

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
DLP222	David Brookes	<p>Concerns raised in relation to the loss of open countryside and ecological habitat, including ancient trees, and the urbanisation and intensification of growth around Polesworth and Dordon.</p> <p>Traffic congestion and flood constraints in Polesworth highlighted.</p> <p>Concerns raised in relation to the capacity of existing road infrastructure, services and facilities to accommodate additional growth.</p>	<p>Comments relate to sites POL/DOR1 and POL23.</p> <p>These sites have been appraised using clearly defined and consistently applied assumptions set out in Appendix 6 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report. The assumptions draw on the most up-to-date evidence.</p> <p>Loss of greenfield land has been assessed via SA objective 7 and impacts on biodiversity have been assessed via SA objective 9.</p> <p>Information on the capacity of services and facilities is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through investment in existing facilities or the development of new services and facilities. This has been clearly explained in the next iteration of SA.</p>
DLP234	Fleur Fernando	<p>Concerns raised in relation to the capacity of existing infrastructure, services and facilities to accommodate additional growth.</p> <p>Concerns raised in relation to the loss of open countryside and ecological habitat.</p>	<p>Loss of greenfield land has been assessed via SA objective 7 and impacts on biodiversity have been assessed via SA objective 9.</p> <p>Information on the capacity of services and facilities is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			investment in existing facilities or the development of new services and facilities. This has been clearly explained in the next iteration of SA.
DLP242	Paula Nichols	<p>Concerns raised in relation to the capacity of existing road infrastructure, services and facilities to accommodate additional growth.</p> <p>Furthermore, the representation raises concern re: the potential for reductions in air quality associated with increases in road congestion.</p> <p>Concerns raised in relation to the loss of open countryside and ecological habitat.</p>	<p>North Warwickshire contains no Air Quality Management Areas (AQMAS). AQMAS identify areas which contain particularly poor air quality to justify active management. Without AQMAS to help identify spatial variations in the quality of the air in the Borough, it is difficult to consistently and accurately assess the implications of new development options on local air quality (SA objective 11), including adverse effects on people's health (SA objective 3). Air quality monitoring in recent years has revealed that annual mean levels of nitrogen dioxide (NO₂), often associated with traffic-related pollution, has been declining. However, it is acknowledged that significant growth within the Borough could reverse this trend. SA objective 15 promotes increasing use of public transport, cycling and walking to reduce the use of the private car. The objective assesses the proximity of site options to town centres and public transport links, i.e. the likelihood that new residents and employees will travel via alternative means to the private car. This is considered an appropriate proxy for assessing the likelihood of significant increases in traffic related air pollution. The cumulative effects of the general growth proposed in the Borough on traffic levels and air quality have been assessed in the cumulative effects section in Chapter 6 of the SA Report.</p> <p>Information on the capacity of services and facilities</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through investment in existing facilities or the development of new services and facilities. This is clearly explained in the next iteration of SA Report.</p> <p>Loss of greenfield land and landscape impacts have been assessed via SA objective 7 and impacts on biodiversity have been assessed via SA objective 9.</p>
DLP246	Polesworth and Dordon Parish Councils	<p>Concerns raised regarding uplift in housing requirement from Core Strategy and states this change is not justified or assessed in sustainability terms. Alternatives for the housing distribution have not been considered.</p> <p>Concern raised in relation to various sustainability issues which may result from the development of 2,000 new homes at land to the east of Polesworth and Dordon, particularly in terms of infrastructure capacity, landscape and wildlife. Consultee highlights that the site performs negatively against five of the twenty SA objectives with only one of the other 23 assessed sites having more negative effects recorded. Other alternatives have not been seriously considered despite the SA showing that other options perform more favourably.</p>	<p>The Council's justification for the increased housing requirement and SA of the different delivery options considered are presented in Chapter 4 of the SA report.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 6 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report. Overall the representation seems to agree with the SA. Reducing use of the private car, which is likely to reduce traffic and congestion, is assessed through SA objective 15. The effects of development on landscape and wildlife are assessed via SA objectives 7 and 9 respectively.</p> <p>In accordance with the PPG, the SA has assessed all options in the same level of detail. The Council's reasons for selecting or not selecting site options</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			are presented in Appendix 8 of the SA Report.
DLP247	Polesworth and Dordon Parish Councils	Same as DLP246 above.	See response to SLP246 above.
