

North Warwickshire Draft Local Plan Representations

REF	ORGANISATION NAME	SUPPORT OBJECT	PAGE / PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP266	Richborough Estates	Object		LP39		Land off Birmingham Road, Water Orion	New site proposed. Supporting information submitted including masterplan, Transport appraisal, Landscape and Visual note and housing needs support note. Disconnect between identified spatial strategy and spatial distribution of housing. Significantly more development should be directed to Water Orion as sustainable option. Sites in Green Belt adjoining existing main towns and settlements may be most sustainable options. Scale of development in Local Plan fails to recognise Water Orion's function, role and sustainable location. Local Plan should explicitly deliver the 3790 dwellings for GBHMA. Site has previously been suggested for safeguarding and is therefore considered suitable.	No Change proposed. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.
DLP266	Richborough Estates	Object		LP1-40			Specific Policy requirements should remain flexible and allow for site specific considerations and are subject to necessary viability assessment.	Noted. Plan should be read as a whole. Consider Policies do provide for flexibility and viability assessments where necessary. No change proposed as a result.
DLP266	Richborough Estates	Object	1.3		Plan period		Concern plan period to 2031 will only cover 11 years. Para 157 of NPPF requires an 'appropriate' timescale of preferably 15yrs. Council should reconsider plan period and add additional sites as a contingency to meet needs if required, for flexibility and improve robustness of Plan and enable Green Belt boundaries to be reconsidered or sites safeguarded to meet needs beyond Plan period where necessary.	Noted. Agreed. See Board report. Plan period to be extended to address issue. Some sites within Green Belt are proposed to be 'safeguarded' for future needs and flexibility.
DLP266	Richborough Estates	Object			Housing Numbers		Coventry and Warwickshire HMA underestimates housing need due to demographic adjustments only based on 5 years not 10, no adjustment made to household formation rates, allowance for job growth only applied from 2014 onwards which does not cover plan period. Agents OAHN assessment is for 5005 dwellings at lower end. In addition the delivery of N&BBC's housing is doubtful as they have yet to sign the MOU and August 2016 CWHMA indicates a greater level of unmet need from Coventry that forms basis of MOU. Concern also that Plan does not provide certainty on addressing Birmingham shortfall, only "an aspiration".	Noted. Disagree, where adjustments need to be made to reflect change to plan period this will be addressed in the next submission stage. Other assumptions and assessments made are considered robust. N&BBC's needs are for them to address through their local plan process. Birmingham's needs are being specifically addressed through the Plan in the allocations, subject to infrastructure delivery and needs. Do not consider that at this time that further flexibility is required. There is a review mechanism that can be triggered if further requirements are expected to be delivered in NW.
DLP266	Richborough Estates	Support		LP7	Housing Density and infrastructure		Support Housing density on no less than 30dph and 50 dph in town centres. Also requirement for infrastructure to be delivered alongside housing is supported.	Noted.
DLP266	Richborough Estates	Object		LP7	Special needs housing		No evidence for 10% special needs housing requirement. Term needs defining.	Noted. Policy is flexible to reflect different needs for differing sites and areas. Some evidence available in the Borough's housing strategy and CWHMA (Chpt 10 Nov 2013), which defines the key special needs groups. Further work may be necessary to better define or explain the term in the Plan. Some delivery has already come forward to address needs. No change proposed but term will be clarified in Glossary.
DLP266	Richborough Estates	Object		LP9	Affordable housing		Housing viability assessment unpublished. Cannot rely on figures in absence of viability testing. Tenure split from HMA (65% to 15% rental/intermediate) also unclear whether has been tested.	Noted. Incorrect. Viability analysis has been published and is available on-line. Tenure split sought in terms of Policy is applied flexibly "wherever practicable", to reflect site and settlement needs, split and tenure needs and viability. No change proposed.
DLP266	Richborough Estates	Object	Para 1.8	LP6	Duty to Co-Operate		Although MOU approach by N&BBC is noted and supported, it is considered that an increased shortfall from Coventry noted in August 2016 HMA and potential increase from Birmingham HMA, in addition to lack of certainty and commitment in Plan to deliver the additional 3790 the Policy should be redrafted to explicitly commit the Council to deliver the additional homes. It is questionable therefore whether the engagement with neighbouring authorities has taken place on a positive manner and whether Plan strategy fully takes account of neighbouring authorities unmet needs.	Noted. Disagree. Plan has made that commitment through the site allocations addressing the full housing need and shortfall identified. Infrastructure needs and requirements will still need to be identified, tested and addressed before delivery. No change proposed. Reject lack of positive approach. North Warwickshire is one of few authorities who have made a pro-active and positive approach to all neighbouring authorities in terms of working with them to address their shortfalls in a reasonable, constructive and supportive process through joint working, joint meetings, signing MOUs and early commitment to including agreed levels to help address their shortfalls in the Plan.
DLP266	Richborough Estates	Object			Safeguarded Land in Green Belt		Necessary to release safeguarded land in green belt to ensure future housing needs are met and ensure Green Belt boundary will endure beyond Plan period.	Disagree. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP266	Richborough Estates	Object			Windfall Allowance		Windfall Allowance is not supported. Plan should allocate sufficient land to meet total housing requirements without reliance on windfalls.	Disagree. Evidence available indicates windfall will continue and can support housing delivery. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP266	Richborough Estates	Object			Context		Strategic comment, spatial vision. References throughout Local Plan to the Plan being a Core Strategy should be removed. Little regard given to relevant evidence base, key to producing a sound and defensible plan. SA has not been an iterative part of plan making process that has informed spatial strategy or selection of sites.	Disagree partly. SA has been on-going process using previous information available on site assessments and plan incorporates Core Strategy policies as updated for inclusion in the New Local Plan. Nevertheless, note taken of references to Core Strategy as opposed to Local Plan as title of Development Plan document. So where reference is inappropriate text will be amended to reflect current Local Plan title.
DLP266	Richborough Estates	Object			Leisure Centre and Allotment Site	Coleshill	COL3 Leisure Centre should be removed as now has benefit of consent, allotments site is unsuitable and undevelopable.	Noted. Disagree. Consent is recent and may not be implemented before Plan adopted so site will be retained until development commences. Site also may enable allotment development. Both sites to be retained.
DLP266	Richborough Estates	Object				Land east of Packington Lane Coleshill	New site proposed. Supporting information submitted including masterplan, Transport appraisal, Landscape and Visual note and housing needs support note. Disconnect between identified spatial strategy and spatial distribution of housing. Significantly more development should be directed to Coleshill. Sites in Green Belt adjoining existing main towns and settlements may be most sustainable options. Scale of development in Local Plan fails to recognise Coleshill's important function, role and sustainable location. Local Plan should explicitly deliver the 3790 dwellings for GBHMA. Site has previously been suggested for safeguarding and is therefore considered suitable.	No Change proposed. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.

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REF	NAME/ ORGANISATION	SUPPORT/OBJECTION	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP266	Richborough Estates	Object				Land west of Packington Lane, Coleshill	New site proposed. Supporting information submitted including masterplan, Transport appraisal, Landscape and Visual note and housing needs support note. Disconnect between identified spatial strategy and spatial distribution of housing. Significantly more development should be directed to Coleshill. Sites in Green Belt adjoining existing main towns and settlements may be most sustainable options. Scale of development in Local plan fails to recognise Coleshill's important function, role and sustainable location. Local Plan should explicitly deliver the 3790 dwellings for GBHMA. Site has previously been suggested for safeguarding and is therefore considered suitable.	No Change proposed. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.
DLP266	Richborough Estates	Object				Land south of Blythe Road, Coleshill	New site proposed. Supporting information submitted including masterplan, Transport appraisal, Landscape and Visual note and housing needs support note. Disconnect between identified spatial strategy and spatial distribution of housing. Significantly more development should be directed to Coleshill. Sites in Green Belt adjoining existing main towns and settlements may be most sustainable options. Scale of development in Local plan fails to recognise Coleshill's important function, role and sustainable location. Local Plan should explicitly deliver the 3790 dwellings for GBHMA. Site has previously been suggested for safeguarding and is therefore considered suitable.	No Change proposed. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.
DLP266	Richborough Estates	Object				Land north of Blythe Road, Coleshill	New site proposed. Supporting information submitted including masterplan, Transport appraisal, Landscape and Visual note and housing needs support note. Disconnect between identified spatial strategy and spatial distribution of housing. Significantly more development should be directed to Coleshill. Sites in Green Belt adjoining existing main towns and settlements may be most sustainable options. Scale of development in Local plan fails to recognise Coleshill's important function, role and sustainable location. Local Plan should explicitly deliver the 3790 dwellings for GBHMA. Site has previously been suggested for safeguarding and is therefore considered suitable.	No Change proposed. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.
DLP266	Richborough Estates	Object				Land at Barn End Road, Warton	New site proposed. Supporting information submitted. SA has not been an iterative part of plan making process that has informed spatial strategy or selection of sites. Site not adequately assessed in SA or in formulation of Plan. Warton considered a sustainable settlement capable of more significant contribution to housing requirement.	No Change proposed. Sufficient sites currently allocated to deliver OAN and test for additional Birmingham shortfall. Propose to "safeguard" site for future development. Whole site was not identified as available or proposed at time of Site Allocations Plan (2014). SHLAA call for sites (2015) or subsequent SA of Reasonable Alternatives. SA would not have assessed a site it was unaware of. Only part of site previously submitted was assessed. Full site area and ownership only submitted initially on 23/05/16 and in detail for consideration at 23/06/17, too late for inclusion in SA, SHLAA or Reasonable alternatives assessments. Warton settlements services assessed as sufficient for category 4 status in settlement hierarchy.
DLP267	IM Properties	Object			Existing Employment Land Identification		Need for Local plan to recognise Coleshill Manor campus as an existing employment site. Details and history of site submitted in support, indicating sites importance and planning consent.	Noted. Extant planning consent guarantees the potential employment use and is a matter of fact. Not considered necessary to identify as an existing employment site until planning consent development completed. Local plan does not identify all uses currently existing or approved within Green Belt or the Borough.
DLP267	IM Properties	Object			HS2 Impact Replacement provision.		Need for local plan to plan positively in response to impacts of HS2 route. Detail of impact of HS2 on campus submitted in support. North Warwickshire ELR states the supply of office premises is limited, with no modern office business parks or "corporate provision" apart from Coleshill Manor. As a result it is clear from the ELR that, as a minimum, the council should consider the need for replacement provision for land lost to HS2 in this location.	The policy behind the building of HS2 is not one that is relevant to the Local Plan. The area safeguarded for HS2 is noted in the Plan and impacts of the national infrastructure scheme will be treated flexibly on their merits as exceptions to normal Green Belt or countryside policies in accordance with NPPF guidance.
DLP267	IM Properties	Object			Employment Areas identified		LP12 identifies key employment sites but focuses only on industrial estates. Ignoring key office locations including the Coleshill Manor site. This is a significant oversight. Request the Office Campus is recognised in Local plan as an important economic asset and key employment site, where development will be supported. The following wording should be inserted in LP12: "Coleshill Manor Office Campus is an important economic asset within the borough. Future development will be supported where this assists with meeting the Council's objectives of broadening the employment base within the borough, subject to proposals meeting the requirements of other policies within this plan."	Noted. No change proposed. Site has benefit of extant planning consent not yet fully implemented. Unnecessary to identify all sites in employment use within Borough, particularly those yet to be fully implemented/completed. Changes of use may occur through permitted rights and/or redevelopment over time. Plan does not prevent site being implemented and would support this.
DLP268	R Arnold H & J Arnold	Support		LP7			Some development of North Warwickshire has to be accepted.	Noted.
DLP268	R Arnold H & J Arnold	Support		LP14, 15 & 16			Character, history and natural environment has to be safeguarded.	Noted.
DLP268		Object		LP25	Transport assessments		Many transport highway problems to be solved before any development proposals can be accepted. Insufficient thought and planning to minor roads and village by-passes.	Noted. Plans Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.

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DLP268	R Arnold H & J Arnold	Object		LP39		Land to east of Polesworth & Doron and Land west of Robey's Lane	Proposals too large. Will swamp existing settlements, create congestion, make existing pinch points/bottlenecks worse, encourage "rat-running", loss of good agricultural land. They are too close to development already taking place such as at Tamworth Golf Course and Polesworth and Birchmoor.	Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed. Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. These are the considered the most sustainable locations and areas with some infrastructure to support development needs. Further infrastructure will be delivered through financial contributions and highway authority investment to address any issues arising, where necessary and appropriate. Loss of good agricultural land may be inevitable in face of housing need and lack of suitably large brownfield or lower value agricultural land in sustainable locations. No change proposed.
DLP268	R Arnold H & J Arnold	Support		LP40 & LP13			Some of existing employment areas need improving to create more employment opportunities. LP13 extremely important to maintain viability of farm holdings, to cover BREXIT period. Shuntington planning and delivery required before development approved. Shuntington needs a By-pass to address current and increase in traffic to avoid highway damage and accidents. Shuntington Bridge will also need upgrading to two lanes to accommodate traffic.	Noted.
DLP268	R Arnold H & J Arnold	Object			IDP		Infrastructure is a key issue that is being addressed through the IDP. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. All development cannot be prevented before infrastructure is delivered as phased development delivery will enable the infrastructure delivery to address both current and future development infrastructure needs and impacts. No change proposed.	Infrastructure is a key issue that is being addressed through the IDP. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. All development cannot be prevented before infrastructure is delivered as phased development delivery will enable the infrastructure delivery to address both current and future development infrastructure needs and impacts. No change proposed.
DLP269	Rob Eaton Birmingham Airport	Support	Para 12.4				Pleased to see Plan seeks to exploit employment opportunities resulting from Airport's growth. Vital that local, regional and national policies support the growth of the airport. Welcome the recognition that Airport is a major economic asset. Would be beneficial if specific reference is made to supporting the Airport as a major tourism and economic driver for the region by adding text in para 12.4 "12.4 Birmingham Airport is experiencing exceptional passenger growth and is in a unique position as it will become the UK's first HS2 connected airport, with high-speed trains serving the capital in c30 minutes. The proximity of the airport brings significant economic benefits and opportunities to North Warwickshire. The Borough will therefore work with the airport to to maximise these benefits and opportunities" and "The Borough will work with the Airport to look at opportunities of increasing and enhancing sustainable surface access connectivity between the Borough and the Airport." This would accord with advice contained within the National Planning Policy Framework.	Noted. Current Airport lies outside Borough's area of responsibility and control. Expansion of Airport not expected within Plan period and would be a sub-regional and/or national proposal. NPPF, Aviation policy Framework and National Infrastructure policies would provide the appropriate Policy background and specific support. No change proposed.
DLP270	Suzanne Cree	Object			New site	Land at Forest Edge, Wood End	Site available for mixed housing and/or employment uses. Site is accessible and close to both Wood End and Kingsbury Link Employment estate. Easy access to Motoway network and transport links throughout country.	Noted. Green Belt site located midway between Kingsbury Link Employment site and Wood End development boundary. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver Employment needs and OAHN. No change proposed.
DLP271	Brian Moss	Object				Kingsbury Hall	Previous permission for 29 units was to enable restoration of Hall, including revocation of holiday condition restrictions. Oppose further residential development around Hall. Site accessed by narrow private road which cannot accept level of traffic both ways. Further development will exacerbate situation. Do not wish to see Green Belt land developed in Kingsbury. Will set too many precedents. Loss of GB land already through HS2.	Concerns noted. Issue of inadequate access may prevent development. In absence of reasonable alternative site access is proposed to be dropped from allocations. Without opportunity to address Historic Hall refurbishment through enabling development the very Special circumstances not considered established to warrant Green Belt release. Delete site from Plan site proposals.
DLP272	Muriel Jeffcott	Object			Transport Impact	Development at Anstey Common	New development requires the provision of adequate infrastructure. Road network too narrow, on road parking impacts on traffic flow, visibility is reduced, congestion is marked at peak times and new build will inevitably increase congestion around schools. Increase in traffic on local roads. Increase in commuter/employment traffic on minor roads due to abysmal public transport services available. Additional cumulative impact from new development at Galley Common.	Noted. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed. Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. These are the considered the most sustainable locations and areas with some infrastructure to support development needs. Further infrastructure will be delivered through financial contributions and highway authority investment to address any issues arising, where necessary and appropriate.
DLP272	Muriel Jeffcott	Object			Environmental Impact	Development at Anstey Common	Loss of recreation space, allotments, access to countryside and removal of hedgerow footpaths will impact community cohesion, environmental quality, sociability, exercise and provision of food. Loss of existing facilities that will need to be replaced elsewhere, which will take time and will not be as accessible.	Noted. Proposals do not intend to result in loss of existing facilities. These will be improved where possible as part of proposals or relocated as near as possible to maintain accessibility. Infrastructure is a key issue that is being addressed through the IDP. The Playing Pitch Strategy and other information is currently being pulled together and will inform the next steps for the Local Plan when available. No change proposed but detailed site needs and requirements will be clarified in the Site Proposals.
DLP272	Muriel Jeffcott	Object			Construction Impact	Development at Anstey Common	Impact on drainage via run off and flooding, wear and tear on roads from construction traffic, site access and safety, congestion, noise pollution, loss of facilities and amenities.	Many of details of construction controls, addressing impact, traffic, noise etc will be matters for details and outline planning applications when and if submitted. Development will not be permitted that increases risk of flooding over that existing currently. Loss of facilities and amenities will be addressed through developer financial contributions and replacement only if and where this is essential to enable the development. Other detailed Plan policies will address these development management requirements and Infrastructure or operational needs.

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DLP273	Alhag Ltd Sean Davies	Object		New Site	Employment Opportunity	Land at rear of Well Spring Close, Carlyon Industrial Estate.	Land currently designated as Green Space. Needed for expansion of adjoining business. Land is waste land suffering from vandalism/antisocial behaviour and of little value as useful public open/green space.	Noted. Disagree. Land does not have to be publically accessible to contribute to Green space, relief from built development and screening of major transport route (Wailing Street). Concern over limited opportunity to expand is noted but Plan is addressing employment land shortfall through new site allocations. Unclear as to how site could benefit existing business with restricted accessibility of green space area. Larger redevelopment of all land and business that retains a level of appropriately managed open space and screening of A5 may be an opportunity to consider but in absence of details that indicate no overall loss of green space no change is proposed.
DLP274	Nicholas Farmer	Object				Development at Anisley Common	Location of development on poorly drained land, with congested roads and poor infrastructure is not acceptable. Areas north and south of Coleshill Road poorly drained. Increased drainage will result in flooding at Chapel End/Anisley Common. Current flooding occurs after heavy rain. Alkmonds are an important community feature and loss would affect local community. Covenant on Recreation/Open Space from National Coal Board preventing development. Coleshill Road already congested, further traffic will increase safety problems especially at Nursery Hill school. Anisley Common has minimal facilities, overcrowded school and small convenience store. Chapel End has other facilities, two convenience stores and fully subscribed GP surgeries. Congestion and waiting times likely to be increased. Lack of thought on housing types could result in significant increase in crime levels and anti social behaviour.	Concerns noted. Development will not be permitted that increases risk of flooding over that existing currently. Loss of facilities and amenities will be addressed through developer financial contributions and replacement only if and where this is essential to enable the development. Proposals do not intend to result in loss of existing recreation facilities. These will be improved where possible as part of proposals or relocated as near as possible to maintain accessibility. Infrastructure is a key issue that is being addressed through the IDP. The Playing Pitch Strategy and other information is currently being pulled together and will inform the next steps for the Local Plan when available. No change to covenanted recreation pitch proposed but detailed site needs and requirements will be clarified in the Site Proposals. No specific housing types proposed. A range of types and tenures will be expected. Disagree that new development will automatically result in criminal activity and/or antisocial behaviour. Development and IDP will need to address infrastructure and health, police, social services needs as part of development requirements for area. Proposal will be clarified to address impacts, needs and infrastructure and relationship with existing recreational open space.
DLP274	Nicholas Farmer	Object		LP39 & 40		Development at Harshill and Anisley Common	Local infrastructure struggling to support population. School places reduced, shopping poor, policing and road maintenance at bare minimum. Do not want to live in a town. A5 busier with impact of earlier builds, resulting in congestion. Difficult to access A5 from drive as a result severe traffic delays. Also impact of flooding incidents on A5. Capacity of A5 and feeder roads impacted when motorways closed. Poor state of road repair will be compounded by increase in traffic. Bus services in villages inadequate, all houses require car and parking. Services in Altherstone inadequate for needs, generating further travel/traffic to Tamworth & Nuneaton. None of new builds will contribute to local communities. Council cash flow is only benefit. No real control over design of development foisted on communities. Spon Lane development provides example of half-truths upon which decisions are made.	Concerns noted. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed. Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. These are the considered the most sustainable locations and areas with some infrastructure to support development needs. Further infrastructure will be delivered through financial contributions and highway authority investment to address any issues arising, where necessary and appropriate. Flooding risk will also need to be addressed as part of any application and Policy requires this. Other development Management policies address design issues. The issue of revenue generated by housing is not a matter that impacts/determines the outcome of decisions in Local Plans or planning applications. Development will nevertheless, have to address infrastructure impacts through appropriate, necessary on-site delivery or financial contributions through S106 obligations. The IDP addresses infrastructure needs and delivery priorities and approaches. No change proposed as a result of objection.
DLP276	Ken Forest	Object			Housing numbers		Support general need for a plan, however, concern over excessive numbers, considered unreasonable level based on own personal research (Statistics and Data Analysis using Census and ONS data submitted in support)	Noted. Housing requirement based on an agreed sub-regional approach published in HMA to arrive at OAHN considered robust. No change proposed.
DLP276	Ken Forest	Object			Plan Period		15 year housing supply will not be delivered in the Local Plan period. Shortfall in time frame covered by Plan needs addressing. Plan period should be extended to 2036.	Noted. Agreed. Plan period will be extended to address this issue and provide a full 15 years from Adopted Plan start date.
DLP276	Ken Forest	Support		LP40	Employment		There is a need to provide good quality employment in the Borough to reduce travel to and from work. Note should also be made of increases in homeworking, self employment and ability to travel during off-peak periods. This should be encouraged and a review of these trends taken into account.	Noted. Agreed. No changes proposed.
DLP277	C J Horton	Object				Development at Altherstone	Size of development disproportionate to size of town and infrastructure available, which cannot cope with increase in population. Inadequate road infrastructure. Impact on wildlife, residents quality of life and close relationship with countryside will suffer. Focus development on more urban areas.	Altherstone is the main urban settlement within the Borough and is most sustainable in terms of infrastructure and size. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed. Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy.
DLP277	C J Horton	Object		LP39	Flooding	Development at Altherstone	Main area proposed for housing is prone to flooding. 100+ hectares of built development will exacerbate this problem.	Proposed site boundary avoids area of flood zones. Also Plan Policy requires development of site to address flooding issues and to ensure surface water run-off and flood storage impact to be no worse than existing to avoid exacerbating flooding risk. No change proposed.
DLP277	C J Horton	Object		LP39	Alternative options.	Development at Altherstone	Land proposed for development is enjoyed by many. Land nearer town centre enjoyed by only one family is geographically more suitable but is "protected". Unprotect this land to allocate for development so residents can benefit from environment and well being.	Noted. No specific site identified. Other available sites nearer town centre have other constraints, heritage, access, ecology etc that prevent or discourage their development. Allocated sites do not have these constraints. No change proposed
DLP278	Bill Blencoe CWLEP Growth Hub	Support			Duty to Co-operate		Support initiatives by WCC, Coventry and Warwickshire Districts for partnership working and MOU's for housing and employment.	Noted.

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DLP278	Bill Blencoe CWLEP Growth Hub	Support		LP4	Scope of Plan		Support the scope of housing and employment proposals and principle of looking beyond the plan period to safeguard land for longer term growth needs.	Noted.
DLP278	Bill Blencoe CWLEP Growth Hub	Object		LP11	Para 2		Policy supported in principle. However, Para 2 wording should be amended to make clear release of employment land should only occur in exceptional circumstances.	Noted. Planning Guidance seeks Plan policies to not be overly restrictive and to be positive, reasonable and flexible. Policy protects employment land unless clear evidence shows no prospect of realistic employment use. Increasing restrictions to only exceptional circumstances may result in sites lying vacant and undeveloped. No Change proposed.
DLP278	Bill Blencoe CWLEP Growth Hub	Object		LP12			Application of policy Criteria based on use of B1, B2 and B8 criteria may not achieve stated objectives. New hybrid buildings that accommodate a variety of uses are increasingly popular. Policy should encourage applicants to make clear the range and mix of uses that might be subsumed within any individual building.	Noted. Issue is considered too detailed for Local Plan Policy to specify. More appropriate to address at planning application stage. Development Management policies and application validation should ensure this information provided at planning application stage to enable Policy control where and when appropriate. Permitted development rights will also cloud the use issue. No further change proposed.
DLP278	Bill Blencoe CWLEP Growth Hub	Support		LP13			Policy fully supported.	Noted.
DLP278	Bill Blencoe CWLEP Growth Hub	Object			Recognition of sub-regional initiatives		Draft plan strategy needs to recognise and reflect impact of other sub-regional initiatives, including WCMA SEP.	Noted. Plan focus is on North Warwickshire needs and requirements but takes into account employment needs and growth from wider sub-region through additional employment land allocated to address accommodation of housing for Birmingham shortfall. No change proposed.
DLP278	Bill Blencoe CWLEP Growth Hub	Object			Market Demand		Draft plan fails to acknowledge some of key issues that affect provision of range of employment space to enable economy to grow, including shortfall of "shovel ready" sites, demand for small to medium enterprise sites with capacity to expand, and need for further major strategic employment allocations to meet sub-regional and local requirements. Plan should include more analysis of market trends, particularly for SMEs. Focus allocation on large green field sites will not enable smaller low cost premises.	Noted. Disagree. Plan allocations enable a range of opportunities to come forward that will potentially satisfy both local and sub-regional needs, at MIRA, Hams Hall and Birch Coppice. Policies enable appropriate expansion or redevelopment and site Proposals seek to encourage delivery of SME sites as part of development proposals. Employment Land Review evidence includes assessments of market trends. No change proposed.
DLP278	Bill Blencoe CWLEP Growth Hub	Object			Market assessment		Qualitative assessment and disaggregation of current and future market should be carried out as advised in DCLG Planning Practice Guidance. No evidence that these have been carried out to inform quantum of land allocated.	Noted. Disagree. Sub-Regional Employment Land Reviews and other studies have informed plan. Plan allocations enable a range of opportunities to come forward that will potentially satisfy quantum of both local and sub-regional needs, at MIRA, Hams Hall and Birch Coppice. No change proposed.
DLP278	Bill Blencoe CWLEP Growth Hub	Object		LP40	Employment Land supply figures		Figures for total provision of supply to 2031 and beyond is not clear. Figures exclude outstanding permissions at Hams Hall and Birch Coppice. These need to be integrated in land supply figures. Single user site identification (AM) also not consistent with approaches elsewhere, where these are excluded from supply. Needs clarification and simplification.	Noted. Exlant consents at Hams Hall and Birch Coppice reflect delivery for previous Regional requirements over and above local requirements. Will consider whether figures can be clarified. Identification of land for single user still contributes to supply and does not prevent future sale or redevelopment for other users. Current owner has indicated intention to develop. Will simplify and clarify where appropriate. No other changes proposed.
DLP278	Bill Blencoe CWLEP Growth Hub	Object			Mixed Use opportunities		LEP supports the inclusion in major residential led proposals of small scale commercial mixed uses, compatible with new residential schemes.	Noted. Focus of large site allocations is on housing does not prevent or preclude opportunity of appropriate small scale mixed employment or business uses coming forward as part of a development proposal. This can be clarified through the Development Briefs, Concept and Master plans that will be sought by the Plan proposals for the major site allocations. No change proposed
DLP278	Bill Blencoe CWLEP Growth Hub	Object		IDP	Implementation, timing and phasing of employment land release		IDF offers little detailed information, cross reference to policies or main strategic employment and housing areas which LEP consider is a major deficiency in Draft Plan. IDP does not indicate the balance or sources of funding between developer contributions and public infrastructure funding. More work needs to be undertaken to understand infrastructure provision, its funding and timing. This needs to be linked to proposed policies and allocations. This is particularly the case with major road proposals and factors that impact timing and delivery of major development schemes. Major investors require relative certainty in order to be attracted to new commercial allocations.	Noted. Issues being addressed through the IDP. This is a continual process. Issue of funding will also be addressed in Board report. Ongoing discussions underway with services, infrastructure providers and agencies to identify funding sources, opportunities and timing where necessary. As situation clarified this will be reflected in updates to the IDP.
DLP279	Susan Green HBF	Object			Duty to Co-Operate	Coventry shortfall	Uncertainty over Duty to Co-operate due to current Coventry shortfall not being met in Nuneaton and Beoworth Borough's plan.	Noted. Disagree. Shortfall in N&B&C Plan is matter for N&B&C Plan process. Further work to address this is underway. NWBC is addressing the agreed shortfall as per the MOU with Coventry. No change proposed.
DLP279	Susan Green HBF	Object			Duty to Co-Operate	Tamworth shortfall	Following Tamworth plan adoption there is uncertainty about meeting a requirement for North Warwickshire and Lichfield to address Tamworth's 825 shortfall by 2017/18.	Disagree. Recent planning consents within both Lichfield and North Warwickshire are already addressing Tamworth's shortfall and progress in both authorities Local Plan, through site allocations/proposals, will provide clarity on how shortfall is being addressed. Further work on Joint MOU's is underway. No change proposed.
DLP279	Susan Green HBF	Object			Duty to Co-Operate	Birmingham shortfall	Confusion over derivation and division of agreed contribution in NWBC/Birmingham City MOU, between Tamworth's and Birmingham's relative shortfalls. Multilateral MOU, not unilateral, required between all affected authorities.	Disagree. No confusion. Tamworth is part of Birmingham HMA. The agreement to deliver 3780 for Birmingham shortfall also includes and addresses the Tamworth shortfall. The two settlements should not be treated in isolation as if in separate HMAs. To add two shortfall figures addressing same HMA housing requirement would result in duplication and oversupply. To avoid Local Plan delay a unilateral MOU approach has been taken while other authorities move forward at different positions within their respective Local plan processes. No change proposed.

