



Burntwood
TOWN COUNCIL

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CHASETOWN

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Our Ref: JM

22 June 2018

To: All Members of the Burntwood Neighbourhood Plan Committee

Councillors Mosson (Chairman), Mrs Bacon (Vice Chairman), Mrs Banevicius, Birch, Mrs Conolly, Mrs Fisher and Humphreys

Mr Chamberlain, Mrs Fletcher, Mr Holdsworth, Pastor Lewis, Mr Norman, Mr Stanley and Mrs Taylor

Copy: All Members of the Town Council
Mr Wellock, Kirkwells Consultancy

Dear Committee Member

BURNTWOOD NEIGHBOURHOOD PLAN COMMITTEE

You are invited to attend a meeting of the Burntwood Neighbourhood Plan Committee in the Training Room, The Old Mining College Centre, Queen Street, Chasetown, Burntwood WS7 4QH on Monday 02 July 2018 at 7pm to consider the following business.

Yours sincerely

Jayne Minor

Jayne Minor (Ms)
Senior Administration Officer

While audio and video recordings of this meeting are entirely legal, as a matter of courtesy to Town Council members who work for this town and this Council on a voluntary basis, we would be grateful if you would let the Clerk or the Chairman know beforehand.

AGENDA

1. APOLOGIES FOR ABSENCE
2. DECLARATIONS OF INTERESTS AND DISPENSATIONS

To consider any declarations of interests and consider requests for dispensations.

3. MINUTES

To receive and approve the Minutes of a Meeting of the Neighbourhood Plan Committee held on 12 March 2018 (Minute Nos. 5-11) **(ENCLOSURE NO. 1)**.

4. BURNTWOOD NEIGHBOURHOOD PLAN

To consider the Burntwood Neighbourhood Development Plan Regulation 14 Consultation responses and recommended action **(ENCLOSURE NO. 2)**.

MINUTES OF A MEETING OF THE BURNTWOOD NEIGHBOURHOOD PLAN COMMITTEE HELD AT THE OLD
MINING COLLEGE CENTRE, QUEEN STREET, CHASETOWN
ON MONDAY 12 MARCH 2018 COMMENCING AT 7:00 PM

PRESENT

Councillor Mosson (in the Chair)

Councillors Mrs Bacon, Mrs Banevicius, Birch, Mrs Conolly (from 7:04 pm) and Mrs Fisher

In attendance

J Brown, Interim Town Clerk

Ms J Minor, Senior Administration Officer (SAO)

M Wellock, Kirkwells Consultancy

V Chamberlain, Burntwood Action Group (BAG)

Mrs S Fletcher

Pastor Lewis

S Norman

K Stanley

12. APOLOGIES FOR ABSENCE

Councillor Humphreys

Mr Holdsworth

Mrs Taylor

13. DECLARATIONS OF INTERESTS AND DISPENSATIONS

None declared.

14. MINUTES

RESOLVED That the Minutes of the Meeting of the Burntwood Neighbourhood Plan Committee held on 05 September 2017 (Minute Nos. 5-11) be received and approved.

15. BURNTWOOD NEIGHBOURHOOD PLAN

Councillor Mosson explained that the whole purpose was to merge the previous Plan with the BAG Vision ensuring that it conformed to Lichfield District Council's Local Plan Strategy, National Planning Policy Framework (NPPF) etc. Councillor Mosson asked Mr Wellock to explain the challenges of this.

Mr Wellock said that he felt that it was worthwhile re-capping on where the Town Council was now. As a result of these changes the Burntwood Neighbourhood Development Plan was being re-published for informal consultation. Once approved, a Regulation 14 Draft Plan would be prepared and published for a six weeks formal consultation (to include people who live, work and carry out their business in the area). After the consultation the Plan will be amended and

submitted to Lichfield District Council for a further minimum 6 weeks consultation before the Plan is subjected to an examination and then referendum.

Mr Wellock explained that he had tried to keep the essence of the BAG Vision within the amended Plan.

Mr Wellock explained the key changes namely (1) focus on each of the centres (BAG Vision), however, Mr Wellock did point out that aspirations do not necessary turn into policy; (2) up the presentation of the document (better images were still needed); (3) what form the consultation takes; and (4) to be happy with the wording (general thrust). Mr Wellock asked if Members could email the SAO so that comments could be co-ordinated.

Councillor Mosson asked Mr Chamberlain if BAG were happy with the document as it stands. Mr Chamberlain stated that BAG had not really seen the document due to timescales however he felt that it capsulizes the essence of the BAG Vision.

Mr Norman made reference to Page 16 and in particular the Figure 2 - Burntwood Population Comparison graph. Mr Stanley confirmed that this new graph was at his request as he felt that the new graph was now much clearer to understand. Mr Norman also pointed out that the A5190 ran through Burntwood.

Councillor Birch made reference to Page 17 and felt that some of the information was out of date. Councillor Birch made reference to Page 20, Para 3.10 and said that the children's centre at Boney Hay had closed some time ago. Mr Wellock said that slight amendments would be needed.

Mr Norman made reference to Page 22, Para 3.15 and felt that since the recent round of costs that some parts of the area have less access to public transport, such as Boney Hay, and, overall Sunday services were very poor and not just poor. Councillor Birch also made reference to Page 22 and felt that social housing needed to include Midland Heart, Waterloo and Sanctuary not just Bromford.

Mr Norman made reference to Page 23, Paras 3.17 and 3.20 and felt that the paragraphs were contradicting to a degree. Mr Wellock said that he would change the last sentence of Para 3.17.

Mr Norman made reference to Page 23, Para 3.19 and felt that the first sentence did not make sense to him. Mr Wellock said that he would reconsider the wording.

Mr Norman made reference to Page 24, Para 3.20 and stated that the Chasetown Wakes needed to be changed to Burntwood Wakes.

Mr Norman made reference to Page 24, Para 3.22 and stated that Chasewater Nature Park was just known as Chasewater. Mr Norman stated that the new Chase Retail Outlet Park was known as Mill Green and felt that "whilst visitors and tourists are in the area they must be" he felt that it was more appropriate to use the words "could be". Councillor Birch asked if a "coach park" site had been identified as he felt that as the Town Council had specifically mentioned it, it needed to be identified.

Pastor Lewis stated that the retail development on the former Olaf Johnson site had already stated and having asked the contractors he had established that they would be on site for approximately six/seven weeks. Pastor Lewis stated that he had spoken to several traders at Sankeys Corner and had received mixed feelings from the traders (some had raised concerned

about their livelihoods). Councillor Mrs Fisher stated that this had been discussed at the Town Deal Meeting held on 09 March 2018 and that this had been taken on board.

Mr Norman made reference to Page 25, Para 3.24 and in particular "A" level course work. Mr Stanley stated that this needed to be made more generic.

Mr Norman made reference to Page 25, Para 3.26 and in particular that the Health and Well Being Centre was unlikely to be granted planning permission for another temporary period. Mr Wellock stated that he would need help with the wording for this paragraph. Mr Norman also said that the two new health centres promised were following the closure of Hammerwich Hospital.

Councillor Birch made reference to Page 30, Para 5 and in particular what was meant by "particularly around terraces". Mr Wellock stated that this included high housing density areas and that perhaps the sentence needed to be expanded.

Mr Norman made reference to Page 36, Para 7.4 and asked that the "underline" be removed. Mr Norman also made reference to the wording "Town Square". Mr Chamberlain stated that these were pedestrian areas with retail built around and that it was BAGs wish would be to remove car traffic (aspirational). Mr Wellock stated that all ideas must translate into planning policy.

Councillor Birch made reference to Page 38 (c) and asked that "this was due to start February 2018) be removed.