DLP266	Pegasus Group on behalf of the Richborough Estates (this representation has been presented across six document and addresses six sites)	<p>Concern raised that the SA has not informed the plan, given that the Local Plan was produced in August 2016 and the SA was produced in February 2017.</p> <p>Concerns raised that the SA has not considered all reasonable alternatives, particularly land West of Packington Lane, Land at Barn End Road and Land North of Blythe Road Coleshill.</p> <p>Land at Barn End Road has not been considered in its entirety (as site WAR7 only contains part of the site) and that the reason for discarding the site is not valid. Land south of Blythe Road, Coleshill scores higher for many of the SA objectives than a number of the sites taken forward at this stage. Only part of this site has been considered through the appraisal of SLA59. The representation also highlights the (++) recorded in the SA for sustainable transport and challenges the (?-) recorded in terms of biodiversity, as well as the scores recorded for cultural heritage, economy and efficient use of land.</p> <p>Queries findings of the SA in relation to land at Birmingham Road, Water Orton for access to services and facilities and sustainable transport and developing and supporting vibrant and active communities as the site is located within 640m of a community centre. The negative effects scores recorded for this site in the SA Report relating to the natural environment, landscape and cultural heritage are all queried in the representation. Effects relating to the economy and efficient use of land and landscape (North of Blythe Road only) have also</p>	<p>The Draft Local Plan was consulted on between Thursday 10th November and Friday 31st March 2017. While the SA was prepared alongside the Draft Local Plan and influenced its development, the SA Report was consulted upon in early February up to the end of March. The consultation period was extended until March 2017, to allow consultees time to consider both documents. The delay in the publication of the SA allowed time to reflect the content of the Draft Local Plan published for consultation. Furthermore, chapters 2 and 4 of the SA Report also describe how previous iterations of the SA have fed into the plan-making process. The SA will continue to influence future iterations of the plan.</p> <p>Chapter 2 of the SA Report sets out how reasonable alternatives were identified and notes that a number of sites submitted to the Council were not deemed to be reasonable for a number of reasons. Whilst the SA Report explains how alternatives have been identified and assessed, it is the role of the Council to identify reasonable alternatives.</p> <p>Table A8.1 in Appendix 8 of the SA Report states WAR 7 (land at Barn End Road) is no longer considered to be a reasonable alternative as part of the site has planning permission.</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		<p>been queried.</p> <p>The allocation of West of Packington Lane could provide opportunities for landscape improvements.</p> <p>It is stated that that the explanation for not including land east of Packington Lane (PS153) and land south of Blythe Road (SLA59) is not site specific to the site (“Green Belt release not proposed for Coleshill”) and has not taken into account the likely landscape and visual effects.</p>	<p>All sites have been assessed in line with the SA framework, which was agreed to ensure consistency across the SA assessments. Not all site options have detailed surveys or development plans; therefore, in order to ensure that all options have been appraised to the same level of detail, all options have been appraised at a high level based on an up-to-date evidence base.</p> <p>Appendix 8 of the SA Report records the Council’s reasons for selecting and not selecting site options. There are multiple factors that influenced the Council’s decision-making, as reflected in the SA.</p>
DLP288	Natural England	<p>Natural England broadly supports the inclusion of SA Objective 7 in the SA Framework, but recommends that geodiversity should also be considered in this objective.</p> <p>Natural England also recommend that SA objective 9 is strengthened to show that negative effects on European sites and SSSIs have been appropriately considered. There should be a recommendation that any policies or proposals that do not adequately protect SSSI or European sites should be removed or modified. Impact on priority habitats should also be considered using necessary inventories, maps and government policies.</p> <p>Natural England welcome the fact that all significant effects identified through the SA have monitoring proposed but state that it is not clear how indicators will work in practice and if effects of the plan or wider changes are to be monitored. Examples of approaches to monitoring are also included.</p>	<p>The SA objectives are broad, headline objectives. Appendix 6 details how these have been considered in the assessment of sites.</p> <p>Geodiversity is considered as part of SA Objective 9: Valuing, enhancing and protective the biodiversity of North Warwickshire (see Appendix 6 of the SA Report).</p> <p>References to ‘international’ and ‘national’ designated conservation sites in Appendix 6 are sufficient to show that effects on European sites and SSSIs have been considered. Future iterations of SA demonstrate that the HRA has been taken into account and include appropriate recommendations regarding protection of these sites. Future iterations of the SA will also review monitoring proposals.</p> <p>SA Objective 9 considers biodiversity in North Warwickshire at a strategic level, which is</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>considered proportionate to the SA process. As explained in paragraph 2.57 of the SA Report, <i>“the strategic nature of the SA meant that it was not possible to investigate this potential for each site and the score was based on designated sites only. This approach was considered to be the best way of ensuring consistency and a comparable level of detail in each site appraisal. Where consultees (for example, Natural England or the Wildlife Trust) have provided specific information on the potential biodiversity value of a site, this has been built into the assessment as far as possible”</i>.</p>
DLP298	Rita Poulsen	<p>Concern raised re: the need to plan for green space and recreation facilities to meet the needs of the growing population.</p>	<p>The SA has assessed green space and recreation via SA objective 3 (health) and SA objective 6 (recreation).</p>