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DLP279	Susan Green HBF	Object			OAHN		Further clarity needs to be provided on Borough's own OAHN and the precise figures for Coventry, Tamworth and Birmingham respectively. Classifying the meaning of these unmet needs as only an aspiration undermines commitment. Concerns over Covid/works HMA on adjustments for longer term migration trends, using HFR in younger age groups as mechanism to improve affordability, no increase to help deliver affordable housing, misalignment of economic growth forecasting timeframes and publication of 2014 SNPP and SNHP raises doubts on requirement figures. Aspirational figure of 3790 for Birmingham also not based on OAHN for the HMA.	Disagree. OAHN based on evidence including 2015 SHMA that Warwick DC Inspector recently accepts and considers to be based on reasonable and soundly based assumptions. Further clarity on housing figure breakdown may be provided but Plan Tables 1 and 7 make clear that Tamworth 500 and Coventry HMA shortfalls are included in 5280 figure. Although 3790 figure (Bham shortfall) indicated as to be tested in table 2, actual Plan site allocations include land to address delivery of all this figure (9070) subject to provision of necessary infrastructure. There is a review mechanism that can be triggered if further requirements are expected to be delivered in NW. No further changes proposed.
DLP279	Susan Green HBF	Object		LP4	Housing Land Supply	Safeguarded Land	Given uncertainties regarding unmet need there should be greater flexibility in bringing forward safeguarded land.	Noted. Disagree. Board Report will address some of these issues. No change proposed.
DLP279	Susan Green HBF	Object		LP8		Windfall Allowance	Not considered necessary to set out proposed windfall allowance as a policy in the Plan. Policy should be deleted.	Noted. Policy provides guidance and surety and contributes to identifying flexibility and evidence of delivery in housing supply. Board Report will address some of these issues. No change proposed.
DLP279	Susan Green HBF	Object				% flexibility contingency	HBF suggest 20% flexibility contingency should be applied, based on per annum delivery since 2011.	Disagree. Evidence of housing delivery over recent years indicates significantly and continuously improved delivery over previous years at or above local plan requirement, see monitoring data on council website. Board Report will clarify some of these issues. No change proposed.
DLP279	Susan Green HBF	Object				5 year housing requirement	5 year housing requirement should be based on OAHN for borough plus unmet needs from elsewhere. If there is not reasonable certainty that Council has 5 Yr+LS on adoption Plan cannot be considered sound. Plan should be considering allocation of more residential sites to address shortfall and improve flexibility of supply top maximise delivery.	Noted. Board Report will address some of these issues. OAHN for Borough is 5280 which will be figure used for 5 yr supply and housing delivery. No change proposed
DLP279	Susan Green HBF	Object		LP7		Special needs housing	10% special needs housing requirement requires evidence. Term needs defining.	Noted. Policy is flexible to reflect different needs for differing sites and areas. Some evidence available in the Borough's housing strategy and CWHMA (Cpt 10 Nov 2019), which defines the key special needs groups. Further work may be necessary to better define or explain the term in the Plan. Some delivery has already come forward to address needs. No change proposed but term will be clarified in Glossary.
DLP279	Susan Green HBF	Object		LP9		Affordable housing	Policy should be reviewed in context of changes proposed in Housing White Paper and updated whole plan viability testing.	Disagree. Guidance and clarity on Housing white paper proposals still awaited and may require changes to NPFF. This would delay Local plan process unnecessarily. Viability addressed through Policy flexibility allowing reduced affordable housing where viability appraisal indicates targets cannot be met. No change proposed.
DLP280	Aaron Gibson	Object		LP14		Natural Environment	How will the quality, character, diversity and local distinctiveness of the natural environment be enhanced? In who's opinion will it be enhanced? Surely the natural environment should be left as it is?	Noted. Enhancement will be sought through on-site specific or off-site works via financial contributions to restore or improve existing ecology and environments. This will be led primarily through advice and guidance from Natural England, Warwickshire, Warwickshire County Council and Warwickshire Wildlife Trust. Delivery may also be managed through the Environment Bank.
DLP280	Aaron Gibson	Object		LP11		Economic Regeneration	Add additional criteria to LP 11 "And the proposed business will have an adverse affect on the environment and local residents"	Noted. This issue will be addressed and controlled by other Policies dealing with Natural Environment in the Plan. Unnecessary duplication. No change proposed.
DLP280	Aaron Gibson	Object		LP4	Land at Hawkeswell Lane, Coleshill, and land to the west of Tanworth Road, Kingsbury		Why are these particular areas being removed from Greenbelt?	Noted. The areas will be safeguarded for potential release for housing needs in the future if required. It is not intended to release these sites from the Green Belt until a new Local Plan requires this. Nevertheless, they are being highlighted in this Local Plan as potential opportunities for the future, if housing requirements and policies need to change due to land supply, availability and housing needs. This will be clarified in the Board Report and the Plan.
DLP280	Aaron Gibson	Object	Para 6.5				Include requirement for Calisthenics equipment to be placed in all or most parks. Its a new trend and costs almost nothing to maintain.	Noted. Issue of specific types of equipment is too detailed for Local Plan policies but could be encouraged as part of the "Support the promotion of health and well-being" strategies currently under review. No change proposed.
DLP280	Aaron Gibson	Object	Para 13.30				Major development providing a minimum of 10% of its operational energy requirements from a renewable energy source subject to viability doesn't seem very ambitious. Why only a minimum of 10%? And why only subject to viability...?	Noted. Insufficient evidence and support to seek larger requirements locally. Viability impact is required by National Planning Policy Guidance as an integral part of a flexible planning policy to avoid 'preventing' development that may be of economic, social or environmental benefit. No change proposed.
DLP280	Aaron Gibson	Object		LP39		Britannia Mill	Although I am in favour of redeveloping the Britannia Hat Factory site, I am concerned about parking and the number of new vehicles on Coleshill Road.	Noted. Site now has planning consent for development that addresses some of the parking issues. Proposal may be dropped from Plan to reflect current consent.
DLP280	Aaron Gibson	Object		LP40		MIRA	Concerned about the impact of additional traffic and additional pollution being added to the A5. Electric vehicle charging points should be installed as a compensating factor.	Noted. This issue will be addressed through the emerging STA, which is awaited and will address in more details issues of A5. Further discussions underway on parking issues and standards will consider opportunity for EV Charging facilities as a requirement.
DLP280	Aaron Gibson	Object					No specific comments raised.	Noted. No change proposed.
DLP281	Christopher Holmes KFC Ltd	Object		LP21			Policy LP21 Headed "Disproportionate Concentration" to be deleted or, at the very minimum, an explanation and evidence provided as to what the causal relationships are that the policy seeks to address, together with an explicit statement as to the circumstances in which hot food takeaways will and will not be permitted, as required by National Planning Policy Framework paragraph 154. Concerned that Policy LP21 appears to link poor health and obesity to, firstly, high concentrations of takeaways without evidence for a causal link or at what concentration it becomes a problem and, secondly, to the proximity of takeaways. It is unclear how the factors cited would be taken into account and why.	Noted. Clarification will be provided based on increases of deprivation and health/obesity data, similar to work undertaken at Barking and Dagenham. But basis of Policy is wider than simply health impacts, primarily addressing impacts on vitality and viability of retail centres/areas due to over concentration of uses. No change to policy proposed.

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DLP282	Kevin Woolley	Object				Development at Dordon and Polesworth	Scale of proposed plan disproportionate to size of villages Dordon & Polesworth. Level cannot be sustained without major investment in infrastructure and services.	Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Infrastructure and service investment issues being addressed through the IDP and contribution by Development. This is a continual process. Board Report will address some of these issues. No change proposed. Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. These are the considered the most sustainable locations and areas with some infrastructure to support development needs. Further infrastructure will be delivered through financial contributions and highway authority investment to address any issues arising, where necessary and appropriate.
DLP282	Kevin Woolley	Object		Settlement Hierarchy		Development at Dordon and Polesworth	Re-labelling the two villages as "market town" lacks any sound foundation. Sites throughout Borough should be used to lessen impact on individual communities.	Dordon and Polesworth have been identified as a large settlement formed by two adjoining settlements in numerous planning documents including the County Structure Plan since 1996. The Structure Plan notes that "Warwickshire has no pre-eminent centre and is essentially made up of a number of main towns - Nuneaton, Rugby, Leamington, Bedworth, Warwick, Kenilworth, Stratford-upon-Avon, Atherton and the settlements of Polesworth and Dordon - and then a far larger number of relatively small market towns and villages which are predominantly rural in character". This clearly links the two settlements and classifies them as a main town in effect. The Structure Plan further states that "these nine towns stood out as significantly larger and of a more urban character than the rest of the settlements in the County, including the five with populations between 4,000 and 8,000." The Draft New Local Plan allocations reflect the historical identification and reality that Polesworth and Dordon, along with Atherton and Mancetter and Coleshill form the largest major settlements (in scale, population, size, transport links and opportunities and available services and facilities) within North Warwickshire Borough and have been identified as such within the Strategic Policy, past and present, dealing with the Settlement Hierarchy for the Borough. Prior to the Structure Plan the close relationship between the two settlements in Planning terms was recognised by the Polesworth and Dordon Local Plan Brief in 1984 and Local Plan in 1989.
DLP282	Kevin Woolley	Object			IDP/ Infrastructure and services	Development at Dordon and Polesworth	Local Services, public transport links and road network insufficient to accommodate additional population. Increase in vehicles will affect existing congested roads, A5 and B5000. Narrow canal/bridges inadequate for traffic levels, increasing congestion and pollution. GP waiting times excessive. Schools unable to cope with increased demand and significant expenditure to address these issues will make proposals not viable.	Infrastructure and service deficiencies and needs are issues being addressed through the IDP and contribution by Development. This is a continual process. Board Report will address some of these issues. No change proposed.
DLP282	Kevin Woolley	Object			Village character and impact on environment		Fabric and character of villages will be irreversibly changed, adversely affecting lives of residents. Reduction of green spaces and eco systems will have negative impact on diverse wildlife and biodiversity.	Noted. Plan Policy PL14 seeks to protect, conserve and enhance the natural environment and landscape throughout the Borough. Where proposals impact on natural or built environment compensatory measures will be sought. Delivery of needed housing, services and infrastructure through development is considered will benefit residents.
DLP282	Kevin Woolley	Object				Brownfield site priority	Prioritise brownfield sites before green field.	Noted. There are insufficient brown field sites within the Borough to deliver the housing need, resulting in the necessity to allocate green field, countryside sites. Where impacts are significant compensatory measures will be sought. Duty to Cooperate requirements and pressure from both commercial and residential development needs mean pressure for development cannot be avoided.
DLP282	Kevin Woolley	Object			Birmingham overspill impact		Study of sites needed to determine land availability and number of dwellings that can be accommodated. Decision to accommodate the level of Birmingham overspill should be reviewed. Dordon already seen huge levels of building at Birch Coppice and further encroachment into 'Meaningful Gap'. Need to limit this commercial and residential sprawl and seek other, more sustainable options utilizing whole borough.	Duty to Cooperate requirements and pressure from both commercial and residential development needs mean pressure for development cannot be avoided. Development impact needs to be managed to limit its impact while maximising any benefit and improvement to services/infrastructure. Where impacts are significant compensatory measures will be sought. Current National Green Belt constraints limit options for spreading development across Borough, hence focus on the area outside Green Belt. Most significant development allocations are targeted at the most sustainable settlements in the Borough (outside of Green Belt). No change proposed.
DLP283	Prologis UK Ltd	Object			New Employment Allocation	Birmingham International Gateway (BIG)	Promotion of land adjacent M42, Junction 8 stretching to Peckmore strategic employment allocation in Birmingham. Supporting information and evidence submitted. Evidence base identifies preferred location for meeting large scale strategic sites is within M42 corridor. Land should be identified in this location for this need.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. No change proposed.
DLP283	Prologis UK Ltd	Object			New Employment Allocation	Land adjacent to Duntun Park Industrial Estate, M42, J9, Curdworth.	Promotion of land adjacent to Duntun Park Industrial Estate, M42, J9, Curdworth. Supporting information and evidence submitted. Evidence base identifies preferred location for meeting large scale strategic sites is within M42 corridor. Land should be identified in this location for this need.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. No change proposed.
DLP283	Prologis UK Ltd	Object			Strategic Objective 3		Strategic objectives fail to take into account need to plan for benefit of Region and Midlands Engine. Outlook far too local in scale, lacks ambition, has no regard to Strategic economic Plans of CSWLEP and WMCA. Plan should take a proactive approach and plan positively to meet more than local needs to comply with duty to co-operate.	Disagree. Local Plan is delivering wider than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. This reflects a positive and pro-active approach to Duty to Co-operate responsibilities. No change proposed.
DLP283	Prologis UK Ltd	Object	Para 7.45 - 7.48		Employment requirements		Plan provides too little employment land, only for lowest level of local need with no regard to wider regional and strategic employment land requirements. Plan notes need identified for wider area but strategy is not pro-active or positive in seeking to meet this need. Plan should plan positively to meet need for large scale strategic employment sites to meet wider than local need taking account of location of greatest demand and suitability identified in WMSSESS and WMLC.	Disagree. Local Plan is delivering wider than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. This reflects a positive and pro-active approach to Duty to Co-operate responsibilities. No change proposed.

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DLP283	Prologis UK Ltd	Object		LP6	Amount of Employment Development		The Plan should aim to deliver substantially more than the 90ha identified to address the shortfall across West Midlands, Birmingham, Coventry and Warwickshire and Southall areas, for high quality large sites, advanced manufacturing and supply chain/distribution requirements. Recent appeal decisions at J10 and release of Hams Hall Power Station B site support and evidence this need and demand.	Disagree. Local Plan is delivering wider than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs and Tamworth employment needs, agreed through tMOU. This reflects a positive and pro-active approach to Duty to Co-operate responsibilities. No change proposed.
DLP283	Prologis UK Ltd	Object		LP40	Employment Allocations		Insufficient land allocated to meet objectively assessed needs. No allocation made for large scale employment land to meet need for high quality large sites, advanced manufacturing and supply chain/distribution requirements. Evidence base identifies preferred location for meeting large scale strategic sites is within M42 corridor. Land should be identified in this location for this need.	Noted. M42 corridor area referred to lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, Tamworth employment shortfall needs, agreed through tMOU. No change proposed.
DLP284	Alan Vaughton Coleshill & District Civic Society	Comment			General building design		Mix of size and style, with emphasis on affordable to satisfy local residents needs should be priority. Design should be commensurate with existing buildings in same setting or proximity. Favour use of design briefs.	Noted. General Development Management and Design Policies in Plan should address these issues.
DLP284	Alan Vaughton Coleshill & District Civic Society	Comment			Conservation Areas		Conservation Areas should be enhanced whenever opportunities arise. Concerned that too great a diversity of building design, shop frontages and signage, impacting on cherished Georgian and Victorian heritage in street scene. Some aspects of design have slipped.	Noted. General Development Management and Design Policies in Plan and Neighbourhood Plans should address these issues.
DLP284	Alan Vaughton Coleshill & District Civic Society	Comment			Environment	Blythe Valley and Coleshill Corridor	Resist development in Blythe valley, east of town. This area of high quality landscape in Green Belt should be buffer to urban expansion. Landscape of Coleshill Corridor to west should be upgraded to help offset negative impact of HS2.	Noted. No allocations have been proposed in Green Belt east of town. Council recognise sensitivity of this area. Limited control over impact of HS2 as a national infrastructure project but Council is seeking mitigation of impact of HS2 which will include seeking landscape and environmental measures. However, these measures are outside the remit and control of the Local Plan.
DLP284	Alan Vaughton Coleshill & District Civic Society	Comment			Economy		Society will support efforts to invigorate Coleshill High Street. Seek extra parking and appropriate planning policies to assist vibrancy. Redevelopment and modernisation should be encouraged where space is available.	Noted.
DLP284	Alan Vaughton Coleshill & District Civic Society	Comment			Traffic		Planning and highway authorities need to work in partnership to address supporting infrastructure, seek ways of improving traffic circulation in and around Town and address issue of increasing traffic volumes.	Noted. The Strategic transport assessment and IDP for the Plan will address some of the highway infrastructure needs issues. Further work on Transport Issues will be undertaken.
DLP285	David Brownbridge				Supply vs Demand		At consultation meeting, supply mentioned frequently, "demand" never. Consultation information unclear as to details of estimated required supply, my estimate of housing required is 6800 houses. How can this level of housing be justified until Brexit negotiations and New Freedom of Movement Rules are introduced?	Housing need and demand were part of Objectively Assessed Housing need established through the Coventry and Warwickshire Joint Strategic Housing Market Assessment. Additional pressure from "Duty to Co-operate" to help address the Birmingham housing shortfall has added to demand and North Warwickshire falls within both the Coventry/Warwickshire and Birmingham Housing Market areas the impacts, needs and demands from which resulted in the housing need indicated. No change proposed.
DLP286	Margaret Henley North Warwickshire Heritage Forum	Object	Para 10.9		Historic Environment		Historic Environment has not been considered in sufficient detail in the Draft Plan. At 10.9 the draft plan lists the numbers of sites in the Warwickshire Historic Environment Record. The Forum believes that not all of the sites have been included in this record. Some are still to be identified and will be lost under current development approval in the Borough.	Noted. The Warwickshire Historic Environment Record is the evidence base along with the Borough Council's own Historic Environment Assessment that informs the Plan. The County Environment team receive details of applications and will raise concerns where Historic Environment issues are known. The need to undertake Historic Environment Assessments will be dealt with by the appropriate Development Management policy and planning conditions. Further work is underway on Historic Environment and will help inform Plan. No change proposed.
DLP286	Margaret Henley North Warwickshire Heritage Forum	Object			Landscape Impact		Landscapes can be particularly sensitive to inappropriate development and the Forum believes the draft plan does not emphasise the importance of these landscapes sufficiently. The Forum believes that the openness of the Arden landscape needs to be preserved. Also features in the landscape which are outside the conservation areas, historic monuments and listed buildings in the Borough, which are an integral part of the landscape and are vital to the interpretation of the sites should be protected.	Noted. The evidence base for the Plan includes a Landscape Character Assessment and the Historic Landscape assessment is included as part of the HEA. Landscape Impact is addressed in Policy LP14 in Plan. Further work is underway on Historic Environment and will help inform Plan. No change proposed.
DLP286	Margaret Henley North Warwickshire Heritage Forum	Object	Para 10.11		Buildings at Risk		The Forum believes that not enough involvement by the Borough has taken place with owners of some of the '14 designated assets' noted at risk in 10.11. Examples include Bramcote Hall, Beech House, Atherton; 6, 8 and 10 Church Street, Atherton; The Cruck Cottage, Warton; the old chapel at Hants Hill and the hatched black and white cottage at Hants Hall by the Hams Hall Environmental Centre. The Forum believes that more input from the Borough is required to save and conserve these buildings.	Noted. The Plan highlights the "Buildings at Risk" list in 10.11 but to list these in the Plan is considered unnecessary excessive detail. Responsibility for the list lies with Historic England and the information is available on-line. Encouragement is given to property owners to address these issues but the Plan has limited control and weight to enable this beyond application of flexible policies that encourage appropriate re-use and redevelopment while seeking to conserve and enhance the distinctive character, quality and distinctiveness of the historic asset.
DLP286	Margaret Henley North Warwickshire Heritage Forum	Object			Historic setting and curliages.		Conservation and protection is needed on some open spaces which are an integral part of the heritage of the area together with green spaces and gardens attached to houses which form an integral part of the whole site. Examples of these are The Cottages and gardens at Whittington; Wickey Farm; Grendon Lodge Gardens; Well Cottage, Grove Lane, Wishaw, the Quaker burial ground in Hants Hill which need protection.	Noted. The Plan addresses impacts of proposals (planning applications) on Local and National Heritage assets setting and surrounding through the appropriate Development Management policy and use of planning conditions where necessary. Further work is underway on Historic Environment and will help inform Plan. No change proposed.

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DLP286	Margaret Henley North Warwickshire Heritage Forum	Support/Comment		LP15			LP15 states that 'wherever possible, a sustainable reuse of the redundant historic buildings will be sought, seeking opportunities to address those heritage assets identified as most at risk'. The Forum is aware that this has not been the way these buildings have been dealt with, which has led to the loss of some buildings so the inclusion of this in the plan is welcomed. However the Forum believes that by taking a narrow and rigid view of what makes a building or development sustainable, opportunities may well be missed to adapt and enhance what is already there.	Noted. Unclear as to what constitutes a "narrow and rigid view" of term sustainable re-use. Will try and clarify term in RJ, noting intention is to secure a buildings continued use and survival.
DLP286	Margaret Henley North Warwickshire Heritage Forum	Object			Development and Application requirements for HEA		The draft plan states that 'all development proposals that affect any heritage asset will be required to provide sufficient information and an assessment of the impacts of those proposals on the significance of the assets and their setting'. This should be a requirement for all developments, irrespective of whether there is an identified heritage asset recorded. These need to be carried out by a qualified conservation architect who is aware of the importance of conservation issues.	Noted. However, Local Plan requirements for Development Proposals are determined by evidence and National Planning Policy framework and Guidance. In absence of specific evidence justifying a requirement the Plan will be limited to what it can require in submission of planning applications under 'validation regulations'. The National Requirements that apply to planning applications are The Town and Country Planning (Development Management Procedure) (England) Order 2015 available online for more detailed information.
DLP286	Margaret Henley North Warwickshire Heritage Forum	Object		LP15			LP15 also states that 'where a proposal would result in the partial or total loss of a heritage asset or its setting, the applicant will be required to secure a programme of recording and analysis of that asset and archaeological excavation where relevant and ensure the publication of that record to an appropriate standard'. The Forum believes this should be done as a matter of course and not 'where relevant'. Inclusion of this phrase will give developers a means to opt out of such recording and analysis. The Forum believes that these types of analysis should be carried out before any new build to ensure that hitherto unknown sites are not wilfully destroyed. If the site is then found to be of major historic interest, then the building plans must be rejected. The Forum would also like to point out that archaeology itself destroys the very thing it is recording and many sites, whether already known or are yet to be discovered, need to be left undisturbed to allow less intrusive procedures to be carried out in the future.	Noted. Disagree. The term "where relevant" relates to the relevance of the archaeological excavation element of the analysis undertaken to that part of the asset affected, particularly in cases where only partial impact. Does not enable or relate to ability or otherwise of a developer to "avoid" requirement for analysis and recording. Unnecessary to do a complete analysis or archaeological excavation of a major asset if only a very small, insignificant element is affected or potentially lost. Analysis and/or archaeological excavation should relate only to that element impacted by total or partial loss. Policy is considered clear, where a proposal would result in the partial or total loss of a heritage asset or its setting, the applicant will be required to secure a programme of recording and analysis of that asset and archaeological excavation. May include clarification in RJ to avoid confusion.
DLP287	E.On Ltd & Prologis			LP2	Settlement hierarchy.	Lea Marston Development Boundary	Object to Policy LP2 (settlement hierarchy). Lea Marston Village should be identified as a 'category 4 village' and have a defined development boundary encompassing the existing village and land south of the village.	Noted. Settlement has no services to warrant classification as Category 4 settlement. Also currently wholly within (washed over by) Green Belt. No very special circumstances considered established to warrant Green Belt release. No change proposed.
DLP287	E.On Ltd & Prologis				Green Belt 'infill' village boundary.	Lea Marston	The Plan designates Lea Marston as a Green Belt 'infill' village. This designation does not offer any opportunity for the village to grow in order to meet the needs of local residents and the delivery of associated community infrastructure.	Noted. Village currently within Green Belt and benefits from no services. Not considered a sustainable location for increased development. No change proposed.
DLP287	E.On Ltd & Prologis				New Site	Land West of Hams Hall	E.ON propose land west of Hams Hall at the gateway into Hams Hall Manufacturing and Distribution Park. Bounded by Faraday Avenue to the north, an existing railway line to the East, a canal to the south and the A446 to the West. Site will form two plots due to impact of H22, comprising 3.3 hectares east of the line and 5.7 hectares to the west. A significant proportion of the east/term plots in employment use. The allocation will provide additional range and choice in an established and attractive employment location. The site has clear and established boundaries and is capable of being developed without having an adverse impact on the surrounding green belt.	Noted. Site lies within Green Belt. No Change proposed. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver employment needs.
DLP288	Andy Stubbs Natural England	Object			HRA & SA		No evidence within SA that HRA undertaken. Note that several site allocations fall within 15km of the River Mease Special Area of Conservation (SAC) and Enso's Pool SAC and the Cannock Chase SAC Partnership Project. Recommend your authority provide evidence that you have sufficiently considered the Plan with regards to European Sites. All your policies in the local plan (including any proposed land use allocations) will need to be screened, not just some of them, and in considering the potential impacts it should use the correct European site level conservation objectives.	Further work underway will address issue. SA will note and address issue. Further clarification to text may be necessary. Board Report will address the issue.
DLP288	Andy Stubbs Natural England	Support			SA Objective 7		Natural England supports this objective, we recommend that your authority also considers geodiversity as well as biodiversity under this objective.	Noted.
DLP288	Andy Stubbs Natural England	Object			SA Objective 9		Per the outcome of your HRA, your authority will need to consider the criterion on testing the plan's policies and proposals for negative impacts on European sites as well as SSSIs. The objective should be strengthened to show that European Sites and SSSIs have been appropriately addressed. As part of the strengthening of the SA Report, there should be a recommendation that any policies or proposals that do not adequately protect SSSIs, or fully consider the impacts of development on them, should be removed from the plan or modified. It should be clearly evidenced that alternatives have been assessed where impacts on European sites/SSSIs cannot be ruled out. There is no evidence within the SA report that the impact of the plan on priority habitats has been considered.	Noted. Further work underway will address issue. SA will note and address issue. Further clarification to text may be necessary. Board Report will address the issue.
DLP288	Andy Stubbs Natural England	Comment			Monitoring		Welcome that all significant effects of the plan (as identified in the SA) appear to have monitoring proposed for them. But it is not clear how these indicators will work in practice. Examples of best practice are available elsewhere.	Noted.

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REF	ORGANISATION NAME	SUPPORT/OBJEC	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP288	Andy Stubbs Natural England	Support			Duty to Co-operate		Recommends as part of your duty to co-operate with other local authorities, to consult the Cannock Chase SAC Partnership to help determine whether your plan will not have Likely Significant Effect on the European Site.	Noted. Consultation as part of HRA will be undertaken.
DLP288	Andy Stubbs Natural England	Support		Vision and Objectives	Objective 7		Natural England broadly supports Objective 7. Natural England recommends that as part of the overall objective, that the wording could be amended to "To protect and enhance the quality of the natural environment, which includes biodiversity, geodiversity and landscape" to strengthen the aims of the objective.	Noted. Text clarification to strengthen aims of the objective. Include text as reference in Glossary
DLP288	Andy Stubbs Natural England	Support			Objective 8		Natural England broadly supports Objective 8.	Noted.
DLP288	Andy Stubbs Natural England	Support		LP14	Natural Environment		Natural England broadly supports Policy LP14.	Noted.
DLP288	Andy Stubbs Natural England	Support		LP16	Nature Conservation		Natural England broadly supports Policy LP16. NE is unable to provide advice on the specific impacts of proposed development allocations on local sites, recommend that your authority should use locally available evidence and expertise to assess impact on them.	Noted.
DLP288	Andy Stubbs Natural England	Support		LP17	Green Infrastructure		Natural England supports this policy.	Noted.
DLP288	Andy Stubbs Natural England	Support		LP19	Local Nature Reserves		It isn't clear from this policy what the strategy will be for the named LNRS as part of the Local Plan.	Noted. Open space and recreation review underway may help inform strategy. Text clarification to strengthen aims of the policy. (To agree with EN).
DLP288	Andy Stubbs Natural England	Support		LP20	Green Spaces		Natural England recognises that your authority is currently still reviewing the strategy for green spaces. May wish to consider how the policy could consider the protection, enhancement and creation of new open spaces which will link in with the Green Infrastructure Policy.	Noted. Open space and recreation review underway may help inform strategy and address creation of new spaces. IDP and site specific proposals may also help inform new site opportunities. Text clarification to strengthen aims of the policy.
DLP288	Andy Stubbs Natural England	Support		LP31	Development Considerations		Natural England supports this policy. Your authority may wish to reference that development should not impact on designated sites so this policy can clearly be linked with those policies relating to designated sites.	Noted. Additional bullet point to reference impact on designated sites.
DLP288	Andy Stubbs Natural England	Support		LP35	Water Management		Natural England supports this policy	Noted.
DLP288	Andy Stubbs Natural England			LP39	Housing Allocations		A number of allocations fall within/adjacent to or in close proximity to Sites of Special Scientific Interest. It is important that your authority has collected sufficient evidence to determine that the housing allocations will not have any significant impact on these sites, listed below. Any allocations that will make management of nearby SSSI's less viable and where there will be significant air or hydrological related impacts should be deleted from the allocation, and we would encourage the allocation of alternative sites. Natural England recommends the deletion of any allocations that will make the management of nearby local sites less viable through urbanisation or isolation of the site. Should the allocations remain, Natural England recommends appropriate mitigation be implemented.	Concerns noted. As part of further work these issues will be highlighted and addressed.
DLP288	Andy Stubbs Natural England					Coleshill south site proposals	the River Blythe SSSI	Concerns noted. As part of further work these issues will be highlighted and addressed.
DLP288	Andy Stubbs Natural England					Dordon & Polesworth site proposals	Birches Barn Meadows SSSI and River Mease SSSI/SAC	Concerns noted. As part of further work these issues will be highlighted and addressed.
DLP288	Andy Stubbs Natural England					Land adjoining Tamworth – west of Robbey's Lane	Awecote Pool SSSI	Concerns noted. As part of further work these issues will be highlighted and addressed.
DLP288	Andy Stubbs Natural England					Land south of A6, MIRA, Caldecote	Ensor's Pool SAC/SSSI	Previously addressed in Core Strategy SA and Site Allocations SA Development Plan consultations. Concerns noted. As part of further work these issues will be highlighted and addressed.
DLP288	Andy Stubbs Natural England					Hatshill & Anselay Common – East and west site proposals	Ilings Trench SSSI and Ensor's Pool SSSI/SAC	Previously addressed in Core Strategy SA and Site Allocations SA Development Plan consultations. Concerns noted. As part of further work these issues will be highlighted and addressed.
DLP288	Andy Stubbs Natural England					Ausley Development Boundary	River Mease SAC/SSSI	Previously addressed in Core Strategy SA and Site Allocations SA Development Plan consultations. Concerns noted. As part of further work these issues will be highlighted and addressed.
DLP288	Andy Stubbs Natural England					Shutlington site proposals	Awecote Pool SSSI	Concerns noted. As part of further work these issues will be highlighted and addressed.

