

**To: Leader and Members of the Executive Board
(Councillors M Stanley, Hayfield, Humphreys, Moore, Morson, Phillips, Simpson, Smith and Sweet)**

For the information of other Members of the Council

For general enquiries please contact David Harris, Democratic Services Manager, on 01827 719222 or via e-mail - davidharris@northwarks.gov.uk.

For enquiries about specific reports please contact the officer named in the reports.

The agenda and reports are available in large print and electronic accessible formats if requested.

EXECUTIVE BOARD AGENDA

24 SEPTEMBER 2012

The Executive Board will meet in the Committee Room at The Council House, South Street, Atherstone, Warwickshire on Monday 24 September 2012 at 6.30pm.

AGENDA

- 1 Evacuation Procedure.**
- 2 Apologies for Absence / Members away on official Council business.**
- 3 Disclosable Pecuniary and Non-Pecuniary Interests**

PART A – ITEMS FOR DISCUSSION AND DECISION (WHITE PAPERS)

- 4 **Core Strategy – Next Steps** – Report of the Assistant Chief Executive and Solicitor to the Council

Summary

This report seeks the Board's approval to progress the Core Strategy to the final stages of consultation prior to formal submission to Government.

The Contact Officer for this report is Dorothy Barratt (719250)

- 5 **Business Rate Retention Pooling Proposal** – Report of the Deputy Chief Executive to follow

Summary

This report proposes that the Council confirms that it will participate within a Business Rate Retention Pool along with all other Warwickshire District Councils, Warwickshire County Council and Coventry City Council from 1 April 2013.

The Contact Officer for this report is Sue Garner (719374)

PART C – EXEMPT INFORMATION (GOLD PAPERS)

- 6 **Exclusion of the Public and Press**

Recommendation:

That under Section 100A(4) of the Local Government Act 1972, the public and press be excluded from the meeting for the following item of business, on the grounds that it involves the likely disclosure of exempt information as defined by Schedule 12A to the Act.

- 7 **Coleshill Leisure Centre – Project Management and Appointment of Architect Led Design Team** - Report of the Assistant Director (Streetscape) to follow

The Contact Officer for this report is Richard Dobbs (719440)

JERRY HUTCHINSON
Chief Executive

Agenda Item No 4

Executive Board

24 September 2012

Report of the Assistant Chief Executive and Solicitor to the Council

Core Strategy – next steps

1 Summary

- 1.1 This report seeks the Board's approval to progress the Core Strategy to the final stages of consultation prior to formal submission to Government.

Recommendation to the Council

Recommend that Council approve the submission publication version for submission to the Secretary of State following a statutory six week pre-submission publication period.

2 Consultation

- 2.1 Councillors Sweet, Winter, M Stanley, Simpson and Hayfield have been sent an advanced copy of this report for comment. Any comments received will be reported verbally at the meeting.

3 Background

- 3.1 The Borough Council has now completed a further 12 week consultation on its proposed Draft Core Strategy. The main purpose of this report is to bring those comments to members with any suggested changes and to agree a Submission version to be sent out for its final consultation prior to formal submission to the Government.
- 3.2 Members should be aware of the name change for the Core Strategy. The recent regulations talk about the Local Plan for the Borough rather than the individual documents. In order to avoid confusion and to ensure that generally it is realised that the Core Strategy is part of the Local Plan the title of the document will be Core Strategy – part of the Local Plan for North Warwickshire. The Local Plan for North Warwickshire will eventually include other documents such as the Site Allocations Plan, Development Management Plan, Gypsy and Travellers Plan and Neighbourhood Plans.

4 Representations

- 4.1 There have been 88 representations made to the Plan during the period 31 May to 23 August 2012 with an additional representation received recently. These are summarised at Appendix A. Alongside each summary is a suggested response. The main issues that come out of the representations are outlined and discussed further below.
- 4.2 The consultation was carried out in tandem with the Draft Infrastructure Delivery Plan and the very initial stages of consultation on the Development Management and Gypsy and Travellers DPD's. These other documents will be considered in a future meeting of the LDF Sub-Committee.

5 Main Issues

5.1 Duty to Co-operate

- 5.1.1 As Members are fully aware the Duty to Co-operate was introduced by the Localism Act 2011 and requires the Council with other organisations to work together. A separate report has been prepared – Appendix B.

- 5.1.2 The following summaries some of the main issues:

- *Birmingham City Council* is supportive of the Core Strategy but is now seeking changes to reflect the fact that very recent information on their housing numbers indicates that there may be a need to look outside of their current boundaries.
- *Coventry, Solihull & Warwickshire sub-region* - Work is progressing on a Memorandum of Understanding on the future of the sub-region.
- *Nuneaton & Bedworth* - Their concerns are essentially about ensuring there are no detrimental impacts on Nuneaton and Bedworth from the point of ensuring there is sufficient housing and not over supplying employment land whilst ensuring adequate infrastructure provision. Also they are keen for the previous Regional Logistic sites to be retained as such.
- *English Heritage* – changes requested to ensure compliance with NPPF.

Suggested response

- 5.2 In relation to Birmingham City Council it is suggested that a change in wording could be made but in a general way. A section on the Duty to Co-operate has been added to the introduction of the Core Strategy to refer to reviews generally. The Core Strategy has been altered to include a section on reviews of the Plan generally rather than dealing purely with Birmingham's situation. The suggestion covers the fact that situations will change with more up to date evidence and that as and when these arise the Borough Council will consider what changes, if any, it needs to make to the current Core Strategy.

5.3 There are no changes at the present time from the comments by Nuneaton and Bedworth or Coventry City Council but further discussions will take place with the Councils.

6 **Housing and Employment Numbers**

6.1 There are a range of representations relating to housing and employment numbers. Some say that we have not planned enough housing whilst others are concerned at the over supply of employment land.

Overall housing numbers

6.2 Nuneaton and Bedworth BC are worried about a potential under provision of housing in North Warwickshire. This is due to the potential impact this may have on increasing the housing pressure in Nuneaton and Bedworth. They are keen to have reassurances that this Borough will deal with its own housing requirement and so not put increased pressure on them to provide on our under-supply.

6.3 Other representations seek a much higher housing requirement taking the housing requirement over 4,000 units for North Warwickshire's needs alone. Some of these representations look to change the plan period and change the way the figures are calculated.

6.4 With the nearing abolition of the Regional Spatial Strategy it is now up to this Council to determine its own housing figures. As Members will recall a paper was presented to the LDF Sub-committee setting out the various options for a potential housing target. The aim of the housing target is to deal with our own housing requirement. The housing figure in the Core Strategy is a minimum requirement. Due to the nature of the Borough a delivery rate to achieve a much higher housing target is questionable. Therefore the housing target set is seen as deliverable yet still challenging.

5% or 20% Buffer

6.5 The Core Strategy uses a 5% buffer to the housing figures. There are representations that question this approach as the delivery of housing has not matched the anticipated 150 per annum over the Plan period to date. It is recommended that this approach is maintained as the Plan provides the strategic framework for development and has been positively prepared encouraging growth. In addition the Borough Council is actively working towards publishing a Site Allocations Plan.

Numbers of housing to settlements

6.6 As a result of representations made in relation to the number of houses in Newton Regis officers have looked at the numbers compared to the approximate number of houses in every settlement. As a result it is suggested that the numbers for Newton Regis be reduced from 40 to 15 and that the numbers for Polesworth and Dordon be increased from 415 to 440.

This is set out in Table 1 below. As can be seen this change gives consistency in the number of dwellings directed to settlements in the same categories.