Councillor Birch made reference to Page 49 and in particular the key to maps 5, 6, 7 and 8 and felt that this should be moved to the bottom of Page 51. Councillor Birch made reference to Page 51 – Policy Map 6 - Swan Island and asked that the blue line be extended to include the flower shop, butchers etc in Rugeley Road. Councillor Birch made reference to Pages 52 (Policy Map 6 – Ryecroft Shops) and Policy Map 8 (Morley Road Shops) and asked if these could be lined blue (protected retail frontages).

Mr Norman made reference to Page 57 and asked what Lichfield District Council's views were on "enhancing the identity and distinctiveness of local neighbourhoods". Mr Wellock stated that Objective 3 was also in the previous Plan and it was hoped that Lichfield District Council would generally be supportive of it.

Mr Norman made reference to Page 73 and stated that Ryecroft Park was known as Chaseview Park. Councillor Birch asked if the football pitches behind Burntwood Memorial Hall could be included within Policy 10 – Local Green Spaces. Mr Wellock stated that the Burntwood Memorial Hall pitches could be included within Policy 9 – Protecting and Enhancing Local Sport and Recreation Facilities. Mr Norman asked if Maple Close could also be included.

Councillor Birch made reference to Page 82 – Policy B12 – Retaining and Enhancing Existing Community Facilities and stated that the police station needed to be removed as the building was going up for sale. The Interim Town Clerk said that the word "former" could be added to the wording and pointed out that the word "Centre" needed to be added at the end of the Old Mining College.

Councillor Birch made reference to Page 85 and stated that Mary Danby's name needed to be removed and that the correct address needed to be added.

Mr Norman stated that he was happy to provide photographs for the Plan.

Pastor Lewis made reference to the loss of the last bank in Burntwood and asked what influence the Town Council have on the banks (way and means to influence a bank). Pastor Lewis felt that with the new retail development there should be a new bank. The Interim Town Clerk stated that if there is a commercial market in the future a bank may come back to the Town. Mrs Fletcher made reference to a planning application for change of use of the Post Office (Boora Newsagents and Post Office, 5 Cannock Road, Chase Terrace) into a dental surgery.

Councillor Mosson stated that valid points had been made by the Committee Members and that he was keen to get the Plan moving. Councillor Mosson informed Committee Members that these minutes together with the Plan would be going to the Town Council Meeting on 15 March 2018.

Mr Wellock stated that a target date was needed and that the Town Council needed to wait for the formal comments from the consultation events before submitting to Lichfield District Council. To meet Regulation 14 Mr Wellock reminded Committee Members that the Town Council needed a six week formal consultation. Mr Wellock stated that he would provide a “key dates” programme with say Friday 20 April being the start date. Mr Wellock reminded Committee Members that the comments received from the consultation events would need to be looked at by the Neighbourhood Plan Committee and the Town Council and that the comments needed to be documented (how the Town Council have treated the comments – a clear audit trail).

Councillor Mosson stated that two consultation events would be held (at the Library and Old Mining College Centre) and that the launch event would be on 28 April 2018 between 10 am and 2 pm.

(The Meeting closed at 8:05 pm)

Signed

Date

Burntwood Neighbourhood Development Plan Regulation 14 Consultation Responses and Recommended Action

The following table summarises all the responses received to the Regulation 14 consultation. The recommended response/action for the Town Council to take is included in the right hand column.

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
1	V. Chamberlain	<p>1. Further work should be undertaken to set out an aspirational plan for Sankeys Corner.</p> <p>2. The industrial estates at Prospect Road, New Road and Mount Road should be re-designated as residential.</p>	<p>1. Amend Background/Justification to identify a mechanism for how a more detailed aspirational plan for Sankey's Corner can be developed.</p> <p>2. These areas are protected in the Local Plan – no change.</p>
2	P. Chamberlain	<p>1. Further work should be undertaken to set out an aspirational plan for Sankeys Corner.</p> <p>2. The industrial estates at Prospect Road, New Road and Mount Road should be re-designated as residential.</p>	<p>1. Amend Background/Justification to identify a mechanism for how a more detailed aspirational plan for Sankey's Corner can be developed.</p> <p>2. These areas are protected in the Local Plan – no change.</p>
3	Burntwood Action Group	<p>1. Further work should be undertaken to set out an aspirational plan for Sankeys Corner.</p> <p>2. The industrial estates at Prospect Road, New Road and Mount Road should be re-designated as residential.</p>	<p>1. Amend Background/Justification to identify a mechanism for how a more detailed aspirational plan for Sankey's Corner can be developed.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
			2. These areas are protected in the Local Plan – no change.
4	Alan Shore	Supporting comment with suggestion that the plan could include more on dealing with vacant sites and improving the state of the area's roads.	Use of vacant sites is addressed in the BNDP e.g. Policy B2. Maintenance of roads is not a neighbourhood plan issue. No change.
5	R. Bridgewater	Additional health facilities needed.	Policy B12 protects and supports enhancements to existing community facilities. There are no site specific proposals for new health facilities. No change.
6	K. Robinson	Supporting comment	Support noted
7	R. Bridgewater	Where are the open spaces?	Protected open spaces are shown on Map 9 of the BNDP. No change.
8	D. Barton	Encourage development on non Green Belt land.	Comment noted. No change.
9	M Allibone	Improve road safety especially at the Aldi entrance.	Ament Policy B1.1 to include this suggestion.
10	R. Bridgewater	Improved bus links and services to Walsall and Lichfield.	Service improvements is not a land use planning matter. Town Council to consider how this issue can be addressed separate from the BNDP.
11	L. Brown	1. New retail development should not adversely affect existing independent local businesses.	1. Comment noted. Policy B1, B3 and B4 seek to support local businesses. No change.

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>2. New housing development should take account of existing pressure on local services.</p> <p>3. Local landowners should release land for car parking.</p>	<p>2. Comment noted. No change.</p> <p>3. Comment noted. This is already addressed in the BNDP e.g. Policy B1h and B3f.</p>
12	A. Carbally	<p>Raises concerns about over-development of Burntwood without consideration of infrastructure. Especially impact on older residents and young families.</p> <p>Also off Common View an area of open space should be protected.</p>	<p>Comment noted. No change.</p> <p>Add common View to Protected Open Spaces on Map 9.</p>
13	S Cobbett	Protect playing fields and green spaces	Comment noted. BNDP already addresses this through Policies B9, B10 and B11.
14	R Bridgewater	Need for leisure facilities such as cinema, bowling alley or ice rink.	Comment noted. Already addressed in Policy B1c.
15	R Bridgewater	New retail facilities for new homes.	Comment noted. No change.
16	M Wallace	Support protection of Green Belt. Great to see new retail development has started.	Support noted.
17	S Fletcher	The plan should include further work to be carried out to establish an aspirational plan for Sankey's Corner this should include safe walking and a cycleway/promenade to and from Chasewater.	Amend Background/Justification to identify a mechanism for how a more detailed aspirational plan for Sankey's Corner can be developed.
18	Coal Authority	The BNDP falls within a defined coal field. There are recorded risks from past coal mining activity. Should the BNDP seek to allocate sites	Comments noted. No change.