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DLP288	Andy Stubbs Natural England					Warton site proposals	Birches Barn Meadows SSSI	Concerns noted. As part of further work these issues will be highlighted and addressed.
DLP288	Andy Stubbs Natural England					Wood End site proposals	Kingsbury Wood SSSI	Concerns noted. As part of further work these issues will be highlighted and addressed. However, it is considered impact likely to be negligible in this case.
DLP288	Andy Stubbs Natural England				Soils and Agricultural Land Quality		The Local Plan should give appropriate weight to the roles performed by the area's soils, as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils. The conservation and sustainable management of soils is also reflected in the National Planning Policy Framework. Plan policies should take account of the impact on land and soil resources and the wide range of vital functions they provide in line with paragraph 17 of the NPPF, to: <ul style="list-style-type: none"> • Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future. • To avoid development that would disturb or damage other soils of high environmental value and, where development is proposed. • Ensure soil resources are conserved and managed in a sustainable way. 	This is an issue that is addressed in the Board Report. Information on site classification will be addressed and sustainability issue due to land proximity and limited alternatives noted.
DLP288	Andy Stubbs Natural England				Air Quality		Plan makes references to the Borough having Air Quality issues but has not made any specific policies to address this.	There are no AQMA's within Borough currently. However, the situation is being monitored and air quality assessments are undertaken. No change proposed.
DLP288	Andy Stubbs Natural England				Ancient Woodland		Your authority may wish to implement a specific Policy to protect ancient woodland and aged or veteran trees.	Policy LP16 addresses the issue of ancient woodland and veteran trees. No change proposed.
DLP289	Mike Brooks email	Object			Atherstone Allocations		Inadequate infrastructure in Atherstone to support new homes planned.	Infrastructure is a key issue that is being addressed through the IDP. Board Report will address some of these issues.
DLP289	Mike Brooks email	Object			Traffic		Congestion on A5 and surrounding transport network. Insufficient parking in the town.	Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Infrastructure and service investment issues being addressed through the IDP and contribution by Development. This is a continual process. Board Report will address some of these issues. No change proposed.
DLP289	Mike Brooks email	Object			Employment		Insufficient jobs to provide employment in the town, will encourage commuting. Need to replace lost jobs from firm closures such as at BHS and Avondale.	Plan addresses employment need and growth through allocation of employment sites. Redevelopment of vacant sites enabled through Development Management Policies and constraint on loss of existing employment land. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. No change proposed.
DLP289	Mike Brooks email	Object			Infrastructure		Insufficient school capacity despite new TOEA. Insufficient GP services and facilities. Insufficient food retail shops and capacity. Refuse services will collapse under the pressure. Overall the proposals will damage Atherstone unless the lack of infrastructure is addressed.	Infrastructure and service investment issues being addressed through the IDP and contribution by Development. This is a continual process. Board Report will address some of these issues. No change proposed.
DLP289	Mike Brooks email	Object			Flooding		Risk of flooding off Sneyre Road fields.	Noted. Flooding risk will also need to be addressed as part of any application and Policy requires this. Development will not be permitted that increases risk of flooding over that existing currently.
DLP290	Sharon Martin	Object			New Site	Land to the North-East side of School House, Nuneston Road, Coleshill B46 2NG	Site should be included within the development boundary and excluded from Green Belt.	No development boundary close to site. Site washed over by Green Belt. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.
DLP290	Sharon Martin	Object					Site originally contained cottages, since demolished. New use would be same as previous. Land formed part of previous applications for change of use to one dwelling in July 1963 and change of use to dwellings in 1961, still part of the deeds available. Site benefits from lawful vehicular access granted after the land was designated Green Belt. Proposal would not involve any changes to this access or on site turning area. No increase in vehicular traffic to the site is expected as the site is for one dwelling only. Site has been used for purposes granted (parking and garden land) consistently without raising objections. The proposal would not involve removal of mature boundaries so would not impact on enjoyment of countryside or negatively impact landscape. Proposal would involve improvement of landscape through removal of builders rubble.	Current and former use noted. However, redevelopment not considered appropriate as an exception to normal Green Belt constraints. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.
DLP290	Sharon Martin	Object					Current development boundary does not follow clear physical features of landscape. Site was always intended for dwellings and does not add value to Green Belt currently.	No development boundary close to site. Site washed over by Green Belt. Very Special circumstances not considered established to warrant Green Belt release.
DLP290	Sharon Martin	Object			Green Belt		Site does not support Core Strategy statement of Green Belt as a vital component in protecting and enhancing the Borough as an area of pleasant countryside as the site is neither open or pleasant, containing remnant rubble of its former use. Restoring land to its former use with landscaping would not reduce Green Belt's effectiveness or be detrimental to it. Also, opportunity the site could be considered as a Green Belt infill and redevelopment opportunity.	Current and former use noted. However, redevelopment not considered appropriate as an exception to normal Green Belt constraints. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.

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REF	NAME/ ORGANISATION	SUPPORT	PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP290	Sharon Martin	Object			Housing Need		Borough has committed to release other Green Belt land to address housing needs. This site should be included as part of that commitment. No affordable houses in the area available.	Limited Green Belt release proposed as part of larger SUE adjoining allocations. Other sites simply safeguarded not released until next Local Plan review if required. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.
DLP290	Sharon Martin	Object					There is a proven record of housing need in Over Whitacre since 2009 which has not been met. No allowance has been made for a Category 4 dwelling in Over Whitacre which is not realistic. However previous sites have come forward within Over Whitacre and this track record should be reflected by including Over Whitacre in the Category 4 Settlements and reflect its ability to contribute to the delivery of new housing. As no other sites are identified in Over Whitacre this site would contribute towards that supply.	Noted. Significant number of houses have been approved on brownfield exception sites or redevelopment of existing sites to address need in Over Whitacre. As part of NPPF exceptions this is likely to continue. Exceptional or Very Special circumstances not considered established to warrant Green Belt release on this site. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.
DLP290	Sharon Martin	Object			Self Build		Am registered for self build plots but none currently available. This site could provide a 'self build' opportunity as part of the solution to the housing crisis. Borough Council have not met any of the Government Policies for self building in this area. Site has no obvious physical constraints or environmental constraints.	Noted. Self Build opportunity does not override Green Belt constraint. No change proposed.
DLP290	Sharon Martin	Object			SHLAA		The site would achieve a Green Category rating in the SHLAA as it is suitable, available within 5 years and achievable.	Noted. Exceptional or Very Special circumstances not considered established to warrant Green Belt release on this site. No change proposed.
DLP290	Sharon Martin	Object					This site can meet the needs of the SHLAA "to include as many sites as possible and not to exclude any simply because of current policy designations." The site would contribute to the supply noted in the Memorandum of Understanding with Coventry City to address Coventry's shortfall within the wider HMA. Also helps towards the 'resting' of delivery for Birmingham's shortfall.	Noted. Exceptional or Very Special circumstances not considered established to warrant Green Belt release on this site. No change proposed.
DLP290	Sharon Martin	Object					PPG notes the SHLAA aim is to identify as many sites with housing potential as possible in the study areas including a range of different sizes and opportunities. It is considered this site meets the SHLAA requirements in factors including Market factors, cost factors and delivery factors. The site would also contribute towards the Council's current 5 year housing shortfall.	Noted. Exceptional or Very Special circumstances not considered established to warrant Green Belt release on this site. No change proposed.
DLP290	Sharon Martin	Object			Adopted Core Strategy		Site meets the objectives in the Core Strategy Spatial Vision, "accommodating development in a balanced and sustainable way... to give a choice of tenure and location."	Site not considered a sustainable location. Exceptional or Very Special circumstances not considered established to warrant Green Belt release on this site. No change proposed.
DLP290	Sharon Martin	Object			Windfall		Site contributes to shortfall as a windfall site.	Site not considered a sustainable windfall opportunity. Exceptional or Very Special circumstances not considered established to warrant Green Belt release on this site. No change proposed.
DLP290	Sharon Martin	Object			Very Special Circumstances		1) Primarily health and personal factors justifying release of the site for housing. 2) The site's former history as residential. 3) The site's existing use as parking with access. 4) The adjacent existing uses (dwelling and domestic curtilage). 5) Restoring land to its former use as dwelling will not impact on openness, or reduce Green Belts effectiveness, or be detrimental to it.	Noted. Exceptional or Very Special circumstances not considered established to warrant Green Belt release on this site. No change proposed.
DLP291	Jennifer Evans	Support					General Support for Policies LP1-LP40. Support for Policy LP31.	Support noted.
DLP291	Jennifer Evans	Support and Comment					Site allocation, land adjoining Tamworth west of Robey's Lane. Able to support the development only if keep current proposal that the primary access will NOT be via Robey's Lane. If traffic does impact Alvacote, I would expect discussions to take place to compensate residents for loss of employment of their current rural, secluded properties due to traffic increase. If residents are going to support a large development, impacting the rural aesthetic, they should enjoy some of the benefits of living in a less rural area, such as superfast broadband, a regular bus route or a gas supply to Alvacote. These improvements would mitigate Alvacote's loss of no longer remaining a rural hamlet on the outskirts of Tamworth. I am pleased to see attention will be given to Alvacote Wood to prevent or mitigate potential impacts.	Noted. Representation forwarded to current planning application PAP20170257
DLP291	Jennifer Evans	Support and Comment			IDP		IDP - See comments above	Noted. Representation forwarded to current planning application PAP20170256

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REF	ORGANISATION NAME/	SUPPORT OBJECT	PAGE / PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP292	T Summerfield & B Chaburn	Object			New Site	Land at St John's Spiney Gun Hill New Arley	<p>Given wider housing needs pressures from Coventry, Birmingham and Tamworth, the site is considered a suitable site to be deleted from the green belt and included within the settlement boundary. The site will help provide towards the supply of smaller sites in sustainable locations. This avoids over-reliance on large strategic sites. Note the current SHLAA states that windfall allowance has not been included due to lack of robust evidence, whereas current trajectory includes an allowance which is contradictory. The windfall figure of 600pa is not underpinned by sufficient evidence, supporting the release of small "quick win" sites such as this. A systematic review of current development boundaries is necessary. Continued reliance on existing boundaries and limits of the green belt is no longer sustainable. Para 83 of NPPF supports this approach and Para 85 notes "When defining boundaries, local planning authorities should... not include land which it is unnecessary to keep permanently open...". Whilst the Borough's Green Belt review paper seeks to address this part of the NPPF, the macro-scale approach needs developing further as part of a full review of development boundaries pursuant to LP2.</p> <p>Continued from above: It is quite feasible for low quality land around settlements to be removed from green belt to provide towards development needs without compromising the objectives of green belt under the NPPF, and that is considered to be the case with this site. It is read as part of the settlement more than it is as part of the countryside and the green belt, with mature woodland to its northern and eastern boundaries, restricting any views of the site from these directions (i.e. from the countryside and from within the green belt). It fails to contribute to the feeling of openness (i.e. an absence of built form) given it is developed on the edge of a village and its landscape setting is most certainly urban fringe. It is considered unnecessary to keep this land permanently open. The development of this site at circa 280dph could generate up to 10 dwellings towards the housing supply. This is a meaningful contribution without harming the strategic aims of the Plan - that being to provide for social and economic gain without compromising the environmental qualities of the Borough, in this case the purpose of green belt keeping the settlements within the Borough separate from the wider West Midlands conurbation.</p>	<p>Noted. Exceptional or Very Special circumstances not considered established to warrant Green Belt release on this site. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall.</p>
DLP292	T Summerfield & B Chaburn	Object			New Site	Land at St John's Spiney Gun Hill New Arley	<p>Continued from above: The land is of low visual environmental quality and development of it would be read as a sustainable extension to the village as opposed to an incursion into the open countryside, reducing the separation between settlements.</p> <p>It is noted that emerging policy LP11 would affect this site. The policy, as currently written, seeks to protect all employment land. This is both unfeasible and disproportionate for small sites such as my clients: if it becomes necessary to consider alternative uses. This approach is at odds with the increasingly permissive regime of permitted development rights allowing other commercial, retail, residential and flexible uses - particularly in rural locations. This absolute protection is not supported by evidence that demonstrates a significantly negative context for the rural economy presently exists and there is a subsequent need to protect every single employment premises at all costs. Many vacant premises exist even on larger sites in settlements higher in the hierarchy, and are struggling for a tenant. Imposing the financial burden of marketing and delay (including wasted business rates) is inappropriate beyond the larger, purpose built industrial and business parks.</p>	As above
DLP292	T Summerfield & B Chaburn	Object			New Site	Land at St John's Spiney Gun Hill New Arley	<p>Continued from above: The land is of low visual environmental quality and development of it would be read as a sustainable extension to the village as opposed to an incursion into the open countryside, reducing the separation between settlements.</p> <p>It is noted that emerging policy LP11 would affect this site. The policy, as currently written, seeks to protect all employment land. This is both unfeasible and disproportionate for small sites such as my clients: if it becomes necessary to consider alternative uses. This approach is at odds with the increasingly permissive regime of permitted development rights allowing other commercial, retail, residential and flexible uses - particularly in rural locations. This absolute protection is not supported by evidence that demonstrates a significantly negative context for the rural economy presently exists and there is a subsequent need to protect every single employment premises at all costs. Many vacant premises exist even on larger sites in settlements higher in the hierarchy, and are struggling for a tenant. Imposing the financial burden of marketing and delay (including wasted business rates) is inappropriate beyond the larger, purpose built industrial and business parks.</p>	<p>The Plan Policy deals with issues beyond permitted development rights. Level of detail inappropriate for Local Plan. If site is in current employment use then it will benefit from a level of pd rights, unaffected by Local Plan. However, if proposal goes beyond pd right allowances then Local Plan policy will apply, requiring loss of use to be justified and evidenced, given need to maintain and diversify rural employment opportunities and provision. No change proposed.</p>
DLP292	T Summerfield & B Chaburn	Object		LP11	New Site		<p>Isolated rural employment sites cannot compete in a modern climate with those locations better served by transport and service infrastructure, such as Birch Coppice and Hams Hall, and hence the protection should relate to the established business parks/industrial estates as defined on the Proposals Map. Given their better connections, there is a more real prospect of re-occupation of premises for employment purposes. Notwithstanding this, one only need look at the next 'tier' of employment sites in Atherstone, Nuneaton, Tamworth, Coleshill and Birmingham to see that even there - despite better connectivity compared to rural villages - many vacant premises exist and are struggling for a tenant. Hence imposing the financial burden of marketing and delay (including wasted business rates) is inappropriate beyond the larger, purpose built industrial and business parks.</p>	<p>Disagree. Small employment sites and opportunities can often serve local needs and their loss can impact on rural employment and economic growth opportunities. Existing identified sites can provide location for many small scale sites to aspire and relocate to, from premises/properties such as this. Vital for rural economy. Note Policy does not prevent small scale redevelopment based on pd rights or Para 89 NPPF Green Belt exceptions. No change proposed</p>
DLP293	T Summerfield & B Chaburn	Object		LP2			<p>Unclear on what basis the settlements are categorised as 'local service centres' and 'other settlements with a development boundary', with no apparent evidence base to inform this settlement hierarchy. Comprehensive review of development boundaries required to address needs and shortfall. Include "quick win" small sites for delivery and flexibility.</p>	<p>Settlement hierarchy based on review and update or earlier settlement assessments that accorded settlement position in hierarchy based on level of services and infrastructure available to the settlement. Part of overall evidence base. Development Boundaries have been reviewed to include the proposed Site Allocations within them, and, where appropriate, planning consents granted. No change proposed.</p>

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DLP293	T Summerfield & B Chaburn	Object			Category 4 settlements		Arbitrary "Cap" of 10 units on size of windfall developments appears without justification. Part A "small in scale"... requires definition, whilst text "adjacent to a village" excludes affordable exceptions sites on edges of Category 1 and 2 settlements, where it is most sustainable. The policy, as a whole, fails to deal with the approach to rural based development in the countryside, including barn conversions. This omission creates a conflict with the Category 5 section of the policy for a barn conversion application, whilst the policy fails to confirm that appropriate development for agriculture, forestry, equestrianism, tourism, sports and recreation will be supported, following the Matthew Taylor Report (as alluded to at para. 7.3). This policy should deal with the spatial distribution of development of all kinds -- not just housing and employment.	Threshold of 10 units reflects differentiation between major and minor applications in a rural Borough. 'Cap' also used by National Planning Policy Guidance such as S106 and Affordable Housing requirements thresholds. No change proposed. Term 'small in scale' will depend on circumstances of case and site/settlement. Difficult to give precise definitions where situations may differ and change. Unnecessary detail and unnecessary need to repeat NPPF Policy and Guidance. Part B provides some of clarification and explanation sought. No change proposed.
DLP293	T Summerfield & B Chaburn	Object			Category 5 settlements		Policy generally follows NPPF but continued reliance on existing limits of the Green Belt is no longer sustainable. The Green Belt review paper is noted but its macro scale approach needs developing further as part of a full review of development boundaries pursuant to LP2. It is quite feasible for low quality land around settlements such as Piccadilly, Kingsbury or the two Arleys to be removed from green belt to provide towards development needs, without compromising the objectives of Green Belt under the NPPF. Equally, sites around Water Oton and Cotes Hill might warrant greater protection in order to prevent the very real threat of coalescence.	No change considered necessary at present time. Exceptional or Very Special circumstances not considered established to warrant major Green Belt release currently. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP293	T Summerfield & B Chaburn	Object		LP3			This policy appears to be a 'valued' Green Belt designation, with its intent to prevent the merging of settlements. However the policy does not appear capable of surviving beyond the Plan period without review. Given the need to surrender Green Belt elsewhere, continuing pressure on land to the south of the A5 for employment needs, and the 'meaningful gap' contiguous with the existing Green Belt designation; a case for extending the Green Belt this far north could be made.	Disagree. Although similar to Green Belt objectives the principal reasoning is to maintain separation of settlements. This is a long established Planning Best Practice approach through use and maintenance of "Strategic Gaps". Part of Gap has been impacted by recent Planning Appeal which will inform area to be designated. Board report will cover Meaningful Gap and refer to this issue in more detail. No further change proposed.
DLP293	T Summerfield & B Chaburn	Object		LP5	Meaningful Gap		Policy needs restructuring/rewording, with 'there will be' followed by an aspiration (second bullet). There is no objection to the OAN for the Plan period in principle, although the deliverability of this need and the requirement to maintain a 5 year rolling supply may result in the need to allocate more so to demonstrate a supply at adoption (and thus a sound Plan).	Noted. Text may be clarified. Plan period will be extended to address this issue and provide a full 15 years from Adopted Plan start date, and maintain a 5yr rolling supply.
DLP293	T Summerfield & B Chaburn	Object		LP6			The quantum of special needs housing (for the aging population) seems to be an arbitrary figure (10%) without any regard to viability of development schemes across the Borough. The need for such accommodation is generally couched in the desire to downsize from larger dwellings to smaller houses or bungalows. In these circumstances the occupants would not qualify for affordable housing given their existing capital/income. Ergo, it will be rare for any of the special needs housing to be accommodated within the affordable housing element (notwithstanding that this 40% requirement conflicts with the fact it could be 30% or 40% as required under policy LP9). The effect of this policy, therefore, would require 30-40% affordable housing and a further 10% special needs housing (up to half of the overall total) of any particular site above 100 dwellings. Experience suggests that land values are not sufficiently high in the Borough, or anywhere in the wider region, to sustain this policy requirement.	Policy is flexible to reflect different needs for differing sites and areas. Special needs requirement applies to all types and tenure of housing not simply 'affordable'. Covers wide category of special needs adaptable housing from disabled to elderly adaptations and accessibility. Some evidence available in the Borough's housing strategy and CWP/IMA (Cipt 10 Nov 2013), which defines the key special needs groups. Further work may be necessary to better define or explain the term in the Plan. Some delivery has already come forward to address needs. No change proposed but term will be clarified in Glossary.
DLP293	T Summerfield & B Chaburn	Object		LP7			The densities of 30dph and 50dph are aspirational and there does not appear to be evidence underpinning this policy which demonstrates such targets are achievable. It is suspected that such figures are being used to assess the capacity of allocations under LP39 and thus this could have significant ramifications for the soundness of the Plan.	Densities of 30dph are fairly conservative when compared with actual development density delivery and 50 dph within central urban development sites is also not uncommon. In addition allocated sites within LP39 are reduced further by threshold from gross to 60% net for sites over 150 units and 70% net for sites less than 150 units. Sites less than 10 is 100%.

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REF	ORGANISATION NAME/	SUPPORT/OBJEC	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP293	T Summerfield & B Chaburn	Support		LP8			<p>The recognition of windfall contributing to supply is welcomed, but the strategy for development (particularly LP2) must facilitate consistent delivery of windfall sites across the Plan period in order for 60 per annum to be sound. As availability of such sites dries up, the ability to maintain a rolling supply will be put into jeopardy (given 60 dpa represents nearly a quarter of the Borough's annual need (23%), adjusted to exclude allocations for Coventry, Birmingham, etc.)</p> <p>Policy needs restructuring. "On schemes of 10 or more dwellings, 1-30% of housing provided on-site will be affordable 2, except in the case of Greenfield (previously agricultural use) sites where 40% or more... when the PPC states "...more than 10..." (i.e. 11 or more). This makes the policy unsound. Furthermore, it is unreasonable to base requirements on gross housing numbers, particularly when reliance on windfall sites is real. The inclusion of "net" would address this. The definition of greenfield is incorrect as greenfield means previously undeveloped land (see Annex 2 of the NPPF). If it is intended to only capture agricultural land, then "greenfield" should be omitted from the policy. However this creates a loophole in that a prior change of use to, say, sports or equestrian use, would then circumvent the need to provide 40%. Finally, whilst the 100% affordable housing need in the SHMA is noted, 30% or 40% does not appear to be underpinned by viability work. Even greenfield sites are often unviable at 30%, let alone 40%, and the Council appears to be pursuing a target which cannot be met in the modern economic climate.</p>	<p>Noted. Evidence available indicates windfall will continue and can support housing delivery. Windfall is assessed at a conservative level and are expected to continue. Sufficient sites currently allocated to deliver OAM and address additional Birmingham shortfall. No change proposed.</p> <p>Agents, landowners and developers seek to justify increases in site profit percentages year on year (from 10% in 2007/8 to 12.5 in 2009 to 17 to 20 in 2015 now 25% expectations) based on the premise this is the "industry norm", applying average or reasonable expectation based on industry comparisons. Approach appears to suggest that this continuous increase in profit margins is sacrosanct and cannot be redirected towards social, affordable housing or other infrastructure provision, which is seen as automatically "unviable" and must be reduced without argument (despite earlier lower profit expectations being accommodated as a "norm"). This is considered unreasonable. Why are the increasing profit margins not equally arguable as "non-viable" where the expectation is far too high to be truly reasonable or necessary? SHMA viability assessments take a number of issues into account to address site and affordable housing viability. Percentage proposed is considered a reasonable starting point for negotiation. Policy is applied flexibly not rigidly in accordance with NPPF and National Planning guidance.</p>
DLP293	T Summerfield & B Chaburn	Object		LP9	Tenure split		<p>The target affordable housing tenure mix of 85% rent to 15% intermediate does not provide flexibility. It also does not appear to be underpinned by evidence from a SHMA (particularly as the Borough accepts they are part of a wider HMA).</p> <p>Para. 8.16 – suggest that offering to the local letting list first is inappropriate for "overspill" from adjoining authorities, with these developments of strategic scale and relevance to the adjoining authority, not the Ward affected.</p> <p>Protection of all employment land is unfeasible and disproportionate for small businesses if it becomes necessary to consider alternative uses for their premises. This approach is at odds with the permissive regime of permitted development rights allowing other commercial, retail, residential and flexible uses – particularly in rural locations. The absolute protection should relate to established business parks/industrial estates where there are better transport connections and supporting services, and thus a real prospect of re-occupation of premises for employment purposes. Isolated rural employment sites cannot compete in a modern climate with such locations and imposing the financial burden of marketing and delay (including wasted business rates) is inappropriate. Suggest that the sites protected are those listed in LP12, with the two policies merged.</p>	<p>Disagree. No differentiation in need is expressed. Policy is worded flexibly "where practicable" and subject to viability assessment. No change proposed.</p>
DLP293	T Summerfield & B Chaburn	Object		Para 8.16			<p>Para. 8.16 – suggest that offering to the local letting list first is inappropriate for "overspill" from adjoining authorities, with these developments of strategic scale and relevance to the adjoining authority, not the Ward affected.</p>	<p>Noted. Circumstances will depend on merits of case. However, Plan priority is to address North Warwickshire affordable housing needs first. No change proposed.</p>
DLP293	T Summerfield & B Chaburn	Object		LP11			<p>The Plan Policy deals with issues beyond permitted development rights. Level of detail inappropriate for Local Plan. If site is in current employment use then it will benefit from a level of rights, unaffected by Local Plan. However, if proposal goes beyond pd right allowances then Local Plan policy will apply, requiring loss of use to be justified and evidenced, given need to maintain and diversify rural employment opportunities and provision. No change proposed.</p>	<p>The Plan Policy deals with issues beyond permitted development rights. Level of detail inappropriate for Local Plan. If site is in current employment use then it will benefit from a level of rights, unaffected by Local Plan. However, if proposal goes beyond pd right allowances then Local Plan policy will apply, requiring loss of use to be justified and evidenced, given need to maintain and diversify rural employment opportunities and provision. No change proposed.</p>
DLP293	T Summerfield & B Chaburn	Object		LP13			<p>The re-use provisions of this policy would conflict with LP11 where the premises concerned were a B1, B2 or B8 use. Furthermore, the closing paragraph imposes restriction not sustained at a national level, requiring a sequential consideration of uses where the NPPF is more permissive in letting market forces drive re-use of existing rural buildings. Analysis of consents given since 2006 under similar saved policy provisions would suggest very few or no community facilities have been secured by this approach, and very few employment opportunities. The former guidance in PPS7 is not reflected in the NPPF, and thus this policy is inconsistent with it.</p>	<p>Disagree. Do not consider a conflict occurs. If properties in question have already been converted or changed use to B1/B2/B8 uses and a further change of use/redevelopment is sought for residential or other non employment generating uses then they are no longer affected by Policy LP13 but by Policy LP11. Farm diversification has, in effect, already occurred. No change proposed.</p>
DLP293	T Summerfield & B Chaburn	Object		LP15	Conserving the Historic Environment		<p>The section on 'Conserving the Historic Environment' states: "Where a proposal affects the significance of a heritage asset, including a non-designated heritage asset, or its setting, the applicant must be able to demonstrate that: i) all reasonable efforts have been made to sustain the existing use; find new uses or mitigate the extent of the harm to the significance of the asset; and, ii) the works proposed are the minimum required to secure the long term use of the features of the asset that contribute to its heritage significance and interest are retained. Where a proposal would result in the partial or total loss of a heritage asset or its setting, the applicant will be required to secure a programme of recording and analysis of that asset and archaeological excavation where relevant and ensure the publication of that record to an appropriate standard. (emphasis added) This wording allows for a development adjacent to a heritage asset to unacceptably harm its setting, and thus its significance, but still accord to the policy if attempts have been made to mitigate the impact – even where its setting is totally lost. This fails to draw in the consideration of public benefits and the balancing exercise required in heritage terms (as confirmed by recent high court rulings).</p>	<p>Disagree, clarification sought on interpretation from English Heritage. Further work on HE assessment of Historic setting underway and will inform Plan. Policy must be read as a whole. Only where the proposal has been justified and evidenced that it outweighs the Historic Assets degree of significance and the impacts on the setting of an asset will the subsequent criteria for demonstrating efforts to sustain existing use, find new uses and ensure works are minimum necessary will apply. Does not pre-suppose that development with unacceptable impact will automatically be allowed, simply because that have submitted supporting evidence and assessments. If considered that proposal has an unacceptable impact this will be sufficient to warrant justifiably refusal. No change proposed. Clarification may be added to RL.</p>

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DLP293	T Summerfield & B Chaburn	Object		LP21			<p>In respect of the restriction on A2, A3 and A5 uses, this appears to be based on perception as opposed to evidence. Para. 11.4 states that "poor health and in particular obesity, is an issue throughout the Borough", but with some local high concentrations. In addition there is increasing concern over betting"; but no evidence appears to support these claims. Recent changes to other legislation are stemming the gain of betting and cash shops, whilst permitted development changes also provide control. However, there must be an evidence base to demonstrate that additional premises in that use in that particular area would be harmful to the vitality of the town/local centre. Similarly, this would be applicable to takeaways, restaurants and cafes – the latter of which are arguably important in maintaining the vitality of a centre and should in fact be encouraged – not resisted.</p>	<p>Current evidence based on assessment of existing uses. Current indices of deprivation available indicate health, poverty and obesity indicators across Borough. No specific perception expressed beyond avoidance of high concentrations, which addresses issues of health, poverty, town centre viability and vitality, to avoid loss of retail choice and availability and economic health. National research has shown links between increase in numbers of fast food outlets and obesity see - http://www.bmj.com/content/348/bmj.g1464 No change proposed. Other authorities successful in applying restrictions, Birmingham, Gateshead and Barking and Dagenham in east London where evidence of high rates of obesity, poverty coincide with high incidence of fast food takeaways, betting shops and payday loan outlets, with the aim of limiting the amount of such businesses where these impact on vitality, viability, health and financial security/stability of town centres or associated areas. No change proposed.</p>

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DLP293	T Summerfield & B Chatburn	Object		LP23			Given all services and facilities will contribute to the functioning of the settlement in varying degrees; the structure needs further consideration as it is presently disproportionate by way of an absolute requirement with at 4 criteria - particularly (a) which requires re-siting of the service/facility in all cases (an inappropriate financial burden where the loss of the service/facility would not compromise the day to day lives of the community and thus can be sustained).	Noted. Potential need for RJ clarification in para 11.6. Loss of services and facilities is an important issue in smaller service settlements. This is a particular issue for the last remaining service or facility of a use such as retail. Policy still flexible in allowing loss through change of use where replacement provision made or evidence of availability elsewhere or no realistic prospect of alternative service is likely and loss will not harm vitality. No further change proposed.
DLP293	T Summerfield & B Chatburn	Object		LP24			Suggest change: "Development proposals, where sufficiently large and it is feasible, will be expected to provide."	Noted. Disagree. Policy already notes "where appropriate to the area and to the development". No change proposed.
DLP293	T Summerfield & B Chatburn	Object		LP27			Missing word under Safeguarding of Rail/Routes: "...to allow for the re-instatement of the route or if this is not possible then as a recreational cycle route". Notwithstanding this, re-instatement of rail routes should be based on a likelihood of them providing a passenger or freight service. There is little evidence of passenger demand for either of the routes, with questionable likelihood of the Backsley Colliery site being used for freight given (a) the low lake up of Birch Coppice and (b) its disconnect to the strategic road network.	Noted. Agreed. Text amendment to clarify Policy.
DLP293	T Summerfield & B Chatburn	Object		LP39			Generally the allocations are logical extensions to existing settlements. Consideration should be given to developments around the edge of Nuneaton which facilitate transport improvements to both authorities, such as securing a link between Plough Hill Road and Coes Hill Road, and Church Road and Mancetter Road. A similar approach is noted at the former Orchard Colliery site at Dordon. As Appendix B is omitted from the draft Plan, it is difficult to ascertain whether there is a suitable mix of allocations (i.e. small and large sites, greenfield and brownfield, infrastructure requirements, etc.). However it is clear from recent appeal decisions that the larger allocations/SUEs cannot be counted early on in the trajectory, or in their entirety. The land to the east of Polesworth/Dordon for 2000 houses will span Plan periods, with average build out rates for such an allocation (assuming 2 housebuilders) of circa 80-90 opa (i.e. 1,200 to 1,350 across this Plan period). It seems quite likely that, coupled with other sites of 1000+, that some 1,000-1,500 dwellings projected will not be delivered in this Plan period, ergo more sites are required to deliver the OAN for this Plan and ensure soundness. Circa 49% of housing for the Plan period is to be provided by way of SUEs.	Noted. Allocations such as at Haristill and Ansley Common address issues raised. Plan also includes a number of smaller allocations in addition to major significant SUEs. Current sufficient 5 year supply healthy and current evidence shows no issue of delivery affecting applications coming forward. No change proposed.
DLP293	T Summerfield & B Chatburn	Object		LP39			Continued from above: A greater number of small and medium sized sites appear to be required in order to maintain both 5 year supply and ensure the overall needs are met, and there is ample opportunity (land) across the Borough under the SH-LAA which could facilitate this. Release of further green belt may be necessary to deliver these needs in the most sustainable fashion; but it appears that selective releases of lower value Green Belt, which it is unnecessary to keep permanently open, could offer considerable assistance here.	As above
DLP293	T Summerfield & B Chatburn	Object		LP40			With current supply, based on the latest HMA and FOAN, at circa 3.0 years; there is a need to significantly boost supply now by bringing forward a number of smaller 'quick win' sites to restore the rolling 5 year supply and allow for the extended lead in times on the larger sites	Noted. Allocations such as at Haristill and Ansley Common address issues raised. Plan also includes a number of smaller allocations in addition to major significant SUEs. Current sufficient 5 year supply healthy and current evidence shows no issue of delivery affecting applications coming forward. No change proposed.
DLP293	T Summerfield & B Chatburn	Support and Comment		LP1			Add flexibility - "Quality of Development/Place - all development proposals must, where feasible and viable to do so,"	Noted. Plan should be read as a whole. Other Policies provide necessary flexibility. No change proposed.
DLP293	T Summerfield & B Chatburn	Object		LP2			Settlement categorisation is unclear between local service centres and other settlement with a development boundary - no apparent evidence base. Comprehensive review of development boundaries required to address needs and shortfall. Include 'quick win' small sites for delivery flexibility. Policy as a whole fails to deal with rural based development including barn conversions. This omission creates conflict with Category 5 section of Policy for barn conversions and fails to confirm that appropriate development for agriculture, forestry, equestrianism, tourism, sports and recreation will be supported following the Matthew Taylor Report. This policy should deal with spatial distribution of development of all kinds, not just housing and employment.	Settlement hierarchy based on review and update or earlier settlement assessments that accorded settlement position in hierarchy based on level of services and infrastructure available to the settlement. Part of overall evidence base. Development Boundaries have been reviewed to include the proposed Site Allocations within them, and, where appropriate, planning consents granted. Plan should be read as whole. Unnecessary duplication and cross reference. Other development management and Farm Diversification Policies relate to Rural Barn conversion proposals. No change proposed.
DLP293	T Summerfield & B Chatburn	Object		Category 4 settlements			Arbitrary cap of 10 units on size of windfall developments appears without justification.	
DLP293	T Summerfield & B Chatburn	Object		Category 5 settlements			Part A, "small in scale", requires definition, whilst text "adjacent to a village" excludes affordable exception sites on edges of Category 1 and 2 settlements where it is most sustainable.	Noted. Small in scale will depend on site circumstances, settlement size and character, need identified so to retain flexibility an arbitrary threshold will not be applied. No change proposed.
DLP294	Caroline Hogarth	Object		Scale		Polesworth and Dordon development	Object particularly to Dordon, Polesworth development. Inappropriate scale, will have huge impact over wide area. Combined impact of Tamworth's and North Warwickshire's housing does not appear to have been taken into account including stresses on some infrastructure and services.	Noted. Larger Proposals still reflect current Settlement hierarchy targeting development in larger more sustainable settlements and locations. Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. These are the considered the most sustainable locations and areas with some infrastructure to support development needs. Further infrastructure will be delivered through financial contributions and highway authority investment to address any issues arising, where necessary and appropriate. Board Report will address some of these issues. No change proposed.