Table 1: Number of Proposed Houses between Draft Core Strategy and Proposed Submission Core Strategy

SETTLEMENT	GREEN BELT	APPROX DWELLINGS IN SETTLEMENT	PROPOSED DWELLINGS IN DRAFT	% INCREASE	REVISED FIGURE FOR SUBMISSION	% INCREASE	% DIFFERENCE
Atherstone & Mancetter	NO	5042	600	11.90	600	11.90	0
Polesworth & Dordon	NO	4212	415	9.85	440	10.45	0.6
Coleshill	YES	2985	275	9.21	275	9.21	0
Grendon & Baddesley Ensor	NO	1455	180	12.37	180	12.37	0
Hartshill with Ansley Common	NO	1899	400	21.06	400	21.06	0
Old & New Arley	YES	1286	90	7.00	90	7.00	0
Kingsbury	YES	1608	50	3.11	50	3.11	0
Water Orton	YES	1503	50	3.33	50	3.33	0
Ansley		645	40	6.20	40	6.20	0
Austrey	NO	396	40	10.10	40	10.10	0
Curdworth	YES	479	15	3.13	15	3.13	0
Fillongley	YES	647	30	4.64	30	4.64	0
Hurley	YES	678	30	4.42	30	4.42	0
Newton Regis	NO	165	40	24.24	15	9.09	-15.15
Piccadilly	YES	182	5	2.75	5	2.75	0
Shuttington	NO	151	10	6.62	10	6.62	0
Shustoke	YES	232	15	6.47	15	6.47	0
Warton	NO	529	45	8.51	45	8.51	0
Whitacre Heath	YES	246	20	8.13	20	8.13	0
Wood End	PART	741	30	4.05	30	4.05	0
TOTAL			2380		2380		

Proportions of proposed housing between the Settlement Categories

6.7 The above changes would mean that the split of housing between the various categories still aims most develop to the main towns with still sizeable but more equitable numbers being targeted at the smaller range of settlements. This is shown in Table 2 below.

Table 2: Split of housing numbers to Category of Settlements

Percentage of development to Market Towns	54.20
Percentage of development to Local Service Centres	32.35
Percentage of development to other settlements	13.45

Employment Land Numbers

- 6.8 There is a concern raised by Nuneaton and Bedworth that we are not providing for a strategic provision of employment land because we have said that the 20 hectares originally earmarked for Hams Hall should now be floating outside of the Green Belt and which may be able to help with any spin-offs from the Enterprise Zone at MIRA. The CWLEP however fully supports the Council's stance and considers we are being flexible in our approach. In addition, Birmingham City Council, who have in the past voiced concern over the amount of employment land in North Warwickshire because it would take away regeneration opportunities for the conurbation, has supported the Core Strategy in terms of its employment policies.
- 6.9 There has been a representation made by E.on to say they now want the site at Hams Hall to be used for logistics use. This is following a developer enquiry in August 2012. Unlike Birch Coppice there has been no approach for logistics on this site since the refusal of planning permission for B8 use in 2006. Interest has been shown for a power generation use. The stance the Core Strategy has taken is to become more flexible in how it handles the possible development of the 20 hectares but doing this within the overall strategy of the Core Strategy, essentially targeting it outside of the Green Belt. In addition, the NPPF supports this stance as it sees the retention of the Green Belt as important.

7 Sustainable Development

- 7.1 The re-use of sites in the countryside is a contentious issue. Representations have been made seeking the development strategy to be altered to allow brownfield sites in the countryside to come forward for development if they fulfil certain requirements. Government through the NPPF encourages the re-use of Brownfield sites. However the core essence of the NPPF is development is sustainable. The agreed Core Strategy has a strategy which directs development to the most appropriate location

8 Next Steps

- 8.1 The next step for the Core Strategy is for it to put the final proposed Submission Core Strategy out for a further six week statutory consultation period. As this is set out in regulations we are not able to comply with the Warwickshire Compact with a further 12 week consultation period. We will however endeavour to send out information in a timely manner as soon as practicable.
- 8.2 A copy of the proposed submission Core Strategy is attached as Appendix C. Some additional minor changes are still outstanding and will be brought to members' attention as soon as they are complete.
- 8.3 The intention is to commence the consultation on the 8 November and finished on Thursday 20 December. This is in accordance with Regulation 19

in accordance with the Town & Country Planning (Local Planning) (England) Regulations 2012.

- 8.4 Subject to no adverse comments that would significantly undermine the Strategy the document will be formally submitted for consideration by the Secretary of State. An Inspector will be appointed by the Planning Inspectorate and the Examination process will begin.
- 8.5 It should be noted that once the document has been submitted to the Secretary of State the document can not be changed, although minor changes can be suggested to the Inspector.

9 Other Documents

Sustainability Appraisal / HRA

- 9.1 All development plan documents are required to undergo Sustainability Appraisal and a Habitats Regulations Assessment. A Sustainability Appraisal and a Habitats Regulations Assessment has been undertaken at each stage of the Core Strategies production. These need to be finally completed prior to the formal consultation period starting incorporating the changes between the Draft and the final Submission. The period between Council's approval of the Submission document and the 8 November will be used to finalise the Sustainability Appraisal and the Habitats Regulations Assessment.

Rural Proofing

- 9.2 Rural Proofing has been carried out on the Submission Core Strategy to ensure there are no adverse effects on the rural nature of the Borough and is attached as Appendix D. The process of rural proofing is actually better placed to deal with detailed policies rather than strategic policies. It however does indicate that the Plan does not have an adverse impact on the rural economy.

...

10 Soundness

- 10.1 This new period of consultation is unlike any other period of consultation as now representations can only be made on the "soundness" of the plan. Unlike the previous rounds of consultation, this stage requires respondents to specify why they consider a policy to be 'unsound', having regard to the 'soundness test'. This effectively means that representations can only be made on whether the Plan is:
- justified;
 - effective;
 - deliverable; and,
 - consistent with the NPPF

This places the onus on the respondent to either find fault with the evidence base or Council's interpretation of it in setting the policy.

10.2 In addition, it also requires the respondent to specify the changes they are seeking to the policy that would resolve the concerns regarding its 'soundness'. To aid in this process, the Planning Inspectorate has produced a model pro-forma for use in making representation at the Regulation 19 stage, along with a detailed guidance note for respondents representations can only be made on the following:

11 Consultation

11.1 An important factor in demonstrating the soundness of the Core Strategy relates to being able to demonstrate public engagement in its development. A paper has been prepared to outline the public consultation undertaken throughout the process and is available on the Council website.

12 Evidence Base

12.1 Core Strategies must be must be founded on a robust and credible evidence base. The Forward Planning team has prepared as well as commissioned a number of studies on key aspects of the social, economic and environmental characteristics of the borough to inform the preparation of the Core Strategy. All of the evidence is available on the Borough's website. The findings of these studies have been used to inform the submission version.

13 National Planning Policy

13.1 The Core Strategy must be consistent with national policy and in 'general conformity' with regional policy, unless there is robust local evidence to justify a departure. It is also important that the policies of the Core Strategy do not simply repeat national or regional policies – the former being a material consideration within the planning process and the latter part of the local development plan.

14 Examination

14.1 The examination process is concerned with the legal compliance and soundness of the document as a whole. Consequently, the focus at the examination is no longer on individual objections as used to be the case at Local Plan inquiries. This fundamental difference means that the Council no longer needs to respond to each and every individual representation but rather to assess the representations made and provide a summary of the main issues raised.

14.2 While the Council can not make any further changes to the Core Strategy prior to submitting the Plan, it can, in response to the summary of issues, prepare a schedule of minor post-publication changes. Copies of all responses received during this pre-submission publication will then be forwarded to the Planning Inspectorate, along with the submission publication version of the Core Strategy, the summary of key issues raised, and the schedule of minor post-publication changes proposed.

- 14.3 Once submitted, it is for the Inspector to determine what additional material, if any, they might want the Council to produce before the Hearing starts. These could include an issue or issues identified by the Inspector but not raised in any representation. This reflects the 'inquisitorial' nature of the examination process. The Inspector will not accept any further unsolicited material after the Core Strategy has been submitted.
- 14.4 Given this requirement, it is therefore fundamental that the Council, when publishing and submitting the Core Strategy must be satisfied that it is sound. In considering the representations and preparing the summary of main issues raised, officers may consider that certain representations might give rise to valid soundness concerns. In such circumstances, officers will bring the information back to Board. Members should note that the Council has no power to withdraw the Core strategy once it has been submitted.

