

	<p>circumstances this should be in line with Staffordshire County Council’s Rights of Way Improvement Plan and could include:</p> <ul style="list-style-type: none"> <li>- the creation of bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists.</li> <li>- the creation and promotion of short circular walks to promote the health benefits of walking.</li> <li>- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council’s Least Restrictive Principle for path furniture</li> </ul> <p>The County Council is able to provide further advice and guidance as and when required. However, <b>it is suggested the Plan makes reference to Staffordshire County Council’s Rights of Way Improvement Plan</b> in the supporting text to T&amp;M 2.</p> <p><b>Flood Risk and SuDS.</b> We welcome strategic Aim 6: ‘Flooding and Drainage - To ensure that new development in Whittington and Fisherwick does not exacerbate the risk of flooding’ and that the risk of flooding is considered early within the development process. There is history of flooding from the village, given that Whittington is located within a shallow depression, and the village is susceptible to overland flow from the agricultural areas, several networks of pipework to surcharge when overwhelmed.</p> <p>We also welcome Policy DP3 Flood prevention &amp; management (objective 1), which will encourage developers and consultants to rigorously consider the drainage implications of any development. We also welcome the intention to restrict sites to greenfield run-off rates. Policy D3: sustainable design features and that porous/permeable surfacing for drives etc. are to be encouraged. We are supportive of any new development that ensures that they help improve and not worsen water quality and include SuDS features to attenuate and restrict site outflows.</p> <p>There are numerous watercourses and ditches across the Whittington and Fisherwick area, such as the Birmingham &amp; Fazeley Canal / Coventry canal; Mare Brook; the Tame to the eastern boundary; the Leasow Brook; and we have recognised flooding hotspots in Whittington village. Fisherwick is seemingly less affected by flooding concerns. Other benefits include slowing down/temporarily storing water to help reduce localised flooding.</p> <p>Green links also have the potential to offer multiple benefits to the existing amenity and biodiversity that it will add to the area. Green links can be used as sustainable drainage features to help accommodate surface water from carriageways or where surface water is pooling from impermeable urban areas in terms of being able to collect and convey surface water run-off to prevent any standing water build-up and for additional attenuation capacity.</p>	<p>Noted, no amendment required but meeting will be sought with SCC</p> <p>Agreed text to be amended</p> <p>Support noted and welcomed</p> <p>Analysis and support noted and welcomed. Information will be added to the evidence base.</p>
--	---	--

	<p>We would also recommend that any major proposal considers the detailed inclusion of two SuDS treatment trains with adequate space and areas where they could be located. This should demonstrate attenuation, storage and treatment capacities as detailed in the CIRIA SUDS Manual (C697) and updated CIRIA C753. We would advocate the inclusion of more areas of open space to incorporate conveyance and attenuation systems such as filter drains, swales and even proposing rainwater harvesting for any future dwellings.</p> <p>In terms of the recently published Environment Agency climate change advice, depending on the lifetime of the development, we would recommend that the attenuation is designed to accommodate the 1:100 year &amp; 30% cc storm event and understand the flooding implication for the 1:100 year &amp; 40% cc event. It could be that additional mitigation is required and that any proposal should design for exceedance.</p> <p>As with any development, we advise that external levels fall away from property to minimise the flood risk from a variety of sources. Any overland flows generated by the proposed development must be carefully controlled. In terms of the recently published Environment Agency climate change advice, we would recommend that the attenuation is designed to accommodate the 1:100 year &amp; 30% cc storm event and understand the flooding implication for the 1:100 year storm &amp; 40% cc event. It is possible that additional mitigation is required and that any proposal should design for exceedance</p> <p>In terms of the highlighted sites, please find our comments below:</p> <p><b>Site W1</b> (Whittington 1): Land at Huddlesford Lane, Whittington – 2.7ha, 60 dwellings - The site is not shown to be adversely affected by the updated flood map for surface water (uFMfSW) of at risk from fluvial (river flooding). There is a pond on-site to the north-eastern corner, which could be naturally occurring or from previous agricultural use. The subsurface is potentially suitable for infiltration SuDS although the design will be influenced by the ground conditions. Any application would have to quantify infiltration rate via an infiltration/soakaway test and consider whether infiltration can be used as a SuDS technique alongside side SuDS based attenuation storage. There are also no major watercourses nearby to help dispose of surface water. Currently, there are no public sewers nearby to accommodate either surface water or foul flows from the proposal, so if infiltration is not a feasible option, then sewers may have to be requisitioned in order to serve the site.</p> <p>We would advise that mitigation is included within any proposal to install a French drain at the south of the site to help capture any overland flows and to ensure that the risk is not increased or exacerbated to the houses nearby. Any proposed dwellings may also consider raising the finished floor level for additional protection against overland flow.</p>	<p>Information will be added to the evidence base and passed to LDC/Landowners.</p> <p>Information will be added to the evidence base and passed to LDC/Landowners.</p>
--	---	---

	<p><b>Site W2</b> (Whittington 2): Former Whittington Youth Centre, Main Street, Whittington - Site area 0.3 (Ha). Approximate yield 8. There is a 1000yr accumulation area shown on the uFMfSW crossing the on-site, which could feasibly be picking up the existing hardstanding areas, in addition to a mapped flow path along Main Street. In terms of surface water, any proposal could utilise either an existing connection to the adjacent 225mm combination sewer in Main Street or undertake a Developer’s Enquiry with Severn Trent Water. The introduction of green space and garden area could feasibly decrease the pluvial (surface water) residual risk shown to the site. Any proposed dwellings may also consider raising the finished floor level for additional protection against overland flow.</p> <p><b>Site W3</b> (Whittington 3): Land at Chapel Lane &amp; Blacksmith Lane, Whittington. Site area 0.6 (Ha). Approximate dwelling yield 10 - Parts of the site are showing significant pooling in the uFMfSW and any proposal should consider over-engineering the drainage on-site to help alleviate flooding incidences in the area. We would advise that mitigation is included within any proposal to install French drains around the lower periphery of the site to help capture any overland flows and to ensure that the risk is not increased or exacerbated to the houses nearby. Any proposed dwellings may also consider raising the finished floor level for additional protection against overland flow. There are combination sewers nearby, which subject to capacity and a gravity solution may be considered, and in any SuDS scheme should also consider the use of infiltration, although the feasibility will be influenced by ground conditions.</p> <p><b>Site W4</b> (Whittington 4): Land west of Common Lane, Whittington. Site area 0.6 (Ha). Approximate dwelling yield 10 - The site is not shown to be adversely affected by the uFMfSW (updated flood map for surface water) of at risk from fluvial (river flooding). In terms of surface water drainage, the subsurface is potentially suitable for infiltration SuDS although the design will be influenced by the ground conditions. Any application would have to quantify the infiltration rate via an infiltration/soakaway test and consider whether infiltration can be used as a SuDS technique alongside side SuDS based attenuation storage. There are no major watercourses nearby to help dispose of surface water. But there are combination sewers nearby, which subject to capacity, could accommodate either surface water or foul flows from the proposal, so if infiltration is not a feasible option, then sewers may have to be requisitioned in order to serve the site.</p> <p>We would advise that mitigation is included within any proposal to install a French drain to the rear of the existing dwellings to help capture any overland flows and to ensure that the risk is not increased or exacerbated to the houses nearby. Any proposed dwellings may also consider raising the finished floor level for additional protection against overland flow.</p>	<p>Information will be added to the evidence base and passed to LDC/Landowners.</p> <p>Information will be added to the evidence base and passed to LDC/Landowners.</p> <p>Information will be added to the evidence base and passed to LDC/Landowners.</p>
--	---	---