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DLP294	Caroline Hogarth	Object					Health care and education services already struggling to meet demand. Limited shops available in the villages.	Necessary infrastructure will be delivered through financial contributions and highway authority investment to address any issues arising, where necessary and appropriate. Board Report will address some of these issues. No change proposed.
DLP294	Caroline Hogarth	Object			Parking		Limited parking and public transport provision which is not a realistic alternative.	Development Management policies will ensure sufficient parking provision is provided within new developments. On larger site proposals Public Transport services will be encouraged and supported through S106 Obligations and financial contributions, requiring early commencement to encourage use.
DLP294	Caroline Hogarth	Object			Traffic		In absence of improved public transport, heavy traffic impact will occur. New Relief Road will access onto A5 and one of worst bottlenecks on A5. Surrounding rural road network insufficient to accommodate potential traffic. Many historic and fragile single trade canal and river bridges may be impacted/damaged. Unsustainable proposals which will inevitably generate increased car traffic/travel.	Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Infrastructure and service investment issues being addressed through the IDP and contribution by Development. This is a continual process. Board Report will address some of these issues. No change proposed.
DLP294	Caroline Hogarth	Object			Environmental impact		Several uncommon animal and plant species within site need protection. Several areas nearby subject to flooding. Reducing Green Spaces and reducing ability to absorb rainfall and increase run off will increase flood risk.	Noted. Impact on ecology and natural environment will be addressed through compensatory measures such as Biodiversity offsetting contributions. Proposals will include areas of habitat retained and conserved as Local wildlife sites. Proposals will be required to address flooding issues to ensure current run-off is not increased and flood storage and preventative measures will be an integral part of larger proposals.
DLP294	Caroline Hogarth	Object					Will impact setting of listed Dordon Hall and ancient Leonard's Cross.	Noted. Further work underway to address setting of Historic Assets. Board Report will address some of these issues. No change proposed.
DLP294	Caroline Hogarth	Object		LP39			Object. No comment.	
DLP294	Caroline Hogarth	Object		LP40			Object - Concerns over further large scale development close to A42/M42 bottleneck, particularly once HS2 affects area. No provision for small scale employment units amongst residential areas, to reduce car travel.	Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP294	Caroline Hogarth	Object			IDP		IDP/SA see earlier replies regarding inadequate infrastructure and services.	Infrastructure and service investment issues being addressed through the IDP and contribution by Development. This is a continual process. Board Report will address some of these issues. No change proposed.
DLP295	Kate Barren	Object				Ansley Common/Hartshill Allocations	Insufficient advertising of consultation.	Disagree. Plan consultation advertised in a number of ways through North Talk delivered to all Borough properties, on-line consultation and direct letter or e-mail to over 2000+ individual consultees, agencies and contacts. Also advertised in Local press and consultation period extended over 12 weeks with numerous public drop in sessions including evenings and weekends.
DLP295	Kate Barren	Object					Scale of Proposals too large for Ansley Common.	Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. Ansley Common and Hartshill are treated as a combined service settlement. These are the considered the most sustainable locations and areas with some infrastructure to support development needs. Board Report will address some of these issues. No change proposed.
DLP295	Kate Barren	Object			Infrastructure		Insufficient health, dentists, and GP services available. Schools - insufficient capacity in local schools.	Further infrastructure will be delivered through financial contributions and work is ongoing to inform IDP and site proposal requirements. Board Report will address some of these issues. No change proposed.
DLP295	Kate Barren	Object			Traffic Impact		Traffic impact, particularly around schools. There is insufficient parking provisions for additional housing resulting in congestion. Transport network already heavily congested and cannot cope with additional traffic generating pollution.	Local Plan Strategic Transport assessment aims to address the traffic and transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP295	Kate Barren	Object			Drainage		Existing drainage problems at Ansley Common. Drainage system and drains need thorough review before plans are approved. Additional surface water run off will increase current problems.	Plan Policy requires development of site to address flooding issues and to ensure surface water run-off and flood storage impact to be no worse than existing to avoid exacerbating flooding risk. Development will not be permitted that increases risk of flooding over that existing currently. Where specific site and/or area problems are highlighted the Site Proposals and IDP will note the need to address the issue. The Board Report will address some of these issues. No further change proposed.
DLP295	Kate Barren	Object			Rural Environment and Wildlife		Former disused rail track at rear of property is used by walkers and cyclists plus noted in rambling leaflets. Moor Wood contains variety of birds nests, species and should not be forced to move. Removal and loss of hedgerows and trees will affect the eco-structure and lead to more pollution.	Noted. Former route is not a Public right of Way, but may be an opportunity to encourage its inclusion as part of Site Proposals and enabled by development. Concerns over natural environment impact are noted and Plan Policies require proposals to address impact through protection of ecologists/species where possible and conserve, enhance and retain nature conservation features as part of any development. Bio diversity Offsetting may also be applied to address impacts on Nature Conservation. No change proposed.
DLP295	Kate Barren	Object			Local Community		Community is semi-rural interacting in shops, allotments etc. Proposal will turn area into a large sprawling estate that will destroy the community as housing on a vast scale is impossible to integrate into a village community.	Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. Ansley Common and Hartshill are treated as a combined service settlement. These are the considered the most sustainable locations and areas with some infrastructure to support development needs. Board Report will address some of these issues. No change proposed.

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REF	ORGANISATION NAME	SUPPORT/OBJECT	PAGE / PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP295	Kate Barren	Object			Roads & Access	Ansley Common Allocations	Access to estate will involve demolition of my neighbours and potentially my house which is worrying. Roads are busy and additional heavy vehicles for quarry and logistics will put enormous strain on road systems. Vital a review of the road system and any changes to facilitate construction is undertaken before construction starts. No alternative options appear to have been considered or appraised. Consultation process poor, not written in Plain English. No effort to reach "hard to reach" groups. Does not meet any recognised standards for public consultation such as consultation principles published by Cabinet Office.	No details of access to site proposals yet determined or whether specific properties will need to be acquired in order to demolish. Local Plan Strategic Transport assessment aims to address the traffic and transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed. Alternative Options were considered through the Growth Options paper. Disagree with consultation comment. Wide consultation undertaken including article in North Talk delivered to all households and drop in sessions for public to come and discuss Plan and issues with Officers. Sessions held outside office hours and weekends to enable access for hard to reach groups as well as meetings at rural Hubs. Wide range of individuals, consultants and agencies directly contacted to maximise consultation principles published by Cabinet Office are non-statutory and not wholly applicable to consultations on large complex documents such as Local Plans. Nevertheless, plain English and avoidance of acronyms was applied as much as practically possible.
DLP296	Sue Eaton	Object		LP1-40			I believe there are alternatives to many of Policies proposed which are not demonstrated have been considered prior to arriving at Policies in Plan.	Alternative Strategic Options were considered through the Growth Options paper, which were subject to Sustainability Appraisal. Reasonable Site Alternatives have also been assessed through the Sustainability Appraisal and published for information/evidence base. Sustainability Assessment also assesses alternative options. No change proposed. Noted.
DLP296	Sue Eaton	Object				Polesworth Dordon Allocation	Object to Proposals	
DLP296	Sue Eaton	Object			Core strategy changes		Changes to 2014 Core Strategy have no clear justification. No consideration of alternative options and appraisal of these options.	Alternative Strategic Options were considered through the Growth Options paper, which were subject to Sustainability Appraisal. Reasonable Site Alternatives have also been assessed through the Sustainability Appraisal and published for information/evidence base. These along with the increased housing requirement identified in the OAHN and impact of Birmingham Shortfall are the evidence justifying the change in strategy and policy. No change proposed.
DLP296	Sue Eaton	Object					Inadequate infrastructure to support housing development of this scale and LDP supporting the Plan is lacking in detail with no risk assessment of likelihood of achieving funding required for infrastructure.	IDP is an ongoing process. Further work underway with service providers will inform IDP and Plan and address delivery. Board Report addresses some of these issues. No change proposed.
DLP296	Sue Eaton	Object		LP40			Object to Proposal. Only one perspective and no alternative options demonstrated or appraised.	Alternative Strategic Options were considered through the Growth Options paper, which were subject to Sustainability Appraisal. Reasonable Site Alternatives have also been assessed through the Sustainability Appraisal and published for information/evidence base. No change proposed.
DLP296	Sue Eaton	Object		IDP			No evidence of consultation with Statutory bodies e.g. NHS or WCC for education. IDP is directly contradicted by WCC consultation on Education Sufficiency Strategy. The Plan (IDP) does not demonstrate a credible likelihood of delivery therefore, along with Local Plan, should not be approved.	Disagree. All relevant service providers, infrastructure providers, agencies and relevant statutory bodies have been consulted. IDP is an ongoing process. Further work underway with service providers will inform IDP and Plan and address delivery. Board Report addresses some of these issues. No change proposed.
DLP296	Sue Eaton	Object					Roads and Access - Access to estate will involve demolition of my neighbours and potentially my house which is worrying. Roads are busy and additional heavy vehicles for quarry and logistics will put enormous strain on road systems. Vital a review of the road system and any changes to facilitate construction is undertaken before construction starts.	No details of access to site proposals yet determined or whether specific properties will need to be acquired in order to demolish. Local Plan Strategic Transport assessment aims to address the traffic and transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP296	Sue Eaton	Object					General - Area being used simply to achieve government targets. Other areas not impacted as greatly, e.g. Solihull. How does accommodating Birmingham overspill support need for housing for local people.	Housing need established through Objectively Assessed Housing Needs Assessment (OAHN) and Strategic Housing Market Area study for Coventry and Warwickshire. All areas are affected by housing need and growth. Duty to Co-operate requires the Borough to work positively with adjoining authorities to consider and help address any shortfall they cannot accommodate. Impact reflects Boroughs situation lying within two Housing Market Areas (Coventry's and Birmingham's). The local housing requirement is still a priority to address. No change proposed.
DLP296	Sue Eaton	Object					Proposal needs to be fair, proportionate (in scale) and sympathetic to the community. Small development, supported by infrastructure can be integrated into community. As area is one of poorest in North Warwickshire, likely to be bottom of list for funding. Development needs to be more fairly spread out including to the more affluent areas.	Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. Ansley Common and Hartsill are treated as a combined service settlement. These are the considered the most sustainable locations and areas with some infrastructure to support development needs and the need for regeneration enabled by development. Board Report will address some of these issues. No change proposed.
DLP297	Junction 9 Consortium	Object			New Site	CH9 Land Parcel east of J9 of M42 west of Hams Hall	Site is affected by HS2 Safeguarding area. Site does not score highly in Green Belt review (12/20). Impact of HS2 may also affect site. Site will be constrained between HS2 and Hams Hall. Also part of Minerals safeguarding area. Site could provide opportunity for significant logistics development to address the urgent need for more high quality employment land in the region highlighted by CWLEP SEP.	The policy behind the building of HS2 is not one that is relevant to the Local Plan. HS2 is a national infrastructure proposal that lies outside the Local Plan process and is considered insufficient reason to warrant Green Belt release. Other similar transport infrastructure proposals (M42/M6 Toll) have not resulted or generated Green Belt release as a direct result. Very Special circumstances not considered established to warrant Green Belt release.
DLP297	Junction 9 Consortium	Object					NWBC has significant locational strengths for the logistics distribution industry and site, with good and efficient access to national transport infrastructure could help address this need. J10 M42 St Woodmen Appeal noted the Adopted Core Strategy did not have enough employment land.	Disagree. Plan focus is on North Warwickshire needs and requirements but takes into account employment needs and growth from wider sub-region through additional employment land allocated to address accommodation of housing for Birmingham shortfall. Plan allocations enable a range of opportunities to come forward that will potentially satisfy both local and sub-regional needs, at MIRA, Hams Hall and Birch Coppice. No change proposed.

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DLP297	Junction 9 Consortium	Object			CH9 Land Parcel east of J9 of M42 west of Hams Hall		Delivery of this site to a named occupier will provide Borough with confidence that existing jobs will not be lost to other LAs and ensure further growth will be contained within Borough. Impact of HS2 will affect landscape character as will minerals extraction so a phased logistics use after these will ensure employment retention in North Warwickshire.	Disagree. Plan focus is on North Warwickshire needs and requirements. Plan allocations enable a range of opportunities to come forward that will potentially satisfy both local and sub-regional needs. Very special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver employment needs. No change proposed.
DLP297	Junction 9 Consortium	Object					Noted. HS2 is a National Infrastructure proposal outside the remit and control of the Local Plan process. Too early to establish impact. The area safeguarded for HS2 is noted in the Plan and impacts of the national infrastructure scheme will be treated flexibly on their merits as exceptions to normal Green Belt or countryside policies in accordance with NPPF guidance. Very special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver employment needs. No change proposed.	
DLP298	Rita Poulson	Object				Daw Mill	Site at Daw Mill should be used as a Recreational Area and Sanctuary for wild life. All developments for redundant buildings need exploratory investigations before work begins to avoid loss or damage to historic site.	Noted. Not within public ownership or control to enable. No change proposed.
DLP298	Rita Poulson	Object		LP15				No automatic assessment required on all proposals by regulation as some governed by "Prior Notification". Nevertheless, where planning permission is required and building conversion works involved on buildings noted of historic value/merit an assessment will be required through Policy LP15. County Council with responsibilities for historic environment data are consulted on all applications through weekly lists. No change proposed.
DLP298	Rita Poulson	Object		LP39			Object to Policy. Current developments too cramped and lack garden space and recreational areas. Impacts on lack of privacy and mental health.	Noted. No details on design, open space, garden provision or density yet submitted. Concept/Master Plan Design Brief for larger proposals will address design and open space provision. Plan should be read as a whole. Development Management Policies, LP24, 31 and 32 also address built form, amenity and open space issues. No change proposed.
DLP298	Rita Poulson	Object		LP40			Object to additional development as road network provides good access to employment. Unnecessary.	Disagree. Plan focus is on North Warwickshire employment needs and requirements but takes into account employment needs and growth from wider sub-region. Plan locations enable a range of opportunities to come forward that will satisfy both local and sub-regional needs. at MIRA, Hams Hall and Birch Copple, which should discourage unnecessary commuting traffic outside of Borough with resulting congestion and pollution impacts. No change proposed.
DLP298	Rita Poulson	Object	Para 10.9				History and Heritage of an area give an identity to all residents of North Warwickshire. With increasing population we need knowledge and understanding of our surroundings and green space for recreation.	Noted. Current open Space and Recreation review underway. Will inform plan. No change proposed.
DLP299	David Hodgetts Estates	Object		LP2		Settlement hierarchy.	Coleshill should be downgraded to a Category 2 settlement, 'Market Town within the Green Belt'	Disagree. Services, facilities and size all indicate a main sustainable settlement, appropriate to its position in the Settlement Hierarchy. No change proposed.
DLP299	David Hodgetts Estates	Object		LP5		Meaningful Gap	On the basis that appropriate development should be allowed between the settlements of Polesworth & Dordon and Tamworth, and that this was the intention of the Inspector when suggesting a principal modification to Policy NW18, Bullet point 3) should be deleted in order to make the Draft Local Plan sound. The extent of the meaningful gap should be amended to release an area of land west of Dordon, for mixed-use development as shown on the 'Policy Formulator' (ref. 22170010/1) plan submitted with these representations.	Disagree. The Board Report will address the Meaningful Gap issue. No change proposed.
DLP299	David Hodgetts Estates	Object		LP6		Amount of Development	The total amount of employment land requirement identified at Policy LP6 should be recalculated in light of double counting of permitted sites, identified strategic need and the future loss of existing employment land due to HS2.	Disagree. Plan focus is on North Warwickshire needs and requirements but takes into account employment needs and growth from wider sub-region through additional employment land allocated to address accommodation of housing for Birmingham shortfall. Plan allocations enable a range of opportunities to come forward. Impact of HS2 will be addressed at the time of implementation. No change proposed.
DLP299	David Hodgetts Estates	Object		LP11		Economic Regeneration	Delete the words "small scale" from "rural business to be compliant with paragraph 28 of the NPPF.	Disagree that Policy conflicts with Para 28. Reference to "sustainable growth and expansion of all businesses" in NPPF enables focus on sustainable locations and avoidance of development in unsustainable locations. Enables Local Plan to focus and encourage major development towards sustainable settlements/locations. Plan should be read as a whole. Does not necessarily prevent regeneration or small scale expansion of existing large rural businesses but enables assessment of impact on countryside and consideration of sustainability of proposal. No change proposed.
DLP299	David Hodgetts Estates	Object		LP12		Employment Areas CORE 42	List 'Core 42' as an existing industrial estate.	Noted. Core 42 part of former site proposal and current planning consent. Plan will be updated to reflect consents and changed circumstances, where relevant.
DLP299	David Hodgetts Estates	Object		LP13		Rural Employment	Delete bullet points b) and c) as they do not conform with paragraph 28 of the NPPF.	Disagree that Policy conflicts with Para 28. Plan should be read as a whole. Criteria b and c relate specifically to rural building conversions, not new build. No change proposed.
DLP299	David Hodgetts Estates	Object		LP21		Town Centres and Neighbourhood Centres	'Browns Land & New Street Shopping parade, Dordon' should be designated as a 'District Centre'.	Disagree. Scale and level of services on Browns Lane parade insufficient to warrant District Centre designation and other services in settlement too dispersed. New proposal to east may enable creation of District Centre, in association with existing services on Long Street. No change proposed.

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DLP298	David Hodgetts Hodgetts Estates	Object		LP32	Built Form		The second and third paragraphs under 'Alterations, Extensions and Replacements' should be amended so that the policy conforms with paragraph 28 of the NPPF. General principles should be detailed to read: d) reflect the positive characteristic architectural styles, patterns and features taking into account their scale and proportion; e) reflect the predominant materials, colours, landscape and boundary treatments in the area that make a positive contribution to the built form; Object to allocation of Land to east of Polesworth & Dordon for predominantly residential uses. Propose an alternative allocation of land west of Dordon for mixed-use, incorporating open space, local nature reserve, allotments, community facilities and residential - Policy Formulation (ref. 221700101).	Disagree that Policy conflicts with Para 28. Plan should be read as a whole. Where specific proposals for rural building conversions have been enabled to conserve their historic rural character, this should be retained and protected. Nevertheless, note is taken of issue regarding buildings converted as a result of NPPF guidance in para 55 "where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting." Further clarification will be considered.
DLP299	David Hodgetts Hodgetts Estates	Object		LP39	Housing Allocations		Allocation of Land Immediately West of Birch Coppice Business Park, Dordon for employment purposes supported. Allocation of Site of playing fields south of A5 Dordon, adjacent to Hat End Farm supported, including provision of replacement playing fields on land north of the A5. Suggested new allocation on land north-east of J10 M42 as motorway service area. See below:-	Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. Site falls within area designated as "Meaningful Gap" and impact of HS2 safeguarding route. No change proposed. Board Report addresses some of these issues.
DLP299	David Hodgetts Hodgetts Estates	Support		LP40	Employment Allocations		Allocation of Land Immediately West of Birch Coppice Business Park, Dordon for employment purposes supported. Allocation of Site of playing fields south of A5 Dordon, adjacent to Hat End Farm supported, including provision of replacement playing fields on land north of the A5. Suggested new allocation on land north-east of J10 M42 as motorway service area. See below:-	Noted.
DLP299	David Hodgetts Hodgetts Estates	Object			New Site	Land NE Junction 10, M42	Propose new allocation on land north east of Junction 10 M42 as Motorway Service Area use.	Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs and OAHN. No change proposed.
DLP300	Stoford Properties	Object			New Site	Brickhill Street Farm	Site within Green Belt enclosed by Strategic Road Network, providing clear defensible boundaries. Development would not contribute to merging of Coleshill/Birmingham.	Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs and OAHN. No very special circumstances considered established to warrant Green Belt release. No change proposed.
DLP300	Stoford Properties	Object			New Site	Stonebridge Road off A446 Packington.	Site ideally placed for employment and development.	Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs and OAHN. No very special circumstances considered established to warrant Green Belt release. No change proposed.
DLP300	Stoford Properties	Object					Both sites considered suitable for employment with no strategic impact on the Green Belt	Noted. Disagree. No very special circumstances considered established to warrant Green Belt release. No change proposed.
DLP300	Stoford Properties	Object					Economic need to contribute to Midlands Engine and CWLEP SEP. Scarcity of employment land has potential to damage economic prospects of area.	Noted. No very special circumstances considered established to warrant Green Belt release. No change proposed.
DLP300	Stoford Properties	Object					NWBC has core strength in the Logistics, Distribution, Manufacturing and Construction sections these sites could support. Two recent appeals on planning decisions support the release of sites, Hams Hall Power Station B site in the Green Belt and St Modwens J10 of M42. Appeal to support the need for additional employment land. Both sites could be developed now and are available.	Noted. Disagree. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs. No very special circumstances considered established to warrant Green Belt release. No change proposed.
DLP301	Curworth Parish Council	Object				Community Facilities	Need Local Plan Policies to protect current existing facilities to protect current existing facilities including PO, Shop, School, village hall and two pubs, Church and Church Hall. Apply concept of 'building of special interest' (Local Listing) to those buildings that make positive contribution to local environment and community.	Noted. Plan addresses issue of loss of Local services and facilities in policies LP22, 23 and Chapter 11. No change proposed.
DLP301	Curworth Parish Council	Support					Pressure Borough is under recognised and PC support to focus most development towards three Market towns rather than creating a "new village" elsewhere.	Noted.
DLP301	Curworth Parish Council	Object					Need improved design control to avoid inappropriate development. A design brief for use would be helpful.	Noted. Local design brief could be part of a Neighbourhood Plan if required. Plan addresses design issues in Policies LP15 Historic Environment, LP31 Development Considerations and LP32 Built Form. No change proposed.
DLP301	Curworth Parish Council	Support			Green Belt		Opposed to Green Belt erosion. Pressure locally to develop "high quality employment sites" need to be managed and slowed down. Support the retention of Green Belt boundary largely intact as proposed.	Noted.
DLP301	Curworth Parish Council	Object					Concerned over loss of good quality agricultural land if this approach, loss of Green Belt, is taken. Rurality is still predominant character of area despite major infrastructure such as M42 and M6 Toll. Green Belt closest to existing conurbation is the most valuable of all and retained as a bulwark against urban encroachment as long as possible.	Noted. No significant loss of Green Belt land proposed. No change proposed.
DLP301	Curworth Parish Council	Object			Employment		Borough is already well provided for with large sites no further needed. However, small or starter sites are in short supply and PC would support Borough initiatives to provide more of these.	Noted. Local Plan is delivering more than local needs in terms of employment land. Sufficient range of sites currently allocated to deliver Employment needs. No change proposed.
DLP301	Curworth Parish Council	Object					Avoid further distribution warehousing due to impact on exponential increases in HGVs on local road network. These are close to capacity.	Noted. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Local Plan is delivering more than local needs in terms of employment land. Sufficient sites currently allocated to deliver employment needs. No very special circumstances considered established to warrant Green Belt release in Curdworth area. Board Report will address some of these issues. No change proposed.

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DLP301	Curdworth Parish Council	Support			Traffic & Transport		PC acknowledge the Borough's recognition on need for commensurate infrastructure noted in the IDP and supports aspirations therein. Quality of life for residents has fallen due to HGV movements, pollution noise and vibration. Pollution levels are noted particularly. Impact of overnight parking in lay-bys and verges also of concern. Nevertheless PC are both to support concept of a HGV park within the Borough as traffic should be kept moving through what is basically a national traffic hub!	Noted. Wholesale restriction of B8 uses not practicable. Need and demand for use exists. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP301	Curdworth Parish Council	Comment			Public Transport		PC will support measures to reduce amount of traffic on local road network and support any proposal to improve or provide subsidised bus services (recently lost service in Curdworth) for benefit of rural communities.	Noted. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP302	Mrs J Woolley	Object				Polesworth and Dordon proposals	Object to allocations in Polesworth/Dordon. Dordon and Polesworth are not market towns. An artificial designation made by the Council to justify the large scale of development.	Dordon and Polesworth have been identified as a large settlement formed by two adjoining settlements in numerous planning documents including the County Structure Plan since 1996. The Draft New Local Plan allocations reflect the historical identification and reality that Polesworth and Dordon, along with Atherstone and Mancetter and Coleshill form the largest major settlements (in scale, population, size, transport links and opportunities, and available services and facilities) within North Warwickshire Borough and have been identified as such within the Strategic Policy, past and present, dealing with the Settlement Hierarchy for the Borough. Prior to the Structure Plan the close relationship between the two settlements in Planning terms was recognised by the Polesworth and Dordon Local Plan Brief in 1984 and Local Plan in 1989. The Plan links the two settlements with a continuous development boundary and notes in para 4.19 that "the built up area of Dordon is an indistinguishable continuation of Polesworth southwards". Plan does allocate significant number of sites at other main and service settlements in Borough, outside of Green Belt constraints.
DLP302	Mrs J Woolley	Object					Limited shopping, leisure and community facilities that do not compare to a 'Market Towns' Limited employment opportunities. Residents have to travel to Tamworth or Atherstone to meet their needs.	Noted. Polesworth/Dordon one of main urban settlements within the Borough and is most sustainable in terms of infrastructure and size. Proposal may enable improved retail, leisure and community facilities to be realised. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP302	Mrs J Woolley	Object					Scale of development disproportionate to size of the villages. Merging the two will result in loss of identity. Also disproportionate compared to other settlement allocations elsewhere.	Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. These are the most sustainable locations and areas with some infrastructure to support development needs. Further infrastructure will be delivered through financial contributions and highway authority investment to address any issues arising, where necessary and appropriate. No change proposed.
DLP302	Mrs J Woolley	Object					Concerned North Warwickshire is only Council to have agreed to take Birmingham and Coventry over-spill.	Noted. Other Local authorities will need to address the shortfall issue through the Duty to Co-operate as they progress their Local Plans. No change proposed.
DLP302	Mrs J Woolley	Object		LP9			Concerned over 40% affordable requirement which will not be primarily for locals but for Birmingham rather than North Warwickshire which is losing its green fields. Birmingham is allocating brownfield sites for parks, when this should be for housing.	Disagree. Affordable housing priorities will be for local needs or people with local links. Main issue with brownfield sites is viability and deliverability for sensitive residential uses, where recreational uses may be achievable. Nevertheless, where opportunities arise brownfield redevelopment is also a priority. No change proposed.
DLP302	Mrs J Woolley	Object			New Village		Council should be forming a new village.	Noted. Disagree. Growth options considered alternative approaches. Availability of land outside Green Belt limited opportunities to apply exceptional circumstances and/or very special circumstance to be applied to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. Lead in time for establishing a "new settlement" would be too long to address current development needs.
DLP302	Mrs J Woolley	Object					Where will funding for services and facilities come from given the current demands on and lack of funds for existing services and facilities. Children's Centre has reduced services and schools are overcrowded.	Infrastructure is a key issue that is being addressed through the IDP. This is a continual process. Issue of funding and delivery will also be addressed in Board report. Ongoing discussions underway with services, infrastructure providers and agencies to identify funding sources, opportunities and timing where necessary. As situation clarified this will be reflected in updates to the IDP. Board Report will address some of these issues.
DLP302	Mrs J Woolley	Object			Traffic		Traffic already a nightmare. Long Street cannot cope with further demand. Congestion already occurs. Village roads not designed for current traffic volumes. Increased risk of highway safety for road users and children. Development will add to this problem. New relief road and Grendon Road Island will not alleviate these issues.	Noted. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP302	Mrs J Woolley	Object					Increase in development at Birch Coppice will also add to traffic pressure. Increase in commuting to Birmingham. B5000 traffic congestion is dire. Increased traffic will increase percentages of accidents on narrow bridges.	Noted. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP302	Mrs J Woolley	Object					Poor public transport links which are under threat. Increased Council cuts will reduce access to employment and surrounding area even further, increasing congestion through use of private transport.	Noted. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP302	Mrs J Woolley	Object					If the Council pushes ahead with the plans the infrastructure should be put in place first before houses are built.	Concerns noted. Cannot prevent all development coming forward prior to infrastructure as development may be enabling delivery of infrastructure through on-site provision of financial contribution. Pricing will address some of delivery issues. Board report will address some of infrastructure issues. No change proposed.