DLP304	Course and Shelton on behalf of residents of Hartshill and Ansley Common area	<p>The representation objects to the residential development for the Hartshill and Ansley Common area. It is stated that much of the information in the SA Report is misleading e.g. the library referred to in the assessment for site HAR3 is within a Church, which would have priority over the use as a library if conflict of need was to arise. One of the two surgeries referred to lies outside of the Borough.</p> <p>The SA Report has highlighted that all of the proposed sites at Ansley Common perform negatively against all environmental objectives and worse than the non-preferred sites. Table 5.7 of the SA report is incorrect, particularly because Ansley Common has limited services and facilities. Also states that the open space at Brett Hal Estate is not used and considered unsafe.</p> <p>Considered misleading to refer to services and facilities outside of the Borough as these are outside of the scope of the LPA.</p>	<p>All sites have been assessed in line with the SA framework, which was agreed to ensure consistency across the SA assessments. The assumptions used in scoring each option are detailed in Appendix 6 of the SA report. SA is a strategic, high-level process and it would not be proportionate to consider issues, such as a potential future conflict of use between the church and library.</p> <p>The SA has considered GP surgeries both within and outside the borough, where they are within the distance thresholds used) as residents could visit either.</p> <p>Appendix 7 of the SA Report presents detailed SA matrices for site options. This presents the</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		<p>Further concerns are raised in relation to the lack of cycle paths which would reinforce car dependency and current employment opportunities in the area. Concerns raised regarding the limited range and capacity of local services and facilities and lack of frequent public transport links.</p> <p>States that ANSCOMM is not within 600m of shops, as the distance from Nursery Hill Primary School to local shops at Chapel is 0.9 miles. Also noted that the site is within an MSA, on greenfield land and lies within an area of medium sensitivity with regards to historic environment. Concerns that there may be capacity issues at Nuneaton Severn Trent Water, an increase in greenhouse gas emissions and adverse effects on biodiversity, particularly at Moorwood Lane Local Wildlife Site and Hartshill Hayes Country Park.</p> <p>ANSCOMM/HAR1: 450 m is a considerable distance to travel for the elderly or less mobile. It is misleading that the site is within 600m of a Town Centre.</p> <p>ANSCOMM/HAR2: Site is considerable more than 300m from Hartshill Hayes. No healthcare services within Ansley Common.</p> <p>PAS139 (PS139?): Liberal Club has selective access. Chapel End Social Club and Chase Public House have ceased trading. Concern about loss of allotments and loss of greenfield land and sensitivity of the historic environment.</p>	<p>reasoning behind the scores presented in Table 5.7 of the main report. Community facilities considered in the SA include schools, GP surgeries and village halls.</p> <p>The strategic nature of SA means that presence and proximity of features are used to assess effects, whereas issues such as current use and perceived safety of existing facilities should be considered through other means.</p> <p>Sustainable modes of transport, such as cycling and public transport are assessed via SA objective 15.</p> <p>Measurements in the SA have been taken from the closest point, which is made clear in the next iteration of SA. These are measured in straight-line distances as walking distance depends on the layout of development. Nursery Hill Primary School is one of the furthest points of the site. The SA has been reviewed to reflect the fact that the Liberal Club has selective access and the Chapel End Social Club and Chase Public House have now closed.</p> <p>Presence of MSAs has been assessed through SA objective 14. Historic environment assessments have been based on the HEA are assessed via SA objective 8. Water quality, including consideration of sewage treatment works where capacity issues are known to exist, are assessed via SA objective 11. Biodiversity is assessed via SA objective 9.</p> <p>The 600m threshold for walking distance was drawn from The Institution of Highways and Transport document. The data limitations section of the SA Report has been updated to give a full account of</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>the reasoning.</p> <p>Town centres were defined by NWBC and utilised in this SA. Distance to services include services in adjoining settlements, providing they are within the distance thresholds set out in the assessment assumptions (Appendix 6).</p> <p>Site PS139 is not believed to include the allotments, therefore these will not be lost to development.</p>
DLP307	Savills UK on behalf of Cathedral Agriculture Partnership and White Family	<p>Focussing in particular on the area of Polesworth and Dordon, it is unclear from the main (SA) report why the sites on the west of the large allocation have been identified as 'not preferred' other than being over 5ha in size.</p> <p>We consider that some of the criteria which mean that they perform less well than those which are 'preferred' such as master planning to protect and enhance biodiversity.</p> <p>Further clarification is therefore sought for what this means for the allocation.</p>	<p>This comment appears to relate to sites POL11, POL10 and PS158. Table A8.1 in Appendix 8 of the SA Report gives the Council's reasons for selecting each residential site options or otherwise and Table 8.2 in Appendix 8 gives the Council's reasons for selecting each employment site options or otherwise.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 6 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report. The assumptions draw on the most up-to-date evidence. Not all site options have detailed development plans; therefore, in order to ensure that all options have been appraised to the same level of detail, all options have been appraised at a high level based on an up-to-date evidence base.</p>
DLP311	Alan Wilson	Concerns raised in relation to the loss of character in the town.	The potential impact of new development in North Warwickshire (specifically policies and site

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		<p>Concerns raised in relation to the capacity of existing infrastructure, services and facilities to accommodate additional growth.</p>	<p>allocations included in the Draft Local Plan) on the quality and distinctiveness of the built environment (including the cultural heritage) are considered by the SA Report through SA objective 8 while impacts on landscape are considered through SA objective 7 in Appendix 6. As explained in Appendix 6 of the SA Report the Historic Environment Assessment (HEA) for the Borough have been used to inform the appraisal of individual site options in relation to SA objective 8. The scoring of SA objective 7 has considered the potential loss of greenfield land in the Borough with larger greenfield sites scoring less favourably than smaller greenfield sites and brownfield sites. The SA framework has been agreed to ensure consistency across the SA Report in relation to the sites and policies of the Local Plan and reasonable alternatives which have been considered.</p> <p>Issues relating to existing infrastructure have also been addressed in the SA Report through the appraisal of options against SA objectives 1, 2, 3, 6, 15 and 20 which collectively consider the accessibility of new site options to existing infrastructure and services and facilities, specifically community, health, recreational and culture, sustainable transport and education.</p> <p>Information on the capacity of services and facilities is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through investment in existing facilities or the development</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			of new services and facilities. This is clearly explained in the next iteration of SA.