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		for future development in areas of past coal mining activity or surface coal resource then detailed consideration would need to be given to these issues. The BNDP does not make allocations so the Coal Authority has no specific comments to make.	
19	Savills	<p>Object to Key Issues 1, 3, 6, 7 and 8.</p> <p>Key Issue 1 – “we agree that the town centre needs to be rejuvenated however we do not think that the explanation to this issue or Policy B1 (which we have covered in a separate response to Policy B1) provides enough detail on how the Town Council intend to upgrade the town centre. We consider that significant investment is required in order to rejuvenate the Town Centre and a larger community is required in order to sustain the town centre uses that are provided. The objective to rejuvenate the town will be greatly assisted by new residential development. We have discussed this issue in further detail in our response to policy B1 however, in short, we do not consider that the current scale and location of residential development proposed is enough to generate the investment required to rejuvenate the town centre.”</p> <p>Key Issue 3 - “we seek clarification on what ‘adequate’ is defined as. We request that this is in accordance with Lichfield District Council’s car parking standards.”</p> <p>Key Issue 6 – “within the explanatory text to this Issue it states that “there are concerns about the suitability of infrastructure and its phasing in relation to new development. Ideally, new retailing, community and leisure facilities should be provided ahead of proposed new housing development”. We object to this statement and seek clarification on how</p>	<p>Comments noted. No change to the plan. The Key Issues have been developed following consultation with the local community and others. Some of the suggested changes are policy related. The Key Issues section of the BNDP does not set planning policy.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>this is justified. Providing new services and facilities ahead of developing housing will not be financially viable for developers or contribute towards until they have generated funds from selling dwellings first. Retail, community and leisure facilities also require a critical mass of people to make them viable which will be generated once new houses are built. Generally, planning permissions are conditioned to ensure that developers provide certain contributions at the completion of a certain number of dwellings before they can develop or sell any further dwellings. We consider that the sentence underlined above should be removed from the Neighbourhood Plan. We also seek clarification over what ‘adequate’ means in relation to providing health facilities. “</p> <p>Key issue 7 – “as the majority of the Green Belt land surrounding Burntwood is in private ownership, one option that the Town Council have to improve accessibility between the town and the countryside is to develop parts of it and create links within the development. S106 agreements could be utilised in order to ensure that as part of a development, some of the land is used for community use, for example a country park, greenway or play areas.”</p> <p>Key Issue 8 – “in order to address this issue and improve the local environment, funding is required. New development is one way of securing the funding or investment required to improve the local environment to make Burntwood a connected, greener and coherent community”</p>	
20	Savills	Comment on Policy B2. In relation to Part a of Policy B2, clarity is required to define what is ‘detrimental impact’ means? This should be set out in the policy or in its supporting text.	Amend to bring in to line with national planning policy replace with “significant adverse impact”.

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
21	Savills	Comment on Policy B7. Appendix 1 of the Neighbourhood Plan provides a list of all of the statutorily listed buildings within Burntwood. However, as this policy only relates to non-designated heritage assets we consider this list to not be relevant to Policy B7. We consider that in order to provide more clarity and be unambiguous, this policy should include a list of what the Neighbourhood Plan considers is a 'local, non-designated heritage asset' within Burntwood.	<p>Appendix 1 is included as an informative. No change.</p> <p>Committee to consider adding a list of non-designated heritage assets.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
22	Savills	<p>Objection to Policy B1. We consider that Policy B1 is in accordance with Core Policy 8 and the vision for Burntwood within the Lichfield Local Plan Strategy. However, further to the points we have raised in our separate response to the 'Key Planning Issues' (pages 29 – 32), we consider that in order to ensure that Burntwood town centre is enlarged and rejuvenated it requires significant investment which we (<i>sic</i>) can be generated by development proposals within and adjacent to the town.</p> <p>Paragraph 23 of the National Planning Policy Framework ('NPPF') states that Local Planning Authorities should "<i>recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites</i>". We consider that regenerating and developing within the town centre alone will not ensure the continued vitality of Burntwood town centre. In order to ensure that any new retail, office, foods and drink uses which are developed within the town centre are successful then they need to be supported by the expansion of the local community. It is apparent that the current local community is not enough to sustain the existing town centre and therefore more residents are required to ensure its success. Therefore, we propose that further residential development should be encouraged within the Neighbourhood Plan in order to expand the local community and seek to increase the footfall of visitors to the town to use the existing and proposed shops and services being sought.</p> <p>Paragraph 173 of the NPPF also states that "plans should be deliverable" and "pursuing sustainable development requires careful attention to viability and costs in plan-making". The</p>	<p>Objection noted. The BNDP has considered the option of allocating housing sites and this option has been rejected. There is no requirement for a NDP to allocate land for residential development. This is a matter for the Lichfield District Local Plan Allocations Document.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>paragraph goes on to state that any development should not be subject to a scale of obligations which would threaten its viability. All of the (limited number of) sites currently proposed for residential development within Burntwood are brownfield sites. One of the sites is allocated in the emerging Local Plan Allocations document, is still in employment use. Unlike greenfield sites, in most cases brownfield sites (particularly those which have been used for employment uses) have significant build costs related to demolition and ground conditions works which usually means that their viability can be affected meaning potentially reduced Section 106 contributions towards obligations such as affordable housing or community facilities. Due to viability reasons, we consider that the limited brownfield sites currently proposed for residential development within Burntwood will not provide the investment alone which will be required to rejuvenate the town centre nor will their scale mean that they will generate to scale of residents required to sustain any new retail, leisure or food and drink uses which may be developed.</p> <p>According to the March 2018 consultation draft, the emerging revised NPPF is likely to place considerable weight on viability and that viability assessments should be undertaken at the plan-making stage to avoid situations where it becomes known that a site is unviable at the planning application stage / decision-making stage. We consider that Burntwood Town Council and Lichfield District Council should review all of the proposed residential allocations currently within Burntwood and assess whether they are viable and deliverable and able to contribute towards rejuvenating the town centre with the proposals sought for the town.</p>	

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>In summary, although we agree that Burntwood Town Centre needs to be rejuvenated, we consider that this will not be possible unless more viable and deliverable sites within and adjacent to Burntwood are allocated for residential development. The sites that are currently allocated for development will not generate the investment required to improve the town centre nor will they generate the number of additional residents who will assist in sustaining any new retail, leisure or food and drink use that may be developed which will result in the continual decline of the town centre. The Neighbourhood Plan should make allowance for further residential development sites to come forward in order to generate the contributions and residents which will allow the town centre to be strengthened and maintained.</p>	
23	Savills	<p>Object to Policy B6.</p> <p>In relation to part 1 ('Setting') of Policy B6, we request further information on what the triggers are for a site requiring a Landscape Visual Impact Assessment? The policy currently states "in some cases". We assume that the trigger will be the same as the Lichfield District Council planning</p>	<p>Amend Background/Justification to set out when a Landscape Visual Impact Assessment may be necessary.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>application validation requirement triggers (wind turbine and major commercial and residential applications) but request that this policy or its explanatory text provides some clarity on this matter.</p> <p>We also want to submit comments on the wider housing development issue within Burntwood and the rest of the District. We know that Neighbourhood Plans do not have to allocate additional sites to those already allocated within the Local Plan. However we consider that the Burntwood Neighbourhood Plan should consider allocating additional sites or identifying potential future growth locations. Lichfield District is part of the Greater Birmingham Housing Market Area ('HMA'). There is currently a housing shortfall of at least 37,900 dwellings (the Black Country Authorities recently suggested that there may have an additional emerging capacity shortfall of up to 22,000 dwellings within their authority boundary) which needs to be met across the HMA. Although the shortfall has not been distributed yet, Lichfield Council has already commenced a Local Plan Review in order to address this HMA issue. Planning practice guidance states that in order <i>"to reduce the likelihood of a neighbourhood plan becoming out of date once a new Local Plan is adopted, communities preparing a plan should take account of latest and up-to-date evidence of housing need"</i>. Although this Neighbourhood Plan is in accordance with the Local Plan Strategy, this strategy is already out dated as more up to date evidence is available which sets out that there is a significant shortfall in the HMA. Therefore this Neighbourhood Plan risks being out of date soon after it is 'made' once the Local Plan Review is adopted which is currently expected by December 2020.</p> <p>In order to ensure that the Burntwood Neighbourhood Plan is as up to date as possible, we consider that as the second most sustainable settlement within Lichfield District (Lichfield Local Plan Core Policy 1), reference should be made to accommodating future residential growth in addition to the sites</p>	<p>Point on housing has been responded to with regard to response 22.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		allocated within the adopted Local Plan Strategy and the emerging Local Plan Allocations document. This should include consideration of reserve sites to meet future housing requirements and would provide greater certainty to the residents of Burntwood rather than new sites being imposed after the Neighbourhood Plan is made.	
24	Historic England	<p>Historic England is supportive of the Vision and objectives set out in the Plan.</p> <p>Historic England has no adverse comments to make upon the draft plan which we feel takes a suitably proportionate approach to historic environment issues pertaining to Burntwood. We commend the emphasis on local distinctiveness, protecting local heritage assets and the maintenance of historic urban character in the “village” centres whilst improving their connectivity.</p> <p>Beyond those observations we have no further substantive comments to make.</p>	Comments noted.