	<p><b>Policy T and M 3 – Managing the impact of HS2</b> - It is noted that the Plan contains a policy related to HS2. The planning, design, construction and operation of HS2 should take account of traffic routes and flows, measures to reduce noise disturbance, landscaping, construction material used and the re-instatement of any affected roads, footpaths, or bridle ways in order to minimise any adverse impact on the environment of Whittington. You may refer Environmental Minimum Requirements.</p> <p><a href="https://www.gov.uk/government/publications/environmental-minimum-requirements">https://www.gov.uk/government/publications/environmental-minimum-requirements</a> which are a set of documents which accompany the High Speed Rail (London - West Midlands) Act 2017 for Phase One of HS2 between London and the West Midlands. The Act gives HS2 Ltd. the power to construct, operate and maintain Phase One of the railway. Any nominated undertaker will be contractually bound to comply with the controls set out in the Environmental Minimum Requirements. HS2 Ltd. also have a Community Engagement Framework, which details how they will keep communities, including Parish Councils, informed of the work going on in their area.</p> <p>The Parish Council may also wish to address the importance of engaging with the information provision process, and ensuring that Parish Councillors and residents are aware of the correct channels of communication/complaints procedures.</p> <p>As a county council, we remain focused on getting the best deal for Staffordshire in terms of mitigation, compensation for residents, economic benefits and improved connectivity. We petitioned against Phase 1 and successfully achieved the lowering of 8 km of the line in Lichfield. We will be working with HS2 Ltd. into construction to ensure as far as we can that they deliver their obligations under Environmental Minimum Requirements.</p>	<p>Acknowledgement and support for policy noted and welcomed.</p>
<p><b>Organisations</b></p>		
<p>3 Staffordshire Wildlife Trust 13/01/21-7</p>	<p><b>Evidence Base.</b> There does not appear to be any biodiversity or green infrastructure information in the evidence base documents/ appendices, showing the data required to be gathered by the NPPF/ Planning Practice Guidance. This includes:</p> <ul style="list-style-type: none"> <li>▪ the location and extent of internationally, nationally and locally designated sites;</li> <li>▪ the distribution of protected and priority <a href="#">habitats and species</a>;</li> <li>▪ areas of <a href="#">irreplaceable natural habitat</a>, (ancient woodland, veteran trees, and other ancient habitats, the significance of which may be derived from habitat age, uniqueness, species diversity and/or the impossibilities of re-creation);</li> </ul>	<p>Noted, will review evidence base and add information where necessary.</p> <p>Noted, will review evidence base and add information where necessary.</p>

	<ul style="list-style-type: none"> <li>▪ habitats where specific land management practices are required for their conservation;</li> <li>▪ main landscape features which, due to their linear or continuous nature, are important for the migration, dispersal and genetic exchanges of plants and animals, including any potential for new habitat corridors to link any isolated sites that hold nature conservation value, and therefore improve species dispersal;</li> <li>▪ areas with potential for habitat enhancement or restoration, including necessary help biodiversity adapt to climate change or which could assist with the habitats shifts and species migrations arising from climate change;</li> </ul> <p>The group should contact Staffordshire Ecological Record, who can provide any existing information on sites, habitats and species held currently. <a href="http://www.staffs-ecology.org.uk">www.staffs-ecology.org.uk</a> However, many locally designated wildlife sites are in need of re-survey, and that not all habitats of high value have been identified across the county, so there are likely to be further areas that warrant designation. Please information sheet ‘Neighbourhood plans - Ecology Information 2017’ for more details on ecology baseline information.</p> <p><b>Policy NE&amp;L 2: Biodiversity and Habitats</b> This should include reference to the above features and how they should be protected, impacts mitigated and enhanced. There should also ideally be an aim to achieve ‘More, Bigger, Better and Joined’ local wildlife sites and important habitats, as per the report ‘Making Space for Nature’, which is attached. Mention of protected and priority species should also be made, if there are additional specific policies to be made in the plan area. Neighbourhood plans can set out more detailed policies, as long as they are in line with national and district guidance. The policies for habitat creation within developments in the National Forest are a good example of specific requirements for developments and other contributions – see <a href="http://www.nationalforest.org/">http://www.nationalforest.org/</a></p> <p><b>Green Infrastructure (GI)</b> While the policies and wording within the draft plan mention green infrastructure and improving this, there is no indication that a green infrastructure strategy or plan is to be produced, and there has been no mapping of existing GI assets, gaps, or opportunities for improvements/ additions. This is important to guide contributions from future developments, as well as to plan new projects and take advantage of any funding available to the area. We recommend that after sufficient baseline information has been gathered, that a biodiversity opportunities map is produced, to sit within/ inform a GI strategy for the plan area. The plan could also include a biodiversity action plan, with more specific targets and aims for particular habitats and species important or unique to the area and its character.</p>	<p>Agreed, policy will be amended accordingly.</p> <p>No amendment to the Plan is needed at present. This suggestion is noted and the potential for developing a GI Plan will be considered once the Neighbourhood Plan has been completed</p>
<p>4 LEPs 03/3/17 SSLEP</p>	<p>As a LEP we, SSLEP, haven’t commented on Neighbourhood Plans as a policy. Out of courtesy I thought I’d respond</p>	<p>Noted, no amendment needed.</p>

5 Environment Agency	Assume interest were covered by SCC flooding comments.	No amendment needed.
6 Sport England 31/01/2017	<p>The NPPF identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing/employment land and community facilities provision is important. It is important that the Neighbourhood Plan reflects national policy for sport as set out in the above document (Paras 73&amp;74) to ensure proposals comply with National Policy. It is important to be aware of Sport England’s role in protecting playing fields/presumption against loss, see: ‘A Sporting Future for Playing Fields – Planning Policy Statement’.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</a> Sport England provides guidance on developing policy for sport and further information can be found following the link below: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a> Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as CIL are utilised to support the delivery of those recommendations.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a> If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p>	<p>Noted</p> <p>Noted, the context will be added to the text of the Neighbourhood Plan.</p>
7 Historic England	<p>Thank you for the invitation to comment on the Whittington and Fisherwick Draft Neighbourhood Plan. Historic England is extremely supportive of both the content of the document and the vision, strategic aims and objectives set out in it. We particularly commend the use of historic characterization to provide a context and a sound evidence base for well thought out Plan policies. In this and other respects Historic England considers that the Plan takes an exemplary approach to the historic environment. The recognition in the Plan of the importance of the local historic environment is highly commendable and Historic England strongly support that view. The emphasis on the conservation of local distinctiveness and the protection of locally significant buildings</p>	<p>This support is noted and welcomed.</p>