DLP325	Peter Bateman (Framptons Town Planning) on behalf of KNG Developments	The representation supports the methodology of the SA Report however the appraisal of site SLA40 is queried. In relation SLA40 the scores relating to health, landscape, built environment, biodiversity, efficient land and waste are all suggested to be amended. These updated scores are presented in comparison with other sites considered as part of the SA.	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 6 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report. This ensures that all sites are assessed in the same way, as required by the PPG.</p> <p>Developmental design is uncertain at this stage, as allocation of a site in the Local Plan does not mean that the design put forward by the promoter at this stage will be realised. In addition, site-specific surveys, details of developmental design and proposed mitigation are not available for all sites. In order to ensure consistency and transparency in the SA process a precautionary approach has been taken in the SA, therefore developmental design, detailed survey results and potential mitigation measures have not been taken into account.</p>
DLP326	Neil Cowley (Castlewood Property Ventures)	<p>Consultee is promoting Land South of Birmingham Road, which includes site SLA116 along with a field to the west of this and one to the north of that.</p> <p>Concerns raised that the SA Report is not based on an updated scoping report. The requirement for growth at land adjacent to settlements is only briefly analysed in the SA Report but this provides only a weak evidential base for the creation of a new settlement category.</p> <p>It is stated that Table 4.4 of the SA Report suggests that the</p>	<p>The information included in the Scoping Report formed the basis of the SA Report and has been updated at each stage of the SA process. An updated review of plans, policies and programmes is presented in Appendix 2 of the SA Report and updated baseline information is presented in Appendix 3.</p> <p>The SA of all growth options considered by the Council is presented in Chapter 4. This was</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		<p>proposed spatial strategy has been guided by the need to protect the Green Belt rather than a consideration for the most sustainable strategy to deliver growth and option OUT2 (which would provide housing at settlements nearest where shortfalls lie) was discounted inappropriately.</p> <p>Concerns raised that as the Growth Options Paper was not consulted upon and pre-determined the conclusions of the Draft Local Plan SA the process was not transparent. Concerns that the blanket approach of preventing development in the Green Belt prejudices the SA Report and does not accord with the NPPF approach to Green Belt at paragraphs 83 and 84 of that document as well as failing to promote sustainable development.</p> <p>Concerns that the SA Report does not detail how the Green Belt evidence available has informed the spatial strategy or site selection.</p>	<p>assessed according to the methodology and SA framework set out in the SA report. The SA has assessed all options in the same level of detail, which is proportionate to the scale of the options considered. Table 4.4 presents the Council's rationale for selecting the growth options included in the Local Plan and not selecting other options. It is the role of the Council, not the SA, to select the option deemed most appropriate and this may include factors other than the SA.</p> <p>The Growth Options Paper was subject to SA in June 2016 and it is the results of this SA that are reflected in the SA of the Draft Local Plan. Note that the SA is an independent process, carried out by external consultants and that a number of factors may influence the Council's decision-making, alongside SA.</p> <p>The SA presents the Council's reasons for selection or non-selection of sites in Appendix 8.</p>
DLP327	Mathieu Evans (Gladman)	<p>States that the SA process should clearly justify policy choices. It should be clear from results of the SA why some policy options have been progressed and others rejected.</p> <p>Concerns raised that the SA was produced after the completion of the plan and therefore did not inform the options chosen in the plan. Concerns that no consideration was made for the overall quantum of development, particularly to include the remaining unmet needs of Coventry, Birmingham and Tamworth.</p> <p>It is stated that site PS187 is a sustainable option and that many of the issues raised through the SA (particularly access to services, natural environment, heritage, biodiversity, efficient</p>	<p>The SA report represents a record of the SA of all options considered for inclusion in the Local Plan, which informs decision-making along with a number of other factors. It is often not possible to 'rank' options in terms of sustainability and the Council may not choose to proceed with the option perceived as most sustainable if there are other, overriding factors. Appendix 8 of the SA Report explains the Council's reasoning for selecting or not selecting site options.</p> <p>The Draft Local Plan was consulted on between Thursday 10th November and Friday 31st March</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		<p>use of land and waste) and SHLAA might be mitigated or are issues which face all greenfield sites.</p>	<p>2017. While the SA was prepared alongside the Draft Local Plan and influenced its development, the SA Report was consulted upon in early February up to the end of March. The consultation period was extended until March 2017, to allow consultees time to consider both documents. The delay in the publication of the SA allowed time to reflect the content of the Draft Local Plan published for consultation. Furthermore, chapters 2 and 4 of the SA Report also describe how previous iterations of the SA have fed into the plan-making process. The SA will continue to influence future iterations of the plan.