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
25	Lichfield District	<p>General Comments in relation to the whole plan:</p> <p>The document as drafted is well presented and clearly set out and is clearly the result of significant work within the community. The structure of the document, providing context, issues, vision and objectives and subsequent planning policies is clear and well-presented.</p> <p>Evidence – it is recommended that the neighbourhood plan is supported by greater evidence and provides greater reference to the significant evidence base which underpins the local plan and is available for the Town Council. Much of the supporting text refers to community desire – whilst it is accepted this is a key part of the neighbourhood plan process it is not sufficient evidence on its own to support a policy. Negative wording of policies – a number of the policies within the draft neighbourhood plan are more negatively worded than would usually be expected. The District Council has previously expressed the view that greater supporting evidence could be referenced within the ‘Background/Justification’ sections of the plan.</p> <p>Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA): The neighbourhood plan has previously been screened with regard to HRA and SEA with a screening report produced in January 2017 on a much earlier draft of the neighbourhood plan. Whilst it may be that the conclusions of the screening process are applicable to this draft of the neighbourhood plan it may be beneficial for the current draft of the neighbourhood plan to be screened for SEA and HRA. The District Council can undertake this at the Parish Council’s requires and strongly recommend that this take place.</p> <p>LDC has continued to progress the second part of its current Local Plan, the Local Plan Allocations document. The document is due to be</p>	<p>Comment noted. No change.</p> <p>Remove any negative wording and increase references to the evidence base used in Background/Justification section to each policy.</p> <p>Town Council to request a revised SEA/HRA screening.</p> <p>Amend as suggested.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>submitted for examination in May 2018 and it is anticipated the examination will take place later in 2018. Whilst the allocations document is yet to be examined and adopted it is worth noting its progress and the advanced stage of the document.</p> <p>LDC has commenced work on a review of the current Local Plan with the publication and consultation on the Scope, Issues and Options document. Whilst this plan is at a very early stage it is recommended that the Town Council continue to engage in the process and make representations as appropriate on the local plan documents produced by the District Council.</p> <p>Specific comments: Paragraph 1.8: As noted above within the general comments section it is recommended that this current draft of the plan be screened for HRA & SEA as the previous screening process was undertaken on an early draft of the neighbourhood plan in early 2017.</p> <p>Map 3: It is recommended that this map be removed from the neighbourhood plan. Whilst this is the policy map associated with the adopted Local Plan Strategy once the Local Plan Allocations document is adopted updated policies maps will be produced. As such the map included at Map 3 of the neighbourhood plan may become outdated quite quickly. Therefore, it would be better simply to refer to the policies map rather than include this within the plan.</p> <p>Paragraph 2.6: The following could be added to the end of the first sentence of the paragraph to provide clarity as to the role of the allocations document: "...and will form the second part of the Lichfield District Local Plan".</p>	<p>Comment noted. No change.</p> <p>Town Council to request a revised SEA/HRA screening.</p> <p>Remove Map 3.</p> <p>Amend as suggested.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>Paragraph 3.11: Part of Chasewater is designated as a Site of Special Scientific Interest (SSSI), it may be beneficial to include this designation within this contextual paragraph, particularly as other environmental designations are noted within the paragraph.</p> <p>Section 4: Support the inclusion of the ‘key issues’ section. This clearly demonstrates the issues the neighbourhood plan is seeking to address.</p> <p>Paragraph 7.4: It would be beneficial to add some text to this paragraph to specifically reference ‘Policy Burntwood 3’ within the adopted Local Plan Strategy and ‘Policy Burntwood 3’ within the emerging Allocations document which will replace the adopted policy. Both of these policies provide context and support for the enhancement and improvement of an expanded town centre for Burntwood, and as such should be clearly referenced within the neighbourhood plan.</p> <p>Policy B1 – Burntwood Town Centre: Generally support the thrust of the policy and the desire to deliver a larger and improved town centre. This is supported within adopted and emerging local plan policy. However, there is concern that the policy as drafted may be too prescriptive in terms of the exact uses to be included within the site and there may be questions over the deliverability of elements of the policy. The explanatory text to the policy provides limited information in terms of the deliverability and whether the proposals are realistic. The NPPF requires plans to be aspirational yet realistic and therefore there should be greater justification to the policy.</p> <p>Map 4: The town centre boundary shown on map 4 is consistent with that in the adopted Local Plan, however the town centre boundary shown with the emerging allocations document is slightly different and is based on the up to date evidence within the Lichfield Centres Study 2016. As such it</p>	<p>Amend as suggested.</p> <p>Supporting comment noted.</p> <p>Amend as suggested.</p> <p>Amend Background/Justification to identify a mechanism for how a more detailed aspirational plan for Sankey’s Corner can be developed.</p> <p>Amend Map 4 as suggested.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>is recommended that the boundary on Map 4 be modified to reflect the latest position within the up to date evidence. Additionally there appears to be two '1's on the map and no number '2'.</p> <p>Policy B2: Criteria a) of the policy which supports temporary uses of sites/properties is considered to be quite broad and gives no indication as to what uses would/would not be acceptable. The policy also refers to 'key road and pedestrian' approaches are these the same as the 'improved links' shown on the maps? It would be beneficial to be clear in either the explanatory text or through the accompanying map to define the 'key approaches'.</p> <p>Policy B3 and paragraph 8.6: There is limited justification within the plan to the identification of the key frontages discussed within the policy and shown on its accompanying maps (Maps 5, 6, 7 and 8). Greater explanation as to how and why these particular frontages have been selected should be included within the explanatory text to the policy.</p> <p>Maps 5, 6 and 8: As has been commented upon previously these maps show neighbourhood boundaries which are slightly different to those identified on the Local Plan Strategy policies maps. It is recommended that the existing boundaries from the adopted Local Plan are used unless there is evidence/justification for the boundaries shown within the neighbourhood plan. However, such evidence/justification would need to be included within the plan and presently this is not the case.</p> <p>Policy B5: There is concern that as drafted the policy excludes the possibility of contemporary design and/or the use of modern materials. The policy should focus on the use of high quality design and materials and that such design responds well or is informed</p>	<p>Amend to set out the temporary uses that would be acceptable. Define "key approaches".</p> <p>Amend Background/Justification to set out how frontages identified.</p> <p>Committee to decide which boundaries to use those in BNDP or those in Local Plan.</p> <p>Add criterion to address contemporary design and modern materials as suggested.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>by the local character whilst ensuring this is not confined to traditional design and materials. Policy B6 provides better support where it states “proposals should be designed in such a way that the best of the varied local building styles in the Burntwood neighbourhood area is used to inform new design”. Such text could be incorporated into policy B5 to ensure that it does not exclude good quality contemporary design.</p> <p>Policy B7: Support the overall thrust of the policy to protect local non-designated assets. It would be beneficial if the policy identified specific assets or provided information on how such assets will be identified. This could represent an opportunity for such assets to be identified by the community for inclusion within this neighbourhood plan.</p> <p>Policy B10: Support the identification and proposed designation of ‘Local Green Spaces’. The evidence provided at appendix 2 of the document provides some evidence as to how the spaces have been selected. However, as has been previously commented upon by the District Council the NPPF is clear that Local Green Space designations will not be appropriate in most circumstances. Therefore sufficient evidence must be included within or alongside the neighbourhood plan to justify the designation of the selected spaces.</p> <p>Paragraph 13.8: The District Council published an updated Open Space Assessment in 2016 which is available via the District Council’s website at the link below. It would be beneficial to use this document as evidence within this paragraph as it is more up to date.</p> <p>https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Evidence-base/Healthy-Safe-Communities/Downloads/Open-space-assessment/Open-space-assessment-2016.pdf</p>	<p>Committee to consider identifying non-designated heritage assets.</p> <p>Add additional evidence at Appendix 2.</p> <p>Add link to Open Space Assessment.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>Policy B11: Open spaces within the District are protected through Core Policy 10 of the adopted Local Plan. Policy B11 effectively repeats adopted policy and therefore it adds little to the adopted policy. As noted previously given that the open spaces are not being proposed as Local Green Spaces it is considered that adopted policy within the local plan provides sufficient protection to these green spaces.</p>	<p>Whilst Policy 10 protects such sites they are not mapped. Amend Policy B11 to reference Policy 10 and retain Map 9.</p>
26	Natural England	<p>Policy B8 - Natural England welcomes the spirit of this policy and has the following comments which are intended to help get the most out of any projects aimed at improving access to the semi-natural and open space resource around and adjoining the Burntwood neighbourhood plan area.</p> <p>The neighbourhood plan area includes and adjoins designated sites such as Gentleshaw Common and Chasewater Country Park and also the protected landscape of Cannock Chase Area of Outstanding Natural Beauty (AONB).</p> <p>We acknowledge the wish to enhance links to the surrounding countryside as expressed in 'Key Planning Issues' (No 7) and encourage the Town Council to make contact with relevant stakeholders involved in the management of these local resources in order to discuss your plans for new or enhanced</p>	<p>Comment noted. Town Council to make contact with key stakeholders.</p>