	<p>including historic farmsteads and also of rural landscape character including archaeological remains is equally to be applauded. Those who have clearly worked extremely hard in drafting what is a truly comprehensive Plan are to be congratulated. Overall, Historic England considers that the Whittington and Fisherwick Draft Neighbourhood Plan exemplifies “constructive conservation” and constitutes a very good example of community led planning. Peter Boland, Historic Places Advisor</p>	
<p>8 Highways England David Pyner 09/03/2017</p>	<p>Thank you for the opportunity to comment on the Whittington &amp; Fisherwick Neighbourhood Plan.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highways company under the provision of the Infrastructure Act 2015 and is responsible for the operation and maintenance of the Strategic Road Network (SAN) in England. This includes all major motorways and trunk roads. In Whittington and Fisherwick these are the A5 and A38.</p> <p>Highways England <b>supports Policy DP2</b> and the consideration of new development impact on traffic flow when taking into account proposed locations for housing.</p> <p>Highways England also <b>supports Policy T&amp;M1</b> in that proposed developments that would generate a significant amount of movement should be supported by measures to maintain highway safety. Further to this, Highways England supports the requirement for larger scale developments to consider off-site measures and provide Transport Statements or Assessments.</p> <p>Highways England <b>supports policy T&amp;M1</b> in encouraging developments to seek opportunities for extending and improving routes to increase pedestrian and cycle connectivity where that is feasible. Highways England also supports Community Proposal CPT&amp;M2 in encouraging a sustainable transport system and attempts to gain improvements to public transport facilities.</p> <p>Highways England is pleased Lichfield District Council recognise our position as a statutory consultee. We look forward to being consulted on future development plan documents or applications that have the potential to impact the operation and performance of the SAN.</p>	<p>This support is noted and welcomed.</p> <p>This support is noted and welcomed.</p> <p>This support is noted and welcomed.</p>
<p>9 Natural England 06/03/2017</p>	<p>Thank you for your consultation on the above dated 26/01/2017.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p>	<p>Noted and welcomed.</p>

	<p><b>Natural England welcomes the neighbourhood plan group’s consultation though we have no specific comments on this draft neighbourhood plan.</b></p> <p>We refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. For clarification of any points in this letter, please contact me on . For any further consultations on your plan, contact:</p>	
<p>10 Canals &amp; Rivers Trust</p>	<p>Thank you for consulting the Canal &amp; River Trust on the draft Whittington &amp; Fisherwick Neighbourhood Plan. The Canal &amp; River Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding. The Trust has a range of charitable objects including:</p> <ul style="list-style-type: none"> <li>• To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;</li> <li>• To protect and conserve objects &amp; buildings of heritage interest;</li> <li>• To further the conservation, protection and improvement of the natural environment of inland waterways; and</li> <li>• To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.</li> </ul> <p>Approximately 5.5km of the Coventry Canal runs through the Neighbourhood Plan area, mainly passing through open countryside but also skirting the north and east edges of Whittington. The canal forms a notable feature within the landscape and provides a reminder of the industrial heritage of the wider area, as well as a leisure and recreational resource for the local community and visitors alike. There are a number of canal bridges along this stretch, although only Swan Bridge in Whittington and Tamhorn Farm Bridge are listed structures (both Grade II). In addition, about 500m of the old Wyrley &amp; Essington Canal branches off the Coventry Canal just within the eastern boundary of the Neighbourhood area near Huddlesford- the remainder of this canal heading towards Lichfield is currently disused, but is the subject of active plans for restoration by the Lichfield &amp; Hatherton Canals Restoration Trust. The following elements of the draft Plan are of particular relevance to us:</p> <p><b>Strategic Aim 2: Design.</b> We consider that the aim and intent of Strategic Aim 2 is appropriate, and as the canal is an important feature which forms part of the historic character of the Plan area, it should also benefit from this aim; it is worth considering whether the canal should be specifically mentioned within Strategic Aim 2.</p> <p><b>Strategic Aim 3.</b> The Trust supports the intention to preserve and enhance the canal towpath network within the Plan area. The canal generally provides a wildlife habitat and supports a range of ecology and thus merits protection for this reason, as well as to protect its value as a recreational resource and the role the towpath plays in</p>	<p>Noted, this context will be added to the evidence base.</p> <p>Noted and welcomed, a reference will be added to Strategic Aim 2.</p> <p>The support is noted and welcomed.</p>



	<p>forming part of the local network of footpaths. Measures to protect the value of the canal and towpath and, where practicable, to enhance it are welcomed.</p> <p><b>Strategic Aim 7.</b> The Trust supports the aims set out here which seek to protect green infrastructure (which includes the canal as an important green infrastructure corridor) and to improve connections and accessibility to the canal towpath as part of the wider network of paths and open spaces. The towpath offers a recreational and amenity resource for the local community, and we support proposals to improve access to it and to help integrate it with the wider local footpath network, as this will help to encourage its wider use.</p> <p><b>Policy HE2: Local (non-designated) Heritage Assets.</b> We note that the canal bridges within the Plan area are highlighted as local heritage assets, and we would suggest that the canal itself should also be considered as a local heritage asset in its own right and might therefore be added to the list contained in Appendix E. As the policy seeks to ensure that new development avoids having a detrimental impact on the setting or context of buildings and structures on the local list, the inclusion of the canal would offer a further level of support in ensuring that new development also has proper regard to the setting of the canal and the visual impact that new development can have on it.</p> <p><b>Policy NE &amp; L 2: Biodiversity and Habitats.</b> The Trust supports the inclusion of this policy and would comment that the canal within the Plan area forms an important wildlife habitat which supports a wide range of ecology, and as such should benefit from the protection proposed in this policy.</p> <p><b>Policy NE &amp; L 3: Requirements for New Development and Approaches to Green Infrastructure.</b> The Explanation accompanying this policy states that linking open spaces along the canal is included within its aims. The canal forms a valuable green infrastructure corridor which can link wildlife habitats and open spaces, and the canal towpath provides opportunities for the local community to gain access to the surrounding countryside. We support measures designed to enhance the biodiversity value of the canal or to improve access to it and to help fully realise its potential as a multi-functional resource which can benefit the local community as well as supporting a diverse range of wildlife.</p> <p><b>Policy T &amp; M 3: Managing the Impact of HS2.</b> We note that this policy refers to measures to minimise adverse impacts on the canal towpath at Section E. We can confirm that the Trust has agreed with HS2 Ltd the parameters of and process by which, the mitigation of impact on our waterways will be achieved for Phase 1 of the HS2 project via our side agreement signed in July 2016.</p> <p><b>Policy T &amp; M 5: The Coventry Canal.</b> The Trust is pleased that the value of the Coventry Canal to the local community is recognised with the inclusion of this policy which aims to ensure that new development protects and, where possible, enhances the canal and</p>	<p>The support is noted and welcomed.</p> <p>Noted and welcomed, the canal will be added to the list of local heritage assets.</p> <p>The support is noted and welcomed.</p> <p>The support is noted and welcomed.</p> <p>The support is noted and welcomed.</p> <p>The support is noted and welcomed.</p>
--	--	--