</p> <p>The Council's justification for the housing requirement and SA of the different delivery options considered are presented in Chapter 4 of the SA report.</p> <p>The SA has been reviewed to take account of nearby bus stops highlighted in the representation.</p> <p>All sites have been assessed in line with the SA framework, which was agreed to ensure consistency across the SA assessments. The assumptions used in scoring each option are detailed in Appendix 6 of the SA report.</p> <p>Mitigation is likely to depend on developmental design and there is no guarantee of possible mitigation measures coming forward. In addition, details of developmental design and proposed mitigation are not available for all sites. In order to ensure consistency and transparency in the SA process a precautionary approach has been taken in the SA, therefore potential mitigation measures</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>have not been taken into account in the selection of sites for allocation.</p> <p>However, mitigation measures for the site allocation policies set out in Chapter 14 of the Draft Local have been considered in the SA of the Draft Local Plan in Chapter 6 of the SA Report.</p>
DLP341	Spawforths on behalf of the Harworth Group	<p>The representation objects to Policies LP2: Settlement Hierarchy and LP39: Housing Allocations, specifically demanding that the spatial distribution of development in the Borough be reconsidered, moving development away from the A5 and disseminating it more evenly between the Borough's Category 3 'Local Service Centres' to provide a more balanced settlement hierarchy and to meet the development needs of the wider Borough and alleviate the highway capacity issues on the A5...Rather the Draft Local Plan has prioritised Green Belt over...the need to promote sustainable patterns of development.</p> <p>Objection to policies LP12: Employment Areas, LP39: Housing Allocations and LP40: Employment Site – The former Daw Mill Colliery Site has key locational characteristics that make the opportunity afforded by the existing rail connections significant.</p> <p>Objection to Policy LP40: Employment Allocations as the 'Land at MIRA' employment allocation should be reallocated from a 'Category 2 – Adjacent adjoin settlement' site to a new Category 5 site as the site does not sit adjacent to an adjoin settlement.</p>	<p>Table 4.4 of the SA Report presents the Council's justification for taking forward the selected growth option and not selecting alternatives to this. Table A4.1 in Appendix 4 of the SA Report details how policies in the Draft Local Plan have developed. Decision making was influenced by the results of the SA, as well as other considerations such as the need to accommodate growth from neighbouring authorities and other evidence base documents. Reducing use of the private car, which is likely to reduce traffic and congestion, is assessed through SA objective 15.</p> <p>The Former Daw Mill Colliery Site has been included in the site audit trail table in Appendix 8.</p> <p>The heading 'Adjacent Adjoining Settlements' in the SA Report has been reworded to 'Sites Adjacent to Neighbouring Local Authorities'</p>
DLP349	Tim Plagerson (RPS) on behalf of St Modwen Development	<p>It is stated that the SA Report does not consider sites which are included in the updated SHLAA and there does not assess all reasonable alternatives. The representation relates to site Dairy House Farm which has not been included in the SA Report although it was submitted for consideration as part of the SHLAA. The consultee has undertaken an appraisal of the site in</p>	<p>Table A8.1 in Appendix 8 of the SA Report gives the Council's reasons for selecting each residential site options or otherwise and Table 8.2 in Appendix 8 gives the Council's reasons for selecting each employment site options or otherwise. Whilst the SA details the reasonable alternatives considered</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		question in line with the SA methodology and this is presented in the representation document. It is suggested by the consultee that the scoring compares favourably with the proposed allocations in the emerging Local Plan. Site GRE4 which was appraised in the SA Report contains land at Dairy House Farm. This site is the same distance from services and facilities as site GRE1 and GRE2 and therefore the same score should be recorded for these sites in relation to SA objective 1 (services and facilities) and SA objective 2 (vibrant communities).	and assesses these, it is the role of the Council to identify reasonable alternatives. For GRE4, review SA objectives 1 and 2 based on facilities mentioned for GRE1 and GRE2 (i.e. Grendon Village Hall).
DLP350	Tim Plageron (RPS) on behalf of St Modwen Development	Concerns raised that the site at Dairy House Farm (which the consultee wishes to see allocated for 1,000 new homes) has not been appraised. The site adjoins the settlement boundary and would score well against the SA objectives thereby meaning it should be considered as a reasonable alternative.	Table A8.1 in Appendix 8 of the SA Report sets out the reasoning for why each site option considered was deemed to be reasonable. Chapter 2 of the SA Report sets out how reasonable alternatives were identified and notes that a number of sites submitted to the Council were not deemed to be reasonable for a number of reasons. Whilst the SA Report explains how alternatives have been identified and assessed, it is the role of the Council to identify reasonable alternatives.
DLP354	William Gallagher Town Planning Solutions on behalf of Holiday Extras and Airparks Services Ltd	It is contested that Policy LP36 which addresses airport parking in the Borough is too restrictive. The representation states that the SA Report has not considered the airport parking policy wording appropriately and has not been tested against reasonable alternatives.	The appraisal of all policies has been undertaken in line with the agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report.