15 Report Implications

15.1 Finance and Value for Money Implications

- 15.1.1 The cost of preparing, publishing, consulting and submitting the Core Strategy is contained within the existing LDF budget (2009)

15.2 Legal and Human Rights Implications

- 15.2.1 The Core Strategy is the key Development Plan Document (DPD) in the Council's Local Development Framework which will provide the overall spatial vision and objectives for the Borough. At the examination in public of the Core Strategy, the Council will be required to demonstrate that the document complies with all the legal requirements set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) relating to the preparation and consultation process of the Core Strategy. A failure to comply with the statutory requirements may result in the Core Strategy being found 'unsound' at the examination in public.

15.3 Environment and Sustainability Implications

- 15.3.1 The Core Strategy will define the strategy of how environmental impacts will be considered as well as setting out what sustainability means to the Borough. A Sustainability Appraisal has been undertaken that has appraised the social, environmental and economic effects of the plan from the outset. This will ensure that decisions are made that contribute to achieving sustainable development. The appraisal has performed a key role in providing a sound evidence base for the plan and formed an integrated part of the plan preparation process.

15.4 Human Resources Implications

15.4.1 It is anticipated that the preparation and then taking part within the Examination process will take up the majority of the time within the Forward Planning team. This may have implications on the time spent on other documents, assisting Parish Council's in the production of Neighbourhood Plans, economic development work and HS2.

15.5 Risk Management Implications

15.5.1 A risk assessment is attached.

15.6 Equalities Implications

... 15.6.1 A full Equality Impact Needs Assessment has been carried out and is attached as Appendix E.

15.7 Links to Council's Priorities

15.7.1 The Core Strategy has links to all the Council's priorities.

The Contact Officer for this report is Dorothy Barratt (719250).

Background Papers

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date

Risk Management Form

**NORTH WARWICKSHIRE
BOROUGH COUNCIL**

Division

Forward Planning

Cost Centre or Service: 2009

Risk Ref	Risk: Title/Description	Consequence	Likelihood (5 = high, 1 = low)	Impact (5 = high, 1 = low)	Gross Risk Rating	Responsible Officer	Existing Control Procedures	Likelihood (5 = high, 1 = low)	Impact (5 = high, 1 = low)	Net Risk Rating
29a	Non-delivery of Core Strategy	<ul style="list-style-type: none"> • Policy vacuum in planning • Decisions affected • Impact on five year housing supply • Affordable Housing not developed sufficiently • Loss of reputation 	3	4	12	Steve Maxey/ Dorothy Barratt	<ul style="list-style-type: none"> • Officer and legal advice • Inspectors form independent objective recommendations- carries significant weight • Member involvement, presentations, meetings, Executive Board and Council • Revised work programme timetable • LDF Sub-committee 	2	3	6
Risk Ref	Options for additional / replacement control procedure						Cost Resources	Likelihood (5 = high, 1 = low)	Impact (5 = high, 1 = low)	Net Risk Rating

Completed By: Dorothy Barratt

Date:08/08/12

REF NO	NAME	ORGANISATION	REF NO	COMMENTS	NWBC RESPONSE
DPSR1	K Simmons		DPSR1A	We own land at Wood End & the need for 30 new houses whether affordable or not the site is available All the other views are good, the only thing that concerns me are sites for travellers.	Support Noted. Sites provision for travellers will be dealt with under the Gypsy and Travellers DPD
DPSR2 DPSR3	Mr C Narrainen P G Sharpe	Inland Waterways Association	DPSR2A DPSR3A	Consistent with National Policy Core Policy NW11 Natural & Historic Environment: The Birmingham & Fazeley Canal and the Coventry Canal are historic waterways and valuable amenity and recreational corridors, providing leisure boating, walking, angling, cycling and nature conservation benefits. Their contribution to the built environment of North Warwickshire is significant with their historic and attractive bridges, locks, cottages, workshops, etc. IWA is aware of 5 Listed structures along the Birmingham & Fazeley Canal and 19 on or adjacent to the Coventry Canal within North Warwickshire. These include 7 locks, 7 bridges, 3 milestones, 2 canal cottages, a drydock, workshops, stables and clock house at Hartshill, an associated public house, a canalside works and a priory. There are also other historic features including further milestones not yet individually protected, and the towpath and canal channel itself. Overall protection of unlisted structures and the setting of listed buildings would be enhanced by Conservation Area status.	Noted. No programme to include Canal structures & waterways within a new Conservation Area, but may be considered in the future. Elements may be included within revised Conservation Area's in urban locations in future. Current National and Local Policy protection considered to provide sufficient protection.
DPSR3			DPSR3B	The Inland Waterways Association appreciates that the value of the Birmingham & Fazeley and Coventry canals within the Borough is recognised in the pre-Submission Core Strategy Many canals have been designated as linear Conservation Areas in recognition of the special architectural and historic interest of their built heritage. The whole of the Coventry Canal and certainly the rural section of the Birmingham & Fazeley Canal have equal historic and amenity value and merit similar protection. North Warwickshire should designate the full length of their canal corridors, including associated and adjacent historic buildings and amenity sites, as Canal Conservation Areas. Ideally this would be in conjunction with neighbouring authorities.	Noted. No programme to include Canal structures & waterways within a new Conservation Area, but may be considered in the future. Elements may be included within revised Conservation Area's in urban locations in future. Current National and Local Policy protection considered to provide sufficient protection.
DPSR3			DPSR3C	The current Pre-Submission Tamworth Local Plan, Policy CP11 says that "The heritage and tourism contribution of the Borough's canal network will be strengthened and promoted through the consideration of a joint designation of a canal based conservation area, in conjunction with Lichfield District Council." IWA requests that NW includes a similar commitment to protection of their canal heritage in the supporting text to Policy NW11	Noted. No programme to include Canal structures & waterways within a new Conservation Area, but may be considered in the future. Elements may be included within revised Conservation Area's in urban locations in future. Current National and Local Policy protection considered to provide sufficient protection.
DPSR4	Harry Siepmann	CAA	DPSR4	Comments made relate to Infrastructure Delivery Plan	No response required
DPSR5	Mike Abbott	Newton Regis, Seckington and No Mans Heath PC	DPSR5A	An allocation of 40 houses for Newton Regis represents a 25% increase whereas the 40 house allocation for Austrey represents only a 10% increase. It was suggested that this imbalance was down to Newton Regis "getting off lightly in the past" (not my words). I have lived in Newton Regis for 24 years and do not believe that there has been significantly more new housing in Austrey in that period in proportion to the respective sizes of the villages. Most of the new housing in Newton Regis has been in the form of barn developments and I challenge NWBC allocation of new houses for Newton Regis made on the basis that it has got off lightly in the past. No recognition has been given to the historic nature of Newton Regis and it's picture postcard image that should be preserved, not destroyed by over-development. The Core Strategy appears to represent an attack on rural communities whose character should be preserved and scant recognition has been given to the fact that these rural communities with their lack of infrastructure, bus services etc cannot support the proposed new housing allocations	Suggested change from 40 dwellings to 15 which is in line with other settlements with a Development Boundary, but not in the Green Belt
DPSR6	Helen Winkler	Tyler Parkes	DPSR6A	The document is not "sound". Apparent that it is not consistent with National Policy on the approach taken to housing allocations. It would be consistent with National Policy to remove land at Tamworth Road out of the greenbelt and be allocated for residential development.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough.