	<p>helps to support its multi-functional role as a valuable leisure and recreational resource, wildlife and green infrastructure habitat, visitor and tourism attraction and heritage asset. We support the inclusion of this policy within the Plan.</p> <p>The accompanying commentary to this policy refers to the need for works to improve and maintain the waterway and towpath. Where new development has the potential to generate increased footfall on the towpath and/or to facilitate easier access to it, we do look to see whether a case can be made to secure a developer contribution towards maintaining or improving the towpath surface to help it cope with increased use, and Policy T &amp; M 5 could help to provide support for this.</p> <p>We hope that these comments are of assistance to the Steering Group, but please feel free to contact me direct if you wish to discuss any matters further. Ian Dickinson, Area Planner (East and West Midlands)</p>	<p>Noted, a reference will be included in the text of the Plan.</p>
<p>11 Network Rail 15/02/2017</p>	<p>Thank you for the opportunity to provide feedback to the proposed policy. Network Rail is the public owner and operator of Britain's railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations – the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network. <b>Network Rail has no comments.</b> Diane Clarke, Town Planning Technician LNW Network Rail, Floor 1, Square One, 4 Travis Street, Manchester, M1 2NY.</p>	<p>Noted, no amendment needed</p>
<p>12 HS2 30/01/2017 Plans. James Fox Safeguarding Planning Manager HS2 REF: HS2-LDC- PE-017</p>	<p>Thank you for consulting HS2 Ltd on this matter, points raised in our previous response from February 2014 (<i>see below</i>) are still applicable to the draft neighbourhood plan. However, please note that the Safeguarding Directions previously issued by the Secretary of State for Transport in 2013 were replaced by an updated set of directions in August 2016. Further details together with guidance for local planning authorities are available to view at: <a href="https://www.gov.uk/government/publications/hs2-phase-one-safeguarding-for-developers-and-local-authorities">https://www.gov.uk/government/publications/hs2-phase-one-safeguarding-for-developers-and-local-authorities</a> and your attention is drawn to paragraphs 23-28 of that guidance.</p> <p><i>24/02/2014 RE: Designation of Whittington and Fisherwick Neighbourhood Area. Thank you for consulting High Speed Two (HS2) Ltd on the above proposal to designate a neighbourhood area. While HS2 Ltd has no specific comments to make on the proposed designation, should a neighbourhood plan be produced for the area it should take account of the proposed Phase One line of route of HS2 which passes through this Neighbourhood Area. Further advice is provided in paragraphs 21-16 of the guidance for Local Planning Authorities to accompany the adopted safeguarding direction, which can be found at the link below.</i></p>	<p>Noted, no objection to the HS2 specific policy.</p>

	<p><a href="http://assets.hs2.org.uk/sites/default/files/consultation_library/pdf/Safeguarding%20Guidance%20note%20October%202013.pdf">http://assets.hs2.org.uk/sites/default/files/consultation_library/pdf/Safeguarding%20Guidance%20note%20October%202013.pdf</a></p>	
<p>13 CT Planning 09/03/2017</p>	<p>For landowner</p> <p><b>Land East of Common Lane, Whittington, Lichfield, WS14 9LG</b></p> <p><b>1.</b> It is respectfully submitted that the Whittington Neighbourhood Plan is undermined by the fact that it fails to allocate any sites for housing. A significant amount of resources from developers, local stakeholders and the local community have been invested in the plan making process, and in particular the Developer’s Open Forum held on 16 May 2015. The failure to allocate housing sites in the neighbourhood brings into disrepute the whole consultation process undertaken as part of the preparation of the plan and an inability to answer the challenging question the plan making process generates.</p> <p><b>2.</b> Lichfield Local Plan Strategy Core Policies 1 and 6 look to accommodate housing development at or around a number of settlements including Whittington. Policy Whit4 makes provision for some 35-110 houses in Whittington. The housing figures give an indication of the likely scale of development that is to be accommodated within Whittington.</p> <p><b>3.</b> It has been confirmed in recent appeal decisions within Lichfield District that these figures in the Local Plan are not a maximum and the delivery of Policy Whit4 is not to be constrained by existing settlement boundaries; development will have to occur beyond the existing built form of Whittington in order for the housing requirement to be met.</p> <p><b>4.</b> Whatever priority might be given to infill development or support for small scale development, modest development outside, but adjacent to Whittington settlement boundary is to be expected and is inevitable. Indeed, Policy Whit4 anticipates that development will have to occur beyond the existing built form of the village.</p> <p><b>5.</b> Unless the Whittington Neighbourhood Plan allocates land for housing, it runs a real risk that it will have foisted upon them, through the emerging Lichfield District Site Allocations Plan, land that it does not wish to see developed and indeed at a scale of development it does not support.</p> <p><b>6.</b> Neighbourhood plans, as with all development plan documents, should plan positively. The Neighbourhood Plan should therefore grasp the nettle and identify land for housing for some 110 houses.</p> <p><b>7.</b> The Neighbourhood Plan seeks to justify the lack of any housing allocations on Page 13 of the Consultation Draft Plan. It refers to the sites that are available in Lichfield’s SHLAA and suggests that the sites identified in the SHLAA could accommodate 160 dwellings <b>“so not all will be needed and the scale of development on some could be reduced”</b>. It is respectfully submitted that the land at Chapel Lane/Blacksmith Lane, Whittington, which is one of the sites identified in the SHLAA, is not deliverable in terms of Paragraph 47 of the Framework. The landowners are not actively promoting the site. They have consistently rejected approaches from developers interested in bringing the site forward. There is no realistic prospect that housing</p>	<p>Disagree. It is extremely difficult for an NP, especially where the LPA does not want it to because a Local plan is emerging, to allocate sites in the Green Belt. Indeed, legally an NP cannot alter the Green Belt.</p> <p>Noted, no amendment needed.</p> <p>Noted, no amendment needed.</p> <p>Noted, no amendment needed.</p> <p>Disagree. It is extremely difficult for an NP, to allocate sites in the Green Belt. Indeed, legally an NP cannot alter the Green Belt.</p> <p>Noted, but the NP satisfies the indicative growth requirement. No amendment needed.</p> <p>This is a matter which needs to be taken up with LDC in terms</p>

