement for Burntwood is below what it should be for one of the most sustainable settlements in the District and below the approximate figure set out in the adopted Local Plan</p>	None	Representations noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Paragraph 4.7 of the LPA commits the Council to undertaking a Local Plan Review. The Council has set out its timetable for the Local Plan Review within its Local Development Scheme.
FC238	Adrian Moore (Pegasus) on behalf of Wilson Bowden Developments Ltd	Fradley	Yes	[Left blank]	No	Yes	Yes	<p>Promoting Land at Hay End Lane, Fradley as a housing land allocation. In response to Reg 18 representations the Council said the site would be reviewed as part of the full Plan review rather than in the Local Plan Allocations Document.</p> <p>Spatial strategy identifies a hierarchy of settlements, placing Fradley among the six key rural settlements to which rural housing growth should be directed. The allocations proposed in the Focused Changes Document representable a significant departure from the spatial strategy. In particular Core Policy 6 with the Focused Changes document now directing 12.5% of homes to 'other rural' settlements, which exceeds the number within the key urban settlement of Burntwood and those proposed for the key rural settlements.</p> <p>Replacing a number of smaller allocations with a single large site at Watery Lane means a substantial element of housing supply will be reliant on a large site which increases risk of delay and failure to deliver within a five year period. The latest version of the LPA still fails to address the full needs of the wider area, in particular the overspill needs of Birmingham. The Local Plan is taking a reactive rather than proactive approach. It is not suitable for delivering the strategic priorities set out in the LPS. The LPA is considered to be a less effective plan than the previous iteration, it should be delivering a more effective and efficient way of bringing forward the Council's housing supply rather than introducing the potential for a greater degree of certainty and delay. To counter this additional land, even on a safeguarded basis should be identified.</p> <p>Note outline application (18/00078/OUT) has been submitted for the redevelopment of Hay End Farm Piggery. If approved, the allocation of Land at Hay End Lane for development would compliment it in form and function. Submitted promotion document in support of Land at Hay End</p>	None	Comments noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. 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.
FC239	M Gale (Bagshaws) on behalf of Messers Robinson	Para 4.1 to 4.8 Policy LC1 Table 4.1 Inset 1	[Left blank]	[Left blank]	[Left blank]	Yes	Yes	<p>Objects to Table 4.1 as it indicates that 11,515 dwellings are to be provided over the Plan Period, however do not agree with the assumptions in the table. Considers North of Tamworth housing delivery is unreliable, there is double counting on the windfall allowance and does not agree that a 15% flexibility is built into the supply. Considers the rate of non-delivery is much higher than 5%. Additional allocations should be made to the Plan which improve flexibility and improve the delivery rate of dwellings to the market.</p> <p>Confirms land is available at Brownsfield Farm, North of Lichfield. The site adjoins proposed allocations L2 to the east and OR7 to the west.</p>	None	Representation noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy and includes sufficient flexibility and an appropriate non-implementation rate.
FC240	Marc Hourigan (Hourigan Connolly) on behalf of Anwyl Land Limited	Policy B1: Burntwood Housing Allocations Policy B2: Burntwood Mixed-use Allocations	[Left blank]	[Left blank]	No	Yes	Yes	<p>Scale of development for Burntwood over the remainder of the plan period is significantly less than the Local Plan Strategy anticipated, with new dwellings accounting for 9% over the plan period as opposed to the 13% as expected in the LPS. Serious shortfall in the second most sustainable settlement in the District and unlikely to be remediated given Green Belt constraints. Clear Green Belt release is needed in Burntwood to meet the minimum housing requirements.</p> <p>Proposes site land north of Rake Hill and should be included within Policy B1: Burntwood Housing Allocations. Site may be capable of accommodating circa 250 dwellings, technical work will be submitted to LDC once it is complete.</p>	None	Comments noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy.

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FC241	Rachel Jones (HOW Planning) on behalf of Grasscroft Homes & Property Ltd	Policy F1: Fradley Housing Allocations Paragraph 1.10 SHLAA 2017, Table B.1445 (site ID: 1119)	No	Yes	No	Yes	Yes	<p>Promoting a site at Hay End Lane Fradley which represents a sustainable site and should be allocated within the Local Plan and also included within the settlement boundary that it adjoins.</p> <p>Outline planning permissions and Strategic Development sites in Fradley are likely to under deliver as such further sites should be delivered to accommodate this to ensure housing needs are met for Fradley and the District.</p> <p>LDC should plan for more housing to contribute to the GBHMA shortfall by allocating more sites within the Allocations document. It needs to be clear when the Local Plan Review will take place, LDC should be planning for an immediate review and should be clearly outlined with the Allocations document now. An immediate review of Sefton's Local Plan was recently required by the Inspector, which has similarities to the situation in Lichfield. LDC should follow key principles required by Sefton Local Plan Inspector.</p>	None	Representations noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Paragraph 4.7 of the LPA commits the Council to undertaking a Local Plan Review. The Council has set out its timetable for the Local Plan Review within its Local Development Scheme.