DPSR6	DPSR6B	Welcome the retention of the wording from the Spatial Vision (Housing catering for the needs of residents will be provided in order to give good choice of tenure, location and will be located to take advantage of good public transport, accessibility and to help maintain and enhance the vitality and viability of settlements) Essential for Policies to be included which will promote appropriate levels of growth in line with the objectives of the NPPF. Agree with the settlement hierarchy - appropriate that Kingsbury falls within Category 3B	Support noted.
DPSR6	DPSR6C	Object to lack of any greenbelt land for residential development - object to lack of identification of any "safeguarded" greenbelt land for longer term development as required where necessary by the NPPF	The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough.
DPSR6	DPSR6D	The document states that there is data to indicate that there is more than sufficient land to cater for housing requirements up to and beyond 2028 - yet this appears to be based on the SHLAA which is 2 years out of date and consequently fails to meet the NPPF requirements. Annual housing target not met for past 2 years - given the ongoing economic downturn - real possibility that the authority may continue to meet their needs. No clear definition in the NPPF with regards to "persistent" - we believe it would be logical and fair for this to mean under delivery. We consider it would be unsound for the LPA to fail to make provision in the plan for a 20% buffer above the housing requirements, which may require reassessment of greenbelt boundaries. The Authority should plan beyond the current plan period and safeguard land in the greenbelt for future development.	The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. There is considered to be sufficient sites and land available to avoid the need for releasing Green Belt land except for exception sites and Community Right to Build proposals. Evidence suggests we should retain 5% buffer at current time.
DPSR6	DPSR6E	Insufficient weight attached to actively support the future vitality of existing communities, particularly those with good transport links, by allowing developments which would secure the future of rural settlements an approach supported by the NPPF. - Greater weight should be given to the need to relax the greenbelt to promote sustainable development adjacent the exiting built environment. Kingsbury is a prime example of a vibrant rural settlement where the greenbelt is acting as a strangle hold on sustainable development. We propose that the greenbelt boundary be adjusted to allow for development. Fully support the requirement of NW3 for development to take place in locations having regard to the needs of each location and their capacity to support additional development.	The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. Sites are available within Green Belt settlements and redevelopment opportunities exist. Community Right to Build also available to communities such as Kingsbury if needed.
DPSR6	DPSR6F	Policy NW4 - Object to restriction of development in Kingsbury of 50 new dwellings - firmly believe it is inadequate to meet the need for housing and therefore the policy fails to meet the objectives of the NPPF. Limit of 50 new dwellings to Kingsbury would stifle growth in Kingsbury and risk the viability of the community and facilities. Investment and development in Kingsbury is vital to achieve Warwickshire's Local Transport Plan - Objective 3(securing a replacement station at Kingsbury). The greenbelt is effectively threatening the prosperity of the settlement. Recommend that the ceiling of 50 dwellings be reassessed and a more appropriate figure included to reflect the need to protect services, provide housing for the local community and provide a catalyst for funding for provision of a replacement railway station.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development need. No evidence of funding gap or demand that requires release of Green Belt land to deliver new railway station. No programmed plan for delivery of new station to reflect in Core Strategy. Reference to potential for new station at Kingsbury can, nevertheless, be included in text for sustainable development, local services and facilities or transport sections.
DPSR6	DPSR6G	Policy NW5 - Object to lack of a rural exception Policy - believe that it is imperative that policy provision is made for affordable housing development outside, but adjacent to settlement boundaries in the countryside, including the greenbelt. Consider - not appropriate for "Rural affordable Sites" will be included in future Development Plans or neighbourhood Documents. Production of these documents would delay development of much needed affordable housing in rural locations. In line with the NPPF, we recommend that the Rural exception Policy should be included and should include some provision for allowing some market housing to facilitate the provision of additional affordable housing to meet local needs. In conclusion the Draft Pre-Submission Core Strategy is not sound and does not meet the the tests of soundness in the NPPF in that it is not justified by up to date evidence and is not consistent with National Policy -	Noted: Disagree. By virtue of a proposal being an exception there is no need for an 'exception' policy. NPPF makes allowance for exceptions to policy. No need for duplication of NPPF in Core strategy.

			DPSR6G	(1) need to identify a 20% buffer of housing land allocation (2) realign the greenbelt boundary around thriving rural settlements to allow sustainable development (3) identify "safeguarded" land for future development post plan (4) include a Rural exception Policy 95)realign the greenbelt at Tamworth Road, Kingsbury to allow for sustainable residential development	As above
DPRS7	Mike Abbott	NRS&NMHPC	DPSR7A	6.14. We consider this is the wrong way to allocate housing targets as it completely disregards the ability of the settlement to absorb and accommodate the allocated targets. It takes no recognition of the capacity of the existing infrastructure services, public transport availability and the impact such targets will have on settlements. It is also biased against rural communities who will take a disproportionate share of the housing targets.	Disagree. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries along with the potential of NPPF policy on rural exceptions and Community right to build approach.
DPRS7			DPSR7B	6.15. This clause does not prevent a developer from building the settlement's housing allocation all on one site, either in phases or in one go. Our understanding from attending the consultation meetings on Monday 18th June 2012 is that whatever developers want with regard to phasing and mix and type of housing, it is likely that it will be approved by NWBC.	Noted: The actual implementation of the housing allocation will depend on individual settlement circumstances and number of sites available. Intention is nevertheless to take an incremental growth rather than all at once approach. This issue will be considered in more detail in the Site Allocations Plan and Development Management Plan.
DPRS7			DPSR7C	NW4. The allocation of 40 units for Newton Regis represents a 25% increase compared to the neighbouring village of Austrey which has been given the same allocation of 40 units representing a 10% increase. In our submission of the 3rd January 2012, we stated that there is no demand within the village for new housing on this scale and considered 10 units a reasonable target. At the consultation meetings on Monday 18th June 2012, this disproportionate allocation was queried and NWBC made the statement that "Newton Regis got off lightly in the past" We take great exception to this statement. Not only is it not true but it ignores the fact that Newton Regis is and has been for many years subject to a developments boundary and applications for small developments, other than infill, were turned down by NWBC. The new housing that Newton Regis has provided has mainly been from barn conversions. The other issue that has been completely overlooked in the Core Strategy is the need to protect the character of villages	Suggested change from 40 dwellings to 15 which is in line with other settlements with a Development Boundary, but not in the Green Belt
DPRS7			DPSR7D	Clearly NWBC no longer considers it beneficial to protect the character of our village. NWBC are now proposing to tear up the development boundary and allow a free-for-all without any regard to the impact on one of North Warwickshire's most picturesque and visited villages. Despite NWBC comments that Severn Trent had been consulted and saw no need for additional sewerage services, it is well known in Newton Regis that the sewerage system regularly overflows after heavy rain. NWBC stated that Severn Trent would be re-consulted over this, but without local knowledge and input any such consultation would, at the very least, be flawed. At this time no such request for any information has been received.	Disagree: No intention to "tear up" development boundary. Housing delivery levels considered (once amended) appropriate to the village. Policies NW8, 10, 11 and 12 address development impact on the design, character and local distinctiveness of settlements, sites and wider environment.
DPRS7			DPSR7E	6.51. Due to the totally inadequate provision of public transport in Newton Regis, 40 new housing units would represent approximately 100 additional cars on minor rural roads, an increase in pollution and road safety risk. The idea put forward by NWBC at the consultation meeting that each house could have provision for parking up to four cars is completely against NWBC's own stated policy for Climate Change as recorded above. It would also be against both Warwickshire County Council's policy and H.M. Government's wish to reduce CO2 emissions. We strongly oppose the housing targets for Newton Regis.	Suggested change from 40 dwellings to 15 which is in line with other settlements with a Development Boundary, but not in the Green Belt
DPRS7			DPSR7F	Clause 2.9 makes reference to the possible impact of the HS2 "Y" option following the M42 but makes no mention on the impact it would have on the housing targets for those villages that would be affected, only on local traffic. We would suggest that if the HS2 Y Route is published this Autumn, as forecast, and it follows the M42 corridor, there will be no chance of meeting the housing targets in the rural communities affected which makes the reliance on rural communities to meet such a high housing target appear ill considered. We are concerned at the ready support that NWBC appears to give to wind farm applications in scenic parts of the County and consider the Strategic Plan should include a measure for Landscape Protection to protect the beauty of this area from unsightly and uneconomical wind farms. We consider such areas should be protected by a Landscape Character Designation.	Noted. Discussions are taking place with other local authorities on the possibility of a landscape designation