	<p>will be delivered on the site within five years and in particular that the development of the site is viable. There is no realistic prospect that the site at Chapel Lane and Blacksmith Lane, Whittington is deliverable and could be viably developed at the point envisaged.</p> <p><b>8.</b> In the context of the above, it is proposed that land to the east of Common Lane, Whittington (edged red on the attached drawing 4021.99) be allocated for housing development. The site comprises some 0.77 hectares that is located between existing residential development to the north and Whittington Primary School to the south. The site is contained to the east by existing mature hedgerows; to the west the site fronts onto Common Lane. The site is well related in terms of its scale and location to the existing pattern of development. The site can be brought forward for residential development without undermining the purposes of Green Belt. The site has readily recognisable and defensible boundaries. The release of this site from the Green Belt would not undermine the Green Belt Function of the adjoining land.</p> <p><b>9.</b> The site is considered capable of accommodating some 21 homes providing for a mixture of 2 and 3 bedroom homes and providing for a mixture of tenures.</p> <p><b>10.</b> There is also scope within the site to provide for an area of off-site car parking to serve Whittington School.</p> <p><b>11.</b> There are no known technical or environmental constraints that would preclude the site from coming forward for development.</p> <p><b>12.</b> The site is located outside of the Conservation Area.</p> <p><b>13.</b> The site is available for development now. The site is deliverable in Framework terms.</p>	<p>of the emerging Allocations Document.</p> <p>Disagree. It is extremely difficult for an NP, especially where the LPA does not want it to because a Local plan is emerging, to allocate sites in the Green Belt. Indeed, legally an NP cannot alter the Green Belt.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
<p>14 Czero 22/2</p>	<p>We have completed the questionnaire and I attach this submission. No "Disagree" comments, majority "Agrees" and several "Neutral"</p>	<p>Noted, no amendments needed</p>
<p>15Elford Homes 10/03/2107</p>	<p>(Through CT Planning) <b>Site at Church Farm, Back Lane, Whittington, WS14 9NL</b></p> <p><b>1.</b> It is respectfully submitted that the Whittington Neighbourhood Plan is undermined by the fact that it fails to allocate any sites for housing. A significant amount of resources from developers, local stakeholders and the local community have been invested in the plan making process, and in particular the Developer's Open Forum held on 16 May 2015. The failure to allocate housing sites in the neighbourhood brings into disrepute the whole consultation process undertaken as part of the preparation of the plan and an inability to answer the challenging question the plan making process generates.</p> <p><b>2.</b> Lichfield Local Plan Strategy Core Policies 1 and 6 look to accommodate housing development at or around a number of settlements, including Whittington. Policy Whit4 makes provision for some 35-110 houses in Whittington. The housing figures give an indication of the likely scale of development that is to be accommodated within Whittington.</p>	<p>Disagree. It is extremely difficult for an NP, especially where the LPA does not want it to because a Local plan is emerging, to allocate sites in the Green Belt. Indeed, legally an NP cannot alter the Green Belt.</p> <p>Noted, no amendment needed.</p>

	<p><b>3.</b> It has been confirmed in recent appeal decisions within Lichfield District that these figures in the Local Plan are not a maximum and the delivery of Policy Whit4 is not to be constrained by existing settlement boundaries; development will have to occur beyond the existing built form of Whittington in order for the housing requirement to be met.</p> <p><b>4.</b> Whatever priority might be given to infill development or support given for small scale redevelopment, modest development outside, but immediately adjacent to Whittington settlement boundary is to be expected and is inevitable. Indeed, Policy Whit4 anticipates that development will have to occur beyond the existing built form of the village.</p> <p><b>5.</b> Unless the Whittington Neighbourhood Plan allocates land for housing, it runs a real risk that it will have foisted upon them, through the emerging Lichfield District Site Allocations Plan, land that it does not wish to see developed and indeed at a scale of development it does not support.</p> <p><b>6.</b> Neighbourhood plans, as with all development plan documents, should plan positively. The Neighbourhood Plan should therefore grasp the nettle and identify land for housing for some 110 houses.</p> <p><b>7.</b> The Neighbourhood Plan seeks to justify the lack of any housing allocations on Page 13 of the Consultation Draft Plan. It refers to the sites that are available in Lichfield’s SHLAA and suggests that the sites identified in the SHLAA could accommodate 160 dwellings <b>“so not all will be needed and the scale of development on some could be reduced”</b>. It is respectfully submitted that the land at Chapel Lane/Blacksmith Lane, Whittington, which is one of the sites identified in the SHLAA, is not deliverable in terms of Paragraph 47 of the Framework. The landowners are not actively promoting the site. They have consistently rejected approaches from developers interested in bringing the site forward. There is no realistic prospect that housing will be delivered on the site within five years and in particular that the development of the site is viable. There is no realistic prospect that the site at Chapel Lane and Blacksmith Lane, Whittington is deliverable and could be viably developed at the point envisaged.</p> <p><b>8.</b> It is considered appropriate for the Whittington Neighbourhood Plan to seek to allocate a number of smaller sites. This will reduce an over-reliance on large sites. A range of smaller sites will ensure that there is, at all times, a range of deliverable housing sites which, although small in scale, will continue to make a meaningful contribution to housing supply. It will also enable traffic to be spread across the village as opposed to focussing all the traffic into one location.</p> <p><b>9.</b> In the context of the above it is respectfully submitted that consideration should be given to the allocation of land at Church Farm, Back Lane, Whittington (edge red on attached location plan).</p> <p><b>10.</b> The site comprises some 2.1 hectares and is capable of accommodating some 50 dwellings. Development could provide for a range of housing in terms of its size, type, design and tenure.</p>	<p>Noted, no amendment needed.</p> <p>Noted, no amendment needed.</p> <p>Disagree. It is extremely difficult for an NP, to allocate sites in the Green Belt. Legally an NP cannot alter the Green Belt.</p> <p>Noted, but the NP satisfies the indicative growth requirement. No amendment needed.</p> <p>This is a matter which needs to be taken up with LDC in terms of the emerging Allocations Document.</p> <p>Disagree. It is difficult for an NP, especially where the LPA does not want it to because a Local Plan is emerging, to allocate sites in the Green Belt. Indeed, legally an NP cannot alter the Green Belt. The Draft NP already encourages smaller sites Disagree no amendment needed</p> <p>Noted.</p>
--	---	---