FC242	Mark Dauncey (Pegasus) on behalf of Mr D Wright	Whole Document	No	[Left blank]	No	Yes	Yes	<p>Promotes land off Stockings Lane, Upper Longdon.</p> <p>Does not consider LPA complies with Duty to Cooperate. Council has failed to demonstrate that satisfactory cooperation has taken place in relation to addressing smaller scale housing and employment of TBC.</p> <p>Council should focus on a Local Plan Review to address Birmingham's housing needs or at least commit to introduce a review mechanism policy. LPA was failing to deliver the spatial distribution strictly in accordance with Table 8.1 of the LPS - appears LPA merely allocated committed schemes and was not being used as a tool to deliver the housing strategy. There are few advantages in progressing an LPA document when circumstances have materially changed since the adoption of the LPS.</p> <p>Concerned with deliverability of sites including Policy NT1 - land at Arkall Farm. Additional allocations including some smaller scale Green belt release will ensure a five year supply of housing land is maintained, particularly in the event that larger strategic sites continue to be slow to deliver. The LPA document fails to make settlements such as Upper Longdon more sustainable by allowing some growth to occur. Promotes land of Stockings Lane, Upper Longdon to meet housing needs of Upper Longdon.</p>	None	Representations noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Paragraph 4.7 of the LPA commits the Council to undertaking a Local Plan Review. The Council has set out its timetable for the Local Plan Review within its Local Development Scheme.
FC243	Mike Smith (Walsall Council)	Whole Document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Housing provision: consider a more explicit reference to the Local Plan Review should be made in the LPA document itself especially in view of the imminent publication of the GBHMA Strategic Growth Study.</p> <p>Employment land: Clarification necessary in respect of allocations for development in Use Class B1 (Sites F2, A6 and OR6). Assume allocation is intended to be for B1(b) and B1(c) uses. Para 5.2 says proposals for B1(a) offices should have regard to CP8 however this does not justify the unrestricted allocation for B1 uses in the first place nor is it sufficient to ensure offices are subject to the application of 'town centre first' approach across the catchment area they serve. Does not appear there is evidence to justify provision for offices outside the centres of Lichfield and at Burntwood. Shenstone Neighbourhood Plan provides for provision of offices and it is considered that the floorspace provided through 'additional' allocations should be subtracted from the overall quantum of offices to be provided at 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.</p> <p>Retail: In respect of Site LC27 it would useful if a clear definition of "bulky goods" could be provided and it should be set out in what circumstances the sequential and impact tests might be applied if / when other developments come forward in the catchment area such as Friarsgate.</p> <p>Provision for gypsy and travellers: Notes the number of traveller pitches to be allocated under policy GT1 does not meet the identified need.</p> <p>Confirms Walsall will continue to work with Lichfield in the context of the Strategic Growth Study and to discuss issues under Dtc.</p>	None	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.

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FC244	Mark Rose (Define Planning & Design) on behalf of Hawksmoor Property Services	Whole Document	[Left blank]	[Left blank]	No	Yes	Yes	<p>LDC has not progressed its Local Plan Review despite the commitment in both the Local Plan Strategy and the Allocations document. Allocations document does not consider the potential for the safeguarding of land to long term development needs beyond 2029.</p> <p>Local Plan Review should be brought forward without delay, questionable whether LDC should continue to dedicate time and resources to progressing the Allocations document at the expense of progressing a Full Review of the Local Plan. Commitment to review should be established within policy in the Allocations document.</p> <p>As recognised in both the Strategic Green Belt Review (2012) and its Supplementary Report (2013) there will, therefore, be a need for a further revision to the Green Belt boundaries to the south of the City. That reflects the reality that the capacity of the available land within the urban areas in the District is ultimately limited, and that the allocation of a portfolio of development sites in sustainable locations is required to meet the District's identified development needs. Land at Fossey Lane, which is currently designated Green Belt should be allocated for development in the Local Plan Review.</p>	None	Representations noted. Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy. Paragraph 4.7 of the LPA commits the Council to undertaking a Local Plan Review. The Council has set out its timetable for the Local Plan Review within its Local Development Scheme.
FC245	Neil Cox (Pegasus) on behalf of Richborough Estates	Whole Document	[Left blank]	[Left blank]	No	Yes	Yes	<p>Promotes land at Huddlesford Lane, Whittington for residential development.</p> <p>Land at Huddlesford Lane was previously allocated as part of the Local Plan Allocations Reg 19 document (Site Ref: W1), however the Focused Changes removes this allocation and is considered a retrograde step resulting in the plan becoming unsound.</p> <p>Considers the spatial distribution of housing growth is significantly different from the spatial strategy established through the Local Plan Strategy which significantly less development being focused in Rural South and East Sub-HMA. The lack of growth within the LPA undermines the role and function of Key Rural Settlements of Whittington, Fazeley and Shenstone providing a level of growth that is significantly lower than the housing requirement. There is 12.5% of growth proposed in 'Other Rural' which is in excess of the 10.5% allocated within Key Rural Settlements through the Local Plan Strategy. The spatial distribution of growth proposed in the Focused Changes will not effectively deliver the spatial strategy of the adopted LPS.</p> <p>Considers that further sites/s should be allocated at Whittington to build in flexibility and provide certainty that the Allocations will deliver the spatial strategy for the settlement. Confirms land at Huddlesford Lane is suitable, deliverable and achievable for the development approximately 70 dwellings. The site is free of constraints and provides a logical, sustainable extension to the village of Whittington.</p> <p>Supports the commitment to a full Review but considers the Allocations document needs to provide further clarity and certainty in respect of the date by which a MoU to deal with the distribution of growth and unmet need for the GBHMA will be signed and the date for adoption of an updated Local Plan. Considers if elements of the adopted spatial strategy are considered out of date and further evidence regarding the GBHMA shortfall is published it may be more appropriate to abandon the LPA document and instead prepare the Local Plan Review.</p> <p>Concerns regarding the realism that all allocated sites will come forward. The evidence prepared by the Council justifies the need to look beyond the existing urban area to allocate sites to ensure the spatial development strategy can be delivered. It is considered necessary to allocate land to deliver at least 72 additional dwellings to meet Whittington's upper housing requirement of 110 dwellings. Concerns the removal of previously allocated sites will further undermine the Council's ability to demonstrate a rolling five year supply of deliverable housing land.</p> <p>Does not support the approach taken in the Focused Changes document. The Council has sought to avoid the release of Green Belt land at the cost of sustainability, resulting in a less sustainable distribution of growth.</p> <p>Consider exceptional circumstances exist to justify the release of Green Belt land at Whittington in the context of the requirements of the NPPF.</p> <p>To overcome areas of unsoundness, further allocations, outside existing settlement boundaries is required within the Key Rural Settlements that lie within the Rural South and East Sub-HMA to ensure delivery of the LPS and allow the role of the Key Rural Settlements to be maintained.</p>	None	Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.