DPRS8	D Clarke	Network Rail	<p>DPSR8A Comments about Atherstone Railway Station from previous consultation in January have not been taken into consideration. Could you please explain why the council has not taken on board our comments after receiving them? We stated that the footbridge has been removed and yet its refurbishment is still in the pre-submission core strategy. I therefore submit again our comments and request that you include them as below in my original response.</p> <p>In addition I would add that the pre-submission core strategy has not taken on board Network Rail's comments regarding level crossings. I have included a list of the level crossings within the North Warks area which could be impacted by developments that increase the volume or type of traffic crossing them.</p>	Text will be amended to reflect removal of the footbridge and existence of Level Crossings noted and added to text.
			<p>DPSR8A We request that a policy addressing potential impacts from development effecting Network Rail's level crossings is provided confirming that: "The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway; Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010 requires that..."Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using any type of level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval." Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact; and</p>	Disagree: This is inappropriate for inclusion in Core Strategy as policy. Unnecessary duplication. LA's statutory responsibilities and requirements for consultation with Utilities and Infrastructure Agencies/Providers is controlled by, and detailed in, existing Planning Statute and Regulations, not Local planning strategic policy documents.
			<p>DPSR8A The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed. When councils' issue a consultation for the construction/erection of wind turbines Network Rail issue the following condition, "Network Rail would wish to see such equipment sited so that the lateral distance from railway boundary to foot of mast is greater than height of mast + length of propeller blade + 3m. Wind turbulence may be a factor to be considered and the applicant would need to ensure design/position of wind turbine did not present a potential problem for neighbours (railway included). Should the turbines collapse for any reason then the developer should ensure that any fail safe distance will include the wind-turbines potential for topple in the direction of the railway line. Network Rail Asset Protection Engineering involvement may only be needed when constructing or undertaking maintenance of the wind turbine and then only where such activities presented a potential risk to the operational railway".</p>	Noted
			<p>DPSR8A This condition is the minimum requirement we would wish to see any developer take on board as part of any construction or erection and maintenance of any wind turbine(s). This condition is issued as standard, however, where a development does not meet this criteria due to safety implications, Network Rail would either object to the scheme until required asset protection measures were taken or stipulate additional conditions to the council.</p> <p>* North Warwickshire Draft Core Strategy should be made aware that any proposed wind turbine scheme that include as part of the remit the installation of cables under the railway to facilitate any works on site or any methods of electricity transmission would invariably be objected too as this would necessitate works that could damage or undermine the safety, operation and integrity of the railway. Any proposal for a wind turbine(s) that necessitated any cabling/high tension lines over the railway would also be objected too pending negotiation/consents/agreements with our National Business Team.</p>	The Issue of Wind Turbines will be referred to in the Development management DPD. This is inappropriate for inclusion in Core Strategy as policy. Unnecessary duplication. LA's statutory responsibilities and requirements for consultation on planning applications with Utilities and Infrastructure Agencies/Providers is controlled by, and detailed in, existing Planning Statute and Regulations, not Local planning strategic policy documents.

			DPSR8A	<p>* Network Rail is a supporter of sustainable methods of producing energy, but we would welcome the consideration of the details as above and in addition we would request that the council take into serious consideration the following comments as follows:</p> <p>* Developers of turbines must consider shadow flicker and its effect upon railway infrastructure. Network Rail would request that developers must consider when constructing wind turbines or wind farms the likely effect upon the railway, particularly where safety is critical. There may be a minimal risk to driver's vision (how they perceive signalling, the route ahead, stopping in the case of emergency etc) which may be impacted by a wind turbine(s). * Network Rail utilises radio/signalling equipment and we would not want to see this interfered with by wind farms/wind turbines, particularly as it is safety critical and absolutely integral to the operation of the railway.</p>	Noted.
			DPSR8A	<p>*There is some concern that vibration from turbines can affect ground conditions; with the possible issue here being embankments and potential instability (if a turbine was ever located close enough to the railway, in which case Network Rail would raise an objection and would wish consultation on a possible repositioning). The construction of the towers, heavy blades, gearbox and generator as well as guy lines to hold the tower in place put strain on the ground at the base of the structure.* Many wind turbines are now a minimum of a 45 metre long tall tower with concomitant long blades, as such it may be necessary for the developer of any proposal for a wind turbine or turbines to gain consent from Network Rail's Abnormal Loads team to gain permission to cross Network Rail infrastructure in particular over a Network Rail bridge prior to construction on site. Consent may be needed as bridges have a maximum load and a wind turbine(s) plus blades and vehicle transporting said equipment may be over the limit for that bridge.</p>	Response as above
			DPSR8A	<p>* Network Rail should be consulted on applications for wind turbine(s) as standard, and this should be added to the council's policy.*include a reference to improved access to Kingsbury Freight Terminal . Support reference for a new station at Kingsbury - to improve connectivity and support growth on the line to Tamworth. In regards to the point below "2.14 The improved provision of train services to Atherstone is supported. Investment has been made to improve the platforms and the train information signage. There remain issues over car parking and access to the western platform under the bridge on the Watling Street. Although lighting has been improved the replacement or refurbishment of the footbridge is supported. In addition opportunities to improve parking for both the station and the town will be pursued. The introduction of the decriminalisation of parking will impact on the town and the County Council with the Borough Council is investigating ways that this can be introduced."</p>	Response as above
			DPSR8A	<p>* The footbridge at Atherstone railway station has been removed and so 'refurbishment of the footbridge' should be removed from the policy. *With regard to car parking and access – talks are on going between Network Rail and North Warks Council on these issues. *With regard to car parking and access – talks are on going between Network Rail and North Warks Council on these issues. * Network Rail would like clarification on what is meant by the sentence, "The introduction of the decriminalisation of parking..." etc</p>	Response as above
DPRS9	Mr David Cox	Co/ Gary Llewellyn	DPSR9A	<p>Accepted that opportunities will come forward from land within the built up area of the village. Designation of Curdworth as a category 4 settlement is appropriate. Minimum of 15 houses is supported but it should be market housing rather than affordable. Utilisation of a Neighbourhood Plan supported - however its preparation requires both political and financial support in order to achieve the community's aspirations.</p>	Noted: provision of housing should reflect need for both affordable as well as open market, including Community mix and need in terms of size, tenure, type.