	<p><b>11.</b> The site of Church Farm, Back Lane, Whittington is not subject to any ecological or heritage constraints. There are no known technical constraints that would preclude the site from being bought forward for development. The site is suitable, available and achievable for housing and is deliverable within the plan period. Consideration should be given to allocating the site for housing.</p> <p><b>12.</b> The land at Church Farm, Back Lane, Whittington is well located in terms of its scale and location to the existing pattern of development, including the residential development that adjoins the site to the south and east. It is of a scale that will not cause harm to the existing village character, nor will it generate a significant number of car borne trips such to adversely affect the Conservation Area.</p> <p><b>13.</b> The site has a wide frontage on to Back Lane from where access would be taken. The site could be developed for housing without adversely impacting upon the natural or historic environment.</p> <p><b>14.</b> The site at Back Lane is within easy walking distance of all services and facilities within Whittington. Back Lane in the vicinity of the site is a public transport route. Everyday activities can be undertaken in Whittington; where there is a need to travel, there is the opportunity to do so by sustainable modes.</p> <p><b>15.</b> A residential development of the land at Back Lane would represent a logical rounding off of the existing settlement.</p> <p><b>16.</b> As a general comment, it is considered that the Whittington and Fisherwick Neighbourhood Plan contains too many generalised development management policies; such development management policies are already provided for in the Lichfield Core Strategy and its emerging Site Allocations Plan. As advised in Planning Policy Guidance, a neighbourhood plan should include policies that are distinct to reflect and respond to the unique characteristics and planning context of the neighbourhood. In these circumstances, the Whittington Neighbourhood Plan should include fewer management development policies; those policies that are to be included, should provide an additional level of detail providing for a distinct local approach to planning in Whittington. No planning purpose is served by repeating development management policies to be found elsewhere in the Development Plan. The draft Whittington and Fisherwick Neighbourhood Plan should be amended accordingly.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted this comment will be considered alongside this submitted by LDC (see above)</p>
<p>16 Cala homes</p>	<p>Interest Changed, see Richborough below.</p>	
<p>17 Richborough Estates (Pegasus)</p>	<p><b>INTRODUCTION 1.1</b> We are instructed by our client, Richborough Estates, to respond to the Whittington and Fisherwick Neighbourhood Development Plan document ('the NDP'). Richborough Estates specialises in identifying brownfield and greenfield development opportunities for residential and commercial uses with a track record for successfully delivering high quality developments, working closely with the landowner, local communities, local planning officers and Parish Council's to create mutually beneficial plans. With offices in</p>	<p>New interest noted.</p>

	<p>Birmingham and Congleton, they operate country-wide but in particular they have significant experience and knowledge of the housing markets throughout the Midlands.</p> <p><b>1.2</b> Richborough Estates are grateful for the opportunity to make representations in respect of the NDP, which is currently at Regulation 14 (Pre-Submission) stage, and are supportive of the proactive approach the Whittington and Fisherwick NDP Steering Group have taken in engaging in the planning process in a manner which seeks to identify and deliver the aspirations of the local community.</p> <p><b>1.3</b> In providing comment, the emerging NDP has been considered against the basic conditions relevant to the preparation of a Neighbourhood Plan, as set out in paragraph 8 (2) of Schedule 4b of the Town and Country Planning Act 1990, and as summarised in the National Planning Practice Guidance (PPG):</p> <ul style="list-style-type: none"> <li>o Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;</li> <li>o The ‘making’ of the neighbourhood plan contributes to the achievement of sustainable development;</li> <li>o The ‘making’ of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);</li> <li>o The ‘making of the neighbourhood plan does not breach, and is otherwise compatible with EU obligations</li> <li>o Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.</li> </ul> <p><b>1.4</b> Our interpretation of the basic conditions is informed by recent NDP Examiners’ Reports and High Court Decisions, which have affirmed the status of NDPs in the planning process and identified the scope/intent of Basic Conditions in terms of detailed planning policies.</p> <p><b>1.5</b> At the outset, Richborough Estates wish to express a commitment to a continuing dialogue with the NDP Steering Group and would welcome the opportunity to discuss further any matters raised in this representation, and to address any questions that may be outstanding in terms of Richborough Estates interests within the Parish. This includes land Huddlesford Lane, Whittington which is being promoted for residential development through the District Council’s emerging Local Plan Allocations document.</p> <p><b>1.6</b> Accordingly, there is much in the NDP that is supported. Therefore, the purpose of making these representations is to highlight areas of the NDP that are supported and draw attention to elements of the NDP, as currently drafted, that do not meet the Basic Conditions. The representations are intended to be helpful identifying a number of minor amendments that should be incorporated within the NDP to provide for provide greater certainty that an appointed examiner will allow the Plan to proceed to referendum.</p>	<p>Noted, the willingness to engage is welcomed.</p> <p>Supported noted and welcomed.</p>
--	--	---

	<p><b>1.7</b> Whilst the NDP sets out eight strategic aims and a number of related objectives in order to meet a vision for the Parish, this representation is focused on the aims, objectives and policies that relate to housing provision and delivery.</p> <p><b>NEIGHBOURHOOD PLAN HOUSING POLICIES 2.1</b> Core Policy 6 of the Lichfield District Local Plan Strategy requires the delivery of at least 10,030 homes at a rate of around 478 per year between the period 2008- 2029. This Policy recognises that to meet this housing requirement there is a need to identify new greenfield sites outside, but adjacent to, historic settlement boundaries.</p> <p><b>2.2</b> The spatial development strategy focuses approximately 16% of the District’s housing growth to the Key Rural Settlements ....and Whittington. Whilst a significant proportion of this growth is to be achieved through completions and commitments to date within existing settlement boundaries, the development plan apportions an additional 440 properties to these Key Rural Settlements to be considered through the Local Plan Allocations document or community led plans, such as a NDP.</p> <p><b>2.3</b> Policy Whit4 provides greater detail in respect of the role Whittington will play in assisting with meeting the District’s housing needs and apportions ‘a range between 35-110 homes’ to Whittington. It should be noted that all Key Rural Settlements would need to deliver the top end of the range to achieve the delivery of the 440 additional homes as specified within Core Policy 6 (as the 440 requirement is derived from the cumulative sum of the difference between the upper and lower housing requirements for the six Key Rural Settlements).</p> <p><b>2.4</b> The Whittington NDP acknowledges this housing requirement, stating: <i>“The minimum level of growth in the Neighbourhood Area is determined by the local planning authority. In the case of Whittington and Fisherwick, the Local Plan proposes that a range of between 35 to 110 homes will be provided, with final numbers and locations to be determined in the Local Plan Allocations Document. The Steering Group has had to formulate its policies within these parameters. This Neighbourhood Plan does not determine where any development will be located, but it can influence the decisions of LDC in their land allocation process.”</i></p> <p><b>2.5</b> The NDP goes on to provide clarification that 19 new homes have either been built or have extant planning permission in Whittington since the start of the Local Plan period, leaving a residual requirement of some 91 homes.</p> <p><b>2.6</b> The NDP is unable to make specific land allocations beyond the existing settlement boundary as the Whittington is encompassed by Green Belt and, at present, the power to amend Green Belt boundaries does not reside with the Parish Council. Whilst the recently published White Paper identifies a proposed amendment to the NPPF to make clear that ‘where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the</p>	
--	---	--