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FC246	James Hollyman (Harris Lamb) on behalf	[Left blank] Policy S1: Shenstone Housing Allocations	Yes	Yes	No	Yes	Yes	<p>Concerns about the deliverability of proposed allocation S1: Land at Lynn Lane. Any proposal to reallocate land at the estate for alternative uses should be justified by marketing evidence demonstrating a lack of demand to occupy the estate for employment use. It needs to be demonstrated that the whole site is not required for employment use over the whole plan period, to 2029. Environment Agency's flood map shows that almost half of the proposed allocation is within Flood Zone 3 (Footherley Brook runs through the site). Concerns about noise, design and access are expressed.</p> <p>Opportunities to accommodate housing in Shenstone on previously developed sites are clearly limited. Therefore Green Belt sites will be required and priority should be given to those sites which are adjacent to the settlement boundary. Land off Court Drive should be removed from the Green Belt and allocated for residential development. SHLAA states that it is deliverable with a proposed yield of 73.</p> <p>Policy S1 should not allocate Site S1: Land at Lynn Lane for development and should allocate Land off Court Drive for Class C3 residential/ Class C2 residential care.</p>	None	Comments noted. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling and employment requirement. Site S1 is allocated through the 'made' Shenstone neighbourhood plan.
FC247	Neil Cox (Pegasus) on behalf of Richborough Estates	Whole Document	[Left blank]	[Left blank]	No	Yes	Yes	<p>Supports the commitment to a full Review but considers the Allocations document needs to provide further clarity and certainty in respect of the date by which a MoU to deal with the distribution of growth and unmet need for the GBHMA will be signed and the date for adoption of an updated Local Plan. Considers if elements of the adopted spatial strategy are considered out of date and further evidence regarding the GBHMA shortfall is published it may be more appropriate to abandon the LPA document and instead prepare the Local Plan Review. Consideration needs to be given to the arising needs of the constrained borough of Tamworth. There is a need for Lichfield and North Warwickshire to deliver a further 825 dwellings between them to address Tamworth's shortfall and an appropriate proportion of this further unmet and quantified need should be dealt with in the Local Plan Allocations document.</p> <p>There is a pattern of non-delivery within Fazeley, Mile Oak and Bonehill. Consider further land should be identified within Fazeley, Mile Oak and Bonehill to ensure the Local Plan is effective in ensuring the housing requirement of 350 for the settlement can be delivered within the plan period. In light of the issues surrounding the deliverability of 1000 units within the North of Tamworth BDL, Fazeley, Mile and Bonehill provides a logical and sustainable location for providing the residual housing requirement that cannot be delivered to the North of Tamworth.</p> <p>Considers the spatial distribution of housing growth is significantly different from the spatial strategy established through the Local Plan Strategy which significantly less development being focused in Rural South and East Sub-HMA. The lack of growth within the LPA undermines the role and function of Key Rural Settlements of Whittington, Fazeley and Shenstone providing a level of growth that is significantly lower than the housing requirement. There is 12.5% of growth proposed in 'Other Rural' which is in excess of the 10.5% allocated within Key Rural Settlements through the Local Plan Strategy. The spatial distribution of growth proposed in the Focused Changes will not effectively deliver the spatial strategy of the adopted LPS. Considers additional land needs to be allocated</p>	None	Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.
FC248	Paul Rouse (Savills) on behalf of Rugeley Power Limited	Policy R1: East of Rugeley Housing Allocations	Yes	No	No	Yes	Yes	<p>Paragraph 11.3 refers to the Borrow Pit within the East of Rugeley SDA, as being anticipated to deliver approximately 450 dwellings. That paragraph then goes on to state that in accordance with Appendix E, the Borrow Pit is to be retained as a landscape /water feature. The Borrow Pit is a separate site outside the R1 allocation. The Borrow Pit is part of the East of Rugeley SDA allocated by LPS CP6. Policy R1 and in combination Appendix E and Table 4.1) cannot delete the adopted LPS policy that applies to the Borrow Pit and surrounding land. A related objection is made to Table 4.1, and Appendix E as it is not possible for policy R1, Table 4.1, or Appendix E to change adopted LPS policy CP6.</p> <p>Supporting text to R1 should support the provision of access through the Rugeley SDA site and specifically through the Borrow Pit Area. The Council is fully aware that an access from the A513 into the Borrow Pit area is necessary to achieve development of that site and the R1 site. This is even more necessary given the provisions of the HS2 Phase 2a Bill which may inhibit the ability to achieve vehicular connection between the east and west parts of the Rugeley Power Station site.</p> <p>Policy R1 should be amended to make clear that the minimum 800 dwelling allocation is in addition to the Borrow Pit contribution to the East of Rugeley SDA. R1 should not attempt to delete the balance of the East of Rugeley SDA allocation which currently applies to the Borrow Pit site.</p>	None	Comments noted. Rugeley Power Station SPD states that it is aspirational to retain the Borrow Pit. Local Plan Allocations states that development of site should have consideration and accord to the SPD.