			DPSR9B	The expectation that all housing sites should be expected to provide affordable housing is accepted and the level of commuted sum is dependant on the economic viability of a scheme is supported. However reference to a commuted sum being sought from small developments requires further clarification and definition. you would expect, for instance, that the provision of a single dwelling would be done through the aspirations of, say, an individual, rather than a property developer. As such, the matter of costs (rather than profits will be the most important and overriding factor to consider in whether such a development would proceed or not. This would apply equally to a modest family home to a spacious executive home.	Noted: Further Policy development will be consulted on as part of the production of the Development Management Plan document. Viability issues will be addressed in any consideration of thresholds or levels of commuted sums sought. Both Costs and Profits will be elements of any analysis of viability.
			DPSR9C	The provisions of policy NW5 are understood but its content is vague. The reference to "varying thresholds" within the wording of the policy needs to be identified and explained in more detail. Ideally the policy should specify the scale of development, in terms of the number of units where a commuted sum would be sought, subject to viability.	Noted: Further Policy development will be consulted on as part of the production of the Development Management DPD. Viability issues will be addressed in any consideration of thresholds or levels of commuted sums sought.
DPSR10	Tom Arnfield	Fisher German	DPSR10A	Themes of the spatial vision and strategy are greatly supported. Amount of housing allocated to Polesworth and Dordon is considered appropriate. Acknowledge the constrained nature of Tamworth and pressure on the Borough to accommodate its growth - the MOU will identify how this will be addressed. Principles of preventing coalescence between Tamworth and Polesworth/Dordon, and the broad location of growth being to the south and east are supported.NW16 stating "Land to the West shall remain undeveloped" is considered to be unreasonable. It is considered that the SHLAA does not identify sufficient sites to the south and east of the area to accommodate the 415 new dwellings	Support Noted: It is also considered that sufficient land and sites are available elsewhere within the Borough to negate the need to develop land to the west of Polesworth/Dordon.
			DPSR10B	The strategy completely disregards any development to the west, despite evidence contained within the SHLAA suggesting more appropriate land for development at Pooley lane. Therefore NW16 is not considered to be justified, contrary to the NPPF. The Policy is considered to be ineffective as it will not deliver the amount of housing allocated to Polesworth/Dordon, resulting in the document being inconsistent with National Policy and unsound. NW16 needs to be reviewed to allow for limited, appropriate development to the west of the settlement in order to ensure the document is consistent with National Policy	It is considered that sufficient land and sites are available elsewhere within the Borough to negate the need to develop land to the west of Polesworth/Dordon.
DPSR11	Phillipa Kreuser	CT Planning	DPSR11A	This representation is made on behalf of Walton Homes Limited with respect to land at Overwoods Road, Hockley. The representation supports Policy NW3 : Housing Development which provides for 500 new dwellings to come forward in North Warwickshire Borough to cater for Tamworth Borough Council's housing needs.It is acknowledged that a phasing mechanism is required in the Policy to control the sequence by which the land required for Tamworth's housing need in North Warwickshire's Borough comes forward for development in relation to bringing forward housing land within Tamworth's administrative area in the first instance. However, it is considered that the phasing criteria set out in Policy NW3 is too prescriptive and does not allow for unforeseen circumstances which may jeopardise the bringing forward, in particular, of the Anker Valley Sustainable Urban Neighbourhood or the remaining housing supply within Tamworth's Urban Area.	Support to NW3 noted: Criteria considered to be minimum necessary to ensure easily developed green field sites in North Warwickshire are not targeted first before delivery of sites and infrastructure within Tamworth that may require greater investment and resources to deliver. If monitoring indicates sites are not being delivered within the Tamworth Core Strategy timeframes then early review can be instigated.
			DPSR11A	The Policy sets out that the delivery of the 500 dwellings for Tamworth's needs will not commence until at least 75% of the 1,150 proposed dwellings at Anker Valley and 75% of the remaining Tamworth housing target are completed, or by 2022 which ever represents the later date. However, circumstances may arise, for example, due to infrastructure problems or an inability for Tamworth Council to maintain a 5 year housing supply which may require the release of land in North Warwickshire's Borough in advance of these criteria being met. A further criterion should be added to the Policy to allow for such eventualities. By including a further criterion Policy NW3 would benefit from greater flexibility and scope to meet the Housing Market Area's housing needs. The NPPF requires Local Plans to provide sufficient flexibility to enable the delivery of sustainable development and includes the requirement of Local Plans to adapt to changing local circumstances.	As above

DPSR12	Keith Stain	DPSR12A	I do not think enough thought has gone into allowing over development of sites just so the developers or the seller can make a lot of profit without taking into account the locality and existing bulking lines and types of property. I am not sure whether there is a requirement for the actual sites that are requesting planning to be visited by the people who make the decision as I do not believe that photographs can fully show what the effect on the area will be, especially if those photos are from the applicant.	All sites subject to planning applications involve a site visit. Policies NW8, 10, 11 & 12 address a wide range of issues affecting the impact of development on a sites and locations character, environment and sustainability. Further detailed planning policies for Development Management purposes will be consulted on as part of the Development Management DPD consultations.
DPSR13	Damien Holdstock AMEC (On behalf of National Grid)	DPSR13		Comments Noted: No change proposed.
DPSR14	N Barlow Packington Estates	DPSR14A	We support the general spatial strategy and, in particular, Policy NW.1 with settlement hierarchy. The concept of diluting and dispersing development to help smaller communities is welcomed. We also welcome improvements in the realisation of the importance of the development of farm diversification, but have some suggestions on further improvements below. The fact that over 90% of firms in the Borough employ ten or less employees is every reason why farm diversification and the redevelopment of barns make such an important contribution to local employment: having said that, economics are tough and in many cases the development of barns for residential use (letting and sale) is a more realistic option. This can be tied in to 2.11. With regard to para 2.14, we welcome the discussion on beneficial after-uses of mineral sites. We have made representations re the Waste Strategy so that the infilling of quarries will allow the early re-use of land for agriculture or planning. Other uses, such as quarries for leisure may be possible, but these are very limited.	Support for NW1 noted. Currently in the NPPF and Local Policy economic growth is a priority when addressing diversification and barn conversions rather than housing. Further detailed planning policies for Development Management purposes addressing issues of farm diversification will be consulted on as part of the Development Management DPD consultations.
DPSR14		DPSR14B	The maintenance of the natural historic environment depends on income from sources within that environment. This includes agriculture, leisure diversification, including the conversion of barns to both residential and commercial uses. We would suggest that paragraph one should be enlarged to reflect this eg., at the end of the second sentence, "these natural and historic assets depend on the maintenance of a healthy rural economy, particularly through the diversification of assets." There should also be a reference in either paragraph seven, or to a new paragraph 8, reflecting what has been mentioned in paragraph 2.6 ie., that 90% of firms in the Borough employ ten or less employees. Strategic Objectives (3) This needs to make mention, not only of urban but also rural landowners. Strategic Objectives (5) The strategic objective in the Draft Development Management Plan document needs to be tied in to this by adding in the words "encouraging appropriate re-use of rural buildings".	Unclear as to basis of assertion that maintenance of the natural historic environment depends on income from sources within that environment. Natural and Historic environment and assets may be supported by a healthy rural economy but not necessarily wholly dependent on it. No change proposed in Core Strategy. Issue can, nevertheless, be addressed in Development Management DPD policy consultation.
DPSR14		DPSR14C	Spatial Strategy – We support the Spatial Strategy, but subject to that below. We welcome the inclusion of the new second paragraph on the rural character, but it is not strong enough. Suggest adding "the maintenance of the well being of the rural area will be given priority through such matters as diversification". Core Policies: NW.2 Green Belt – There is no provision within here for appropriate development in rural areas and within Green Belt to help existing and new businesses. This is a flaw in the Policy. NW.8 Sustainable Development – This Policy has not been substantially amended to reflect the point previously made. Sustainability must be looked at in rural areas in the context of the use and re-use of rural assets, including barns, farm buildings, woods etc. This can allow dispersal of employment which does not necessarily mean that car journeys are longer, they may in fact be shorter. Furthermore, the development within rural areas helps protect and maintain the ecology and bio-diversity.	Support for Spatial strategy noted: Regarding comments on NW2 and NW8 - The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. The NPPF makes provision for sustainable development and rural exceptions development in the Green Belt and rural areas and it is considered unnecessary to duplicate that policy provision in the Core Strategy. More detailed Development Management policies dealing with implementation of farm diversification, re-use and conversions in rural areas will be considered as part of the Development Management DPD consultation. No change proposed.