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REF	ORGANISATION NAME	SUPPORT/OBJECT	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP302	Mrs J Woolley	Object			Green Space		Development will be on fields and green spaces that separate the two villages and will take away the heart of the two communities. These open spaces are currently used by dog walkers and children and loss will have health impacts. Replacement with regular parks will not enable children to thrive or develop as well.	Disagree. Access to countryside will continue and be maintained. Proposals will be subject to Concept/Master plan that will include open space, recreation and green infrastructure. Significant areas of Dordon/Polsworth proposal will remain open space, wildlife sites with accessible links. No change proposed.
DLP302	Mrs J Woolley	Object			Loss of Wildlife		Wide variety of species will be unable to survive on this site. Loss of blue bells particularly.	Disagree, through appropriate management and safeguarding with buffer zones protection should be maintained. Development proposals will need to address impacts and put in place mitigation. No change proposed.
DLP302	Mrs J Woolley	Object			Flooding		High water table means potential for flooding is high. Previous developers decided not to build as is classed as Marsh Land. Built development will cause flooding from rain run off.	Plan Policy requires development of site to address flooding issues and to ensure surface water run-off and flood storage impact to be no worse than existing to avoid exacerbating flooding risk. No change proposed.
DLP302	Mrs J Woolley	Object			Mining		Presence of former mining works has stopped development locally. Cost of addressing this previous use, including contamination, is significant, in region of £2 million to make suitable to build on.	Majority of settlement area surrounding site has history of past mining which has not prevented development. Development proposals will need to address former mining activity, including contamination. Current information indicates site is still viable. No change proposed.
DLP302	Mrs J Woolley	Object			TPO's		Site also includes numerous TPO's.	Presence of TPO's within Site allocations will need to be addressed by any development layout proposed. No change proposed.
DLP302	Mrs J Woolley	Object			Legal Covenant		Land to rear of Church Road has a legal covenant preventing use for "offensive, noisy or dangerous trade or business, or occupation which may be or grow to be a nuisance to Sir George Chetwynd and heirs/successor in title." We feel this development would be a nuisance and would object to buildings used for occupancy.	Noted. This covenant is a civil matter that is not relevant to the Local Plan process. Unclear that the development of the proposal will automatically result in any "offensive, noisy or dangerous trade or business, or occupation which may be or grow to be a nuisance to Sir George Chetwynd and heirs/successor in title." No change proposed.
DLP303	Mr Lakhampaul	Object			New Site	Land at Fyves Court, Wading Street, CV10 0SB	Allocate site for development. To contribute to boost supply of housing to ensure 5 year supply. Site currently in residential use, associated with the use of the house and character is "semi-rural not 'rural". Site has low conservation value and protected trees will be retained. No historical buildings or archaeological remains on site. Site is within walking distance of shops and facilities in Weddington and there is a major employment site at MIRA. (Also planned public transport improvements will help). Careful redevelopment of site would not impact on open countryside character. The proximity of neighbouring development at Lower Farm, currently under construction, is considered similar situation to this site.	Noted. Disagree. Location of site is in countryside, outside any identified settlement in an open sustainable location. No change proposed.
DLP304	Client	Object				Sites at Anasley Common	Object to allocation of sites at Anasley Common - Lack of facilities, services, shops, PO, schools, health, recreation and employment, including places of assembly and worship. Lack of public transport services (road and rail), traffic conflict and congestion, particularly at Nursery Hill School peak times. Insufficient capacity in local and adjoining parish schools (primary and secondary). Local GP health services unlikely to cater for large increases in population and no walk in health centre available in Anasley Common or Harshill. Residents will be almost entirely dependent on use of private cars. Nearest A&E is some 5 miles away at Nuneaton. At this will necessitate travelling with result of increasing pollution and carbon emissions impacting on health. Impact on and loss of award winning allotments and sports ground. New Local plan therefore not fit for purpose and requires further consideration and consultation. Note NWBC acknowledge the difficulties expected in developing the sites from biodiversity and wild life issues.	Noted. Infrastructure is a key issue that is being addressed through the IDP. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. Development sites proposed considered appropriate to the settlements position in the strategic hierarchy. These are the considered the most sustainable locations and areas with some infrastructure to support development needs. Further infrastructure will be delivered through financial contributions and highway authority investments to address any issues arising, where necessary and appropriate. Development proposals will also need to address natural environment impacts and put in place mitigation. No change proposed.
DLP304	Client	Object				HAR3	Site lies within Mineral Safeguarding area and green field site.	Majority of Borough lies within a mineral safeguarding site. Implication for site allocation not considered sufficient to prevent development. No change proposed.
DLP304	Client	Object				ANSCOMM	Site lies within Mineral Safeguarding area and green field site.	Majority of Borough lies within a mineral safeguarding site. Implication for site allocation not considered sufficient to prevent development. No change proposed.
DLP304	Client	Object			Alternative sites	Sites at Anasley Common	Propose alternative sites be considered for new housing in villages nearer Coleshill, such as Conley, Filongley and Kenesley closer to the boundaries of Coventry, with significant benefits of good road access and services/facilities and access to Coventry and Birmingham.	Alternative sites suggested fall within Green Belt, constrained by National Policy and Local strategy. Sufficient land available outside Green Belt to address development needs. No change proposed.
DLP304	Client	Object			Infrastructure costing (IDP?)	Sites at Anasley Common	No regard made towards costing of infrastructure, drainage, schools, health etc, with expressions of potential funding made without commitments from parties concerned.	Noted. Issues being addressed through the IDP. This is a continual process. Issue of funding will also be addressed in Board report. Ongoing discussions underway with services, infrastructure providers and agencies to identify funding sources, opportunities and timing where necessary. As situation clarified this will be reflected in updates to the IDP.
DLP304	Client	Object			Brown Field Register	Sites at Anasley Common	Object to lack of Brownfield Register resulting in green field allocations.	Brown field register work in progress. May inform Plan when available. Current knowledge notes there are insufficient brown field sites available and appropriately located to address development needs. No change proposed.

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DLP304	Client	Object			Housing shortfall from Birmingham and Coventry	Sites at Anstley Common	Insufficient details and information on housing shortfall from Birmingham and Coventry within the Local Plan. Unable to determine whether accepting this shortfall is a matter of necessity or convenience. Inappropriate to accept any volume of housing without prior consultation with residents. Housing allocation therefore ill-conceived and poorly considered. Birmingham and Coventry shortfall is double that of NWBC needs itself. SHLAA is therefore based on incorrect criteria. Criteria used should not be on the basis of available land submitted by parties for development, but on assessment of strategic locations based on infrastructure, services and access to employment with good road links to provide easy access for unimproved journeys and reduce pollution. Anstley Common and Hartsill are considered too poorly located in terms of current road networks. Advice from adjoining Local Authority Leader is that though there is a legal requirement for LA's to consult where neighbouring councils have a housing land shortfall this is not a requirement to "capitulate" (i.e. accept?) and does not preclude a consultation with residents of adjoining boroughs prior to committing land to adjoining authorities.	Coventry shortfall evidenced through Coventry and Warwickshire Strategic Housing Market Assessment and addressed through Memorandum of Understanding between sub-regional group of local authorities. Birmingham shortfall evidenced through Strategic Housing Market Assessment and Local Plan examination. MOU with Birmingham to address an element of this shortfall agreed through Duty to Co-operate. Cannot ignore DIC and if try and refuse to accommodate some shortfall where land is available will result in Local plan process being considered unsound and Planning Appeals difficult to resist. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.
DLP304	Client	Object			Housing shortfall from Birmingham and Coventry	Sites at Anstley Common	Continued from above. No consultation undertaken as to why NWBC should be accepting housing from neighbouring authorities or information available relating to why there is a shortfall of land. It is accepted that local authorities should not act in an isolationist or protectionist manner, but consider object to accommodating additional housing from adjacent authorities which will add to commuting and travel impacts. NWBC need to provide explanation as to why they have signed up to a "Memorandum of Understanding" with Coventry and Birmingham.	As above
DLP304	Client	Object			Affordable Housing	Sites at Anstley Common	Any affordable housing delivered on sites will inevitably, following resale, not be truly affordable. Suggest allocating new builds in lower house price areas. Expect the level of affordable housing delivered will be kept to a minimum.	Noted. Issue of Affordable Housing actual affordability is a National One outside remit of Local Plan. Aim is to achieve affordable housing accessible locally to address range of tenures and types. Where practical and viable this will be maximised. Ongoing work with housing strategy team helps identify needs and opportunities for Proposals to address. No change proposed.
DLP304	Client	Object			Density	Sites at Anstley Common	Proposed site density of 30 dph misleading and/or inappropriate for Anstley Common. Existing pre and post war development at a higher density means site likely to deliver 40 to 50 dph due to developer pressure, meaning significant increase in dwellings in excess of NWBC requirements.	Disagree. Unnecessary to seek significantly higher densities if need also to address environmental impacts and service and infrastructure needs. Where appropriate within site proposals higher densities can be sought but overall likely and expected to be around 30 dph. No change proposed.
DLP304	Client	Object			Green Belt	Sites at Anstley Common	Object to release of land from Green Belt for housing unless not suitable for agriculture or is Brownfield land. Insufficient consideration given to exhaust brownfield site development before Green Belt release. Highlighted by lack of Brownfield register.	Noted. There are insufficient brown field sites within the Borough to deliver the housing need, resulting in the necessity to allocate green field, countryside sites. Where impacts are significant compensatory measures will be sought. Site lies outside Green Belt. Brownfield register work in progress. May inform Plan when available. Current knowledge notes there are insufficient brown field sites available and appropriately located to address development needs. No change proposed.
DLP304	Client	Object			Flooding and Drainage	Sites at Anstley Common	Inadequate flooding and drainage facilities. Bourne Brook currently at capacity for storm water drainage. New drainage and pumping systems will be required. Impossible to consider any form of residential development without infrastructure being put in place first, including drainage, storm water, road network, access to health, leisure, recreational and retail facilities and medical, employment and educational services/facilities being available.	Concerns noted. Plan Policy requires development of site to address flooding issues and to ensure surface water run-off and flood storage impact to be no worse than existing to avoid exacerbating flooding risk. Cannot prevent all development coming forward prior to infrastructure as development may be enabling delivery of infrastructure through on-site provision of financial contribution. Phasing will address some of delivery issues. Board report will address some of infrastructure issues. No change proposed.
DLP304	Client	Object		SA		Sites at Anstley Common	SA report indicates "all proposed sites for Anstley Common and Hartsill perform negatively against all environmental objectives, that is air quality, pollution and the like and are worse than the majority of non-preferred sites". Much of information in SA report (5:40 and table 5.7) is misleading such as availability of library adjoining HAR3. This is volunteer run within the Parish/Church Hall and is assumed could be closed/availability withdrawn at any time by Church Authority if conflict of need arose. Also misleading to refer to services and facilities in adjoining Borough such as Bingo Hall and Chapel End social club, now closed.	Sustainability Assessment performance of sites does not preclude their allocation where other sites are less sustainably located. Development proposals will need to address environmental impacts highlighted in SA. Settlement position in hierarchy linked with Hartsill and nearby services support allocation. New development will also help maintain existing services as well as help to address infrastructure needs. Infrastructure is a key issue that is being addressed through the IDP. This is a continual process. Issue of funding and delivery will also be addressed in Board report. No change proposed.
DLP305	Mr C Smith	Object		LP3	Green Belt Infill		Object to Criterion 3. Limited infill within GB Infill boundaries' conflicts with Criterion 5. Indicating proposals will be determined in line with NPPF. NPPF does not seek to continue infill development to artificially drawn policy boundaries. Infill boundary approach will prevent all or any type of development previously accommodated as 'limited infill in villages' (such as squash court), when no change in National planning policies have arisen to justify the restrictive approach of Criterion 3. Should be amended to state "limited infill in villages", if such boundaries are to be defined, the boundaries should be drawn around the villages.	Green Belt Infill Boundaries subject to a report and assessment in 2012/13 and consultation. Forms part of evidence base. Local approach to be confirmed through Local Plan process. No change proposed.
DLP305	Mr C Smith	Object		LP11			Object to 3rd paragraph of Policy LP11 as inconsistent with the provision of NPPF Section 3. 'Supporting a Prosperous economy'. Para 28 of Framework does not continue sustainable growth and expansion to small businesses. It is not Government policy to strangle growth of large scale businesses in rural areas by the application of restrictive policies to force them into urban areas. Such approach is wholly misguided in context of Government's commitment to create jobs and prosperity (NPPF Para 18).	Noted. Disagree that Policy conflicts with Para 28. Reference to 'sustainable growth and expansion of all businesses' in NPPF enables focus on sustainable locations and avoidance of development in unsustainable locations. Enables Local Plan to focus and encourage major development towards sustainable settlements/locations. Plan should be read as a whole. Does not necessarily prevent regeneration or small scale expansion of existing large rural businesses but enables assessment of impact on countryside and consideration of sustainability of proposal. No change proposed.

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REF	NAME/ ORGANISATION	SUPPORT/OBJECT	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP305	Mr C Smith	Object		LP11	Phrase 'rural businesses'		Object to phrase "rural businesses" implying a judgement of the nature of the business in relation to a rural area. NPPF clear that Government support is given to "all types of businesses" in rural areas. The objective of Policy LP11 to ensure expansion of businesses in rural areas do not impact detrimentally on countryside character etc. amounts to general planning principles which would be applicable to any proposal for expansion of a business of any scale.	Noted. Term is not meant to relate to nature of business, simply its location which is matter of fact. No change proposed.
DLP305	Mr C Smith	Object		LP11	Omission to reference to Policy LP3		LP11 also deficient in omission of a cross reference to Policy LP3. Para 89 of NPPF allowing exceptions to development in the Green Belt relating to limited infilling, partial or complete redevelopment of brownfield land with no greater impact on openness of GB. Note brownfield sites may well be employment sites and LP11 is more restrictive than NPPF. This part of the policy should be rewritten. "Support and encouragement will be given for businesses within the rural area to expand in line with the NPPF, where expansion does not impact detrimentally on the countryside character in environmental or sustainable terms."	Noted. Disagrees that Policy conflicts with Para 89. Local Plan process enables different approach to NPPF to be applied or interpreted. Note also Para 28 NPPF reference to "sustainable growth and expansion of all businesses" in NPPF enables focus on sustainable locations and avoidance of development in unsustainable locations. Enables Local Plan to focus and encourage major development towards sustainable settlements/locations. Plan should be read as a whole. Unnecessary to simply re-iterate NPPF. No change proposed.
DLP306	Client	Support/ Comment				Land south of Anasley Common	In general, we are in support of the local plan as whole.	Noted. The Borough OAHN upon which 5 yr supply is assessed is the 5280 figure, the additional shortfall is for addressing Birmingham's need and forms part of their OAHN. The delivery, particularly of the larger site proposals, will be subject to infrastructure.
DLP306	Client	Object		LP6	Amount of Development		LP6 Amount of Development then caveated by the statement that: 'the actual amount of development delivered over the Plan period will be governed by the provision of infrastructure to ensure developments are sustainable'. Surely if the Borough were to deliver less than at least the 264pa then they would fall into shortfall and possibly the 454pa, regardless of the infrastructure delivery at this time. We therefore, suggest that this paragraph is removed from the policy.	Noted. The Borough OAHN upon which 5 yr supply is assessed is the 5280 figure, the additional shortfall is for addressing Birmingham's need and forms part of their OAHN. The delivery, particularly of the larger site proposals, will be subject to infrastructure capacity and delivery of required infrastructure, delivery of which may extend beyond Plan period. No change proposed.
DLP306	Client	Support/ Comment		LP7	Housing Development		Whilst we do not dispute this policy in general terms, it should be noted that the necessary infrastructure caveat is again present and is a concern, especially in light of policy LP6.	Noted. See response to LP6. No change proposed.
DLP306	Client	Object		LP9	Affordable Housing Provision:		Whilst we do not dispute this policy in general terms, it should be noted that the proposed affordable housing mix of 85% affordable rent and 15% suitable intermediate tenure is deemed to be too high in terms of affordable rent and does not therefore represent a diverse enough approach, which could be achieved by reducing this to a lower percentage and increasing the suitable intermediate tenure percentage, say to a 65% to 45% mix, allowing for greater flexibility of supply.	Policy is flexible, to be applied "where practicable" and subject to viability assessment. No change proposed.
DLP306	Client	Object		LP14	Natural Environment:		Whilst we do not dispute this policy in general terms, it should be noted that the paragraph that states: 'Development will not be permitted which would directly or indirectly damage, existing mature or ancient woodland veteran trees or ancient or species-rich hedgerows.' is too inflexible and should be amended to ensure that developments that will deliver wider benefits and enhancements should be able to be developed if there is a minor direct or indirect damage to a small area of existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows. This policy should be reworded to add, 'unless the benefits far outweigh the perceived damage and adequate mitigation by way of enhancement and/or replacement appropriate planting.'	Noted. Policy reflects level of protection sought in NPPF. Text may be clarified to better highlight when and where impact may be accommodated.
DLP306	Client	Support/ Comment		LP39	Housing Allocations:		Whilst we do not dispute this policy in general terms, specifically the allocation of Land South of Coleshill Road, Anasley Common, (15ha) for residential development, it should be noted that the site could accommodate more than the proposed 230 dwellings.	Noted. Standard density of 30dph net (using %stage discount to address infrastructure requirements) used to establish housing numbers. Actual delivery may vary higher or lower. No change proposed.
DLP306	Client	Object			Additional Land and access route	Land south of Anasley Common	If this additional land were allocated as well it would allow for a road to be brought off Coleshill Road that could access the site, but also be potentially extended in due course, through cross border cooperation with Nuneaton and Bedworth Borough, to become a relief route that could extend through the site onto Plough Hill Road thus reducing existing congestion at the Coleshill Road and Plough Hill Road junction. The allocation of the additional land, would also allow for the potential relocation and additional provision of green open space and recreation land and a greater flexibility of development.	Noted. Sufficient land currently allocated to address housing and employment needs. Longer term potential for access route/recreation land noted and discussions with adjoining Borough undertaken but land not required at present. No change proposed.
DLP306	Client	Object			Housing delivery	Land to north of Anasley Common	Numbers currently provided by the proposed draft Local Plan are likely to suffer, due to the complex delivery issues on some sites, for example the allocated land North of Anasley Common and the likely delays on the necessary infrastructure to deliver the housing numbers required. This may result in an under supply of housing unless additional land is allocated to allow for a greater flexibility in supply. It is considered the land to the North of Anasley Common, (19.7ha) that has been allocated to accommodate 355 new dwellings over the plan period has a number of development constraints likely to prevent or hinder swift delivery.	Noted. Board Report addresses some of these infrastructure and constraints issues. No change proposed.
DLP306	Client	Object			Additional land	Land south of Anasley Common	It is therefore proposed that to aid flexibility of supply and ensure greater rates of delivery over the plan period the additional land to the South of Anasley Common available and illustrated in figure 5b: Harstall with Anasley Common (Reasonable Alternative Sites) of the North Warwickshire Site Allocation Plan (Appendix 3).	Noted. Sufficient land currently allocated to address housing and employment needs. Longer term potential for additional land noted but further land not required at present. No change proposed.
DLP306	Client	Object			Soundness of Plan		In order for the Plan to be sound it needs to be in accordance with paragraph 182 of the NPPF which in turn is interpreted in paragraph 021 Reference ID: 3-20140306 of the NPPF.	Noted. Unclear as to why plan not considered in accordance with NPPF and guidance. No Change proposed.

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DLP307	Cathedral Agricultural Partnership and the White Family	Support/ Comment		LP1			Generally support this policy. However, the final section of the policy refers to 'required infrastructure' of development should be provided and sets out the mechanisms for doing so. Clarification is sought on what the 'required infrastructure' should be, and we consider that this should be reserved until the Infrastructure Delivery Plan is finalised.	Noted. IDP is ongoing work in progress. Board report addresses issue of infrastructure delivery and requirements. Required infrastructure will need to be assessed on a site by site basis at application stage. Plan and IDP provide broad strategic guidance on expected infrastructure which may change over time. Discussions ongoing with service and infrastructure providers and where infrastructure needs and details are available these will be noted in the Plan Site Proposals. No change proposed.
DLP307	Cathedral Agricultural Partnership and the White Family	Support		LP2			No comments	Noted.
DLP307	Cathedral Agricultural Partnership and the White Family	Support/ Comment		LP6			Support the amount of development proposed for the Borough and the testing of capacity to assist in meeting Birmingham's unmet housing need. This approach will assist in meeting the Duty to Cooperate. The Council should be clearer in terms of setting out what the Borough's housing requirement is and the exact figures for the unmet needs of the neighbouring authorities (Birmingham, Coventry, and Tamworth).	Noted.
DLP307	Cathedral Agricultural Partnership and the White Family	Object		LP7	Special needs housing requirement		The provision of 10% 'special needs' housing is expected to be absorbed within the 40% affordable housing requirements of the Plan. The issue is twofold: 1. The 'special needs' housing has not been identified in the subsequent affordable housing policy and tenure mix. It is therefore unclear how this 10% requirement is expected to be delivered through the affordable housing requirement and how it will therefore be enforced. 2. It refers to 40% affordable housing requirement, however policy LP9 identifies 30 - 40% based on the site (whether it is greenfield or not) and therefore it is unclear how this 10% should be absorbed into the different requirements. Suggest that this requirement for 'special needs' housing would be more appropriately considered within policy LP9 on affordable housing.	Noted. Disagree. Special needs requirement applies to all types and tenure of housing not simply 'affordable'. Covers wide category of special needs adaptable housing from disabled to elderly adaptations and accessibility. Policy is flexible to reflect different needs for differing sites and areas. Special needs requirement applies to all types and tenure of housing not simply 'affordable'. Further work may be necessary to better define or explain the term in the Plan. No change proposed but term will be clarified in Glossary.
							Given the mining history of parts of Folesworth/Dordon site, the uncertainty of the remediation costs, the query over viability of delivering 40% affordable housing in the Borough we object to this policy. The evidence base used to inform the policies are considerably outdated, particularly the SPD and its subsequent update which pre-dates the NPPF. The Affordable Housing Viability Study makes references to 40% of sites to be apportioned for affordable housing where the site is more than 0.5 Ha in size or 15 dwellings or more. This does not support the proposed policy in the Draft Local Plan of the provision of 30% affordable housing on sites of 10 or more dwellings, except for greenfield sites which are expected to deliver 40% affordable housing. The Review and Update of the Council's Affordable Housing Viability Assessment, Site Allocations Plan Viability Assessment and CL Study March 2014 appears to be the more appropriate document for this policy. The Draft Local Plan should be clearer in which evidence base documents it is relying upon to inform the proposed policies. We would welcome an update on affordable housing viability as the position may have changed from three years ago and therefore the evidence needs to be up-to-date to support the emerging policies in accordance with NPPF Paragraph 158.	Noted. Plan will be clarified to indicate relevant evidence base. Further work on viability is ongoing. Policy nevertheless provides flexibility to address viability on a site by site basis subject to appropriate appraisal.
DLP307	Cathedral Agricultural Partnership and the White Family	Object		LP9	Affordable Housing		Paragraphs 8.12 and 8.13 refer to the Government's proposals for a national minimum requirement of 20% Starter Homes. However the policy does not identify how this will be dealt with in the NWBC requirement. Paragraph 8.17 makes reference to the 20% provision of starter homes, however does not discuss how this will form part of the affordable housing mix within the policy itself. At the same time that the White Paper was published, the Government also published their response to the Starter Homes Regulations Technical Consultation which was carried out in June 2016 which states that the Government will not implement a compulsory starter homes requirement at this point in time. Further clarification on this matter is therefore sought. The Housing White Paper proposes to amend the NPPF to set a minimum policy requirement of 10% affordable homes on new housing developments. The Council should review this policy in light of this.	Noted. Plan will be clarified to indicate relevant changes to National Guidance where necessary. Starter Homes will be included in definition of 'affordable housing' in Glossary. No current change proposed in Policy prior to any National Policy changes. No statutory requirement for starter homes is now to be applied nationally.
DLP307	Cathedral Agricultural Partnership and the White Family	Object	Para 8.2.12 & 8.13	LP9	Starter Homes		Do not support the blanket approach to retain existing trees, hedgerows and nature conservation features on all sites, unless such features are specifically protected (e.g. TPO's). Policy is overly restrictive and negatively worded and therefore not in accordance with NPPF paragraphs 14 and 162. It should be re-worded to include the words 'where informed by appropriate survey work and where possible, new development should retain...'	Noted. Disagree. Policy does not apply a 'blanket approach' but states 'where necessary'. This should accommodate concerns raised, not be overly restrictive and enable applicants to assess and indicate loss of natural environment and landscape features 'where necessary' to enable the development. No change proposed.
DLP307	Cathedral Agricultural Partnership and the White Family	Object		LP14				

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DLP307	Cathedral Agricultural Partnership and the White Family	Object		LP15	Historic Environment		Policy is unclear. Generally support policies which seek to preserve and enhance heritage assets. The policy should set out clear tests / parameters to assess how development integrates with the historic environment. Concern regarding whether it is necessary for Transport Assessments to include an assessment of how townscape and the historic environment assessed and addressed within development proposals. The evidence set out in appendix C does not make any reference to the need for transport assessments to take into account the historic environment. Therefore clarification and justification is sought on its inclusion.	Noted. Further work on Historic setting impact ongoing. Where impacts affect development proposals in layout, landscaping and mitigation these will be noted in Plan Proposal and addressed through required Concept/Master Plans and Development Briefs. Disagree on Transport assessment requirements. Where design of transport infrastructure affects or impacts on historic assets this needs to be recognised and addressed through appropriate design solutions and materials. Plan will clarify issue in RJ and Appendix.
DLP307	Cathedral Agricultural Partnership and the White Family	Support/ Comment		LP16			Support but further detail is required on how biodiversity off-setting will be dealt with to provide guidance for developers at the appropriate proposal and application stage.	Noted. Unnecessary detail. Clarification of where to access detailed info will be added. No change proposed.
DLP307	Cathedral Agricultural Partnership and the White Family	Support/ Comment		LP17			Support this policy. The Hollies, located in the centre of the proposed allocation to the east of Polesworth and Dordon, shall be retained as part of the development proposals and contribute towards the Green Infrastructure provision on site.	Noted. Clarification in proposal text to reflect and Green Infrastructure opportunity will be noted in Concept/Master Plan.
DLP307	Cathedral Agricultural Partnership and the White Family	Object		LP20			Policy relating to the retention of Green Spaces is very vague. Should set out guidance on how the Council would respond to the loss of any such spaces and how they will be protected. Note Green Space Strategy under review, findings of which will feed into the consideration of sites. Therefore as policy may change, we suggest that the amendments are consulted on prior to the Pre-Submission consultation to ensure that general comments can be taken into account prior the assessment of soundness.	Noted. Further work underway for Open Space/Recreation strategy will inform Plan and proposal changes. Intent is to deliver a SPD which will be consulted on. Policy clarification will be considered through RJ or Policy text additions. No further change proposed.
DLP307	Cathedral Agricultural Partnership and the White Family	Support/ Comment		LP22			Generally support this policy. Suggest some recognition is given towards the inclusion of the strategic housing allocations and the need to also provide new services and facilities in such developments. We suggest that the policy wording is amended to include the following: "within the strategic allocations, new services and facilities will be required as part of development proposals proportionate to the scale of the allocation."	Noted. This is a Development Management Policy that addresses proposals outside of the strategic allocations which will address their specific infrastructure requirements as required. No change proposed.
DLP307	Cathedral Agricultural Partnership and the White Family	Support/ Comment		LP24			The area of land within the strategic allocation to the east of Polesworth and Dordon owned by CAP and the White Family could provide links through the Church Commissioners land to the west to the existing settlement, and also provide better and more formal access to the open countryside to the east and south.	Noted.
DLP307	Cathedral Agricultural Partnership and the White Family	Support		LP25			No comments	Noted.
DLP307	Cathedral Agricultural Partnership and the White Family	Support		LP26	Stations		Support the proposal to improve facilities and services at Polesworth station.	Noted.
DLP307	Cathedral Agricultural Partnership and the White Family	Object		LP28			The STA should assist in shaping this policy when it is published providing information for the strategic road improvements. The policy should be refined at a later stage when proposals for the A5 are clear. As this policy could change, we suggest that the amendments are consulted on prior to the Pre-Submission consultation to ensure that general comments can be taken into account prior the assessment of soundness. Other strategic road improvements should be considered under this policy such as the connection between the A5 and B5000 at Polesworth / Dordon which specifically relates to the delivery of the draft allocation for c. 2,000 dwellings on land to the east of Polesworth.	Noted. Disagree. The Policy is a General Development Management Policy requiring all proposals that generate significant traffic movements to have a Transport assessment and the measures to be addressed through those assessments. Specific requirements identified by STA will be included or addressed through requirements in the Site Specific Proposals, or the IDP. The Board Report addressed some of these infrastructure delivery issues. No change proposed.
DLP307	Cathedral Agricultural Partnership and the White Family	Support		LP31	Development Considerations		No comments.	Noted.
DLP307	Cathedral Agricultural Partnership and the White Family	Object		LP32	Strategic sites		Support the principle in general. However, it is considered that some consideration should be given to the strategic and large sites which may not be appropriate to totally respect and reflect the existing pattern, character and appearance of its setting. We consider that a major urban extension should create its own identity and character areas.	Noted. This is an issue that can be addressed through the Site Proposals Concept/Master Plan requirements. Larger Proposals still reflect current Settlement hierarchy targeting development in larger more sustainable settlements and locations. It is still considered that large allocations can reflect existing pattern, character and appearance of its setting through appropriate layout, design and landscaping. No change proposed.