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		links in the Burntwood neighbourhood plan area at an early stage. This will help those managing the sites mentioned above to be aware of the demand for recreation that may result and to allow discussion of suitable design solutions.	
27	Network Rail	No comments to make	Noted.
28	Sport England	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p>	Comments noted. The BNDP seeks to protect sport and recreation facilities. No change.

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		<p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p>	

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p>	

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		Sport England's Active Design Guidance: https://www.sportengland.org/activedesign	
29	Wood on behalf of National Grid	The neighbourhood area includes the following high voltage overhead powerlines – ZN Route - 500kV from Penn substation in South Staffordshire to Drakelow in South Derbyshire. From the consultation information the powerline does not interact with any of the proposed development sites.	Comment noted.
30	Cannock Chase District Council	Comment on Policy B1. Cannock Chase Council supports the creation of a new town centre with supporting infrastructure, services and facilities to meet local needs. This must be in conformity with the adopted policy of Lichfield District Council's adopted Local Plan: Strategy (2015) which sets the nature and quantum of growth in this regard as this was evidenced and tested through examination in public to ensure that this would enable local regeneration without undermining the viability of other centres including those which lie beyond the boundaries of Lichfield District.	Comment noted. Policy B1 is in general conformity with the strategic planning policies for the area.
31	Cannock Chase District Council	Policy B6: Promoting good quality design in new housing development. While it is noted that this policy is focused specifically on design, there should be a policy link in the Neighbourhood Plan to the policy in the Lichfield District adopted Local Plan Strategy on the Cannock Chase Special Area of Conservation (SAC) to ensure that housing developments provide mitigation for impacts on the Cannock Chase SAC. Cannock Chase and Lichfield District Councils are part of a wider partnership dealing with this European protected site, as mitigation is needed for any housing growth within a 15km zone of influence. Officers at Lichfield District Council will be able to provide further advice and guidance on this matter.	Amend as suggested.
32	Cannock Chase District Council	While it is noted that this policy is focused specifically on design, there should be a policy link in the Neighbourhood Plan to the policy in the Lichfield District adopted Local Plan Strategy on the Cannock Chase Special	Amend as suggested.

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		Area of Conservation (SAC) to ensure that housing developments provide mitigation for impacts on the Cannock Chase SAC. Cannock Chase and Lichfield District Councils are part of a wider partnership dealing with this European protected site, as mitigation is needed for any housing growth within a 15km zone of influence. Officers at Lichfield District Council will be able to provide further advice and guidance on this matter.	
33	Barton Willmore on behalf of Church Commissioners	<p>Land west of Stables Way and land west of Ironstone Road and Stables Way.</p> <p>The Commissioners own two parcels of land, adjacent to one another, on the edge of Burntwood. The northern parcel is referred to as 'Land west of Ironstone Road and Stables Way, Burntwood' and southern parcel is referred to as 'Land west of Stables Way, Burntwood' . A Site Plan is enclosed at Appendix 1 of this letter.</p> <p>Background</p> <p>The Sites, which measure in total circa 14.8 hectares, are located adjacent to the western edge of the town of Burntwood, which is identified as one of two 'principal service centres' in the Lichfield District Local Plan Strategy (adopted 2015); the other 'principal service centre' is Lichfield City. The Sites are located within the Green Belt and abut the administrative boundary of Cannock Chase District. Collectively, both Sites have the potential to accommodate a total of circa 375 dwellings (based on an average density of 35 dwellings per hectare (dph)). The sites are available for development and well located in the context of Burntwood town centre (circa 1 mile) ; they are both within walking distance to services, facilities and close to transport links. These sites could accommodate a significant proportion of development that would be masterplanned carefully to ensure integration with the character of the area. We consider there is the potential to develop both sites collectively</p>	The site is within the Green Belt. Green Belt boundaries can only be reviewed through a Local Plan Review. This is not a matter for the BNDP. If this is pursued it should be through the Lichfield Land Allocations Plan.

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		<p>for housing or for each of the parcels to come forward individually, if preferred, in order to provide shorter-term development opportunities for the area.</p> <p>In accordance with the Neighbourhood Planning (General) Regulations 2012, it is recognised that this consultation is the first formal consultation regarding the Burntwood Neighbourhood Development Plan (BNDP). However, for context, we have previously made representations promoting the Sites for development to Lichfield District Council .</p> <p>At Appendix 2 we include a copy of the representations we made to Lichfield’s Local Plan Allocations consultation which comprises a Green Belt Review of the sites. Furthermore, the Sites will continue to be promoted through Lichfield’s Local Plan Review: Scope, Issues & Options which is currently being consulted on.</p> <p>Our Client generally supports Burntwood Town Council in the production of the BNDP, but we consider it may, at this stage, be premature given the changing planning policy context. The Commissioners are keen to work with Burntwood Town Council to ensure that the BNDP endures without a need for early review and provides a basis for the town to continue to grow in a sustainable manner whilst meeting the housing needs of existing and future residents, including, importantly, affordable housing needs. We set out our response below.</p> <p>New Housing Development We recommend that a specific housing policy is incorporated in the next version of the BNDP to expressly outline how Objective 4 (to support the development of quality new housing and living environments that meet the community’s needs) of the BNDP will be met. The incorporation of a</p>	<p>The issue of whether to include housing allocations in the BNDP has already been considered and rejected. This issue is dealt with through the Local Plan/Land Allocations Plan. No change.</p>