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FC249	Paul Rouse (Savills) on behalf of Rugeley Power Limited	Policy R1: East of Rugeley Housing Allocations	Yes	No	No	Yes	Yes	<p>Table 4.1 identifies the residual balance of housing to be delivered from the Strategic Development Allocations, including the SDA at East of Rugeley. The table incorrectly records the balance of housing to be delivered at the East of Rugeley SDA and this appears to be a deliberate attempt to change the adopted LDS CP6 allocation.</p> <p>Table 4.1 is presented in such a way as to conceal the attempted deletion of the approximately 450 dwellings (and up to 503 in accordance with LPS CP6) from the Borrow Pit site. The 800 dwellings shown as the Local Plan allocation in Table 4.1 are an additional allocation made by LPA policy R1 which the policies map shows clearly to be entirely separate and additional to the LPS CP6 site.</p> <p>The Proposals Map Inset for East Of Rugeley within the LPA continues to correctly show the Borrow Pit within the East of Rugeley SDA, and shows the R1 allocation as a distinct and separate site. The LPA text at Table 4.1 and policies R1 and Appendix E must be amended to be consistent with the policies map and with the adopted LPS.</p> <p>Table 4.1 should be amended to correctly reflect the balance of housing to be delivered in the East of Rugeley SDA, which is 49 dwellings committed (with planning permission but not yet built) and 503 remaining within the LPS CP6 allocation of 1,125.</p>	None	Comments noted. Rugeley Power Station SPD states that it is aspirational to retain the Borrow Pit. Local Plan Allocations states that development of site should have consideration and accord to the SPD.
FC250	Paul Rouse (Savills) on behalf of Rugeley Power Limited	Policy R1: East of Rugeley Housing Allocations	Yes	No	No	Yes	Yes	<p>The matters set out at Appendix E are a 'Key Development Consideration' as referenced in Policy R1, with which development should comply. Appendix E contains a number of requirements which are unreasonable and inappropriate. E2 states that the development should ensure that it makes best use of the land. This is supported. E3(1) states a minimum of 800 homes. This is supported. It is noted that this relates to Rugeley Power Station land other than that included within LPS CP6.</p> <p>Requirements for enhancement of ecology in addition to protection should be deleted. Protection and / or mitigation to equivalent value is appropriate. The requirement to retain existing trees and hedgerows should be revised to it being desirable to do so where it is possible and the trees and hedgerows are in good condition and have a long life remaining.</p> <p>The requirement to retain existing sports pitches should be deleted. This should be replaced by a requirement for sports pitch provision to be in accordance with standards set out in the LPS. This may include retention of existing sports pitches where feasible or new / replacement provision.</p> <p>The requirement to retain the Borrow Pit as a water feature should be deleted as it is outside the policy area and contrary to LPS CP6.</p> <p>Requirements for pedestrian, cycle and vehicular access links with neighbouring third party land holdings should be deleted as requirements, unless the achievement of those requirements is within the control of and delivered by Lichfield DC. The requirement for public art should be deleted and replaced with support for public art provision as part of the development. The requirement for a community hub should be deleted and replaced with clear and justified guidance as to what is necessary in terms of sport, community and education provision to comply with adopted LPS policy. The requirement for convenience retail provision should be deleted and replaced with support for convenience retail provision. The requirement for all development to be within 350m of a bus stop should be changed to be within 400m of a bus stop in accordance with best practice guidance.</p>	None	Comments noted. Rugeley Power Station SPD states that it is aspirational to retain the Borrow Pit. Local Plan Allocations states that development of site should have consideration and accord to the SPD.

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FC251	Neil Cox (Pegasus) on behalf of Richborough Estates	Whole Document	[Left blank]	[Left blank]	No	Yes	Yes	<p>Promotes land off Coulter Lane, Burntwood for residential development. Confirms the site is suitable, developable and deliverable for between 400 - 500 dwellings.</p> <p>Policy B1 of the Local Plan Allocations Document March 17 identified 19 allocations totalling 720 dwellings including the removal of land to the east of Coulter Lane from the Green Belt. The Focused Changes document removes the Green Belt sites which results in a net loss supply of 345 dwellings at Burntwood. The Local Plan Allocations as drafted fails in its role as a deliver vehicle to ensure growth requirements are met in respect of Burntwood as set out within the Local Plan Strategy. It results in a Plan that is not positively prepared, not justified or effective from a housing delivery perspective. It has no regard to housing requirement identified for Burntwood within the adopted Local Plan Strategy.</p> <p>Supports the commitment to a full Review but considers the Allocations document needs to provide further clarity and certainty in respect of the date by which a MoU to deal with the distribution of growth and unmet need for the GBHMA will be signed and the date for adoption of an updated Local Plan. Considers if elements of the adopted spatial strategy are considered out of date and further evidence regarding the GBHMA shortfall is published it may be more appropriate to abandon the LPA document and instead prepare the Local Plan Review.</p> <p>Local Plan Strategy commits the LPA to identify any changes to Green Belt boundaries that do not have a fundamental impact on the overall strategy. The LPS requires the LPA to consider whether the existing Green Belt boundary remains appropriate when considering the needs within the current Plan period and the longer term needs of the District beyond the plan period. Due to the constrained nature of Burntwood there is a requirement to remove land from the Green Belt for immediate housing delivery and a requirement to identify safeguarded land to allow for longer term development beyond the Plan period.</p> <p>Submits a promotion document in support of the development of land to the east of Coulter Lane and land to west of Coulter Lane.</p>	None	The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.