	<p>detailed boundary may be determined through a neighbourhood plan' it is recognised that this is not the current position set out in national policy. Therefore, the NDP approach of including a description of the conclusions reached from local consultation, discussions with developers and landowners and acknowledging the possible approach to site selection that will be taken by the District Council as part of the emerging Allocations Plan <b>is supported</b>.</p> <p><b>2.7</b> The conclusion of the local consultation is stated: <i>“Small-scale infill redevelopment within the Whittington village settlement boundary will be supported to provide new housing. However, it is accepted that in addition, a modest growth around the village may be needed to meet Lichfield District Local Plan requirements and that some sites beyond the village boundary may need to be identified, potentially including a small amount of Green Belt. Whilst maintaining a self-contained community, with clear physical boundaries to complement the character of the village..... the highest priority should be afforded to exploiting key sites within the village where development is already planned. Secondary priority should be given to carefully considered infill developments, appropriately scaled brownfield development and/or appropriate conversion of redundant buildings outside village boundaries but within the parish. Limited low density, high quality, development in Green Belt land adjacent to existing settlement boundaries should, subject to a proven demand for additional housing stock, be given lower tertiary priority.”</i></p> <p><b>2.8</b> NDP Policy DP1 supports the delivery of 35-110 new dwellings identified in the adopted Local Development Plan. However, Richborough submit that the wording of this policy requires a slight amendment to make it clear that the above figures are reflective of a 'minimum' housing requirement of the Local Plan, and are not 'maximum' figures.</p> <p><b>2.9</b> This provides for a level of flexibility within the NDP as required by the Local Plan Strategy and the NPPF and serves to ensure consistency with the emerging Local Plan Allocations document for the District. By providing a level of flexibility this will assist in ensuring longevity in the effectiveness of the Neighbourhood Plan as a tool in the decision-making process in the longer term.</p> <p><b>2.10</b> Regarding the consultation summary, Richborough Estates wish to highlight that to achieve growth around the village which maintains clear physical boundaries and promotes a self-contained community, the most appropriate site to release from the Green Belt is that at Huddlesford Lane. A detailed review of this site is included in Chapter 3 of this representation.</p> <p><b>2.11</b> NDP Policy DP2 sets out a number of local considerations for when assessing locations for new housing development. Whilst Richborough Estates understand the intentions of this policy, particularly in the light of the inability of the Parish Council to currently amend Green Belt boundaries, concern is raised that the Policy is unnecessarily lengthy and unduly restrictive. For example, the</p>	<p>Supported noted and welcomed.</p> <p>Noted but no amendment needed</p> <p>Noted</p> <p>Noted, amendments to and the status of DP2 will be considered as part of the LDC comments (see above).</p>
--	---	--

	<p>bullet points relating to consideration of the redevelopment of brownfield land; the need to preserve and enhance the Conservation Area; and the need to maintain or improve public rights of way are all reflective of the requirements of the Lichfield District Local Plan Strategy and NPPF and do not need to be duplicated here.</p> <p><b>2.12</b> Richborough Estates wish to express no view in respect of Policies HOU1 and HOU2.</p> <p><b>2.13</b> Policy HOU3 concerns housing mix and affordability. Richborough Estates submit that the wording of this Policy is somewhat unclear. The intention to secure a varied mix of house types and sizes is supported by Richborough Estates in achieving a balanced housing market within Whittington. Whilst it is recognised that there is a need to include a proportion of one, two and three bedroom dwellings within development proposals, the provision of larger dwellings (including 4 bed) should not be excluded within schemes of 10 or more dwellings. A more flexible approach will not only assist in providing a varied scheme but will provide greater resilience in not just meeting identified housing needs in the short term, but providing the flexibility to react to changing housing needs in the longer term.</p> <p><b>2.14</b> Regarding Policy D2, Richborough Estates acknowledge the need for sensitive design, which reflects of the character of the location in which a development proposal is set. Indeed, paragraphs 56-68 of the NPPF concern good design, with Paragraph 58 stipulating that local and neighbourhood plans should develop <i>“robust and comprehensive policies that set out the quality of development that will be expected for the area.”</i></p> <p><b>2.15</b> However, Paragraph 59 of the NPPF makes it clear that <i>“design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”</i></p> <p><b>2.16</b> It is considered that Policy D2 provides a proportionate approach, however the supporting text to Policy D2 appears, as drafted, overly prescriptive, providing an unnecessarily detailed analysis of brickwork, chimney colours and styling, roof and eave details, window style and detailing, decorative finishes to properties and boundary treatments. This suggested application of Policy D2 leaves little room for design innovation or variation, and is therefore not in accordance with the NPPF.</p> <p><b>2.17</b> Richborough Estates intends to take a proactive approach through, dialogue with the Neighbourhood Plan Steering Group and local community, in designing a high quality residential scheme, however it is suggested that additional wording should be inserted into the supporting text for Policy D2 providing room for design variation and innovation, in accordance with the NPPF.</p> <p><b>Site Proposals 3.1</b> The site is located to the north-west of Whittington village, north-east of Packington Lane, and covers an area of circa 3.6ha. It comprises the agricultural field immediately adjacent to the</p>	<p>Noted</p> <p>Noted, but the reference to 1,2 &amp; 3 bed homes refer to <i>“..a proportion of smaller dwellings and affordable homes..”</i> and does not preclude larger 4 and 5 bed houses as part of the overall mix. This point will be clarified</p> <p>Noted, amendments to and the status of DP2 will be considered as part of the LDC comments (see above).</p> <p>Noted, amendments to and the status of DP2 will be considered as part of the LDC comments (see above).</p> <p>Noted</p>
--	---	--