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		<p>specific housing policy is critical in securing housing delivery when considering the adopted strategic housing policies within the Lichfield Local Plan Strategy, adopted 2015.</p> <p>Paragraph 184 of the National Planning Policy Framework (NPPF) states that: ‘the ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area...’</p> <p>Paragraph: 065 Reference ID: 41-065-20140306 of the Planning Practice Guidance (launched 6th March 2014) under section ‘What are the basic conditions that a draft neighbourhood plan or Order must meet if it is to proceed to referendum?’ highlights that neighbourhood plans must be : ‘... in general conformity with the strategic policies contained in the development plan for the area of the authority...’</p> <p>Changing Policy Context: Local Plan Allocations In recognising the sustainability credentials pf Burntwood, the Lichfield Local Plan Strategy, adopted in 2015, proposed that approximately 13% (1,350 dwellings) of the district’s housing requirement be directed towards Burntwood. The Local Plan Strategy also provided the platform for the release of Green Belt land for housing through the Local Plan Allocations document.</p> <p>The latest Draft Local Plan Allocations - Focused Changes document (2018) demonstrates that Burntwood will accommodate approximately 9% of the districts housing growth. One of the proposed sites for development in Burntwood is allocated in the Green Belt which will necessitate the</p>	<p>Green Belt boundaries can only be reviewed through a Local Plan Review. This is not a matter for the BNDP. If this is pursued it should be through the Lichfield Land Allocations Plan.</p> <p>Green Belt boundaries can only be reviewed through a Local Plan Review. This is not a</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>boundaries of the Green Belt to be amended.</p> <p>The Lichfield Local Plan Allocations document is set to be submitted to the Secretary of State in June 2018 with examination expected to commence in October 2018. Subject to the Inspectors view, we would expect adoption of the Local Plan Allocations document in early 2019. We note that the Local Plan examination may result in several changes to the Local Plan Allocations document including possible amendments to the proposed numbers of dwellings allocated to Burntwood and to Green Belt boundaries to facilitate housing and development needs.</p> <p>In light of the above we consider the BNDP needs to be flexible to changing circumstances to allow for the potential to modify Green Belt boundaries in order to facilitate housing allocations . Considering the above, we consider that any emerging housing policy in the BNDP should align with the strategic housing growth policies for Burntwood over the plan period.</p> <p>Changing Policy Context: Meeting Future Housing Need</p> <p>There is a need for Local Authorities within the Greater Birmingham Functional Housing Market Area (HMA) to consider how they can assist in meeting unmet housing need within Birmingham and the Black Country. In this respect, the Greater Birmingham Housing Market Area (HMA) Strategic Growth Study (February 2018), jointly produced by GL Hearn and Wood Plc was commissioned by the 14 Local Authorities comprising the Greater Birmingham Functional HMA, namely: Birmingham City Council, Bromsgrove District Council, Cannock Chase Council, Dudley Metropolitan Borough Council, Lichfield District Council , North Warwickshire Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, Redditch Borough Council, South Staffordshire Council, Stratford-on-Avon District Council, Tamworth Council, Walsall Council and Wolverhampton City Council Overall, the Strategic Growth Study concludes</p>	<p>matter for the BNDP. If this is pursued it should be through the Lichfield Land Allocations Plan.</p>

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		<p>that on the basis of the current evidence provision, between 205,000 – 246,000 homes are needed across the Greater Birmingham Functional HMA to 2031; and provision of between 256,000 – 310,000 homes to 2036 (from a 2011 baseline) to meet the Greater Birmingham HMA’s housing needs. Although not yet finalised, the 14 Local Authorities, which comprise the Greater Birmingham Functional HMA, will have to decide how housing will be distributed throughout the region. Many of the more rural Local Authorities in the sub-region will take a proportion of the unmet need from urban Local Authorities. At present, Lichfield District is undertaking a Local Plan Review with the aim to create a new Local Plan that will provide direction on the future growth of the area. The Birmingham Strategic Growth Study is part of the evidence base for the Local Plan Review and it is expected that Lichfield District will therefore take a proportion of the identified housing needs associated with the Functional HMA.</p> <p>The current spatial strategy in the adopted Local Plan Strategy focuses the majority of growth at the most sustainable locations in the district, which includes Burntwood. The Local Plan Review (Scope, Issues and Options) is currently being consulted on and provides Lichfield Council with the opportunity to review the current strategy to ensure the district meets the growing needs of the district. The Local Plan Review is also considering the levels of growth needed for the future and how this need should be met. One of the four residential growth options would see the majority of growth focused upon the major settlements within and adjacent the District, including Burntwood.</p> <p>Having regard to the above, we consider there is a reasonable likelihood that Burntwood will continue to accommodate a proportion of any future growth for the district. By definition in the Lichfield Local</p>	

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		<p>Plan Strategy, Burntwood is a second-tier large centre that provides a good range of services and facilities, including a primary school, public transport, community facilities, and convenience retail and health services. The Commissioners' sites are within walking distance of the Burntwood Town Centre and development of these can be brought forward in keeping with the character of the area, and sympathetic to the landscape and visual amenities of the area, whilst contributing to the housing needs of the District and sub-region.</p> <p>Changing Policy Context: National Planning Policy Framework and Green Belt</p> <p>The NPPF, adopted March 2012, sets out the Government's planning policies for England and how they should be applied. At present, Chapter 9 of the NPPF addresses Protecting Green Belt land. In particular, Paragraph 83 of the NPPF highlights that '...Green Belt Boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.' Therefore, Lichfield District, as the strategic plan-making body, has the authority to alter Green Belt boundaries through the preparation or updating of Local Plans.</p> <p>The NPPF is currently being revised by the Government; a consultation on the draft revised text of the NPPF ran from 5th March 2018 to 10th May 2018. Of particular importance is Chapter 13: Protecting the Green Belt, which sets out in Paragraph 135 that '... where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to those boundaries may be made through local policies, including neighbourhood plans.' The draft revised NPPF is not yet Government policy, however, a final version is expected to be published in July 2018. Draft Paragraph 135 gives clear indication on the Government's intentions and direction of travel. If the proposed NPPF changes are incorporated, then alterations to Green Belt boundaries may be</p>	<p>The review of NPPF is not complete and until such a time Green Belt boundaries can only be reviewed through a Local Plan Review. This is not a matter for the BNDP. If this is pursued it should be through the Lichfield Land Allocations Plan.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>made through the Local Plan or a Neighbourhood Plan. As such, with a demonstrated need for Green Belt release, the BNDP could amend the Green Belt boundaries around Burntwood.</p> <p>Conclusions Our Client supports the principle and production of the BNDP, however we suggest that consideration should be given to the changing policy context. The Local Plan Allocations DPD is yet to be subject to examination, the Local Plan Review is at an early stage that may necessitate further Green Belt release around Burntwood, and there are potential forthcoming changes to the NPPF which would enable neighbourhood plans to change Green Belt boundaries.</p> <p>We would request that consideration is given to potential Green Belt release and the role that the BNDP may have in shaping this in progressing the BNDP. We have identified how our Client's Sites, known as, 'Land west of Ironstone Road and Stables Way, Burntwood' and 'Land west of Stables Way, Burntwood', could assist with the sustainable delivery of housing.</p>	<p>Green Belt boundaries can only be reviewed through a Local Plan Review. This is not a matter for the BNDP. If this is pursued it should be through the Lichfield Land Allocations Plan.</p>
34	Wallace Land Investments	<p>Wallace support the preparation of a Neighbourhood Plan (NP) and understand the importance of communities and the need for communities to have a say in how their area grows and continues to thrive.</p> <p>It is noted that the Burntwood NP is in general conformity with the Lichfield Local Plan Strategy 2009-2029 and the saved policies of the 1998 Lichfield District Local Plan. Lichfield District are also preparing a Local Plan Land Allocations document which will allocate land, this is currently under examination. It is Wallace's view that the saved policies of the 1998 Local Plan are now time expired and should be given reduced weight in influencing the direction of the NP. Indeed a number of these policies are to be deleted and/or superseded by the emerging Land Allocations Plan, which is at a progressed stage. This includes Policy B22 Recreation Zones which is</p>	<p>Supporting comment noted.</p> <p>Saved policies remain part of the development plan until replaced. No change.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>to be deleted and therefore this policy should not be included or shown in the NP.</p> <p>The current consultation does not appear to be accompanied by a Basic Conditions Statement that sets out the key objectives of the NP and how this conforms to the Local Plan, however having reviewed the consultation document we do not consider that the Basic Conditions are satisfied and therefore the NP is at risk of being unsuccessful at examination in due course.</p> <p>We would highlight that once the Land Allocations document is adopted, which is set to be before the end of 2018, the NP would be out of date as it would no longer conform to the Local Plan (as alluded to above).</p> <p>The Neighbourhood Plan</p> <p>In the context of our comments above we would advise that proceeding with the NP at this point in time will result in a need for an early review of the NP once the Allocations Plan is adopted. As such, we would suggest that the NP awaits the adoption of the Allocations Plan and then proceeds under the guide of the emerging Local Plan Review which is subject to simultaneous consultation now, closing 11th June.</p> <p>The emerging Local Plan Review confirms that:</p>	<p>The Basic Condition Statement is a requirement of the Regulation 15 Submission Stage.</p> <p>There is nothing to prevent a neighbourhood plan coming forward at the same time as a Local Plan. The BNDP would not be out of date it is being prepared to take into account the Local Plan Strategy and emerging policy in the Land Allocations Plan. No change.</p> <p>Committee to consider adding a Monitoring and Review section to the BNDP.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p><i>“...in time these neighbourhood plans will need to be reviewed to bring them in line with the strategic requirements of the emerging Local Plan Review. For most parishes, this is likely to require changes to the neighbourhood plan. As part of the Local Plan Review process, the Council will engage with each parish to ascertain how they wish to plan for these changes.”</i></p> <p>It is Wallace’s opinion that the least abortive option would be to put the NP on hold until such time as the Allocations Plan is adopted and then the NP can be prepared in line with the emerging Local Plan Review.</p> <p>Housing</p> <p>The NP at this time sets an objective: <i>“To support the development of quality new housing and living environments that meet the community’s needs”</i>. To achieve this objective the NP relies on the adopted Local Plan housing allocation at Burntwood Bypass. It should be noted that this development is now almost built out and fully delivered. It is considered that this previous Local Plan allocation has now delivered and met the need previously identified. The NP should now be looking towards future growth and needs of Burntwood. In order to really have an impact, it should be working alongside the Local Plan Review to secure appropriate growth for Burntwood.</p> <p>Lichfield falls within the Greater Birmingham Housing Market Area (GBHMA), it therefore is one of fourteen authorities with a duty to cooperate and work together to meet the unmet needs of Birmingham. The latest publication on the GBHMA by GL Hearn published in February 2018 concludes that over the 2011-2031 period, a provision of between 205,000-246,000 homes (minimum) is needed across the Birmingham HMA to 2031, and provision of between 256,000-310,000 homes (minimum) to 2036 to meet the Birmingham HMA’s housing needs. The fluctuation between these figures depends upon which economic scenario is applied. Based on current</p>	<p>The issue of whether to include housing allocations in the BNDP has already been considered and rejected. This issue is dealt with through the Local Plan/Land Allocations Plan. No change.</p>