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DLP307	Cathedral Agricultural Partnership and the White Family	Support/ Comment		LP37	Renewable Energy		Support. However, the policy should offer greater flexibility in accordance with the Renewable and Low Carbon Energy Resource Assessment and Feasibility Study prepared by CAMCO which suggests that 7.5% - 10% renewable energy could be derived locally. Reference should also be given to 'subject to viability'.	Noted. Policy text makes reference to viability. No change proposed.
DLP307	Cathedral Agricultural Partnership and the White Family	Comment		LP38	Information and Communication Technologies		It is understood that Information and Communication Technologies are an important component of new housing development and should be incorporated into proposals as standard. However we query the necessity of providing a 'Connectivity Statement' with planning application submission as this could be appropriately captured within a utilities report. However, ability for the developer or housebuilder to connect to broadband will ultimately fall to the responsibility of BT Openreach. A review of the evidence base does not identify the justification for major infrastructure development providing ducting that is available for strategic fibre deployment or community owned local access networks. Therefore further clarification is sought.	Noted. Further clarification of text will highlight 'opportunity' and benefit of forward planning and 'future proofing' through provision of ducting where new infrastructure development is proposed to support and enable economic growth. No further change proposed.
DLP307	Cathedral Agricultural Partnership and the White Family	Support/ Comment		LP39		Land to the east of Polesworth & Dordon between the A9 and B5000	Support the proposed supply of housing sites to provide flexibility in delivery. Support the requirement for a mix of housing types, including for the elderly and young people. However there are concerns over the requirement for an area of self-build homes as the Council has not provided any evidence on how this could be delivered. Clarification is sought on the final sentence as it is unclear what is meant by this. We consider that proposals prepared by separate landowners should be informed by a wider indicative comprehensive masterplan/ concept plan taking into consideration the phasing of the allocation and associated infrastructure.	Noted. Developers will be encouraged to address self-build and custom build opportunities as an important element of the Government's planning strategy for housing. Final sentence of proposal is intended to address 'piecemeal' delivery of major proposals and potential fragmentation of site and reduced delivery of infrastructure. Agreed that site proposals should accord with Concept/Master Plan and phasing will be an element of the Master Plan. Until master plan available proposal text is intended to catch smaller site opportunities that may be submitted. No change proposed (Text in RJ may be clarified to emphasise issue).
DLP308	George Eliot Hospital	Support					General support of policies LPT1-LP40. Detail provided of current infrastructure capacity and deficiencies.	Noted.
DLP308	George Eliot Hospital	Support		IDP	IDP		Evidence provided that indicates no available in-patient capacity to accommodate healthcare needs of additional population generated by the Local Plan and additional infrastructure will be needed to meet those healthcare needs.	Support and additional information for inclusion in IDP noted.
DLP308	George Eliot Hospital	Comment/ Information		IDP	IDP		Additional capacity needed to address housing growth by end of plan period is: - 1330- non elective admissions per annum, - 183 elective admissions per annum, - 15,900 additional outpatient appointments per annum, - 5,800 diagnostic testing attendance per annum, - 4,200 A&E attendances per annum and increase in maternity provision will be required to address expected demand for maternity beds.	Noted.
DLP308	George Eliot Hospital	Comment/ Information					To meet these infrastructure requirements the NHS Trust seeking to provide additional space within A&E, creation of new short stay assessment and treatment facilities, additional outpatient, diagnostic and rehabilitation facilities within a community hub, additional theatres for inpatients, increased labour and antenatal provision and additional car parking.	Noted.
DLP308	George Eliot Hospital	Comment/ Information					The Trust will seek developers contribution towards the provision of infrastructure to address funding shortfall/availability.	Noted.
DLP309	Arden Cross Consortium	Object		LP27			New Local Plan should recognise and reflect the "Arden Cross" site adjoining the North Warwickshire boundary in Solihull and ensure cross boundary matters of highway, transport or other infrastructure capacity and assessment, ensures compatibility between the new development at UKC Hub and the policies and proposals of the North Warwickshire Local Plan.	Noted. Reference is made in Plan to significant development proposals adjoining the Borough. Further discussions will be undertaken with consortium and adjoining authorities as part of Duty to Co-operate. No change proposed.
DLP309	Arden Cross Consortium	Object				STIA Landfill site, east of M42, north of A45, Packington.	Propose this Arden Cross site be considered as potential country park.	Noted. In absence of promotion by landowner/operator for recreation use potential opportunity very limited/unlikely during plan period. No change proposed
DLP310	Dobbles Garden Centre	Object				Land to East of Dobbles Garden Centre	7.5 ha Parcel of Land east of Dobbles Garden Centre is proposed for employment or industrial uses. Location of site between established uses at garden centre and Treatment works would not harm character, appearance and openness of Countryside. Also enables comprehensive landscaping. Providing employment needs for Borough and wider area.	Noted. Plan addresses employment need and growth through allocation of employment sites. Local Plan is also delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. No change proposed.
DLP311 (1)	Alan Wilson	Object					Loss of Town character. Traffic congestion and parking impact. Shortage of GPs.	Noted. Infrastructure is a key issue that will be addressed. Development will need to contribute towards GP Health needs. IDP will be addressed in Board Report. STA will address traffic impact and infrastructure.
DLP311 (2)	Alan Wilson	Object			Green Belt		Consideration should be given to building on Birmingham side of Borough which would minimise additional traffic on Borough's minor roads, to address Birmingham need, notwithstanding Green Belt considerations.	The Plan provides sufficient land outside the Green Belt to address the OAHM and agreed Birmingham shortfall. No release of Green Belt is proposed or necessary. No very special circumstances warrant release. No change proposed.
DLP312 (1)	Lorraine Hollis	Object			Dordon and Polesworth proposed development Environmental Impact		Scale of development not a fair or realistic amount and out of proportion. Loss of woodland, heathery and wildlife. Loss of accessible countryside and open space, destruction of Bluebell woods - character of villages will be lost.	Proposed allocations address the Objectively Assessed Housing need and the agreed Birmingham shortfall. Open space and woodlands will be retained as part of proposals. Settlements are considered most sustainable to accommodate development proposal. Countryside will continue to be accessible.
DLP312 (1)	Lorraine Hollis	Object			Traffic Impact		Traffic congestion already a current problem that will be made worse. Increasing air pollution and damaging health. Will be added to impact of HS2.	The STA will address impact of traffic growth and need for infrastructure. This issue is dealt with in the Board Report.

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DLP312 (1)	Lorraine Hollis	Object			Infrastructure deficiency		No detail of infrastructure required for development in Plan. Current health and education services already overstretched. Drains and sewerage impact and increase in flooding issues.	The IDP for the Plan provides detail on infrastructure needs and delivery. Further work on the IDP is in progress and will be addressed in the Board Report. Developments will be required to address their infrastructure needs.
DLP312 (1)	Lorraine Hollis	Object			Alternative Options		Have all brownfield sites been considered for Borough and Birmingham. Daw Mill Colliery could make better site for housing than industrial.	Alternative site referred to lies within the Green Belt in an unsustainable location with limited or no infrastructure and services. Similarly many brownfield sites are in such locations. Where available and deliverable they will contribute but there are insufficient brownfield sites to address the level of housing and employment need.
DLP312 (2)	Lorraine Hollis	Object					Proforma 23	Response as Proforma 23
DLP312 (3)	Lorraine Hollis	Object					Article from BBC online submitted relating to lack of new woodland created in 2016 and need for safeguards for ancient woodland.	Noted. Impact on ecology and natural environment will be addressed through compensatory measures such as Biodiversity offsetting contributions. Proposals will include areas of habitat retained and conserved as Local Wildlife Sites, Hoo Hill and woodland areas to be retained and managed as part of site Master plan proposals. No change proposed.
DLP313 (1)	Gary Palmer Solihull MBC	Support		LP6			Welcomes recognition of need to contribute to wider housing and other development requirements, particularly in relation to GBHMA shortfall.	Noted.
DLP313 (1)	Gary Palmer Solihull MBC	Support		LP39			Support growth proposals and strategy focussing outside green belt around Market Towns and larger settlements minimising impact on Green Belt.	Noted.
DLP313 (1)	Gary Palmer Solihull MBC	Support and Comment		LP40			Plan could give greater emphasis to significant proposals outside Borough, notably UK Central and HS2 interchange. Recognise potential benefits and impacts for settlements in southwest of Borough. Borough need an investment strategy to respond to growth proposals and infrastructure requirements.	Noted. Plan notes impact of proposals such as UK Central and HS2 and will update clarity text where necessary to highlight potential impacts.
DLP314 (1)	H Ensor	Object	Para 15:70-71 Austrey Development Boundary				Amend Development Boundary to encompass new developments along Warton Lane and Newton Lane, reflecting implemented permissions.	Noted. Standard density applied for consistency and to address service needs on site. No change proposed.
	H Ensor	Object		LP39			Amend Development Boundary to encompass new developments along Warton Lane and Newton Lane, reflecting implemented permissions.	Noted. Disagree. Development Boundary reflects planning consent granted.
		Object					Planning consents 2014/0569 and/or 2014/0157 not progressed to Approval of Reserved matters yet. Should not be included within Development boundary.	Noted. Disagree. Development Boundary reflects planning consent granted. Additional sites not necessary to address housing need. No change proposed.
DLP315 (1)	Gillian Harrison	Object		AUS14			Object to site. Extends village south into open countryside. Impact far reaching in scale and on biodiversity. Heritage impact. Smaller pockets should be enabled such as PS131.	Noted. Sufficient sites allocated to address OAHN. No change proposed.
		Object		LP39	Chapter 15		Scope for modest increase in housing numbers in Category 4 settlements, particularly Wood End.	Noted. Standard density applied for consistency and to address service needs on site. No change proposed.
		Object					Housing density too low within Wood End, which is a sustainable settlement.	Noted. Sufficient sites allocated to address OAHN. Site is considered too large, out of scale with village size and needs. Potential adverse impact on countryside, landscape and traffic generation.
		Object				New Site Islington Farm, Wood End	Potential site of 14.29ha off Tanworth Road Wood End to Boulton Lane proposed.	Noted. Site allocated. No change proposed.
DLP316	Mr A Summerton Walton Homes	Support		LP39		A: Land north of Orton Road	Support allocation of site. Full supporting statement, Appraisal layout and technical appendices submitted, including Flood Risk assessment, Transport Statement, Ecological Assessment, Archaeological Note.	Noted. Clarification required as believe it may be the same site as "C" below.
DLP316	Mr A Summerton Walton Homes	Object	para 15.59 to 15.62	LP39		B: Land north of Kingsbury Hall	(Attached Statement missing)	Noted. Disagree. No very special circumstances established to warrant release from Green Belt. Sufficient sites allocated to address OAHN. No change proposed.
DLP316	Mr A Summerton Walton Homes	Object		LP39		C: Land at Hemmingford Mill, Coventry, Kingsbury	Proposed site south of Kingsbury of 2.2ha's and has frontages to both Coventry Road and Piccadilly Way. Limited impact, serving housing need for Kingsbury and North Warwickshire. Logical rounding off. Defensible boundaries minimise impact on Green Belt. Sustainable location within walking distance of services and facilities in village.	Noted. No change proposed.
DLP316	Mr A Summerton Walton Homes	Support			Settlement hierarchy	Kingsbury	Support identification of Kingsbury as category 3 Local Centre. Kingsbury is capable of accommodating significantly more housing to reflect its status.	Noted. No change proposed.
DLP317	Jacqui Brooks	Object			Atherstone Proposals		Infrastructure cannot adequately support proposals. Schooling will be an issue. Doctors struggles to service the current residents. Shopping in the large food stores in town struggling to cope. Pressure on other services such as social care and refuse collection? Proposed development will kill Atherstone and its community.	Atherstone is the main urban settlement within the Borough and is most sustainable in terms of infrastructure and size. Infrastructure is a key issue that is being addressed through the IDP. Further infrastructure will be delivered through financial contributions and highway authority investment to address any issues arising, where necessary and appropriate. Board Report will address some of these issues. No change proposed.
DLP317	Jacqui Brooks	Object			Traffic		A5 around the town is already at capacity. Impact on Holy Lane railway bridge. Car parking in Atherstone town centre is an issue.	Noted. Atherstone is the main urban settlement within the Borough and is most sustainable in terms of infrastructure and size. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues. No change proposed.

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DLP317	Jacqui Brooks	Object				Flooding	The risk of flooding - I have seen the roads and fields flooded on many occasions. I cannot believe that this is deemed an acceptable area in which to build.	Plan Policy requires development of site to address flooding issues and to ensure surface water run-off and flood storage impact to be no worse than existing to avoid exacerbating flooding risk. Development will not be permitted that increases risk of flooding over that existing currently. Where specific site and/or area problems are highlighted the Site Proposals and LDP will note the need to address the issue. The Board Report will address some of these issues. No further change proposed.
DLP318	Clerk to Trustees Sir Francis Nethersole Foundation	Support/ Comment		LP39		POL3, Former Polesworth Learning Centre	Support proposal site. Proposal text though a little too prescriptive regarding overall form of development. Prior to further detailed investigation it may be premature to require retention/conversion of former school building.	Noted. Former school building has historic links and value as part of existing built form which should be retained, given close relationship with Conservation Area and listed abbey site/Caterhouse building. Proposal nevertheless is flexible and not considered too prescriptive. Subject to high quality of design, alternative approaches may be possible. No change proposed.
DLP319	Mr W Kler Kler Group	Support			Spatial Vision	Land at Dairy House Farm, Grendon	Support spatial vision	Noted.
DLP319	Mr W Kler Kler Group	Object			Additional Sites	Land at Dairy House Farm, Grendon	Site proposed to rear of Hastings Road/Chetwynd Drive, Grendon to assist meeting housing need.	Noted. Sufficient sites allocated to address Borough's OAHN and Birmingham shortfall agreed. No change proposed.
DLP319	Mr W Kler Kler Group	Support/ Comment		LP6	Quantum of Development		Broadly support approach to delivering Borough's need and needs arising from other authorities in HMA. Borough should ensure Local plan meets fully the OAHN and not acceptable/unsound to only address part of housing, business and other development needs of HMA. Additional land above 10% agreed should be planned to address Birmingham shortfall.	Noted. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing employment needs relating to Birmingham housing shortfall, agreed through MOU. Sufficient sites currently allocated to deliver both Employment needs and OAHN/Birmingham shortfall agreed. Other authorities are progressing Local Plans that should address the Birmingham shortfall as well. No change proposed.
DLP319	Mr W Kler Kler Group	Support/ Comment		LP7		Special Needs housing	Broadly support. But requirements for specialist housing should be on site by site/case by case basis.	Noted. Policy is considered flexible enough to address issue, particularly in relation to threshold, inclusion as part of 40% affordable element if required and regard to site specifics and economics. No change proposed.
DLP319	Mr W Kler Kler Group	Object		LP8		Windfall	Windfall allowance too high at 10% of total housing numbers.	Disagree. Evidence available indicates windfall will continue and can support housing delivery. Windfall is assessed at a conservative level and is expected to continue. Sufficient sites currently allocated to deliver OAHN and address additional Birmingham shortfall. No change proposed.
DLP319	Mr W Kler Kler Group	Object		LP39		Land at Dairy House Farm, Grendon	Omission of site at Dairy House farm. Site is logical extension to Grendon. Full assessment and testing of site requirements and impacts has been undertaken, including Transport Assessment, Ecological Assessment, Flood Risk assessment etc. Other sites allocated in Grendon and Baddesley may have difficulties in delivery compared to this proposal. Additional housing sites are considered necessary to ensure soundness.	Noted. Disagree. Other sites are coming forward as applications and delivery or on site constraints have not been raised or identified as issues. Sufficient sites currently allocated to deliver OAHN and address additional Birmingham shortfall. No change proposed.
DLP320	Prologis & EON UK	Support/ Comment	15.30 and 15.31	LP40		Hams Hall	Prologis and EON support the allocation of land at Hams Hall under Policy LP40 and request additional information is provided to clarify the position with regard to the Hams Hall B Station Site.	Noted.
DLP320	Prologis & EON UK	Support/ Comment				Removal From Green Belt	In addition, it is noted that North Warwickshire Borough Council's Planning Board resolved to grant outline planning permission for "demolition of existing buildings and redevelopment of site for industrial/distribution uses (Class B2/B8) including ancillary offices and associated parking, highway infrastructure, ground engineering works, drainage and landscaping" subject to the completion of a Section 106 Agreement (application ref: PAP201600399). It is anticipated that the S106 Agreement will be completed in April 2017. It is considered appropriate for the New Local Plan Policy to recognise this within the supporting text. The extent of land to be removed from the Green Belt should be consistent with the approved Parameter Plan reference 30659-PL-102E and attached to these representations.	Noted. Agreed. To reflect SoS confirmation of Planning consent the Power Station B site will be removed from Green Belt to reflect the changed circumstances.
DLP321	Anita Alsopp Shutfington Parish Council	Support		LP5		Meaningful Gap	Fully support maintaining few remaining open green spaces. Gap should be enforced.	Noted.
DLP321	Anita Alsopp Shutfington Parish Council	Object				Site at Robey's Lane	Object to 500 houses being built for Tamworth at Robey's Lane. No provision from improved road infrastructure indicated.	Noted. The Borough has committed to accommodating 500 units to address Tamworth shortfall as part of Duty to Co-operate requirements. Further shortfalls have increased this figure which will be delivered across the sites allocated, not simply via the Robey's Lane site. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. No change proposed.
DLP321	Anita Alsopp Shutfington Parish Council	Object				Infrastructure	Concern that additional houses being built in villages are without consideration or implementation of additional infrastructure. Increased Allocation for Shutfington unacceptable given already stretched services and inadequate road infrastructure available in Shutfington. Improved services and facilities should be provided in larger settlements to accommodate housing growth.	Concern Noted. Infrastructure and service deficiencies and needs are issues being addressed through the IDP and contribution by Development. This is a continual process. Board Report will address some of these issues. No change proposed.
DLP321	Anita Alsopp Shutfington Parish Council	Object			Gypsy and Travellers requirements	No of pitches	Concern over number of pitches at Alvecoke, which has no amenities. Plan states there shouldn't be more than 5 pitches per site. Alvecoke has 17. Why haven't Tamworth and Lichfield provided pitches.	Concerns noted. Intention is to seek new smaller family based pitch sites. Text does not specifically relate to existing sites and pitches. Alvecoke is a municipal run larger site. In view of needs would not suggest this be reduced. Tamworth and Lichfield have also to address Gypsy and Traveller site needs were identified/developed. No change proposed.

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DLP322	Efford Homes	Support		LP39	Land to the east of Polesworth and Dordon between A5 and BS000	Site off Laurel Avenue/Common Lane Polesworth	Submission of evidence and technical reports/assessments to support site off Laurel Avenue/Common Lane, Polesworth, part of larger Land allocation to the east of Polesworth and Dordon. Submission includes Planning Statements, Flood Risk assessment, Ecological assessment, Archaeological assessment and site survey.	Noted. Site forms part of larger allocation and is subject of current planning application. No change proposed.
DLP323	McCarthy & Stone Retirement Lifestyles Ltd	Support/ Comment					Generally support Plan and commend the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population particularly within Policy LP7. Housing Development and the accompanying justification to this policy. We would support a review of the site allocations, to ascertain whether or not aspects of the sites are appropriate for locating specialist older persons' accommodation.	Noted.
DLP323	McCarthy & Stone Retirement Lifestyles Ltd	Object		LP7		Supported Housing	'Supported housing' such as Extra Care accommodation require a critical mass of residents in order to be both viable to build and affordable to potential residents. It is unrealistic to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.	Noted. Larger site proposals would have size, scale and critical mass to enable viable proposals to be accommodated. No change proposed.
DLP323	McCarthy & Stone Retirement Lifestyles Ltd	Object		LP7		Proposed approach to specialist accommodation	Best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation at a requirement for homes to be built to a standard that is suitable for the elderly, or easily altered to be suitable for the elderly, such as M4(2) or M4(3) of the Building Regulations. The latter requirement would be more deliverable for conventional house builders and achievable by the mechanisms currently proposed in Policy LP7 (i.e. a 10% requirement on all sites). In light of the above we recommend that Policy LP7 is reworded in line with the advice provided in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit, developed by a consortium of private and public organisations with an interest in housing for the elderly. A copy has been appended for support.	Noted. Aims supported but information too detailed for Local Plan. Text may be clarified to reflect toolkit and need for viable approach, but Policy intent is to cover wider than simply elderly "specialist" needs, which may not always accord with proposed approach. No change proposed.
DLP324	Mr M. Jones	Object			New site	Land at Farthing Lane, Curdworth	Planning statement in support of site. Development Boundary should be redrawn to accommodate site to enable 10 units to be delivered in Curdworth. Current site forms part of farm and attendant buildings.	Noted. Site lies within Green Belt. Very Special circumstances not considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP325	KNK Developments LLP	Support			New Site	Land at Tamworth Road, Kingsbury	Supports the Draft Plan in relation to their land interest at Tamworth Road Kingsbury Planning Statement submitted in support. Includes Transportation Technical Note, Flood Risk Assessment, Noise Report, Air Quality Report, Affordable Housing Note, Ground Investigation, Ecological Assessments and Site Appraisal.	Noted. Very Special circumstances not yet considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. Policy indicates site will be safeguarded for future consideration once implications of HS2 have been clearly identified and established. No change proposed.
DLP325	KNK Developments LLP	Object			SA	Land at Tamworth Road, Kingsbury	Support the methodology, but consider that in relation to SLA4D also at Tamworth Road Kingsbury, the scoring applied fails to accurately assess the site. Changes are also recommended to the scoring in relation to Green Belt Review (2016) specifically in relation to the Kingsbury scores. These are supported in principle but it is submitted they fail to accurately assess the site accurately at Tamworth Road Kingsbury as the scoring appears to be strategically applied and fails to reflect the site character and circumstances sufficiently. Suggested refinements to scoring provided.	Noted. Approach to Green Belt review and scoring assessment is considered consistent and forms part of evidence base. Very Special circumstances not yet considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. Policy indicates site will be safeguarded for future consideration once implications of HS2 have been clearly identified and established. No change proposed.
DLP325	KNK Developments LLP	Object		LP3		Green Belt	Green Belt around Kingsbury in need of formal review due to age of designation. Opportunity to amend boundary in relation to Kingsbury is through this Local Plan process. Site assessed on basis of Green Belt purposes, landscape quality and impact and other criteria and suggest exceptional circumstances have been demonstrated to justify release from Green Belt.	Very Special circumstances not yet considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. Policy indicates site will be safeguarded for future consideration once implications of HS2 have been clearly identified and established. No change proposed.
DLP325	KNK Developments LLP	Support/ Comment		LP4		Safeguarded Land	Generally supportive but have a critical view of Green Belt review, method and scoring mechanism and values used/achieved. Detailed assessment and critique of Review and Scoring assessment submitted. Suggest scoring should be reviewed.	Noted. Approach to Green Belt review and scoring assessment is considered consistent as a technical report and forms part of evidence base, not a consultation document. Very Special circumstances not yet considered established to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP326	Neil Cowley Castlewood Property Ventures	Object		LP6		Amount of Development	It is imperative that North Warwickshire engages fully in the relevant Duty to Cooperate processes and takes account of the findings of the forthcoming Stage 4 report. In this context, draft Local Plan LP6, in proposing to accommodate 10 percent of Birmingham's unmet need, before a wider apportionment is agreed, is effectively premature and cannot be regarded as being properly justified and meeting the test of soundness.	Noted. Disagree. Further delay to delivery of Local Plan should be avoided. Time period for delivery of Stage 4 Report and agreement between all affected authorities on apportionment of Birmingham's shortfall will be lengthy and protracted. North Warwickshire is one of the few authorities that have "engaged fully" in the DiOC process. Positive, pro-active and pragmatic approach taken with Birmingham's support to start to address the shortfall and need to ensure delivery of housing need at least in short term. If recruitment increases this can be addressed through further work through Duty to Cooperate and local plan review.
DLP326	Neil Cowley Castlewood Property Ventures	Object				Duty to Co-operate	In respect of the duty to cooperate, it is noted that NWBC have engaged with relevant LPA's within the two housing market areas within which the Borough is situated. However, at this stage, it is premature to agree a Memorandum of Understanding with Birmingham City Council and propose to provide for 10 percent of the Birmingham's currently identified shortfall. The key issue is that the important Stage 4 report has not yet been published and a wider agreement regarding the apportionment of the city's unmet housing need has yet to be concluded.	Noted. Disagree. Further delay to delivery of Local Plan should be avoided. Time period for delivery of Stage 4 Report and agreement between all affected authorities on apportionment of Birmingham's shortfall will be lengthy and protracted. North Warwickshire is one of the few authorities that have "engaged fully" in the DiOC process. Positive, pro-active and pragmatic approach taken with Birmingham's support to start to address the shortfall and need to ensure delivery of housing need at least in short term. No change proposed.

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DLP326	Neil Cowley Castlewood Property Ventures	Object		LP2	Settlement Hierarchy		Proposed Settlement Hierarchy, as set out in Policy LP2 in the draft Local Plan, is not supported by a separate background assessment. Settlement Hierarchy cannot be regarded as clearly written, fully evidenced or justified, and therefore it does not meet the tests of soundness, as set out in the NPPF. It is also not clear whether future planning permissions granted in accordance with LP2 Category 2, would contribute (formally) to the housing or employment land requirements of NWBC or an adjacent authority.	Disagree. Background documents and evidence include Core Strategy assessments, current Local Plan SA, Growth Options assessment, all which underwent consultation. These are considered sufficient to address concerns raised and test of soundness. Issue of how sites contribute to housing needs of specific authority not relevant. All sites will address housing delivery as identified. No site or element of site is specifically allocated to address the needs of a particular authority or shortfall. Overall delivery will be attributed on a percentage basis with priority focussing on North Warwickshire's OAHN. No change proposed.
DLP326	Neil Cowley Castlewood Property Ventures	Object		LP39	Housing Allocations and Distribution		The Spatial Strategy has been prepared in the absence of a full understanding of the housing needs affecting the Borough. Similarly, the proposed distribution of new housing (and in particular the discounting of option OJ12) is not considered appropriate, as it undermines the contribution to sustainable development. The Council should review its approach to the emerging Local Plan, which at present could not be considered sound. Particular regard should be had to the spatial strategy, the approach to reviewing Green Belt boundaries and the requirement to place achieving sustainable development at the heart of the Local Plan.	Noted. Disagree. Growth options considered alternative approaches. Availability of land outside Green Belt limited opportunities to apply exceptional circumstances and/or very special circumstances are applied to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP326	Neil Cowley Castlewood Property Ventures	Object			Spatial Strategy		Overall, it is considered that the spatial strategy is flawed, as a result of the prioritisation and primacy given to the protection of the Green Belt. However, where the draft Plan does propose amendments to the existing Green Belt boundaries, it does so without explanation of the 'exceptional circumstances' which justify such alterations.	Noted. Site safeguarding is an issue that will be addressed. Sites proposed for safeguarding will not be removed from Green Belt, simply identified as future opportunities once very special circumstances are established. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. Policy to be amended to indicate site will be safeguarded for future consideration once implications of HS2 have been clearly identified and established.
DLP326	Neil Cowley Castlewood Property Ventures	Object			New Site	Settlement status, spatial strategy and Land at Water Orton	The Spatial Strategy has been prepared in the absence of a full understanding of the housing needs affecting the Borough. Similarly, the proposed distribution of new housing (and in particular the discounting of option OJ12) is not considered appropriate, as it undermines the contribution to sustainable development. The Council should review its approach to the emerging Local Plan, which at present could not be considered sound. Particular regard should be had to the spatial strategy, the approach to reviewing Green Belt boundaries and the requirement to place achieving sustainable development at the heart of the Local Plan. In these respects, we note that Water Orton is exceptionally well placed to accommodate significant housing growth as arising from Birmingham's unmet. Water Orton is a sustainable location for growth and a settlement where residential expansion could logically meet the unmet needs of Birmingham. Our site, land south of Birmingham Road, has been evaluated favourably in the SHLAA (2016) and identified as having significant capacity for development. As a result, we submit that the site should be released from the Green Belt and allocated for residential development.	Noted. Disagree. Growth options considered alternative approaches. Availability of land outside Green Belt limited opportunities to apply exceptional circumstances and/or very special circumstances to be applied to warrant Green Belt release. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP326	Neil Cowley Castlewood Property Ventures	Object			Green Belt		The draft Local Plan does not explain the exceptional circumstances which exist to justify the proposed amendments to the Green Belt boundaries. It is difficult to understand exactly how the Council has used these two key Green Belt studies to shape the spatial strategy and inform wider policies within the draft Local Plan. Local Plan does not provide a reasoned and appropriate evaluation of the Green Belt, and cannot be sustained as a sound basis for the release of Green Belt land as presently proposed. Critique of Green Belt Review method, approach and scoring assessment submitted in support.	Noted. Site safeguarding is an issue that will be addressed. Sites proposed for safeguarding will not be removed from Green Belt, simply identified as future opportunities once very special circumstances are established. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. Policy to be amended to indicate site will be safeguarded for future consideration once implications of HS2 have been clearly identified and established. Green Belt studies formed part of joint sub-regional work to ensure consistent approach across Warwickshire authorities. Disagree with criticism of studies, which are not spatial strategy assessments but focussing on how Green Belt currently performing against the 5 key purposes. Similar approach has been used elsewhere. No change proposed.
DLP327	Mathieu Evans Gardman Developments	Object			New Site	Additional Sites, Land at Nuneston Road, Mancetter	To ensure a sufficient supply of deliverable and developable sites and to meet North Warwickshire's and the HMA needs in full, we submit that the plan should be seeking to identify additional sites, and that the process for identifying the sites currently within the plan is in need of further explanation and consideration.	Noted. Disagree. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. Very special circumstances not yet considered established to warrant release of Green Belt site identified. No change proposed.
DLP327	Mathieu Evans Gardman Developments	Object			Duty to Co-operate		The situation with regard to the unmet needs of Birmingham is unclear. Whilst the Council's aspiration to meet 3,750 dwellings of Birmingham's unmet need is a positive step, it is unclear exactly how this figure has been arrived at, or indeed what will happen with the remaining balance of the 37,900 units of unmet need which are un-captured in Birmingham's recently adopted plan. It is also likely that there may be additional needs forthcoming from authorities such as Tamworth and/or Solihull, which may require discussion through the Duty to Cooperate. Therefore whilst Gladman commend the work done in the Coventry HMA, and the approach outlined by North Warwickshire with regard to Birmingham, it is clear that in order to satisfactorily consider that the Duty to Cooperate has been met there is a need for substantial further discussion and joint working between authorities within the West Midlands region.	Noted. Disagree that Duty not met. Discussions are ongoing but lack of progress from other authorities addressing remaining shortfall should not be used to simply delay Local plan progress. Time period for delivery of Stage 4 Report and agreement between affected authorities on apportionment of Birmingham's shortfall will be lengthy and protracted. North Warwickshire is one of the few authorities that have 'engaged fully' in the DiOC process. Positive, pro-active and pragmatic approach taken with Birmingham's support to start to address the shortfall and need to ensure delivery of housing need at last in short term. No change proposed.