DPSR15	M Rossiter	Tetlow King	DPSR15A	NW1 - Support the addition of the text on development of affordable housing- recommend a minor amendment.: "Development for affordable housing outside of development boundaries will only be permitted where there is a proven local need; it is small proportionate in scale, and is located adjacent to a village." Whilst 'small' would skew the bias against much-needed developments, the word proportionate makes greater allowance for the discretion of planning officers in determining schemes against the scale of local housing need and settlement size.	Support for NW1 noted: Comment on term "proportionate" considered acceptable as a minor change that allows a more flexible approach. Agree to amend text to reflect suggestion along lines of "proportionate to the scale and character of the existing settlement". No change proposed for reference to 'cross subsidy'. NPPF addresses this issue and it is not considered necessary to duplicate NPPF policy approach in the Core Strategy
			DPSR15A	This would make the policy more precise and practical to implement. In addition to this change, and as per our previous comments we recommend that rural exception schemes make allowance for an element of cross-subsidy. This would bring the Core Strategy in line with the NPPF definition of rural exception sites which states: "Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding." And as also set out in the main policy text on rural areas: "In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs." (NPPF, paragraph 54, our emphasis)	See above.
DPSR15			DPSR15B	NW4 - Recommend an amendment to the text on development outside settlement boundaries to reflect the need for development to be proportionate to the settlement size and to meet local need. The supporting text to this policy contains the only reference to the provision of specialist housing and care accommodation for the elderly, . Without such a policy, the Council will fail to support the development of a full range of housing/care accommodation to meet the diverse range of needs and demands of the elderly population. As noted by the NPPF: The provision of specialist accommodation can free up a significant number of family sized housing as well as meet the growing need for specialist care for the frail and very old. Enabling the provision of the full range of specialist accommodation should be treated as a priority by the Council	The Core Strategy is a strategic planning document within which the supporting text has the same weight as upper case/bold policy. It is not considered necessary to have a separate detailed policy on housing types, tenures, or specialist needs. This will be addressed on a settlement by settlement basis. Policy NW3 requires <i>development to have regard to the needs of each location and should be of a variety of types and tenures that reflect settlement needs.</i> Policy NW8 also requires that development should <i>be adaptable for future uses and take into account the needs of all users.</i> More detailed Development Management policies will be consulted on as part of the Development Management DPD process. No change proposed
DPSR15			DPSR15C	NW5 - We are concerned that the Council has yet to publish their Affordable Housing Viability Assessment, as referenced within Appendix E. As per our previous comments on this matter (under policy number NW3), without this document it is impossible for consultees to come to an evidence-based conclusion as to the suitability of the 40% target for affordable housing delivery on market housing-led developments. The Council is at significant risk of being found unsound, on the basis of not being justified by a robust and credible evidence base, contrary to advice in the NPPF. We strongly advise the Council to publish the Viability Assessment and make this available for further public consultation alongside the Core Strategy to allow for a full understanding of the appropriateness and viability of the affordable housing target	Affordable Housing Viability Assessment has been completed and published. Past trends indicate this figure is achievable. The 40% target is Borough wide and will be applied on a flexible, viable site by site basis. Delivery will be supported by 100% delivery on Public Sector/Council owned sites to offset any shortfalls. More detailed threshold criteria will be considered as part of the Development Management DPD policies consultation.
DPSR15			DPSR15D	NW19 - We support the reference to affordable housing as one of the key priorities of North Warwickshire Borough Council. The Council should ensure that residential schemes are not subject to planning obligations to the detriment of total affordable housing provision; this should be a priority when developing the CIL Charging Schedule	Support noted.
DPSR16	Mr D Hanratty		DPSR16A	I have been reading the draft core strategy and would like to comment on the document. In the core strategy section 2.77 one of the issues you will focus on is Health and in section 2.78 you point out the links between poor health / obesity and open space, yet you are consulting with local residents in Dordon about turning open space at the top of Kitwood Avenue into housing, how can this be justified under your draft core strategy.	Consultation on redevelopment of Kitwood Avenue is not part of Core Strategy strategic policy. Issue will still have to be addressed as part of that external site specific consultation. Balance will need to be taken between need for housing and current value and contribution of site to open space, recreation and active health uses. No change.

DPSR16			DPSR16B	In section 2.43 you mention the further development of land at Birch Coppice some 40 hectares surely this and any further development will have an effect on the residents of Dordons health and well being due to increases in noise and pollution from the increase in traffic. This increase in traffic could also cause problems in the nature of stress from sleep deprivation and also for residents trying to leave their homes for work and leisure it is already a nightmare trying to get out of the village especially at peak times. Dordon in my opinion is in great need of help in the way of traffic control yet other than a few speed humps no section 106 money or county council money has been spent on any realistic form of help for the village. This has to be a major concern to the County and Borough Councils just as it is to the residents of Dordon.	No change proposed. Detailed issues of noise, pollution, traffic congestion will need to be dealt with at application stage. Proposals will need to address these issues as required by Policies NW8, 10 and 19. More detailed Development Management policies will be consulted on as part of the Development Management DPD process.
DPSR17	C Cousins	BRE Global	DPSR17A	I note that the SA (paragraph 6.348) states that no targets are set (e.g. in relation to Code for Sustainable Homes or BREEAM). As you may be aware, many local planning authorities include policies in their local plans which require particular standards of sustainable construction; as of March this year, some 55% of local planning authorities in England had such policies (requiring standards set out in the Code for Sustainable Homes and/or BREEAM) in adopted plans or those at an advanced stage compared with 44% 10 months earlier. The National Planning Policy Framework's emphasis on achieving sustainable development may well see this trend accelerate.	Noted
DPSR18		Mancetter Tenant led Community Group	DPSR18A	Welcome the amendments made to the Spatial Portrait. Still have concerns by placing Atherstone with Mancetter for the allocation of 600 homes - and that Mancetter may have to take more housing and given that very few sites are identified residents fear that the Brook Playing Field will be lost. Would like assurance that no development will take place on the playing field. Previously suggested re-using land adjoining the railway line including the garage area for housing sites. Concerned that Mancetter will lose its identity with pressure for greater housing, especially if Atherstone is unable to realise sufficient sites coming forward - residents would like a "Welcome to Mancetter" sign, so the village is not lost into Atherstone	No changes proposed. No assurances for preventing any future development of sites can be given unless they have statutory protection through National Policy and regulation. No proposal in Core Strategy for redevelopment of Brook Field. Policy NW10 and supporting text address issue of quality of development and development impact on settlements character. Site Allocation DPD consultation will address site specific potential. Provision of village sign not considered an issue for the Core Strategy.
DPSR19	Mr G Wilson	Arlington Planning Services	DPSR19A	The report indicates 40 dwellings at Ansley - this figure is insufficient to provide the requisite boost and would also not allow the provision of many affordable houses on the back of market housing. Suggest that the figure be raised to 60/80 dwelling	No change proposed. The level of housing allocated is considered sufficient for the settlements needs, its capacity and services/facilities available.
DPSR20	H Winckler	Tyler Parkes (on behalf of Crisp Farm)	DPSR20A	Object on the grounds that it is not "sound" because it fails to fully consider the need to realign the Green Belt boundary in order to allow for residential development which will ensure the sustainable future of rural settlements as required to satisfy the NPPF. The SHLAA prepared as one of the evidence background documents is out of date and fails to satisfy the NPPF requirements to fully consider all the reasonable alternatives. We propose that it would be consistent with national guidance for all or part of our clients land, adjacent to the settlement boundary, to be removed from the Green Belt and allocated for residential development.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough.
DPSR20			DPSR20B	Welcome the retention of the wording from the Spatial Vision "Housing catering for the needs of residents will be provided in order to give good choice of tenure, location and will be located to take advantage of good public transport, accessibility and to help maintain and enhance the vitality and viability of settlements"	Support noted.
			DPSR20C	Spatial Portrait - Object to the misleading description of Austrey's services and facilities which omits to mention a number of well established community and service facilities. Reference should be made to the Primary and Pre school, mobile services and clubs and societies.	Noted: text will be amended to reflect key, main services but will not necessarily be comprehensive.
			DPSR20D	NW1 - Principle of a five tier settlement hierarchy is supported by our clients and consider it appropriate that Austrey should fall within Category 4. Object to lack of recognition within the Policy that a review of the settlement boundaries for category 4 settlements may be required to ensure the future viability of these rural settlements. believe it would be helpful for the policy to break down the settlements in accordance with the sub-categories identified in Appendix C, such that Austrey would be within category 4C. This would enable the distinction between settlements within the greenbelt and those beyond to be easily identified	Support noted: Regarding proposed amendment. The reference to splitting Category 4 settlements between Green Belt and non-Green Belt settlements is noted. Policy NW1 will be amended to reflect this as a sub-category within Category 4.