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		<p>supply assumptions and taking into account proposed allocations in emerging plans, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Birmingham HMA.</p> <p>The emerging Local Plan Review acknowledges that Lichfield needs to plan for some of this unmet need and indeed Burntwood is a sustainable settlement to which growth should be directed. The Town has seen relatively limited growth and less than was previously envisaged to be sustainably delivered as part of the previous Core Strategy. Burntwood is capable of delivering additional development, it can provide a mix and range of properties at values that will meet need and demand in the market. Such development can facilitate positive infrastructure improvements to the Town that for the benefit of new and existing residents alike. Release of Green Belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood.</p> <p>Green Belt Review</p> <p>It is evident from the emerging Local Plan Review that Green Belt Land release will be needed in order to meet the needs of Lichfield DC and the unmet needs of the wider GBHMA. The NP should be mindful of this and as noted previously, it should make reference to this so as not to become out of date immediately upon adoption of the Allocations Plan.</p> <p>The NP should follow the strategic direction of growth, which in the emerging Local Plan Review is that Green Belt land will need to be released for development. The NP has the opportunity to work with the Local Plan process to identify sites for release and therefore have some control over where land is released and how much.</p>	<p>Green Belt boundaries can only be reviewed through a Local Plan Review. This is not a matter for the BNDP. If this is pursued it should be through the Lichfield Land Allocations Plan.</p>

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>When releasing land from the Green Belt the Local Plan and NP should not solely look at the contribution to Green Belt purposes, it should also look at other technical constraints that may affect deliverability, as well as the opportunities and benefits of a site, such as its proximity to services and the existing community and its ability to provide for community space and needs alongside new residential development.</p> <p>Wallace have undertaken an assessment of the opportunities and constraints across Burntwood and this has identified that the land to the east and south east of the settlement is the least constrained and best related to existing services and facilities. We would be happy to discuss this further with the NP Group should this be of interest.</p>	
35	Pegasus on behalf of Bloor Homes	<p>Vision & Objectives</p> <p>The Vision for 2029 is supported by Bloor Homes, however, it should be noted that the Local Plan Review currently being undertaken by Lichfield District Council is suggesting a plan period to 2036.</p> <p>As captured within the Vision, it will be important for Burntwood to be open to new opportunities to address the key planning issues identified. These opportunities may include the provision of new high quality homes, including affordable provision, to support existing services and facilities and assist in facilitating improved social, physical and green infrastructure. Therefore, the emerging Neighbourhood Plan should recognise that new housing development present opportunities, if properly planned for, to play a positive role in towns, providing an opportunity to help grow the economy and to sustain and improve infrastructure, services and facilities.</p> <p>“the objectives identified are broadly supported by Bloor Homes as these relate back to the identified issues and have links to the Vision.</p>	<p>Until the Local Plan is reviewed the plan period for the BNDP is to 2029. No change.</p> <p>Comment noted. No change.</p> <p>Supporting comment noted.</p>

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		<p>Further clarification is sought in respect of Objective 8. As written it is not clear whether the objective is seeking to protect access to the surrounding countryside or whether its intention is to prevent any development beyond the existing urban area of Burntwood. If it is the latter, Bloor Homes would contend that it is not the role of a Neighbourhood Development Plan to prevent or limit the amount of development that is appropriate to an area. The appropriate level of growth will be considered through the Local Plan Review having regard to not only locally derived needs but other factors including cross boundary requirements. The current Local Plan Review will establish a new housing requirement for the District, having regard to local needs and cross boundary pressures and make important decisions on the spatial distribution of planned growth. This may require development beyond the existing urban area, where a range of technical evidence will be considered, including landscape quality and importance of land against the Green Belt purposes.</p> <p>Neighbourhood Plan Policies</p> <p>The Neighbourhood Plan Policies are broadly supported by Bloor Homes. Providing policies that relate to each identified objective provides clarity, however it is noted that no draft policies are provided in respect of Objective 8 (to protect and improve access to the surrounding countryside). Bloor Homes therefore consider that it is necessary to remove Objective 8 from the Neighbourhood Development Plan on the basis that the Plan provides no appropriate means by which to deliver this objective.</p> <p>LAND AT COULTER LANE, BURNTWOOD</p> <p>Bloor Homes has a controlling interest in land at Coulter Lane, Burntwood. The site lies within site references: 494, 907 and 1123 as identified within the District Council's Strategic Housing Land Availability Assessment (SHLAA)</p>	<p>Objective 8 seeks to protect the countryside and improve access. It is acknowledged that Green Belt boundaries can only be reviewed through a Local Plan Review and the Town Council will seek to ensure the countryside is protected through the Local Plan process not through a policy in the BNDP.</p> <p>Comment noted. No change.</p> <p>Green Belt boundaries can only be reviewed through a Local Plan Review. This is not a matter for the BNDP. If this is</p>