DLP364	Warwickshire Wildlife Trust	Concerns that as the SA has scored all sites negatively in relation to biodiversity it is very difficult to differentiate the findings presented. It is stated that mitigation and avoidance might be adopted at some sites and that the SA should be	SA is a strategic process, which focuses on identifying significant effects. Mitigation is likely to depend on developmental design and there is no guarantee of possible mitigation measures coming forward, therefore a precautionary approach has

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		<p>updated to reflect this.</p> <p>WWT has provided commentary on each site assessment individually and suggested changes to assessment results and scores in some cases.</p>	<p>been taken in the SA. The exception to this is where other Local Plan policies are likely to mitigate potentially negative effects, which has been assessed in the Cumulative Effects section of Chapter 6.</p> <p>All sites are assessed in line with the assumptions set out in Appendix 6, which were subject to consultation in earlier iterations of the SA. This ensures that all sites are assessed in the same way, as required by the PPG.</p> <p>Assessments of sites ATH14 and ATH20 have been reviewed to address inaccuracies identified by WWT. Other specific comments suggesting a change of score to site appraisals have been acknowledged in the SA assessment matrices (except those that only suggest a score change if policies are updated).</p> <p>Furthermore, effects on national and local Priority Habitats are considered in the next iteration of the SA Report.</p>
DLP371	Ruth Ellis	Concerns raised in relation to the potential for adverse effects on the natural and historical assets within close proximity to site POL/DOR1.	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 6 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report. The assumptions draw on the most up-to-date evidence. The full appraisal matrix for this site is presented in Appendix 7.</p> <p>The Council's Historic Environment Assessment</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>(HEA) has been used to inform the appraisal of sites in relation to potential impacts on the historic environment (SA objective 8). However, this site option was not covered in the HEA. Therefore an uncertain effect has been recorded for SA objective 8. This data limitation is acknowledged in Chapter 2 of the SA Report. An updated HEA is taken into account in the iteration of the SA Report.</p> <p>The site has been recorded as having a significant negative effect on SA objective 9 (biodiversity) given that the site sits within an area of ancient woodland and a Site of Importance for Nature Conservation (SINC).</p>
DLP375	Tom Shakespeare	<p>Concerns that health and education facilities are over-subscribed, the Council are unable to maintain green spaces and sport and recreation facilities are very poor and neglected.</p> <p>Road links are strained and development would increase congestion on the A5. Concerns that a new through road to the A5 will increase demand on the A5 between Dordon and Grendon and encourage more traffic through Grendon Road, Polesworth.</p> <p>States that rail links to Polesworth are 'almost non-existent'. Suggests reinstating a police station in Atherstone.</p> <p>Suggestions that Polesworth and Dordon have "a good range of existing local services and facilities" comparable to Atherstone and Coleshill are mistaken.</p>	<p>Information on the capacity of services and facilities is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through investment in existing facilities or the development of new services and facilities. This is clearly explained in the next iteration of SA.</p> <p>Reducing use of the private car, which is likely to reduce traffic and congestion, is assessed through SA objective 15. SA is a strategic, high-level process, which assesses all options in the same level of detail. The general growth proposed in the Borough on traffic levels and air quality have been assessed in the cumulative effects section in Chapter 6 of the SA Report.</p> <p>All sites have been assessed in line with the SA</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>framework, which was agreed to ensure consistency across the SA assessments. Assumptions on how this was applied to assessments are presented in Appendix 6 of the SA.</p> <p>Consideration of existing services and facilities considers each in its own right, rather than in comparative terms. As explained above, information on the quality and capacity of facilities is not consistently available, therefore the SA, as a strategic process, can only account for the presence of facilities.</p>
DLP379	Stella Doggett	<p>Concerns regarding the significant positive effect recorded in relation to health for the site at Dordon and Polesworth. The proposed new distributor road which will create more pollution and that the proximity of a health centre to the site should not be used as an indicator of the potential benefits of locating new housing at this location. There will be less space for walking and exercise due to the development.</p> <p>Concerns raised that sustainability criteria are inappropriate and do not take account of the reality of the changes development would bring. Concerns that the consultation process is no more than a 'tick box exercise' relating this to the loss of greenfield land which development would result in.</p> <p>Comments include reference to a lack of infrastructure to accommodate the number of houses proposed, stating that Polesworth and Dordon have been 'artificially' designated as market towns and questioning why the Council is not pursuing a policy of allowing for more incremental growth at the villages in North Warwickshire.</p>	<p>All sites have been assessed in line with the SA framework, which was agreed to ensure consistency across the SA assessments. The assumptions used in scoring each option are detailed in Appendix 6 of the SA Report. The site does not consist of open space, nor is it open access land. It has been assumed that the footpaths running through the site will be protected, in line with national legislation.</p> <p>Information on the capacity of services and facilities is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through investment in existing facilities or the development of new services and facilities. This is clearly explained in the next iteration of SA Report.</p> <p>It is not clear why the consultee believes the</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>sustainability criteria to be inappropriate, as no specific examples are given. The Sustainability Framework was subject to consultation in previous iterations of the SA.</p> <p>The SA of all growth options considered by the Council is presented in Chapter 4. Table 4.4 presents the Council's rationale for selecting the growth options included in the Local Plan and not selecting other options.</p>