FC252	Jason Carwood	Policy W1: Whittington Housing Allocations	Yes	[Left blank]	Yes (positively prepared and justified) No (Effective and consistent with NPPF)	Yes	No	<p>Impact of under provision in Whittington makes the settlement vulnerable to a non-plan based proposal for housing due to its lack of provision in the Local Plan and emerging Neighbourhood Plan. Prudent to consider other additional sites local to the settlement which would help to meet its needs.</p> <p>Sites beyond the settlement boundary including Green Belt land may need to be used to meet the local need of up to 110 homes. Two areas for Whittington are particularly identifiable as potential infill sites, between existing development to the north-east boundary of the settlement north-east of Back Lane and south of the village, east of Common Lane. Inclusion of these sites would reduce the risk of inappropriate development on other sites around the settlement which do not meet NPPF infill criteria.</p>	None.	Comments noted. The Local Plan Allocations document meets the overall dwelling requirement as set out within the Local Plan Strategy.
FC253	Sport England (Ravjir Bahey)	Sites NT1, R1, L27, B3, Appendix E2	[Left blank]	Yes	No	Yes	No	<p>Site NT1 - major housing site north of Tamworth will need to provide sports infrastructure taking account both the Lichfield and Tamworth sporting infrastructure needs. Tamworth has an up to date sport strategy, Lichfield does not.</p> <p>Site L27 - Noise from the adjacent football clubs should be included within the key development considerations. Potential that siting residential development in close proximity to the football club could contain the clubs existing operations and any future growth of the site which would be inconsistent with NPPF paragraph 123.</p> <p>Site B3 - welcome removal of text relating to the 'redundancy rule' from key development considerations. However the text relating to mitigation refers only to playing pitches and not recreational buildings (ancillary facilities) which is inconsistent with Sport England policy and NPPF paragraph 74.</p> <p>Site R1 - Lack of reference to existing sports facilities on site fails to be consistent with NPPF paragraph 74. it is noted that Appendix E2 references a new community/sports building and new sports provision which is welcomed but does not recognise the need to protect/replace existing facilities.</p>	None	Comments noted. Site NT1 has recently been subject to a call in planning inquiry, details around infrastructure provision including sport infrastructure considered at the inquiry. With regards to site L27 this currently benefits from outline planning permission, details around noise and adjacent uses to be dealt with through the planning applications stage. Site R1 is supported by an adopted SPD which provides further detail on the redevelopment of the site including the provision of sporting facilities. The SPD has been informed by comments received from Sport England. With regards to site B3 there are no recreational buildings within the site.

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FC254	Jane Field (Environment Agency)	Whole document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Welcomes the removal of Site S2 and S3 in Shenstone, as they were partially affecting by flooding. Site A2: Dark Lane, Alrewas, has flooding risk concerns. The area is currently covered by the Environment Agency's flood warning service. Level 2 SFRA advises climate change will increase flood risk to parts of the site and could impact on safe access/ egress. A site specific flood risk assessment will be required to support any new development proposals.</p> <p>Site OR3: Footherly Hall. Site is immediately adjacent to the Footherly Brook (main river). The Western part of the site is in Flood Zone 3 (13%) and 2 (2%). It should be possible to manage the level of risk through appropriate site layout / design and the provision of mitigation measures such as floodplain compensation and raising finished floor levels at the western edge of the proposed development. The current planning permission has been designed under outdated climate change allowances therefore any new application on this site would be subject to more stringent requirements.</p> <p>Site OR5: Colton Road. Site does not lie within the floodplain, but is constrained by flooding on surrounding roads. Recommend a flood warning and evacuation plan is submitted with any future planning applications.</p> <p>Not immediately apparent that a sequential test has been undertaken by the Council with regards to sites at risk of flooding either as a standalone document or within the Sustainability Appraisal. Policy IP2: Lichfield Canal. Welcome the revised wording and supporting text as previously agreed with the Council.</p>	None	Representation noted. Site A2: Dark Lane benefits from detailed planning permission and site specific SFRA. The District Council has undertaken a sequential test which supports the proposed allocation of the sites. It should be noted that the sites noted within the representation benefit from planning permission and are supported by site specific flood risk work as part of the planning application process. The detailed flood information submitted as part of the representation has been included within the comments box for site specific question 1, Sustainability Objective 10 Appendix E Sustainability Appraisal.