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		<p>most recently published in July 2017. Further submissions have been made on behalf of Bloor Homes in respect of this site through the Council’s ‘call for sites’ process and the emerging Local Plan Allocations process.</p> <p>Land East of Coulter Lane</p> <p>Land to the East of Coulter Lane is approximately 4.5 hectares and abuts the existing modern residential development delivered on the former St Matthew’s hospital site.</p> <p>CONCLUSIONS</p> <p>Bloor Homes supports the preparation of the Burntwood Neighbourhood Development Plan as it provides a positive opportunity for the local community to have greater influence on the form and location of new development.</p> <p>In light of the shifting sands of housing policy at the local level, the Neighbourhood Plan process could provide a positive opportunity for the local community to have greater influence on planning matters that have implications for Burntwood. However, to maximise this influence it is important to ensure alignment with up to date strategic policies currently being formulated by the District Council. Delaying the production of the Neighbourhood Development Plan or aligning it with the timescales for the District Council’s Local Plan Review would provide an opportunity to consider any changes to the planning context for Burntwood and ensure the NDP remains up to date over a longer time frame.</p> <p>Bloor Homes supports the Neighbourhood Development Plan position that it will be important for Burntwood to be open to new opportunities to address the key planning issues identified. These opportunities may include the</p>	<p>pursued it should be through the Lichfield Land Allocations Plan.</p>

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		<p>provision of new high quality homes, including affordable provision, to support existing services and facilities and assist in facilitating improved social, physical and green infrastructure. Therefore, the emerging Neighbourhood Plan should recognise that new housing development present opportunities, if properly planned for, to play a positive role in towns, providing an opportunity to help grow the economy and to sustain and improve infrastructure, services and facilities.</p> <p>The development of land at Coulter Lane represents a logical, modest extension to Burntwood that could deliver around 480 new homes, including starter homes, family homes and homes for downsizers. This site will continue to be promoted as a 'sound' housing allocation through the Local Plan Review. It provides an opportunity to assist in addressing the issues highlighted within the emerging Neighbourhood Development Plan and in delivering the identified objectives, through economic benefits highlighted at Appendix 1.</p> <p>The benefits associated with the development of land at Coulter Lane represent an opportunity, as referred to within the Vision, to assist in the delivery of the identified objectives of the Neighbourhood Development Plan.</p>	
36	GVA on behalf of Metacre Ltd.	<p>GVA is town planning adviser to Metacre Ltd. Metacre is part of Northern Trust - a developer of commercial and industrial premises and the promoter of high quality, sustainable housing schemes. Our Client has recently agreed terms with the Bradshaw family for the promotion of its land at Bleak House Farm for housing.</p> <p>The site extends to approximately 29ha (71 acres) and is bound to the west by Stables Way, to the north by Sevens Road and to the east by Rugeley Road. The buildings associated with Bleak House Farm occupy land in the</p>	The site is within the Green Belt. Green Belt boundaries can only be reviewed through a Local Plan Review. This is not a matter for the BNDP. If this is pursued it should be through the Lichfield Land Allocations Plan.

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		<p>south west corner of the site. The remainder of the site is open and undeveloped and used for grazing, haylage and a small amount of crop production. The site is in single ownership and can currently be accessed off Ironstone Road, Stables Way and Rugeley Road. A site location plan is enclosed.</p> <p>Over the coming months, our Client will be carrying out various technical assessments to determine what form and scale of development might be most appropriate here and to create a vision of the delivery of a sustainable community. As things currently stand, it is envisaged that the development will be primarily residential. However, consideration is also being given to retaining the farm shop and café and enhancing these facilities with the provision of the recently approved craft / artisan units, together with other uses needed to support the wider development and create a sense of place. Ensuring the right amount of open space, and its location, within any development will also be of key importance.</p> <p>Our Client’s objective is to secure the release of the site from the Green Belt, and its allocation for development, through the Local Plan review. This is a process that will take time, during which there will be much to do and many things to consider. However, throughout this period, Metacre is keen to work with the District Council and the Town Council to ensure that what it brings forward is appropriate to Burntwood and delivers significant benefits. To that end, our Client will be in touch shortly with a view to arranging a meeting during which they will tell you more about Metacre and the approach that it takes to projects such as this. They would also like to take that opportunity to hear from you about the challenges that Burntwood faces and the opportunities that exist to address some of these. On a separate but related matter, our Client notes that the Draft Neighbourhood Plan proposes a ‘Protected Open Space’ designation to the immediate north of Kingsdown Road which extends over Bleak House Farm</p>	

Reference	Respondent	Summary of Comments	Recommended Town Council Response/Action
		<p>land – land that is currently in agricultural use. In light of the fact that the provision and design of open spaces will be a key consideration for our Client when masterplanning the site, it may be that making such a designation now could be considered as premature and that the best way to deal with open space provision would be for the Town Council and our Client to work jointly on the masterplanning phase and help shape the proposals that way. Such joint working will enable all parties to take a fully informed and comprehensive view on the role that open spaces play within and adjacent to the development. It will also help determine where, within the proposed development, open spaces should be located so as to create the best possible ‘place’ and ensure that the proposed development integrates appropriately with the existing urban area.</p> <p>If the Council is happy to proceed on this basis, then our Client would be pleased to arrange the necessary discussions. In the meantime, we would be grateful if, in the next iteration of the Plan, the boundary of the open space designation could be drawn so as to run along the southern boundary of the Bradshaw family’s ownership.</p> <p>We would very much welcome a dialogue on this matter and look forward to having discussions with you in due course. If you have any immediate observations or questions, please do not hesitate to contact me.</p> <p>GVA is town planning adviser to Metacre Ltd. Metacre is part of Northern Trust - a developer of commercial and industrial premises and the promoter of high quality, sustainable housing schemes. Our Client has recently agreed terms with the Bradshaw family for the promotion of its land at Bleak House Farm for housing.</p> <p>The site extends to approximately 29ha (71 acres) and is bound to the west by Stables Way, to the north by Sevens Road and to the east by Rugeley Road. The buildings associated with Bleak House Farm occupy land in the</p>	

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		<p>south west corner of the site. The remainder of the site is open and undeveloped and used for grazing, haylage and a small amount of crop production. The site is in single ownership and can currently be accessed off Ironstone Road, Stables Way and Rugeley Road. A site location plan is enclosed.</p> <p>Over the coming months, our Client will be carrying out various technical assessments to determine what form and scale of development might be most appropriate here and to create a vision of the delivery of a sustainable community. As things currently stand, it is envisaged that the development will be primarily residential. However, consideration is also being given to retaining the farm shop and café and enhancing these facilities with the provision of the recently approved craft / artisan units, together with other uses needed to support the wider development and create a sense of place. Ensuring the right amount of open space, and its location, within any development will also be of key importance.</p> <p>Our Client’s objective is to secure the release of the site from the Green Belt, and its allocation for development, through the Local Plan review. This is a process that will take time, during which there will be much to do and many things to consider. However, throughout this period, Metacre is keen to work with the District Council and the Town Council to ensure that what it brings forward is appropriate to Burntwood and delivers significant benefits. To that end, our Client will be in touch shortly with a view to arranging a meeting during which they will tell you more about Metacre and the approach that it takes to projects such as this. They would also like to take that opportunity to hear from you about the challenges that Burntwood faces and the opportunities that exist to address some of these. On a separate but related matter, our Client notes that the Draft Neighbourhood Plan proposes a ‘Protected Open Space’ designation to the immediate north of Kingsdown Road which extends over Bleak House Farm land – land that is currently in agricultural use. In light of the fact that the</p>	

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		<p>provision and design of open spaces will be a key consideration for our Client when masterplanning the site, it may be that making such a designation now could be considered as premature and that the best way to deal with open space provision would be for the Town Council and our Client to work jointly on the masterplanning phase and help shape the proposals that way. Such joint working will enable all parties to take a fully informed and comprehensive view on the role that open spaces play within and adjacent to the development. It will also help determine where, within the proposed development, open spaces should be located so as to create the best possible 'place' and ensure that the proposed development integrates appropriately with the existing urban area.</p> <p>If the Council is happy to proceed on this basis, then our Client would be pleased to arrange the necessary discussions. In the meantime, we would be grateful if, in the next iteration of the Plan, the boundary of the open space designation could be drawn so as to run along the southern boundary of the Bradshaw family's ownership.</p>	
37	Highways England	Amend par 3.18 to reference A5 and that M6 Toll is operated by Midland Expressway Ltd.	Amend as suggested.