DLP380	Dr John Mark Doggett	<p>Concerns raised in relation to the appraisal of the sites at Dordon and Polesworth in terms of potential health impacts related to increased air pollution due to higher levels of congestion and loss of green space. States that development would be better located spread out in smaller villages across the Borough, particularly to the South, West and North where deprivation is less pronounced. Also suggests this development pattern would be more efficient for education provision.</p> <p>Concerns that development will not be accompanied by appropriate transport infrastructure to improve road safety and congestion issues.</p> <p>Concerns have also been raised in relation to sites at Dordon and Polesworth in terms of the adverse impacts raised in the SA Report which relate to landscape, built environment, biodiversity, efficient land use and pollution with suggestion made that the sites should therefore not be included within the plan.</p> <p>Also raises concerns that a shortage of GPs may reduce the possibility of opening new medical facilities.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 6 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report and include SA objectives relating to landscape (SA objective 7), cultural heritage (SA objective 8), biodiversity (SA objective 9) and efficient use of land (SA objective 10). The assumptions draw on the most up-to-date evidence.</p> <p>Effects of development on health are assessed through SA Objective 3. The assumptions presented in Appendix 6 of the SA state that as there are no AQMAs in the Borough (therefore air quality in the Borough is in line with national objectives). While current air quality levels are not likely to affect the health of residents and workers, the Council will continue to monitor levels of air pollution and action would be taken if air quality degrades below target levels.</p> <p>Effects on green space are assessed via SA</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>objective 3 (health) and SA objective 6 (recreation).</p> <p>Reducing use of the private car, which is likely to reduce traffic and congestion, is assessed through SA objective 15.</p> <p>Table 4.4 of the SA presents the Council's justification for taking forward the selected growth option and not selecting alternatives to this.</p> <p>Information on the capacity of services and facilities is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through investment in existing facilities or the development of new services and facilities. This is clearly explained in the next iteration of SA.</p>
DLP388	Michael Stanley	<p>Concerns raised in relation to the capacity of existing road infrastructure, services and facilities to accommodate additional growth.</p> <p>The Council does not appear to take into account the housing already passed at the former golf course in Tamworth adjacent to the Proposed Robey's Lane site. This would put a possible 2,500 houses in that area alone. The resulting traffic coming down the B5000 and also through other villages such as Shuttington would be significant.</p> <p>The Council has not considered, (given the number of houses required) creating a new village with appropriate infrastructure.</p>	<p>Information on the capacity of services and facilities is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through investment in existing facilities or the development of new services and facilities. This is clearly explained in the next iteration of SA.</p> <p>The permitted site at the former golf course in Tamworth was taken into account in the SA of sites POL23 and PS158. This site will provide a primary school, open space and new bus services which</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>may redirect traffic that would otherwise pass through Polesworth. The full appraisal matrices for these site options is presented in Appendix 7 of the SA.</p> <p>A new settlement was considered by the Council as an option for growth, as explained in Chapter 4 of the SA Report. Table 4.4 explains that this was not selected by the Council due to concerns this could not deliver a substantial amount of the Borough's housing need over the plan period. This was associated with long lead-in times and a lack of suitable sites large enough to be considered for new settlements.</p>
DLP405	Polesworth Group Homes Ltd – Leigh-Anne Smith	<p>There does not appear to be a clear rationale of why Polesworth and Dordon have been selected for significant housing allocation rather than the provision being more fairly spread across category 1 settlements...For example Coleshill is much closer to Birmingham with substantially better road transport system.</p> <p>Traffic congestion and flood constraints in the centre of Polesworth highlighted.</p> <p>Concerns raised in relation to the capacity of existing infrastructure, services and facilities to accommodate additional growth.</p> <p>A number of landscape, heritage and ecological assets have been cited as at risk from adverse effects as a result of the strategic growth at Polesworth.</p>	<p>Table 4.4 of the SA presents the Council's justification for taking forward the selected growth option and not selecting alternatives to this.</p> <p>Traffic, flooding and infrastructure issues are noted. SA assessments have been carried out in line with the assumptions in Appendix 6. The potential of new site allocations to help reduce use of the private car, which is likely to reduce traffic and congestion, is assessed through SA objective 15. The cumulative effects of the general growth proposed in the Borough on traffic levels and air quality have been assessed in the cumulative effects section in Chapter 6 of the SA Report.</p> <p>The SA identifies impacts on landscape, heritage and ecological assets in line with the assumptions set out in Appendix 6 of the SA report.</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