FC255	James Chadwick (Staffordshire County Council)	Whole Document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Habitats Regulation Assessments notes that the Focused Changes document will have a lesser impact upon the Cannock Chase SAC than the previous version as it reduces the amount of development in the 0-8km zone of influence. Given the proximity to the Cannock Chase SAC of Site R1: East of Rugeley at the former Power Station site consideration is required of whether there is a need for additional mitigation measures.</p> <p>Housing allocations in Policy B1: Burntwood Housing Allocations will rely on Chasewater Country Park for open space and recreation, provision will need to provide mitigation of impacts on the Chasewater and Southern Staffordshire Coalfield Heaths SSSI by means of planning obligations.</p> <p>For clarity it may be useful to define the term 'Heritage Asset' within the Explanation paragraphs (7.1 to 7.5) or to include a cross reference to the NPPF Glossary.</p> <p>Following sites have high potential for affecting archaeological remains which has not been identified within the document; Site L1, Site L17, Site L23, Site L28, Site L29, Site L31 and Site W2. Any application should be supported by a heritage assessment and where groundworks form part of the development archaeological mitigation will be required.</p> <p>Cumulative effect of allocation of Site L2 (east of Lichfield/ Streethay) and Site OR7 (land at Curborough craft centre) might raise concerns, however the area will be subject to major change as a result of HS2. Council advised to develop a strategic landscape masterplan.</p>	None	The need for 'mitigation measures' is considered through the HRA for the Local Plan Allocations Focused changes document and at Appendix E at para 16 which requires that regard be had to the SAC. Policy NR7 in the adopted Local Plan Strategy and the adopted 'Guidance to Mitigate..' provides sufficient mitigation and the opportunity to provide bespoke mitigation should the developer wish. Heritage Assessment would be required on appropriate sites at the planning application stage. Site Specific Question 7 Sustainability Objective 2 facilitates the assessment of effect on sites of archaeological importance. The detailed archaeological information provided within the representation against the following sites (L1, L17, L23, L26, L28, L29, L31 and W2) has been included within the comments section against Site Specific Question 7 Sustainability Objective 2. The scores associated with the following sites L17, L23, L31 and W2 have been amended to reflect comments received.

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FC256	Neil Cox (Pegasus) on behalf of Drayton Manor Park	Pages 17 - 20 (Chapter 5)	[Left blank]	[Left blank]	No	Yes	Yes	<p>Allocations document given that the Park is currently covered by saved Policy Emp: Major Developed Sites in the Green Belt which is due to be deleted. Seeking continued protection from the full effect of national and Development Plan Green Belt policy to facilitate long term sustainable development and growth at Drayton Manor Park.</p> <p>Drayton Manor Park is currently a key contribute to the local economy of Lichfield District, Tamworth Borough and the wider West Midlands attracting 1.2 million visitors per year, supporting more than 400 FTE and 700 people overall. The Park intends to upgrade its facilities and invest in delivering new facilities and attractions. The Vision Document provides an overview of the long term proposals and the associated phasing plan.</p> <p>The current proposed Allocations would result in the whole of Drayton Manor Plan becoming subject to the full weight of Green Belt policy. This is an oversight of not including a policy allocation within the LPA document relating to Drayton Manor Park and it could have significant detrimental economic impacts to the District and neighbouring Local Authority areas. Crucial the LPA document incorporates a positive policy framework for Drayton Manor Park so that the future growth and development of the Park is not unduly restricted and a level of certainty is provided.</p> <p>Allocating land at Drayton Manor Park provides an opportunity for a SPD to be prepared providing further guidance that can assist in development management decisions relating to the Park. Makes comparison to Staffordshire Moorlands DC Churned Valley Masterplan SPD which specifically identifies Alton Towers as an 'Opportunity Site' and Wyre Forest DC who identify West Midlands Safari & Leisure Park as 'Previously Developed Site in the Green Belt' under Policy SAL.PDS1.</p>	None	Representation noted. Core Policy 10 of the adopted Local Plan Strategy states that existing local and national tourist attractions including Drayton Manor Theme Park will be supported and promoted where they do not conflict with other Core Polices.
FC257	Kezia Taylerson (Historic England)	Whole document	[Left blank]	[Left blank]	[Left blank]	[Left blank]	[Left blank]	<p>Welcome the amendment to Policy IP2 and inclusion of text referencing the historic environment. Support the inclusion of a policy on the Cannock Chase AONB area (Policy NR10) and would request a reference to the need to protect and enhance the historic environment of the AONB.</p> <p>Recommends a number of amendments to the wording of Policy BE2: Heritage Assets.</p> <p>Welcome specific design criteria included within the Plan that recognised key heritage sensitivities and where more assessment was required.</p> <p>Staffordshire County Council archaeology service have identified sites where there could be a sensitivity for archaeology, requests where this has been identified that a clause be added to relevant site allocation policy to ensure that it is sound.</p> <p>If the Council has not undergone any assessment to identify what historic views and skylines in relation to Lichfield Cathedral, then protection should be included within the Plan including clauses reflecting appropriate and informed building heights and key views.</p> <p>Repetition in respect of Lichfield Cathedral and setting issues such as Site L19 where the design considerations are duplicated.</p> <p>Where 'scheduled ancient monuments' are referenced these are replaced with 'scheduled monuments'.</p>	Yes	Comments Noted. The historic environment of the AONB is recognised and protected through adopted policy NR5. No newly designated heritage assets have been designated which lie within Lichfield District. The views of the Cathedral and skylines are safeguarded in adopted Policy CP14 and BE1. The policies operate well and have been used to require assessments on individual applications. The wording to BE2 was agreed previously by Historic England, a further minor modification is proposed. The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites. All of these sites have been assessed against 16 Sustainability Objectives through 57 Site Specific Questions. SA Sustainability Objective 4 Site Specific Question 3 relates directly to the effect on historic views and vistas. Propose minor modifications to change reference to scheduled ancient monuments to ancient monuments.