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DLP327	Mathieu Evans Gladman Developments	Object			Sustainability Appraisal		Gladman have a number of concerns for the SA process. Firstly, it seems that the SA was produced after the completion of the plan which is currently out for consultation, the document the subject of consultation contains a date of August 2016, whilst the SA and its various appendices were not published until 2017. Gladman would remind the Council that the SA should inform the options chosen in the Local Plan, not be used to justify decisions previously arrived at. Furthermore whilst the Council have tested a number of options in relation to how the development target picked can be met, most notably the 10 options outlined in Chapter 4 of the 2017 SA report no consideration seems to have been given as to the overall quantum of development to which North Warwickshire should be accommodating. Whilst it is perhaps reasonable for the Council to assume that the level of its own housing needs is set through the MoU and perhaps therefore it would not be a reasonable option to test alternatives for its own needs (although as outlined in Section 4 and again in Section 6 Gladman would contest this) there are still unmet needs from Coventry and Birmingham, as well as possibly Tamworth, which need to be met.	Noted. Board Report addresses some of issues raised. No further changes proposed.
DLP327	Mathieu Evans Gladman Developments	Object			Sustainability Appraisal		Continued from above: It would therefore seem that assessing different potential quantum's of delivery for the Local Plan would be reasonable options. The SA contains no such assessment of the overall housing numbers to be delivered in this plan to inform the policy choice taken. Gladman believe that a failure to do so is a serious failing with the SA.	As above
DLP327	Mathieu Evans Gladman Developments	Object			OAHN		It is noted that further consideration of the following issues should be considered with regard to the OAN for the HMA and therefore North Warwickshire.	Noted. No change proposed.
	Mathieu Evans Gladman Developments						a. No adjustment is made for longer term migration trends.	OAHN and SHMA address these issues/matters.
	Mathieu Evans Gladman Developments						b. Addressing household formation rates.	OAHN and SHMA address these issues/matters.
	Mathieu Evans Gladman Developments						c. Delivering affordable housing.	OAHN and SHMA address these issues/matters.
	Mathieu Evans Gladman Developments						d. Ensuring the alignment of housing growth and economic growth.	OAHN and SHMA address these issues/matters.
	Mathieu Evans Gladman Developments						e. The implications of the 2014 SNPP and SNHP.	OAHN and SHMA address these issues/matters.
DLP327	Mathieu Evans Gladman Developments	Support			Spatial Vision and Strategic Objectives		Both the vision and the strategic objectives, listed in Section 5 of the Local Plan, provide a positive framework for guiding development in North Warwickshire.	Noted.
DLP327	Mathieu Evans Gladman Developments	Object		LP1	Sustainable Development		Support the Council in its desire to reflect the positive presumption in favour of sustainable development as outlined in the NPPF, however Gladman object to the second and third parts of the policy as written. These aspects are covered in additional development management policies within the plan. Policy LP1 should simply be a reflection of paragraph 14 of the NPPF. It should outline the presumption in favour of sustainable development and it does not need to encompass additional tests at this stage.	Noted. Disagree. Plan should be read as a whole. Local plan process can expand and develop on National policy guidance reflecting local circumstances and issues, not simply a re-iteration. No change proposed.
DLP327	Mathieu Evans Gladman Developments	Object		LP2	Settlement Hierarchy		Category 5 should be deleted from policy LP2 in order for it to be considered sound, an additional policy which reflects a permissive approach to allowing development outside of the settlement boundary, on a criteria basis, could be inserted. Such an approach would allow the plan to protect itself against unsustainable development at the same time as being open and flexible to additional development opportunities to come forward to meet identified needs.	Noted. Disagree. Additional Policy considered unnecessary. Permissive approach outside Development Boundaries is not being proposed as sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP327	Mathieu Evans Gladman Developments	Object		LP3 - LP4	Green Belt & Safeguarded Land		Gladman therefore object to the policy on the basis that it is not based on, or justified by, robust evidence.	Disagree. Green Belt review and further work underway address issue. No change proposed.
DLP327	Mathieu Evans Gladman Developments	Object		LP6	Amount of Development		Object to policy LP6 as written at present as it is not based on a robust evidence base, we also consider that there must be a firm commitment from North Warwickshire to help tackle the unmet housing needs of Birmingham, the word aspiration with regard to helping meet this need should therefore be deleted from the policy text.	Disagree. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. MOU agreed with Birmingham. No change proposed.
DLP327	Mathieu Evans Gladman Developments	Object		LP7	Housing Development		Consider the Council will need to robustly evidence that the requirements of the policy will not affect site viability and the delivery of allocations. It is also unclear what the Councils definition of special needs housing is.	Noted. Additional work to be undertaken. Board Report addresses some of these issues. The text can be clarified to include comment or Glossary on term 'Special Needs'.

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DLP327	Mathieu Evans Gladman Developments	Object		LP8	Windfall Allowance		Windfall allowance should not form part of any overall housing land supply exercise both for the 5 year period, or the overall plan delivery, but act as an additional safety valve to provide additional plan flexibility in meeting overall targets.	Disagree. Evidence available indicates windfall will continue and can support housing delivery. Sufficient sites currently allocated to deliver OAH and address additional Birmingham shortfall. Smaller 0.2ha sites not allocated but need to be taken into account. Conservative density and net delivery calculations also provide additional flexibility. No change proposed.
DLP327	Mathieu Evans Gladman Developments	Object		LP14	Natural Environment		Policy LP14 provides no clarity on how the Council will apply this policy in a consistent manner through the development management process. Gladman do not believe this policy aligns with the requirements of the Framework and should be revisited prior to progressing the Plan.	Noted. Disagree. Policy may be split to cover the Landscape separately and Natural Environment within LP16 as two topics however they are interconnected. No further change proposed.
DLP327	Mathieu Evans Gladman Developments	Object		LP15	Historic Environment		Policy LP15 does not allow for the consideration of how any adverse impacts could either be mitigated or be taken into account. This is contrary to paragraph 134 of the NPPF which states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use." Consider policy LP15 to be inconsistent with national policy and in need of deletion or revision.	Noted. Disagree. Policy text addresses the concern such as "commensurate to the significance of the asset" and clarifies this issue in sections titled "Understanding the Historic Environment" and "Conserving the Historic Environment". No need to repeat NPPF text. No changes proposed.
DLP327	Mathieu Evans Gladman Developments	Object		LP39	Housing Allocations		Consider that the 5% contingency of just 320 dwellings is slim, especially given that the Council count 900 dwellings from windfalls within the overall plan supply. Would contend that such a buffer should be at least 10% and possibly as high as 20% to ensure the delivery of plan targets. It is also essential that a range of sites in a range of locations are included within Local Plans so that small, medium and large housebuilders can be active. The current list of allocated sites in LP39 shows that just 3 allocations represent 65% of the capacity of the allocations and just 5 sites represent 79% of the allocations.	Noted. Disagree. Evidence of delivery above current requirement over a number of years supports 5% flexibility approach. Allocations do not identify sites of 0.2ha or less. These are addressed through the windfall allowance. Larger sites allocated to deliver significant infrastructure requirements but likely to be subdivided for phased development which will address demand for medium sites. Service settlements also have medium size allocations that address concerns. No change proposed.
DLP327	Mathieu Evans Gladman Developments	Object			Alternative Sites	Land at Nuneaton Road, Mancetter	Site is suitable, achievable and should be allocated for development within the emerging Local Plan. Site can help the Council meet its wider HMA wide housing requirement.	Noted. Sufficient sites currently allocated to deliver OAH and address additional Birmingham shortfall. No change proposed.
DLP328	Waheed Nazir Birmingham City Council	Support/ Comment			Housing shortfall		Birmingham City Council welcomes the new Local Plan and the significant contribution the Plan makes in providing 3,790 dwellings to assist with addressing the Greater Birmingham Housing Market Area (HMA) housing shortfall. The Plan should note that the situation in the Greater Birmingham HMA will be monitored and consideration will be given to the conclusions of the HMA Strategic Growth Study, which has recently been commissioned by the HMA authorities.	Noted. Examination will address any emerging evidence at time. No change proposed.
DLP328	Waheed Nazir Birmingham City Council	Support/ Amendment			Langley SUE co-ordinated approach	Ulniridge Road site.	The Council also supports the proposed housing allocation at Ulniridge Road. Wishaw and append minor suggested track changes to the detailed wording of the policy to ensure a co-ordinated approach with the delivery and development of the of the Langley Sustainable Urban Extension. 15.48 Within the Birmingham Local Plan there is a Sustainable Urban Extension (SUE) called Langley SUE. This site is expected to deliver approximately in the region of 6,000 dwellings. The site is currently in the Green Belt and it is proposed to exclude the site from the Green Belt and to seek it to be developed for housing as part of the Langley SUE. It would make a natural extension to the housing at Langley SUE proposal and would have a strong defensible boundary of the motorway to the east. Approximately 6.7 hectares north of Ulniridge Road, Wishaw is to be excluded from the Green Belt and allocated for residential development subject to: <input type="checkbox"/> Delivery, access, and development and delivery of the site (including infrastructure) to be directly linked to the development and delivery of the Langley Sustainable Urban Extension immediately to the south within Birmingham City Council administrative area and allocated in the Birmingham Local Plan.	Noted. Text changes will be considered to ensure co-ordinated approach taken. No further change proposed.
DLP329	Taylor Wimpey	Object		LP6	OAHN	Land south of Tamworth Road	Concern over findings interpreted in 2015 UAHN. The Council has previously agreed to accommodate an unmet need from Tamworth amounting to 500 dwellings. As indicated above, this is not included within the Council's OAHN (Table 1) and should be added to the identified need of 5,280 to arrive at the figure of 5,780 as the total for this stage in the calculation of need.	Disagree. 5280 figure includes 500 Tamworth need. No change proposed.
DLP329	Taylor Wimpey	Object			Unmet Need from Neighbouring Authorities		A further contribution towards the extant 825 dwellings from Tamworth would be a positive move in terms of ongoing and meaningful Duty to Cooperate activities.	Disagree. 3790 figure includes 825 Tamworth need. No change proposed
DLP329	Taylor Wimpey	Object		LP2	Settlement hierarchy		Presently, for new category for development (Category 2) there is no clarity on the settlements that the Council considers appropriate for expansion under this policy.	Disagree. Allocations adjoining Tamworth, Birmingham (Ulniridge Road) and Nuneaton and Bechworth Boundaries all reflect this Category, but sites will also reflect and address Category 3 Local service centres, where these sites fall within this category of Settlement. Further "refining" or detail considered unnecessary. No change proposed.
DLP329	Taylor Wimpey	Object		LP5	Meaningful Gap		Detailed analysis and assessment submitted of Meaningful Gap. RPS considers that the Council's assessment of land to be included within the Meaningful Gap to be inconsistent with the settlement hierarchy which reflects the need to distribute growth adjoining the outer boundary of the Borough. RPS considers that this could include Land at Tamworth Road as a sustainable location for future growth.	Noted. Board report addresses some of these issues. No change proposed.
DLP329	Taylor Wimpey	Object		LP39	New Site	Land south of Tamworth Road	Detailed analysis and assessment submitted in support of site south of Tamworth Road, including Promotional Document proposing that the site is suitable. Available and Achievable and should form part of the Council housing allocations under Policy L39.	Noted. Board report addresses some of these issues. Sufficient sites currently allocated to deliver OAH and address additional Birmingham shortfall. No change proposed.

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REF	ORGANISATION NAME	SUPPORT/OBJECTION	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP329	Taylor Wimpey	Object		LP4	Safeguarding land for future Development		Policy is unclear what future development could come forward and what need this safeguarded land is expected to serve. The NPPF is clear that the Green Belt should only be amended in exceptional circumstances. RPS considers that the Council should reconsider the intentions of this policy and what the intended purpose is.	Noted. The areas will be safeguarded for potential release for housing needs in the future if required. It is not intended to release these sites from the Green Belt until a new Local Plan requires this. Nevertheless, they are being highlighted in this Local Plan as potential opportunities for the future, if housing requirements and policies need to change due to land supply, availability and housing needs. This will be clarified in the Board Report and the Plan.
DLP329	Taylor Wimpey	Object		LP7	Housing Development		There is concern here that little consideration has been given to the financial considerations associated with this policy and there is no evidence that this has been tested for viability as part of the supporting evidence base. Monitoring and type of housing included unclear.	Noted. Further work will be undertaken. Board report addresses some of these issues. Monitoring based on National Guidance (C2 not included in housing calculation). No change proposed.
DLP329	Taylor Wimpey	Object		LP8	Windfall Allowance		Unclear where windfall information has come from and how the Council has come to the figure of 60 dwellings per annum as the windfall allowance. Greater transparency on the supporting evidence base here would be welcomed.	Noted. Further work undertaken to clarify source from Monitoring records. Board report addresses some of these issues. No change proposed.
DLP329	Taylor Wimpey	Object		LP9	Affordable Housing Provision		The viability assumptions in the emerging policy were appraised as part of the Examination of the 2014 Core Strategy, however RPS would expect the evidence to be brought up to date prior to submission, to ensure that the evidence remains valid.	Noted. Further work will be undertaken. Board report addresses some of these issues. No change proposed.
DLP329	Taylor Wimpey	Object		LP24	Recreational Provision		The viability assumptions in the emerging policy were appraised as part of the Examination of the 2014 Core Strategy, however RPS would expect the evidence to be brought up to date prior to submission, to ensure that the evidence remains valid.	Noted. Further work underway and Open Space/Recreation review in progress. Board report addresses some of these issues. No change proposed.
DLP329	Taylor Wimpey	Comment		LP27	Railway Lines		Proximity of HS2 Safeguarded land to Taylor Wimpey site noted.	Noted.
DLP329	Taylor Wimpey	Object		LP31	Development Considerations		RPS would discourage sequential approach to brownfield sites. Policy term "adaptable for future use" is vague and difficult to interpret. RPS considers that the policy should be reworded in a more positive way to reflect that there will need to be development in MSA areas.	Noted. Interpretation of term "adaptable" and application of sequential approach not considered too difficult. Commonly applied without difficulty in other circumstances, Plans and Policies, MSA an issue for Minerals Local Plan. Most of Borough affected by MSA's. No change proposed.
DLP329	Taylor Wimpey	Object		LP36	Parking		Policy is difficult to comment on as the detailed standards supporting this policy have not been published for consultation.	Noted. Current standards in 2006 Local Plan and Core Strategy appendices. Further work will be undertaken. Board report addresses some of these issues. No further change proposed.
DLP329	Taylor Wimpey	Object		LP37	Renewable Energy		Proposed has viability considerations for development. Policy would be better placed if it sought to adopt a fabric first position, which builds in energy saving measures into the design first, before looking to integrate renewable energy schemes.	Noted. Renewable and Low Carbon Energy Resource Assessment and Feasibility Study prepared by CAMCO suggests that 7.5% - 10% renewable energy could be derived locally. Forms part of evidence base and Informed Core Strategy. Toolkit available online for developers to use to address issue. No change proposed.
DLP330	Stephen Briggs Alvecoke Wood	Object			Natural Environment Impact	Site at Robey's Lane	Land West of Robey's Lane, proposed development, of potentially over 1,000 houses is in extremely close proximity to Alvecoke Wood. It is a precious and irreplaceable habitat, with a Tree Preservation Order applying to the whole site and has been designated a Local Wildlife Site and a Site of Importance for Nature Conservation by Warwickshire Wildlife Trust. Buffer strips/zones should be incorporated to address and safeguard site from development impacts. Visual amenity impact and habitat impact significant.	Noted. Potential of Buffer Zones will be applied to proposal to address impact.
DLP330	Stephen Briggs Alvecoke Wood	Object			Traffic Impact	Site at Robey's Lane	We would also need substantial improvements to the fencing around our site, which would be a substantial cost and negative impact on visual amenity. We do not feel we should have to fund any of these measures in response to external developments instigated with council approval. Robey's Lane already has problems with traffic speeds and additional housing will exacerbate an already very poor situation at several times of the day and in all directions along the B5000 and Robey's Lane and into Alvecoke.	Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues.
DLP330	Stephen Briggs Alvecoke Wood	Object			Commercial Impact on woodland	Site at Robey's Lane	Expect a major impact to the biodiversity and commercial viability of our woodland site should the Land West of Robey's Lane development go ahead. We feel very strongly that this development is not appropriate and it should be withdrawn from the Local Plan.	Noted. Plan addresses current housing and employment need and growth through allocation of sites. Land has been proposed as sustainable opportunity for development. Development Management Policies will hopefully address some of the concerns and impacts raised. Proposal has to assess ecological and environmental impact and address these through appropriate mitigation of financial contributions through Bio-diversity Offsetting approach. No further change proposed.
DLP331	Sewem Trent Water Ltd	Object			New Site	Land east of Curdworth	The Local Plan needs to allocate and safeguard sufficient land now to ensure there is flexibility to respond to housing and employment growth targets. STWL considers that the 9.3 hectares of land east of Curdworth is suitable for housing development as it no longer fulfils the purposes of including land within the Green Belt and therefore should be released from the designation in the next stage of the Local Plan.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP331	Sewem Trent Water Ltd	Object			New Site	Land at Polesworth/Dordon	The Local Plan needs to allocate and safeguard sufficient land now to ensure there is flexibility to respond to housing and employment growth targets. Given Site proximity to the proposed housing allocations, recent developments at Polesworth, policy restraint on development to the west of Polesworth by both existing and emerging Development Plan policy and flood risk constraints on land to the north. Site should also be allocated for development alongside, or potentially as part of, the emerging and large strategic housing allocation to the east of Polesworth and Dordon.	Noted. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.

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REF	NAME/ORGANISATION	SUPPORT/OBJEC	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP331	Severn Trent Water Ltd	Object			New Site	Land at Coleshill	The Local Plan needs to allocate and safeguard sufficient land now to ensure there is flexibility to respond to housing and employment growth targets. It comprises: a large sewage treatment works with several operational and dis-used filter beds; a food to waste plant; redundant non-operational land, and flood plain marshland. The site is bisected by the River Tame and, whilst designated as Green Belt, it is located within a large industrial area, 10km north east of Birmingham City centre. STWL considers that the 70 hectares of land at Coleshill is suitable for employment uses and it no longer fulfils the purposes of including land within the Green Belt and therefore should be released from the designation in the next stage of the Local Plan.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP332A	Matthew Naylor Church Commissioners	Object		LP22		Land at Dordon	Support principle of Policy but need to ADD amend text - "within strategic allocations where these uses are identified as being appropriate within specific policies of this plan"	Noted. No change proposed.
DLP332A	Matthew Naylor Church Commissioners	Support		LP24			Support principle of Policy	Noted.
DLP332A	Matthew Naylor Church Commissioners	Object		LP9	Affordable Housing		Object to 40% requirement in view of pressure from other infrastructure requirements. Clearer updated evidence needed on viability.	Noted. Plan will be clarified to indicate relevant evidence base. Further work on viability is ongoing. Policy nevertheless provides flexibility to address viability on a site by site basis subject to appropriate appraisal.
DLP332A	Matthew Naylor Church Commissioners	Object		LP15	Historic Environment		Policy unclear and should be revised. List of revisions proposed for consideration.	Noted. Disagree, ongoing discussions with historic England may clarify Policy. No further changes proposed.
DLP332A	Matthew Naylor Church Commissioners	Object		LP20	Green Spaces		Clarification sought on identification of LWSs in Dordon Proposal. If classed as green space and open space then superfluous and should be excluded from Policy.	Noted. Further work on Concept/Master plan for site may clarify situation. Green Spaces and Open spaces can be contiguous and do not define whether they are managed or publicly controlled. Areas retained to provide protection should not conflict with their inclusion in Proposal, which will enable their management as part of development proposal. Further discussion may revise map. No further change proposed.
DLP332A	Matthew Naylor Church Commissioners	Support		LP6	Settlement hierarchy		Support and comments submitted relating to Land allocated at Dordon in church commissioners control.	Noted.
DLP332A	Matthew Naylor Church Commissioners	Support/ Comment		LP1	Sustainable development		Support principle of Policy, however, policy cannot be specific as to what required infrastructure can be, is therefore not effective. Policy also seeks to protect PROWs, a criterion that does not sit comfortably with presumption in favour of sustainable development.	Noted. Disagree, "Sustainable development" should be supportive and complementary to protection of PROWs. Infrastructure is a key issue that is being addressed through the IDP. Board Report will address some of these issues. No change proposed.
DLP332A	Matthew Naylor Church Commissioners	Support		LP7	Housing Development		Support policy that requires 100 dwellings or more to have mixed tenure and types of dwelling and that sites provide necessary infrastructure subject to integration with IDP and proportionally funded and delivered.	Noted.
DLP332A	Matthew Naylor Church Commissioners	Support		LP2	Settlement hierarchy		Support settlement hierarchy.	Noted.
DLP332A	Matthew Naylor Church Commissioners	Object		LP14	Natural Environment		Object to criterion "b" retaining trees, hedges and natural conservation features. Suggest amended text	Noted. Policy reflects level of protection sought in NPPF. Text may be clarified to better highlight when and where impact may be accommodated. Further discussion with English Nature ongoing.
DLP332A	Matthew Naylor Church Commissioners	Object		LP16	Nature conservation		Policy needs to be amended if applied to LWSs. Additional wording suggested.	Noted. Policy reflects level of protection sought in NPPF. LWSs are designated local Conservation assets/sites. Development impacts must be assessed and offsetting or mitigation works may be necessary/required. Further discussion on text with English Nature ongoing.
DLP332A	Matthew Naylor Church Commissioners	Support		LP26	Stations		Support with comments.	Noted.
DLP332A	Matthew Naylor Church Commissioners	Support		LP26	Transport Assessments		Support with comments.	Noted.
DLP332A	Matthew Naylor Church Commissioners	Support		LP36	Parking		Support with comments.	Noted.
DLP332A	Matthew Naylor Church Commissioners	Support		LP29	Walking and Cycling		Support with comments.	Noted.
DLP332A	Matthew Naylor Church Commissioners	Support		LP28	Strategic Road Improvements		Support with comments.	Noted.
DLP332A	Matthew Naylor Church Commissioners	Support	Paras 15.34 to 15.38			Land to East of Polesworth and Dordon	Support with comments.	Noted.

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DLP332/A	Matthew Naylor Church Commissioners	Support		LP39	Allocation	Land to East of Polesworth and Dordon	Support with comments.	Noted.
DLP332/A	Matthew Naylor Church Commissioners	Object		LP37	Renewable Energy		Object to "blanket" approach. Not supported by evidence. Not clear it is viable or sustainable.	Noted. Renewable and Low Carbon Energy Resource Assessment and Feasibility Study prepared by CAMCO suggests that 7.5% - 10% renewable energy could be derived locally. Forms part of evidence base and informed Core Strategy. Toolkit available online for developers to use to address issue. No change proposed.
DLP332/B	Church Commissioners	Object			New Site	Glebe Farm, South of Blythe Road, Coleshill	New site proposed for allocation.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP332/B	Church Commissioners	Object		LP1		Sustainable Development	We would question the effectiveness of the policy given the relative vagueness of the criterion stating that development should "provide the required infrastructure". This requirement should be set out in specific policies within a site allocations policy or the Infrastructure Delivery Plan. To avoid any ambiguity we recommend that this criterion (provide the required infrastructure) should be deleted from LP1.	Noted. Disagree. Infrastructure is a key issue that is being addressed through the IDP. Board Report will address some of these issues. No change proposed.
DLP332/B	Church Commissioners	Object		LP2	Settlement Hierarchy		It would be appropriate to reallocate some of the housing numbers from settlements lower down the hierarchy towards the more sustainable Market Town of Coleshill. Glebe Farm would be the most appropriate site to deliver this housing need and meet the economic and social needs of the town and wider area.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP332/B	Church Commissioners	Object		LP3	Green Belt		Green Belt wrapping around Coleshill is seen as a major constraint to significant. This presents significant barriers to the provision of adequate housing and affordable housing within Coleshill and we therefore believe Green Belt land at Glebe Farm should be released to help address this.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP332/B	Church Commissioners	Object		LP4	Safeguarded Land for Potential Future Development		The land to the south of the developable site at Glebe Farm (shown on Appendix 2) could be Safeguarded for potential residential development in the future.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP332/B	Church Commissioners	Object			Housing Numbers		It is important that the District seeks to address the shortfall from neighbouring authorities. We would suggest that this challenge is achieved by allocating sufficient housing across all significant settlements, particularly ones towards the top of the hierarchy such as Coleshill.	Noted. This shortfall issue is being addressed. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP332/B	Church Commissioners	Support			Employment Requirements		Agree with the point in paragraph 7.46 that "any additional housing and employment needs to be considered in balance".	Noted.
DLP332/B	Church Commissioners	Object		LP9	Affordable Housing Provision		Analysis of Affordable housing delivered in Coleshill submitted in support of comment. We consider it is necessary that the Council test the viability of larger sites and amend the policy accordingly. In the absence of an up-to-date and relevant evidence base, LP9 is unsound and further work is required to ensure compliance with paragraph 173 of the NPPF.	Noted. Plan will be clarified to indicate relevant evidence base. Further work on viability is ongoing. Policy nevertheless provides flexibility to address viability on a site by site basis subject to appropriate appraisal.
DLP332/B	Church Commissioners	Support		LP17	Green Infrastructure		The development of this site would contribute to the ambitions of this policy by introducing a green infrastructure link between the town centre and the River Blythe.	Noted. However, site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP332/B	Church Commissioners	Object		LP39	Housing Allocations		The draft Local Plan should be clearer about the proposed housing allocations and commitments for settlements such as Coleshill. The Green Belt is a policy constraint which should not undermine the requirement to meet housing need in particular settlements or to undermine the spatial strategy. We believe that there are justifiable reasons to release land from the Green Belt at Glebe Farm to ensure sufficient housing delivery in Coleshill over the plan period.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP333	Client Group of landowners, house builders and developers with land interests	Object		LP8	Amount of Development		Object to the housing requirement identified in Policy LP8 totalling 9,070 dwellings based on - 1. The assessment of objectively assessed housing need (OAHN) (9,070 dwellings) in light of more recent evidence (1.5 - 1.16 accompanying technical note); 2. The level of unmet need accommodated from Coventry (1.17 - 1.20 of accompanying technical note); 3. The level of unmet need accommodated from Birmingham (1.21 - 1.25 of accompanying technical note). Based on the above Policy LP8 is unsound as: 1) is not positively prepared, 2) it is not justified, 3) it is not effective and 4) it is not consistent with national policies.	Noted. Disagree. Housing requirement based on an agreed sub-regional approach published in HMA to arrive at OAHN considered robust. Further delay to delivery of Local Plan should be avoided. North Warwickshire is one of the few authorities that have "engaged fully" in the DnOC process. Positive, proactive and pragmatic approach taken with Coventry Sub regional authorities and Birmingham's support to start to address the shortfalls and need to ensure delivery of housing need at least in short term. If requirement increases this can be addressed through further work through Duty to Cooperate and local plan review. No further changes proposed.
DLP334	The Feoffees of Boncus Hospital Estate Charity	Object			Development Boundary	Land at Filongley	The development boundary drawn around the village of Filongley prevents any meaningful development taking place in this village and it is questionable as to whether or not the telephone exchange building located off Ousierne Road is deliverable. Filongley should be allowed to expand in such a way to accommodate additional housing.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.

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DLP335	Mr & Mrs G Shakespeare	Object				Land east of Polesworth and Dordon	Whilst my clients are content to have the area of land known as 'The Hollies' included within this proposed draft allocation they also have another site which has been in the draft allocation proposals for some considerable time namely POL 7. Although part of larger site is capable of being developed without the need of a master plan and is already the subject of a current planning application. This area of land was always considered suitable for development prior to the East of Polesworth Dordon proposal scheme and should be allowed to be developed immediately.	Noted. To address issue of wider infrastructure needs, service provision and reasonable contribution to new relief road and other highway infrastructure, preference is to retain site with larger allocation. Concept/Master plan will also enable proper planning of site and area. No change proposed.
DLP336	White Farming Partnership	Object			New site/land addition	Additional land to east of Polesworth and Dordon	Additional land to east of proposal should be included. Enable open space to be provided and site to be viable.	Noted. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP337	Mr C Wilkins Lichfield Machine Tools Ltd	Object		LP4	New site	Land east of Curdworth	LP4 identifies safeguarded land for both housing and employment future uses but fails to identify safeguarded land for employment on land east of Curdworth.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP337	Mr C Wilkins Lichfield Machine Tools Ltd	Object		LP6	Employment		Recent studies into the requirement for employment land show that there is a requirement for large employment sites in the locality of the M42 bypass of Birmingham which is recognised as an optimal location for new strategic employment growth. Currently the plan fails to allocate new land to meet this requirement and take the opportunity to locate this development in North Warks and maximise spin off benefits.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP337	Mr C Wilkins Lichfield Machine Tools Ltd	Object		LP13	Rural Employment		Object that the policy as drafted is over prescriptive regarding the relationship of rural buildings to the road network and that limited extensions are not considered acceptable, this is considered to be out of step with the NPPF at Para 55, and the third bullet point which indicates redundant or disused buildings can be converted in rural areas not withstanding their location. There is no requirement for a rural building to have an employment use first as the primary aim. The NPPF and other Government documents do not support this restrictive approach to housing.	Disagree that Policy conflicts with Para 55. Plan should be read as a whole. Criteria b and c relate specifically to rural building conversions, not new build. Local Plan process enables different approach to NPPF to be adopted or interpreted. Unnecessary to simply re-literate NPPF. No change proposed.
DLP337	Mr C Wilkins Lichfield Machine Tools Ltd	Object		LP40			Object on the basis that it makes no allowance for a strategic employment site to the east of Curdworth.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP338	A R Cartwright Ltd	Support/ Comment				Land south of Anasley Common	Support allocation of Land south of Anasley Common. Note access potential off Cartwright homes adjoining site.	Noted. Access issue noted. Highway concerns over additional traffic onto Plover Hill road. Larger relief road proposal will need consideration. Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Board Report will address some of these issues.
DLP339	Mr M Neachell	Object		LP2	Settlement Hierarchy		The Settlement Hierarchy fails to note Lee Marston as a settlement where development is allowed.	Incorrect. Settlement is "washed" over by Green Belt constraints and located in open countryside. No change proposed.
DLP339	Mr M Neachell	Object		LP3	Green Belt		Para 7.16 identifies Lee Marston as having potential for small scale infill as shown on the proposals map, however this scale of development within the build fabric of the settlement is not considered to be sufficient to sustain the settlement. A new green belt boundary should be drawn to allow development between Hams Lane and Church Lane, which would allow the organic growth of the settlement in a sustainable manner with an appropriate mix of housing types and tenures.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP339	Mr M Neachell	Object		LP3	Green Belt 30% building increase restriction		LP3 as drafted a 30% volume increase in buildings is not in line with the NPPF. What is required is an assessment on individual applications as each building and its setting will vary, it is quite inappropriate to include an express figure and even more ridiculous for this to include the GDPO allowance, which in some cases will exceed 30%.	30% requirement applies outside of and above any PD allowances. Threshold has been upheld at appeal. No change proposed.
DLP339	Mr M Neachell	Object	Para 7.24 & 7.25				Considered out of step with Para 69 final bullet point of the NPPF which clearly says that the redevelopment of PDL land is acceptable and does not prohibit residential reuse.	Disagree. Text is not suggesting the designation as pd means residential is unacceptable. NPPF also requires development to be sustainable and in Green Belt it must not impact on openness. So Para 69 is not as open ended as suggested. If location is unsustainable and development impacts on openness, whether it is brownfield or not is immaterial. No change proposed.
DLP339	Mr M Neachell	Object		LP4	Safeguarded land/New Site	Site west of Hams Hall	Identifies safeguarded land for both housing and employment future uses but fails to identify safeguarded land for employment adjacent to Hams Hall.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP339	Mr M Neachell	Object		LP6	Housing		It is completely unclear at this point in the plan whether the plan is dealing with a housing target of 5280 or 9070. The policy will need to be clarified to establish how for example a 5 year land supply is calculated. Plan has adopted a 10% nominal aspiration of the requirement, yet there is no evidence to support this figure, which could upon agreement be a much larger requirement given that some authorities have claimed they cannot take any of the Birmingham requirement.	Disagree. OAHN based on evidence including 2015 SHMA that Warwick DC Inspector recently accepts and considers to be based on reasonable and soundly based assumptions. Although 3790 figure (Bham shortfall) indicated as to be tested in table 2, actual Plan site allocations include land to address delivery of all this figure (9070) subject to provision of necessary infrastructure. There is a review mechanism that can be triggered if further recruitments are expected to be delivered in NW. Five year supply will be based on 5280 figure as established at Appeal. Further delay to delivery of Local Plan should be avoided. No further changes proposed.