DLP413	Jacky Chambers (Councillor for Dordon and Shadow Health spokesperson for NWBC)	<p>Concerns that alternative growth strategies were not consulted on. A systematic appraisal of other possible green belt sites or other distribution options does not appear to have been undertaken.</p> <p>Concerns that the housing development at Dordon and Polesworth performs much less favourably than the delivery of a new settlement closer to the settlements (Birmingham and Coventry) at which new houses are most needed. This is related to the findings of the SA Report for access to services, vibrant and active communities, health, recreation and culture, climate change, sustainable transport and employment. It is stated that the protection of landscape and the Green Belt have been given undue weight in the selection process.</p> <p>It is also stated that the SA Report supports the view that the proposed site performs very poorly against five of the twenty SA objectives with only one of the twenty three other sites having more negative scores recorded.</p> <p>The representation also contests the findings of the SA Report in relation to site POL/DOR1. Specific issues are raised in relation to these scores for services and facilities, vibrant communities, health, recreation, sustainable transport, employment and skills. Particular issues have been raised in relation to access to healthcare services in this area.</p>	<p>The Council's justification for the increased housing requirement and SA of the different delivery options considered are presented in Chapter 4 of the SA report. Paragraphs 2.34 to 2.43 explain how site options were identified by the Council.</p> <p>The first part of the representation appears to agree with the SA findings. The Council's reasons for selection or non-selection of sites are detailed in Appendix 8 of the SA.</p> <p>All sites are assessed in line with the SA framework and assumptions set out in Appendix 6, which were subject to consultation in earlier iterations of the SA. This ensures that all sites are assessed in the same way, as required by the PPG. Detailed matrices, which give explanations of the scores assigned to each SA objective with reference to the SA objectives and assumptions, are presented in Appendix 7 of the SA.</p> <p>Information on the capacity of services and facilities is not available on a consistent basis across the Borough to be used in the SA. It has therefore been assumed that developments would contribute to ensuring sufficient capacity is available to meet the needs of the new communities, either through investment in existing facilities or the development of new services and facilities. This is clearly explained in the next iteration of SA.</p>
DLP415	David Butcher	Concerns raised that the increase in housing requirement from the Core Strategy (2014) has not been justified or assessed in sustainability terms. The Council has not adequately considered	The Council's justification for the increased housing requirement and SA of the different delivery options considered are presented in Chapter 4 of the SA

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		<p>whether alternative strategies for delivering this growth might be more appropriate and sustainable.</p> <p>Concern raised in relation to various sustainability issues which may result from the development of 2,000 new homes at land to the east of Polesworth and Dordon, particularly in terms of inadequate transport infrastructure, impacts on landscape and wildlife and limited local service provision. Highlights that the site performs negatively against five of the twenty SA objectives with only one of the other 23 assessed sites having more negative effects recorded. Other alternatives have not been seriously considered despite the SA showing that other options perform more favourably.</p>	<p>report.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 6 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report. Overall the representation seems to agree with the SA. Reducing use of the private car, which is likely to reduce traffic and congestion, is assessed through SA objective 15. The effects of development on landscape and wildlife are assessed via SA objectives 7 and 9 respectively.</p> <p>In accordance with the PPG, the SA has assessed all options in the same level of detail. The Council's reasons for selecting or not selecting site options are presented in Appendix 8 of the SA Report.</p>
DLP427	Derek Tattersall	<p>Concerns raised that the SA leaves the "door wide open to carry on regardless of environmental and quality of life values in light of increasing 'development pressures'" and suggests such pressures can be moved, whereas the environment and quality of life cannot.</p> <p>Concerns raised that road infrastructure is not adequate for the proposed increase in traffic. Concerns that an increase in traffic will also have negative effects through increases in pollution. Concerns that wildlife corridors will be destroyed and stresses that habitats need to be joined up.</p>	<p>It is unclear which aspects of the SA the consultee is concerned about as no examples are given.</p> <p>The SA has followed best practice guidance and the framework and methodology have been consulted on through previous iterations of the SA.</p> <p>Reducing use of the private car, which is likely to reduce traffic and congestion, is assessed through SA objective 15. Requirement for new road infrastructure is beyond the scope of the SA, as this depends on traffic associated with growth within and outside the Borough. Reducing use of the private car, which is likely to reduce traffic and congestion, is assessed through SA objective 15.</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			<p>The cumulative effects of the general growth proposed in the Borough on traffic levels and air quality have been assessed in the cumulative effects section in Chapter 6 of the SA Report.</p> <p>Biodiversity is assessed through SA objective 9. Due to the strategic nature of SA, this has relied on assessment of effects on designated sites, as described in paragraph 2.57 of the SA, although it is acknowledged that habitat connectivity is important.</p>
DLP2021	Hannah Godley (Fisher German LLP) on behalf of A Arnold	The representation supports the proposed development for residential use at land south of Shuttington Village Hall (SHUT1). To support the allocation of this land the consultee has provided a review of the appraisal of this site against the agreed SA objectives and has also presented the subsequently updated SA scores for this site in comparison to those for other sites in close proximity to Shuttington.	<p>With regards to SA objective 1, community facilities considered were schools, GPs and community centres/village halls. Public houses were not included. This is made clear in the next iteration of SA.</p> <p>The assessment of SA objective 2 has been updated to reflect the fact that the site is adjacent to the Village Hall.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 6 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Table 2.2 of the SA Report. This ensures that all sites are assessed in the same way, as required by the PPG.</p> <p>SA objective 6 has been updated to acknowledge the sport pitches provided by Shuttington Village Hall.</p> <p>Mitigation is likely to depend on developmental</p>

Table of Comments on Sustainability Appraisal and Proposed Response

Consultation reference	Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
			design and there is no guarantee of possible mitigation measures coming forward. In addition, site-specific surveys, details of developmental design and proposed mitigation are not available for all sites. In order to ensure consistency and transparency in the SA process a precautionary approach has been taken in the SA, therefore potential mitigation measures have not been taken into account.