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FC258	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy LC1	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation</p>
FC259	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy NT1: North of Tamworth Housing Allocations Site NT1	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Allocated Site NT1 is currently subject of a called-in planning application inquiry. Should the enquiry determine the site is not suitable then the site should be deleted from the plan.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.</p>
FC260	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy OR1	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Site OR1 scored poorly on the SA in regards to biodiversity, historic landscape features, location and transport links. It is an opportunity to bring a listed building back into use - thus a case around enabling development rather than site suitability and sustainability. The site is in a unsustainable location and within the Green Belt. There are more sustainable sites which are not within the Green Belt available for housing development and these should be utilised before 24 dwellings are placed within the Green Belt.</p>	None	<p>Comments noted. Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. Site OR1 has an extant permission for 24 units (Application Reference: 15/00485/FUL). The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation</p>

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FC261	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy OR1: Other Rural Housing Allocations Site OR8	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Paragraph 4.5 of section 4 of the Local Plan Allocations states that no land is needed to be removed from the Green Belt. While the site may not be removed from the Green Belt and development which complies with the NPPF may be possible, there are more sustainable sites which are not within Green Belt available for housing development than Site OR8. The erection of 22 dwellings on a site which currently only contains 12 dwellings will also likely have an impact on openness which will be contrary to the aims of the NPPF. It is considered that these should be utilised before 24 new dwellings are placed within the Green Belt.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. Site OR8 has permission for 22 units (net 12). (Application reference; 16/01232/FULM). The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation</p>
FC262	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy W1 (Site W3)	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Site W3 scored poorly on the Sustainability Objectives relating to historic features, loss of greenfield and loss of agricultural land. Considered the site should be scored a significant negative on Objective 4.2. Site is within the Conservation Area and contains protected trees. This greatly constrains the site and reduced the design - led opportunities to manage the constraints. The urban form of the immediate area means any residential development in the allocated site is unlikely to be in keeping with the surrounding area. This would reduce the sustainability of the site accordingly.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation</p>

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FC263	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Whole document Sustainability Appraisal	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation</p>
FC264	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy OR1 (Site H1)	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Site H1 scored poorly on ability to conserve protected species, respect and protect existing landscape character, sustainable modes of transport and ability to improve air, soil and water quality. Considers site should score negative on ability to preserve and enhance the conservation areas. Site should be considered as mainly greenfield and that this would therefore be a significant negative effect when scored against Sustainability Objective. Allocation is seen as an less sustainable location that other sites which could come forward.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation</p>

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FC265	Kathryn Venham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy LC1: Lichfield Housing Allocations Site L10	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Considered that given the site is located within close proximity to both the A38 and the S5127, as well as the West Coast Mainline rail line, that noise mitigation will be required. Coupled with ecological mitigation that will be required, means that an already high density of 38 dwellings per hectare is unrealistic and unobtainable. The number of units allocated to this site should be lowered to a more achievable and realistic level and the need for housing reflected more accurately across all the allocated sites.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation</p>
FC266	Kathryn Venham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy NT1: North of Tamworth Housing Allocations	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Allocated Site NT1 is currently subject of a called-in planning application inquiry. Should the enquiry determine the site is not suitable then the site should be deleted from the plan.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence.</p>
FC267	Kathryn Venham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Policy W1: Whittington Housing Allocations	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Site W3 scored poorly on the Sustainability Objectives relating to historic features, loss of greenfield and loss of agricultural land. Considered the site should be scored a significant negative on Objective 4.2. Site is within the Conservation Area and contains protected trees. This greatly constrains the site and reduced the design - led opportunities to manage the constraints. The urban form of the immediate area means any residential development in the allocated site is unlikely to be in keeping with the surrounding area. This would reduce the sustainability of the site accordingly.</p>	None	<p>Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA.</p> <p>The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation</p>

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FC268	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Whole document	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Proposes site for residential allocation to the north east of Lichfield adjoining Site OR7: Land at Watery Lane. Site is not within the Green Belt and could provide approx. 4.89ha of residential land, achieving 180 dwellings at 37dph. Additional documents include sustainability appraisal for the site and sustainability ranking of all sites and the proposed Meadows site showing its sustainability compared to allocated sites. Vision document states that the site is available, suitable and achievable.</p>	None	Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. An assessment of the proposed alternative site can be found in Appendix E of the Sustainability Appraisal under the reference Post 2nd Regulation 19 Consultation.
FC269	Kathryn Ventham (Barton Willmore) on behalf of Sarah Milward (IM Land)	Whole document	Yes	Yes	No	Yes	Yes	<p>The inclusion of sites which have significant constraints to development at the expense of sites which have few constraints (and none which impact on the ability of the site to come forward for development) will hinder the ability of the plan to meet the full OAN. Those sites where concerns have been identified should be deleted and replaced with the sites being promoted by IM Land who have a proven track record in the District.</p> <p>Those sites which have been identified as having constraints to their development should be replaced by IM's interests at Curborough which are non-Green Belt sites, and which are suitable, available and deliverable.</p> <p>Proposes site for residential allocation two miles north of Lichfield City adjacent Site OR7: Land at Watery Lane. Site is not within the Green Belt and could provide approx. 0.89ha of developable land for up to 40 dwellings. Additional documents include sustainability appraisal for the site and sustainability ranking of all sites and the proposed Orchards site showing its sustainability compared to allocated sites. Vision document states that the site is available, suitable and achievable.</p>	None	Comments noted. The adopted Local Plan Strategy sets the spatial strategy and settlement hierarchy for the District. The Local Plan Allocations document forms the second part of the Local Plan and seeks to allocate sites in accordance with the adopted Local Plan Strategy to meet the overall dwelling requirement. The Local Plan Allocations document proposes to allocate all urban capacity and brownfield sites which are considered to be deliverable and capable of allocation through the Local Plan, this is supported by evidence. An assessment of the proposed alternative site can be found in Appendix E of the Sustainability Appraisal under the reference Post 2nd Regulation 19 Consultation.