	<p>properties on Back Lane, as well as part of the next field to the north-west. A site plan is enclosed at <b>Appendix 1</b>.</p> <p><b>3.2</b> The site is bordered by established residential development to the south and east; to the north-east by a playing field with equipped pay and hard surface tennis/basketball court; to the north by the Coventry Canal, to the west by Huddlesford Lane and further agricultural fields.</p> <p><b>3.3</b> Based on the site area and an indicative density of 22 dwellings per hectare, the site has capacity to accommodate up to approximately 80 dwellings. Given the site's size, there is the flexibility to allow for a mix of housing types and tenures, as well as allowing for the provision of on-site open space, the location of which would be subject to consultation with the local residents of Whittington.</p> <p><b>3.4</b> Any development of the site would look to facilitate pedestrian links with the existing village and utilise existing on site green infrastructure where possible.</p> <p><b>Social Infrastructure and Accessibility 3.5</b> Main Street is located approximately 275 metres to the south of the site, which is home to a number of local services, including the Post Office, pharmacist, village shop operated by the Co-operative, the Bell Inn public house, the Dog Inn public house and Whittington Village Hall. A GP operated by Langton Medical Group also operates from the Village Hall. The Primary School is located south of the village, on Common Lane.</p> <p><b>3.6</b> Whittington has an hourly bus service between Tamworth and Lichfield, with the first service from Lichfield departing at 6:46 and the last at 21:50. The first service from Tamworth departs at 6:15 and the last at 21:20. This service therefore represents a genuine sustainable transport option for residents of Whittington. The nearest bus stops are located on Back Lane, 75 metres from the southern site boundary.</p> <p><b>3.7</b> As noted, Whittington Primary School is located on Common Lane, to the south of Whittington Village. As of January 2016, the school identified a level of capacity for additional pupils<sup>1</sup>. Given that the Green Belt surrounding Whittington currently constrains development to limited brownfield sites/infilling, it is not expected that this capacity will materially change in the future.</p> <p><b>3.8</b> In terms of medical facilities, the nearest GP is the Langton Medical Group, operating from Whittington Village Hall approximately 240 metres to the south of the site, which can be accessed within an approximate 5-minute walk from the site. A pharmacy is located on Main Street, close to the GP surgery.</p> <p><b>3.9</b> There is a public right of way which crosses the site from east-west, connecting Back Lane to Huddlesford Lane. A further public right of way runs along the south eastern site boundary. These rights of way would be retained and incorporated into any development proposals. A number of new pedestrian routes would be created through the development of the site to provide links to the public footpath network.</p> <p><b>Natural Environment 3.10</b> Aside from the Green Belt designation, there are no statutory designations within the site.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
--	---	---

	<p><b>3.11</b> A comprehensive ecological assessment will be undertaken in due course but there is nothing on-site to indicate that there are any issues that would prevent the site coming forward. Any localised ecological considerations would influence the emerging proposal, can provide a green infrastructure framework that would contribute towards achieving environmental sustainability, whilst at the same time working within the natural features of the site.</p> <p><b>Landscape 3.12</b> The landscape character of Lichfield is profiled within Staffordshire County Council's 'Historic Environment Character Assessment'. The site is located within landscape character area 'LHECZ 14 - Land Around Whittington'. Whittington and Fisherwick Parish Council subsequently commissioned Staffordshire County Council to produce a more in depth assessment to be used as a baseline for the NDP.</p> <p><b>3.13</b> The Character Assessment notes that the historical landscape is dominated by the village of Whittington, with the land immediately surrounding the village defined as 'Ancient Settled Farmlands'. The site at Huddlesford Lane falls within this categorisation. The Assessment goes on to note that a number of historical field boundaries have been removed in the latter half of the 20th century. Indeed, land off Huddlesford Lane comprises a single agricultural field.</p> <p><b>3.14</b> The site currently contains strong landscape boundaries which would be retained. These existing physical features would be retained and strengthened to provide a new and enduring Green Belt boundary to the north of Whittington.</p> <p><b>Cultural Heritage 3.15</b> There are no listed buildings or structures within the site identified. There are also no listed buildings or structures in the immediate vicinity i.e. adjoining its boundary.</p> <p><b>3.16</b> The nearest listed structure is Swan Bridge, which is located approximately 160 metres to the east of the site on Burton Road. Green space would be provided on the parcel of land nearest to this listed building. Furthermore, there is limited intervisibility between the site and the bridge, therefore, it is not considered that the development of this site would have any adverse impact on this listed structure.</p> <p><b>3.17</b> The Conservation Area immediately abuts the southern corner of the site. Any development of the site would need to take this into consideration. Nevertheless, there remains flexibility within the site to design development in a sensitive fashion and to provide a positive impact on the setting of the Conservation Area.</p> <p><b>3.18</b> There are considered to be no heritage issues which would preclude the development of this site.</p> <p><b>Flood Risk 3.19</b> The site is located entirely within Flood Zone 1, the area at least risk from flooding. Any development proposal would seek to utilise Sustainable Drainage Systems (SuDS) in developing the most appropriate strategy for drainage for the site.</p> <p><b>Economic Benefits 3.20</b> In terms of economic sustainability, jobs would be created during the construction phase of the development</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
--	---	---

	<p>(including indirect employment through the construction supply chain). The residents of the development would also serve to support the existing local facilities and services within the village, such as the village shop and Post Office, through additional household spend.</p> <p><b>Summary 3.21</b> It is evident that land will be required to be released from Green Belt in order to ensure the objectively assessed housing needs identified within the Lichfield Local Plan Strategy are met.</p> <p><b>3.22</b> Whilst it is recognised that the NDP is currently unable to make amendments to the Green Belt boundary, Richborough Estates are heartened to see that this requirement is nevertheless acknowledged through draft Policies DP1 and DP2 of the NDP.</p> <p><b>3.23</b> The site at Huddlesford Lane represents a logical, sustainable extension to the village of Whittington and has the ability to accommodate a significant proportion of the future housing needs of the area, in line with the Local Plan housing requirement and draft NDP Policies DP1 and DP2.</p> <p><b>OTHER NEIGHBOURHOOD PLAN POLICIES 4.1</b> Policy HE1 concerns heritage assets and states that <i>“Development proposals will be supported where they seek to retain buildings which make a significant contribution to the character and distinctiveness of the Parish. Development in and around the village should protect, complement or enhance the historic rural character of the settlement and hinterland, identified in the Character Study and Conservation Area Documents.”</i></p> <p>4.2 This policy as drafted is considered ambiguous and appears to be overly stringent when considered alongside the requirements of the NPPF as set out in Paragraph 134 and 135. It is recommended that the Policy is reworded to be more specific in relation to development impact upon <b>designated and non-designated heritage assets</b> in accordance with the NPPF.</p> <p><b>4.3</b> Policy HE2 concerns local (non-designated) heritage assets, requiring that they be: <i>“...conserved and enhanced and their loss or substantial harm to an asset will be resisted, unless exceptional circumstance can be demonstrated. Proposals will only be supported where they do not involve:</i></p> <ul style="list-style-type: none"> <li>• <i>The demolition or part demolition of buildings or structures on the local list;</i></li> <li>• <i>The inappropriate alteration or extension to buildings or structures on the local list;</i></li> <li>• <i>A detrimental impact on the setting or context of buildings or structures on the local list.”</i></li> </ul> <p><b>4.4</b> A list of identified heritage assets is at Appendix E of the NDP.</p> <p><b>4.5</b> The test set in NDP Policy HE2 appears to be too stringent in that there is no requirement in the NPPF to demonstrate exceptional circumstances in relation to non-designated heritage assets. Paragraph 135 of the NPPF states: <i>“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that</i></p>	<p>Noted</p> <p>Noted and support welcomed</p> <p>Noted but no change is considered necessary.</p> <p>Noted, “exceptional circumstances” will be deleted</p>
--	--	--