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DLP338	Mr M Neasehell	Object		LP6	Employment		Recent studies into the requirement for employment land show that there is a requirement for large employment sites in the locality of the M42 business of Birmingham which is recognised as an optimal location for new strategic employment growth. Currently the plan fails to allocate new land to meet this requirement. LP6 should therefore be amended to increase the amount of employment land to accommodate a strategic employment site in the M42/ east of Birmingham employment belt.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP339	Mr M Neasehell	Object		LP13	Rural Employment		Object on the basis that the policy is over prescriptive regarding the relationship of rural buildings to the road network and that limited extensions are not considered acceptable, this is considered to be out of step with the NPPF at Para 55. The policy needs rewording to reflect Para 55 of the NPPF, the need to boost the housing supply and the aspirations of the GPDO and the relaxed requirements for rural building conversion.	Disagree that Policy conflicts with Para 55. Plan should be read as a whole. Criteria b and c relate specifically to rural building conversions, not new build. Local Plan process enables different approach to NPPF to be adopted or interpreted. Unnecessary to simply re-literate NPPF. No change proposed. No change proposed.
DLP339	Mr M Neasehell	Object		LP39	Omission of sites at Lea Marston		We object to the omission of any allocation at Lea Marston as set out above.	Noted. Settlement lies within Green Belt. Require "very special circumstances" to be established to enable site release or removal from Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP339	Mr M Neasehell	Object		LP40	New Site	Site west of Hams Hall	Object on the basis that it makes no allowance for a strategic employment site to the west of Hams Hall.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP339	Mr M Neasehell	Object		Proposals Map		We object to the Lea Marston inset plan on the basis that the land between Hams Lane and Church Lane should be included within the development boundary.	Noted. Settlement lies within Green Belt. Require "very special circumstances" to be established to enable site release or removal from Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.	
DLP340	Trustees of the Estate of JB Aucott	Object		LP2	Settlement Hierarchy	Land south of Windmill Lane, Austrey	Defines category 4 settlements as only appropriate for windfall developments and sites identified in neighbourhood plans. New plan can and should propose developments in the category 4 settlements to support the housing land supply. Neighbourhood Plans will therefore have to be reviewed to be up to date. The settlement of Austrey should have additional development and Policy LP2 should be amended to allow for this.	Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs and OAHN. No change proposed.
DLP340	Trustees of the Estate of JB Aucott	Object		LP6	Housing		Unclear at this point in the plan whether the plan is dealing with a housing target of 5280 or 9070. The policy will need to be clarified to establish how for example a 5 year land supply is calculated. It is not clear how the additional requirement of a further 3790 dwellings has been arrived at, when to date there is no published figure for the Wit which sub divides the Birmingham requirement in a rational manner. Currently the plan has adopted a 10% nominal aspiration of the requirement, yet there is no evidence to support this figure, which could upon agreement be a much larger requirement given that some authorities have claimed they cannot take any of the Birmingham requirement.	Disagree. OAHN based on evidence including 2015 SHMA that Warwick DC Inspector recently accepts and considers to be based on reasonable and soundly based assumptions. Although 3790 figure (Pham shortfall) indicated as to be tested in table 2, actual Plan site allocations include land to address delivery of all this figure (9070) subject to provision of necessary infrastructure. There is a review mechanism that can be triggered if further requirements are expected to be delivered in NW. Five year supply will be based on 5280 figure as established at Appeal. Further delay to delivery of Local Plan should be avoided. No further changes proposed.
DLP340	Trustees of the Estate of JB Aucott	Object			New Site	Austrey SAP HS3 (Site AUS14)	The plan says sites in these settlements are not allocated, but the policy says it is allocated, this is very confusing. In any event land off Windmill Lane Austrey should be allocated for development as it is a sustainable site in a settlement that is clearly recognised as an appropriate location for new housing. It is completely unclear whether the named site off Main Road is an allocation or has planning permission.	AUS14 has planning consent. Development Boundary has been amended to reflect current planning situation. No change proposed.
DLP340	Trustees of the Estate of JB Aucott	Object			Proposals Maps		We object to the Austrey inset plan on the basis that the land south of Windmill Lane should be included within the development boundary.	Where necessary, Development Boundaries will be amended to reflect new and extant consents immediately adjoining boundaries. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs and OAHN. No new sites in Austrey proposed.
DLP341	Hanworth Group	Object			Duty to Co-operate	Land at Daw Mill, Filongley	The MOU agreements do not address the "regional" and "sub-regional" employment needs and hence the Draft Local Plan does not meet national planning policy and guidance regarding duty to co-operate in respect of these matters.	Disagree. Local Plan is delivering wider than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. This reflects a positive and pro-active approach to Duty to Co-operate responsibilities. No change proposed.
DLP341	Hanworth Group	Object			Spatial Portrait		Hanworth Group consider that the Draft Local Plan is "silent" on the full employment needs for the Borough with regard to the "regional" and "sub-regional" needs. Development in the countryside should be appropriate in terms of scale and character as set out in paragraph 2.23 of the "Spatial Portrait". Further emphasise the importance of rail within paragraph 2.8. Re-word the final sentence of paragraph 2.23 to add "and that which needs to be accommodated within the countryside due to its specific locational requirements".	Rail already noted as important. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs and OAHN. No change proposed

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REF	ORGANISATION NAME/	SUPPORT/OBJEC	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP341	Harworth Group	Object			Strategic Objectives		Strategic Objective 1, is unsound and not consistent with national planning policy. Paragraph 5.2 of Strategic Objective 1, the Draft Local Plan states "...giving priority to re-using previously developed land and buildings within Market Towns and Local Service Centres". This strategic objective is inconsistent with Policy LP11: Economic Regeneration which clearly states that the redevelopment of existing employment land (previously developed land) can occur outside of development boundaries and not merely within Market Towns, Local Service Centres or those locations related to the settlement hierarchy. It should be amended to encourage the redevelopment of all previously developed land (subject to other planning policies and safeguards) and hence redevelopment of previously developed land should NOT be restricted to Market Towns, Local Service Centres or those locations related to the settlement hierarchy.	Noted. Objective refers to "priority" not total exclusion and/or restriction of employment development outside boundaries. Nevertheless, the Local Plan is intending to bring at allocated employment sites within the development boundary and avoid further allocations outside these boundaries, as Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs and OAHN. Also not all pdi sites lie in sustainable locations or would constitute sustainable development as required by NPPF. No change proposed.
DLP341	Harworth Group	Object		LP1	Sustainable Development		Whilst it is recognised that development should seek to meet the criteria outlined under the heading 'Quality of Development / Place', consider that there should be flexibility within the policy as there may be circumstances where it is not possible to accord with all the criteria where robust justification has been provided. Policy LP1: Sustainable Development is inconsistent with the Framework and national planning guidance by requiring development proposals to conform with or improve an individual settlement's character, rather than seek to respect, reinforce and promote the local character of an area where possible through sustainable development and good design. Amendments to text proposed.	Local Plan should be read as a whole. Local Plan process enables different approach to NPPF to be adopted or interpreted. Unnecessary to simply re-iterate NPPF. No change proposed.
DLP341	Harworth Group	Object		LP2	Settlement Hierarchy		Majority of the new development proposed within the Borough to 2031, is too focused around a small number of settlements / areas of the Borough. Concerned that the Council do not have a clear understanding of the development needs of the Borough as a whole (especially with regard to "regional" employment needs) and hence Policy LP2 has a narrow focus on proposed development areas which are mostly located adjacent or in close proximity to the A5 on the eastern outer boundary of the Borough. Council should: - Reconsider the spatial distribution of development in the Borough away from the A5. - Increase the focus for proposed development in 'Category 3: Local Service Centres' to provide a more balanced settlement hierarchy and meet the development needs of the wider Borough. - Include a Part D to 'Category 5: Outside of the above settlements' which would address pdi sites outside development boundaries.	Noted. Settlement hierarchy based on review and update or earlier settlement assessments that accorded settlement position in hierarchy based on level of services and infrastructure available to the settlement. Alternative Strategic Options were considered through the Growth Options paper, which were subject to Sustainability Appraisal and published for informal evidence base. Sustainability Assessment also assesses alternative options. Current National Green Belt constraints limit options for spreading development across Borough, hence focus on the area outside Green Belt. Most significant development allocations are targeted at the most sustainable settlements in the Borough (outside of Green Belt). Require "very special circumstances" to be established to enable site release or removal from Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAH and address additional Birmingham shortfall. No change proposed.
DLP341	Harworth Group	Object		LP3	Green Belt		'LP3: Green Belt' and its supporting text is wholly inconsistent and at odds with the Framework and national planning guidance through its removal of and conclusion that all partial or complete redevelopment of previously developed land within the Green Belt for open market housing is unacceptable.	Disagree. Policy indicates determination must be in line with NPPF. Local Plan process enables different approach to NPPF to be adopted or interpreted if circumstances and evidence allow. Objector appears also to "cherry pick" elements that fit their argument. No change proposed.
DLP341	Harworth Group	Object		LP6	Amount of Development		Object to the Council's conclusions that the identified "regional" and "sub-regional" need which is a strategic priority does not need to be considered in the Draft Local Plan. Consider that the Council appear to be precluding the "regional" and "sub-regional" need being met in the Borough.	Disagree. Plan focus is on North Warwickshire needs and requirements but takes into account employment needs and growth from wider sub-region through additional employment land allocated to address accommodation of housing for Birmingham shortfall. Plan allocations enable a range of opportunities to come forward that will potentially satisfy both local and sub-regional needs at MIRA, Hams Hall and Birch Coppice. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. No change proposed.
DLP341	Harworth Group	Support/ Subject to		LP11	Economic Regeneration		Support subject to other changes to Strategic Objectives and LP1 and LP2 are agreed.	Noted. Disagree. Changes cannot be made "subject to", if other amendments are opposed. No change proposed.
DLP341	Harworth Group	Object		LP12	Employment Areas	Former Daw Mill	Former Daw Mill Colliery site has key locational characteristics that make the opportunity afforded by the existing rail connections significant. Plan should make specific reference in the supporting text to the rail connection at the former Daw Mill Colliery, its strategic significance and explicitly encouraging proposals that facilitate the efficient use of the site by using the "live" rail connection and the existing rail sidings.	Noted. However, site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAH and address additional Birmingham shortfall. No change proposed.
DLP341	Harworth Group	Object		LP16	Nature Conservation		Paragraph 118 of the Framework confirms that mitigation and compensation relates to the situation only where there is "significant harm" from development. Policy is inconsistent with national planning guidance as it relates to all development and not those that result in "significant harm".	Noted. Policy reflects level of protection sought in NPPF. Development impacts must be assessed and offsetting or mitigation works may be necessary/required. Further discussion on text with English Nature ongoing.
DLP341	Harworth Group	Support/ Subject to		LP31	Development Considerations		Support subject to other changes to Strategic Objectives and LP1 and LP2 are agreed.	Noted. Disagree. Changes cannot be made "subject to", if other amendments are opposed. No change proposed.

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REF	ORGANISATION NAME/	SUPPORT/OBJEC	PAGE/ PARAGRAPH	POLICY NUMBER	ITEM	SITE	COMMENTS	PROPOSED RESPONSE
DLP341	Hanworth Group	Object		LP39	Housing Allocations - New housing Site	Former Daw Mill	Concerned that the Council do not have a clear understanding of the development needs of the Borough as a whole and hence Policy LP39 has a narrow focus on proposed development areas which are mostly located adjacent or in close proximity to the A5 on the eastern outer boundary of the Borough. Council should increase the focus for proposed housing development in Category 1 and Category 3 to those areas not located adjacent or in close proximity to the A5 to provide a more balanced settlement hierarchy and meet the housing needs of the wider Borough. Allocate the former Daw Mill Colliery site as a housing allocation under the new Category 5; Part D as the Hanworth Group have proposed.	Noted. Settlement hierarchy based on review and update or earlier settlement assessments that accorded settlement position in hierarchy based on level of services and infrastructure available to the settlement. Alternative Strategic Options were considered through the Growth Options paper, which were subject to Sustainability Appraisal. Reasonable Site Alternatives have also been assessed through the Sustainability Appraisal and published for information/evidence base. Sustainability Assessment also assesses alternative options. Current National Green Belt constraints limit options for spreading development across Borough, hence focus on the area outside Green Belt. Most significant development allocations are targeted at the most sustainable settlements in the Borough (outside of Green Belt). Require "very special circumstances" to be established to enable site release or removal from Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP341	Hanworth Group	Object		LP40	Employment Allocations	MIRA site	Land at MIRA; employment allocation should be reallocated from a Category 2 - Adjacent adjoining settlements' site to a new Category 5 site as the site does not sit adjacent to an adjoining settlement. Object to the omission of the former Daw Mill Colliery site from Policy LP40; Employment Allocations as an employment allocation.	Noted. MIRA site located adjoining Regional Enterprise Zone and Nuneaton and Bedworth Local Plan allocations, fitting Category 2 status. However, Daw Mill site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP342					New Site	Land at Spring Farm, Wailing Road, Grendon	Proposed site for housing. SHLAA information submitted in support.	Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP343					New Site	Land east of Boulton Lane, Wood End	Promoting site at Wood End, outside Green Belt and adjoining a sustainable settlement. Potential site of 14.29ha off Tamworth Road Wood End to Boulton Lane proposed.	Noted. Sufficient sites allocated to address OAHN. Site is considered too large, out of scale with village size and needs. Potential adverse impact on countryside, landscape and traffic generation.
DLP344	Mark Jordan						Ruining a once great town by expanding too much and too quickly. The community spirit will be diminished. The A5 main road needs to be dual carriage way ALL the way from Alverstone to Tamworth. The railway bridge by the TNT and Aldi needs the footpaths removing to make it wider, and a new pedestrian bridge putting up (similar to the set up by the crows nest pub in Nuneaton. This needs doing now.	Local Plan Strategic Transport assessment aims to address the transport infrastructure issues and impact of development in the Borough. Infrastructure and service investment issues being addressed through the IDP and contribution by Development. This is a continual process. Board Report will address some of these issues. No change proposed.
DLP344	Mark Jordan				New Site	New Town in Green Belt	The BEST way to cater for this influx of people is to build a new town on green belt land. That way the infrastructure can be planned out (similar to Milton Keynes) There is plenty of land around Filbingley.	Noted. Settlement lies within Green Belt. Require "very special circumstances" to be established to enable site release or removal from Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP345	Gary Iredale	Support					Support for the new draft local plan for North Warwickshire. If it were not for this new development I would've struggled to buy a house in the village I love. I believe that the proposed new development can only be a good thing for Polesworth and Dordon as there have been no real improvements to the road network for many years now and I believe the only way this can be achieved is by the area receiving a significant development. The proposed development would also ensure new schools, new GP/healthcare facilities and also leisure facilities all of which are currently very stretched and limited in capacity in the area. The possibility of Polesworth Train station being reopened with a decent level of service in both directions would also be a great benefit to commuters who live in the area.	Support Noted.
DLP346	Ian Fray	Support	15.60 - 15.63			Land north of Kingsbury Hall	We support the removal of land north of Kingsbury Hall from the Green Belt and proposed for housing.	Noted.
DLP346	Ian Fray	Support		LP6			Support the Council's proposals to support the housing shortfall within the Greater Birmingham & Black Country HMA. However, clarification on whether the 3,790 dwellings being offered by NWBC will be sufficient is required as part of the HMA Memorandum of Understanding which has not yet been made public.	Noted. No change proposed.
DLP346	Ian Fray	Object		LP7		Densley	We support the Council's proposal for housing to be built at no less than 30 dwellings per hectare (other than in town centres), but consider that this policy should be amended to include a further reference 'subject to site constraints and opportunities'. We consider that this would be a more reasonable approach which provides sufficient flexibility for housebuilders to make the best use of available land and maximise the use of a site to meet market conditions.	Noted. Policy considered sufficiently flexible and net figure applied to address site constraints and infrastructure/service requirements. No change proposed.
DLP346	Ian Fray	Object		LP7	Special Needs		In addition, the reference to 'special needs' housing should be made more clear by way of definition and evidence provided to justify the level of requirement identified. 10% requirement for 'special needs' housing is expected to be absorbed within the 40% affordable housing requirements of the Plan. Therefore should this requirement for 'special needs' housing be more appropriately considered within policy LP9 which specifically deals with affordable housing?	Noted. Special needs requirement does not necessarily simply apply to affordable housing but across board in terms of tenure and type. No change proposed.
DLP346	Ian Fray	Object		LP9	Affordable Housing requirements		We object to the Council's policy which requires 40% affordable housing on greenfield sites and 30% on schemes of 10 or more dwellings. There is no justification to require an additional 10% affordable housing on greenfield sites.	Disagree. Policy is flexible and accommodates viability assessment were necessary. Further work on viability will be undertaken. Board report will address some of these issues. No change proposed.

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DLP346	Ian Fray	Object		LP14	Natural Environment		We do not support the blanket approach to retain existing trees, hedgerows and nature conservation features on all sites, unless such features are specifically protected (e.g. tree preservation orders). Each development site will have a range of constraints and opportunities which will need to be addressed as part of proposals to bring development forward. This policy is overly restrictive and negatively worded. It should be re-worded to include the words 'where possible, new development should retain...'	Noted. Disagree. Policy does not apply a "blanket approach" but states "where necessary". This should accommodate concerns raised, not be overly restrictive and enable applicants to assess and indicate loss of natural environment and landscape features "where necessary" to enable the development. Policy reflects level of protection sought in NPPF. Text may be clarified to better highlight when and where impact may be accommodated.
DLP346	Ian Fray	Support		LP2			We support the Council's proposals to distribute development in accordance with the Borough's settlement hierarchy. We support the inclusion of Kingsbury as a Category 3 local service centre. (Note rep indicates incorrect policy reference as LP21)	Noted.
DLP346	Ian Fray	Object		LP22	Services and Facilities		We support the policy for new services and facilities to be provided in local service centres such as Kingsbury.	Noted.
DLP346	Ian Fray	Object		LP39			We support the proposed allocation of land north of Kingsbury Hall. It is considered that 41 dwellings suggested under draft policy LP39, is too low. Additional information on site capacity can be provided to the Council, but based on 30dph, we consider that around 50-60 dwellings could be achieved on approximately a 60% net developable site area.	Noted. Concerns over inability to adequately access site and Green Belt less raise concerns over deliverability. Site proposed for removal. Board report will address some of these issues. No other change proposed.
DLP247	Janet Hodson JVH Town Planning	Object		LP2	Settlement Hierarchy		Defines category 4 settlements as only appropriate for windfall developments and sites identified in neighbourhood plans. Any currently adopted neighbourhood plans are in accordance with the adopted Core Strategy. A new plan can and should propose developments in the category 4 settlements to support the housing land supply. The Settlement Hierarchy fails to note Lea Marston as a settlement where development is allowed. The Settlement Hierarchy should include a further tier or settlements below category 4, where modest amounts of development can be permitted adjacent to the settlement boundary to support the future sustainability of the settlement.	Noted. Incorrect. Some sites are allocated in Category 4 settlements. Lea Marston is not a Category 4 settlement and is washed over by Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP247	Janet Hodson JVH Town Planning	Object		LP3	Green Belt	Remove land between Hams Hall and Church Lane from Green Belt	A new Green Belt boundary should be drawn to allow development land between Hams Lane and Church Lane, to allow organic growth of settlement.	Noted. Lea Marston is washed over by Green Belt. Require "very special circumstances" to be established to enable site release or removal from Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP247	Janet Hodson JVH Town Planning	Object		LP3	Green Belt	30% restriction on volume increase	LP3 as drafted a 30% volume increase in buildings is not in line with the NPPF. What is required is an assessment on individual applications as each building and its setting will vary. It is quite inappropriate to include an express figure and even more ridiculous for this to include the GDPO allowance, which in some cases will exceed 30%.	30% requirement applies outside of and above any PD allowances. Threshold has been upheld at appeal. No change proposed.
DLP247	Janet Hodson JVH Town Planning	Object	Para 7.24 & 7.25				Paras Considered out of step with Para 89 final bullet point of the NPPF which clearly says that the redevelopment of PDL land is acceptable and does not prohibit residential reuse.	Disagree. Text is not suggesting the designation as pdl means residential is unacceptable. NPPF also requires development to be sustainable and in Green Belt it must not impact on openness. So Para 89 is not as open ended as suggested. If location is unsustainable and development impacts on openness, whether it is brownfield or not is immaterial. No change proposed.
DLP247	Janet Hodson JVH Town Planning	Object		LP4			Identifies safeguarded land for both housing and employment future uses but fails to identify safeguarded land for employment adjacent to Hams Hall and east of Curdworth.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP247	Janet Hodson JVH Town Planning	Object		LP6	Housing		It is completely unclear at this point in the plan whether the plan is dealing with a housing target of 5280 or 9070. The policy will need to be clarified to establish how for example a 5 year land supply is calculated. Plan has adopted a 10% nominal aspiration of the requirement, yet there is no evidence to support this figure, which could upon agreement be a much larger requirement given that some authorities have claimed they cannot take any of the Birmingham requirement.	Disagree. OAHN based on evidence including 2015 SHMA that Warwick DC Inspector recently accepts and considered to be based on reasonable and soundly based assumptions. Although 3790 figure (Bham shortfall) indicated as to be tested in table 2, actual Plan site allocations include land to address delivery of all this figure (9070) subject to provision of necessary infrastructure. There is a review mechanism that can be triggered if further requirements are expected to be delivered in NW. Five year supply will be based on 5280 figure as established at Appeal. Further delay to delivery of Local Plan should be avoided. No further changes proposed.
DLP247	Janet Hodson JVH Town Planning	Object		LP6	Employment		Recent studies into the requirement for employment land show that there is a requirement for large employment sites in the locality of the M42 belt/ east of Birmingham which is recognised as an optimal location for new strategic employment growth. Currently the plan fails to allocate new land to meet this requirement. LP6 should therefore be amended to increase the amount of employment land to accommodate a strategic employment site in the M42/ east of Birmingham employment belt.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP247	Janet Hodson JVH Town Planning	Object		LP13	Rural Employment		Object on the basis that the policy as drafted is over prescriptive regarding the relationship of rural buildings to the road network and that limited extensions are not considered acceptable, this is considered to be out of step with the NPPF at Para 55. The policy needs re-drafting to reflect Para 55 of the NPPF, the need to boost the housing supply and the aspirations of the GPDO and the relaxed requirements for rural building conversion.	Disagree that Policy conflicts with Para 55. Plan should be read as a whole. Criteria b and c relate specifically to rural building conversions, not new build. Local Plan process enables different approach to NPPF to be adopted or interpreted. Unnecessary to simply re-iterate NPPF. No change proposed. No change proposed.
DLP247	Janet Hodson JVH Town Planning	Object		LP39	Omission of allocation at Lea Marston		We object to the omission of any allocation at Lea Marston as set out above.	Noted. Settlement lies within Green Belt. Require "very special circumstances" to be established to enable site release or removal from Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.

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DLP347	Janet Hodson JVH Town Planning	Object		LP40	New Site	Site west of Hams Hall and east of Curdworth	Object on the basis that it makes no allowance for a strategic employment site to the west of Hams Hall and east of Curdworth.	Noted. Site lies within Green Belt. Require "very special circumstances" to be established to enable release. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP347	Janet Hodson JVH Town Planning	Object			New Site	Austrey SAP HS3 (Site AUS14)	The plan says sites in these settlements are not allocated, but the policy says it is allocated, this is very confusing. In any event, land off Windmill Lane, Austrey should be allocated for development as it is a sustainable site in a settlement that is clearly recognised as an appropriate location for new housing. It is completely unclear whether the named site off Main Road is an allocation or has planning permission.	AUS14 has planning consent. Development Boundary has been amended to reflect current planning situation. No change proposed.
DLP347	Janet Hodson JVH Town Planning	Object		Proposals Maps			We object to the Austrey inset plan on the basis that the land south of Windmill Lane should be included within the development boundary.	Where necessary, Development Boundaries will be amended to reflect new and extant consents immediately adjoining boundaries. Local Plan is delivering more than local needs in terms of employment land, particularly in terms of addressing Birmingham housing shortfall employment needs, agreed through MOU. Sufficient sites currently allocated to deliver Employment needs and OAHN. No new sites in Austrey proposed.
DLP347	Janet Hodson JVH Town Planning	Object		Proposals Map			We object to the Lea Marston inset plan on the basis that the land between Hams Lane and Church Lane should be included within the development boundary.	Noted. Settlement lies within Green Belt. Require "very special circumstances" to be established to enable site release or removal from Green Belt. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No development boundary currently identified only a "Green Belt Infill Boundary" that interprets Para 69 NPPF exception circumstances. No change proposed.
DLP348	Coppice Garden Centre	Object		LP11			Delete the words "small scale" from "rural business to be compliant with paragraph 28 of the NPPF.	Noted. Disagree that Policy conflicts with Para 28. Reference to "sustainable growth and expansion of all businesses" in NPPF enables focus on sustainable locations and avoidance of development in unsustainable locations. Enables Local Plan to focus and encourage major development towards sustainable settlements/locations. Plan should be read as a whole. Does not necessarily prevent regeneration or small scale expansion of existing large rural businesses but enables assessment of impact on countryside and consideration of sustainability of proposal. No change proposed.
DLP348	Coppice Garden Centre	Object		LP11 and LP3			LP11 also deficient in omission of a cross reference to Policy LP3. Para 69 of NPPF allowing exceptions to development in the Green Belt relating to limited infilling, partial or complete redevelopment of brownfield land with no greater impact on openness of GB. Note brownfield sites may well be employment sites and LP11 is more restrictive than NPPF. This part of the policy should be rewritten. "Support and encouragement will be given for businesses within the rural area to expand in line with the NPPF, where expansion does not impact detrimentally on the countryside character in environmental or sustainable terms.	Noted. Disagree that Policy conflicts with Para 69. Local Plan process enables different approach to NPPF to be adopted or interpreted. Note also Para 28 NPPF reference to "sustainable growth and expansion of all businesses" in NPPF enables focus on sustainable locations and avoidance of development in unsustainable locations. Enables Local Plan to focus and encourage major development towards sustainable settlements/locations. Plan should be read as a whole. Unnecessary to simply re-iterate NPPF. No change proposed.
DLP349	Dairy House Farm	Object		LP39	New Site	Land at Dairy House Farm, Grendon	Omission of site at Dairy House farm. Site is logical extension to Grendon. Wish to see land allocated at Dairy House Farm for 1000 dwellings. Full assessment and testing of site requirements and impacts has been undertaken, including Transport Assessment, Ecological Assessment, Flood Risk assessment etc. Additional housing sites are considered necessary to ensure soundness. Critique and extracts from SHLA and Sustainability Appraisal submitted in support.	Noted. Disagree. Other sites are coming forward as applications and delivery or on site constraints have not been raised or identified as issues. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP349	Dairy House Farm	Object		LP2	Spatial Strategy		Wish to see a balancing of Draft Spatial Strategy to increase housing provision at Baddesley Eror with Grendon to make it more consistent with its position in the settlement hierarchy and its location outside the Green Belt.	Noted. Scale and size of development sites proposed considered appropriate to the settlements position in the strategic hierarchy. Local Plan is delivering more than local needs in terms of housing and employment land. Sufficient sites currently allocated to deliver OAN and address additional Birmingham shortfall. No change proposed.
DLP349	Dairy House Farm	Object		LP6	OAHN		Concern over findings interpreted in 2015 UAHN. The Council has previously agreed to accommodate an unmet need from Tamworth amounting to 500 dwellings. As indicated above, this is not included within the Council's OAN (Table 1) and should be added to the identified need of 5,280 to arrive at the figure of 5,780 as the total for this stage in the calculation of need.	Disagree. 5280 figure includes 500 Tamworth need. No change proposed
DLP349	Dairy House Farm	Object			Unmet Need from Neighbouring Authorities		A further contribution towards the extant 625 dwellings from Tamworth would be a positive move in terms of ongoing and meaningful Duty to Cooperate activities.	Disagree. 3780 figure includes 625 Tamworth need. No change proposed
DLP349	Dairy House Farm	Object		LP4	Safeguarding land for future Development		Policy is unclear what future development could come forward and what need this safeguarded land is expected to serve. The NPPF is clear that the Green Belt should only be amended in exceptional circumstances. RPS considers that the Council should reconsider the intentions of this policy and what the intended purpose is.	Noted. The areas will be safeguarded for potential release for housing needs in the future if required. It is not intended to release these sites from the Green Belt until a new Local Plan requires this. Nevertheless, they are being highlighted in this Local Plan as potential opportunities for the future, if housing requirements and policies need to change due to land supply, availability and housing needs. This will be clarified in the Board Report and the Plan.
DLP349	Dairy House Farm	Support/ Comment		LP7	Density		Broadly support acknowledging town centres can take higher densities. Policy could be worded more flexibly to address exceptions.	Noted. No change proposed