FC270	Sushil Birdi (Tamworth Borough Council)	Whole document	Yes	Yes	No	Yes	Yes	<p>Tamworth is unable to meet its housing and employment needs. LDC & NWBC agreed to take on 500 units each through a MOU but the balance of 825 units remains to be agreed. It is understood NWBC are proposing to include a further 120 units for Tamworth reducing the balance to 705 units. LDC and NWBC have made no further progress in identifying a method to allocated the remaining unmet need between them. It's understood the Councils feel the unmet need is part of the wider HMA unmet need that will be dealt with through a Local Plan Review. Tamworth's position is that the unmet need should be dealt with now as indicated in para 4.6 of the Local Plan Strategy. Lichfield are requested to assist in meeting Tamworth's need for one Gypsy and Traveller residential pitch. No work has been undertaken to determine the amount of employment land to be delivered by LDC and NWBC to meet Tamworth's unmet need. Confirms positive discussions have taken place recently to seek to address cross boundary issues.</p> <p>Arkall Farm has been subject to a call in from the SoS and a recent Public Inquiry. We do not know the outcome for this however a development timetable was discussed and the conditions proposed by LDC allow only 500 units to be delivered by the year 2029. It was clear during the Inquiry that development would generate significant impacts that would need to be mitigated.</p> <p>There is a need for a mechanism for collecting and assigning developer contributions to support appropriate infrastructure delivery in Tamworth that is reflected in policy.</p> <p>The site allocations is proposing to allocate development above Lichfield's housing need amounting to 10,030 units. The plan identifies an overprovision of 1,229 units, in view of the additional capacity there is scope within the allocations plan to deal with housing shortfall in Tamworth and agree the division of need with NWBC.</p> <p>No mechanism for affordable housing as part of meeting Tamworth's needs has been put forward, for example nomination rights to TBC.</p>		Comments noted. There is a MOU in place between TBC, LDC & NWDC which commits LDC to accommodating 500 dwellings to meet the needs arising within Tamworth Borough. The MOU does not commit LDC and NWBC to sharing the residual shortfall of 825 dwellings. This shortfall will be considered as part of the overall housing shortfall present within the Greater Birmingham Housing Market Area.

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FC271	John Sewell	Table 4.1, Table 5.1, Para's 9.1, 9.6-9.8, Policy Burntwod 3, Proposals Maps 3, 23	Yes	Yes	Yes	No	No	Plans for the regeneration of Burntwood Town Centre are now more specific and focussed and will be a focus for investment; the number of new homes will be close to that quoted in the adopted Local Plan Strategy; Burntwood's housing needs can be met without the need to remove land from the Green Belt; the Green Belt boundary will be drawn tightly around the St Matthews estate; Plans to prioritise housing development on brownfield sites are more strongly endorsed than in the draft allocations document; LDC have responded positively to the 4000+ letters from Burntwood and Hammerwich residents. Whilst welcoming these changes Burntwood Action Group still has numerous concerns; will the planned review of the Local Plan and Green Belt Review reverse the above changes to accommodate the anticipated request for Lichfield District to accommodate homes for Birmingham; improvements to Burntwood's infrastructure are still not keeping pace with housing development and the realisation of the goal to make Burntwood a healthier, more sustainable place to live and work.	None	Representation noted. Paragraph 4.7 & 4.8 commits the Council to undertaking a Local Plan Review which will consider the housing shortfall from neighbouring authorities. The Council anticipates consulting on the Local Plan Review Scope, Issues & Options consultation in April 2018.
FC272	John Spurling (RPS) on behalf of Fradley West Consortium	Sustainability Appraisal - whole document, Appendix E	Yes	No	No	Yes	Yes	Appendix E of the Sustainability Appraisal (2017) contains factually inaccurate assumptions relating to Fradley junction (Ref 838): 1) The assessment for Objective 4 Question 4 states that "There is a significant gap between the site and the key rural settlement of Fradley" and provides a double negative score. In actual fact the site will directly adjoin the new expanded settlement boundary. It should therefore have been scored at least minor positive. 2) The assessment for Objective 5 Question 1 states that the site is greenfield. This is factually incorrect as the site is previously-developed land, comprising a former military establishment and the definition extends to the entire curtilage. The brownfield status has been confirmed within the SHLAA 2017. There are various other scores within the matrix for Fradley junction which are disagreed with but the view is taken that the above amount to factual errors which render the SA process flawed and in conflict with the relevant regulations.	None	The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (2004 Regulations). The methodology used in the SA was set out in the Scoping Report dated December 2017 and was the subject of formal consultation prior to the commencement of the appraisal process. Section 5 of the Scoping Report includes the scoring criteria used in the SA. The SA has considered and assessed 228 residential, 64 employment and 21 gypsy and traveller sites potential alternative sites. The Council considers these sites meet the requirements for 'reasonable alternatives' required by the 2004 Regulations. Each of the potential sites have been assessed in an impartial and consistent manner using the evidence base prepared for the Lichfield District Council - Local Plan Allocations. The results of the SA process are set out in the SA Report that accompanied the Local Plan Allocation Consultation".