			Concerned that the Policy does not prioritise the case for the relaxation of settlement boundaries in those villages outside the greenbelt. This would divert pressure for expansion away from those settlements with the greatest planning protection towards less restricted areas which might be considered more appropriate areas for development opportunities, such as Austrey.	Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. Unnecessary to prioritise land outside development boundaries of smaller settlements beyond targets identified. No change proposed.
DPSR20E			NW3 - fully support the requirement for development to take place in locations having regard to the needs of each location and their capacity to support additional development.	Support Noted.
DPSR20F			NW4 - Object to the restriction of residential growth in Austrey - inadequate to meet the current and future demands for housing in this rural settlement and therefore fails to meet the objectives of the NPPF. Believe that it is unreasonable to restrict the amount of development to the same as that proposed for the smaller settlement of Newton Regis. Restricting growth in Austrey to 40 dwellings would stifle growth in Austrey which has a range of services and facilities. Restricting growth would risk the viability of the many community groups, services and facilities which will effectively put them under threat and could result in the settlement being allowed to stagnate or decline. We believe that the existing settlement boundary is effectively threatening the prosperity of Austrey and consider it would be appropriate to extend the settlement boundary to protect the future vitality and viability.. Recommend that the figure of 40 dwellings be reassessed and a more appropriate figure included in the Policy.	Disagree. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries along with the potential of NPPF policy on rural exceptions and Community right to build approach. Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. Unnecessary to prioritise land outside development boundaries of smaller settlements beyond targets identified. No change proposed.
DPSR20G			NW5 - Object - to the lack of a rural exception policy - believe it is imperative that policy provision is made for affordable housing outside but adjacent to the settlement boundaries, including within the Green Belt. Not appropriate that "Rural Affordable Sites" will be included in future Development or neighbourhood Plan Documents, as stated in paragraph 6.24. The Authority is primarily a rural local authority area, and the Core Strategy states that the Provision of Affordable Housing remains a priority for the future - we are of the firm opinion that an appropriate worded policy should be included in the submission version and in accordance with the NPPF.	Noted: Disagree. By virtue of a proposal being an exception there is no need for an 'exception' policy. NPPF makes allowance for exceptions to policy. No need for duplication of NPPF in Core strategy.
DPSR20H			We have highlighted that there is a strong case to justify * identifying a 20% buffer of housing land allocations * realigning the Green Belt boundary * identifying "safeguarded" land for future development post plan period * Include a Rural exception policy * realign the settlement boundary at Austrey to allow sustainable development	Noted: Disagree. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. No need to allocate beyond 5% buffer. By virtue of a proposal being an exception there is no need for an 'exception' policy. NPPF makes allowance for exceptions to policy. No need for duplication of NPPF in Core strategy.
DPSR21	Mr J Gilbert	CO/ P Woodhams, Planning Consultant	DPSR21A Policy NW1 requires changing to secure the proper functioning of a core strategy - achieved by deleting the second sentence of the policy and replacing it with one that states that where existing development boundaries need to be changed to accommodate required development this should be located in areas shown generally for expansion on the Key Diagram, which will itself require to be altered .An alteration to the plan is required to meet this objection in the light of the National Planning Policy Framework which requires, at paragraph 156, strategic policies to deliver necessary homes and jobs for its area. It is considered that by retaining the development boundaries of the existing planning policies the Core Strategy would not give the required 'steer' to site specific policies in later development plan documents, notably the proposed Site Allocations Development Plan Document. In the absence of such a 'steer' it is considered that the current policy NW1 fails to give the necessary strategic guidance that should be available in this level of plan, and for this reason it is submitted that the policy as tabled is un:	Disagree. The Core Strategy is a strategic planning document that does not include non-strategic site specific allocations for individual settlements. The Strategic Land Availability Assessment, development constraints diagram, Site Allocations DPD process and individual Neighbourhood Plans or Action Plans will provide the "steer" for site proposals to come forward. The retention of the development boundaries provide the focus for prioritising sites in or adjacent to that boundary to avoid open countryside non-sustainable development and the Site Allocations DPD process will direct and inform the need for Development Boundary review.
DPSR21			DPSR21A In the case of Arley it is considered that the indicative direction of development should be in the area between Old Arley and the railway line - this is that such a direction of growth would facilitate development which would rest comfortably with the existing landscape setting and fabric of the settlement, including proximity to the new medical centre and would also rest comfortably with the potential for a new railway station indicated in the Warwickshire Structure Plan for Arley. It is understood that survey work for the station points to it being sited close to Church Lane where levels are the most practical for a new station. Growth in this direction would be appropriate for this reason also.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt and within Arley's development boundaries to deliver development need. No change proposed.

DPSR21	DPSR21A	Regarding Category 3B settlements - consider the wording of the policy needs to be changed. As currently stated the level of development contemplated for Old/ New Arley is very unlikely to be achievable within the current development boundary. It will therefore need to be changed and as achievement of the level of housing is part of the overall strategy the need for change should be reflected in the wording of the policy.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt and within Arley's development boundaries to deliver development need. No change proposed.
	DPSR21A	For this reason the existing sentence referring to Category 3B settlements should be deleted and replaced by something like :-"Land for development to meet the levels envisaged in other policies of this Plan will be accommodated having regard to the areas generally indicated for growth on the Key Diagram" It is considered that rewording along the above lines will permit the levels of growth envisaged at Old and New Arley to be accommodated in locations determined by the strategic decisions in the Core Strategy. Not known whether the levels of growth presently envisaged at Kingsbury and Water Orton require additional land outside the present boundaries but the foregoing wording will permit the Key Diagram to be constructed accordingly.	See above.
DPSR21	DPSR21B	Item 2 of this policy is going to cause difficulty down the line in relation to the Site Allocations policy. It simply states that no changes will be made to the Green Belt boundary. In the case of Arley development needs set out in the document to which this representation responds will almost certainly require a material alteration to the Green Belt boundary. As a Site Allocations Plan has to generally accord with the Core Strategy the presence of Clause 2 in policy NW2 renders a difficulty in this respect. The Core Strategy is the overarching strategic context for all development, and it is considered that it should acknowledge that the Green Belt boundary requires altering. In addition to accommodating development needs defined in the Core Strategy the Green Belt needs to take account of accommodation of long term development needs. The National Planning Policy Framework clearly requires, at paragraph 83, a Core Strategy to consider long term development needs, and alter the boundary of the established Green Belt accordingly, in order that this will not have to be done at the end of the Plan period.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt and within Arley's development boundaries to deliver development need. No change proposed.
DPSR21	DPSR21B	Clause 2 of Policy NW2 has excluded this possibility. It is considered that if this Clause is retained the policy would be unsound in failing to take proper account of Government Policy. There are emerging proposals for installation of a new station at Arley together with increased frequency to services between Nuneaton and Birmingham. There is no clear timetable for these infrastructure changes and they could take place during the plan period, or beyond it. If they do take place it will alter the sustainability profile of Arley markedly. It is possible therefore that in the longer term there will be a case for more substantial development at Arley. It is possible that a contribution to station works could be justified by significant new development and Green Belt boundaries affirmed now ought not to prejudice such a possible balancing of needs in future.	As above
DPSR21	DPSR21B	The picture painted by the Core Strategy published to date is that there is no proposed alteration to the Green Belt, and this intimates that if any boundary changes are required this will be undertaken in the Site allocations plan. As stated unless clearly prefaced by the Core Strategy this is likely to lead to difficulties of the Site Allocations plan being in general conformity with the Core Strategy. Additionally the Site Allocations plan is not an appropriate vehicle for addressing changes to the Green Belt required to accommodate long term development needs. In order to meet National Planning Policy Framework requirements for the Local Plan (which North Warwickshire Council call a Core Strategy) to have Green Belt boundaries established which take into account long term development needs, it is considered that the Core Strategy needs to 'bite the bullet' now.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt and within current development boundaries to deliver development need. No change proposed.

DPSR21			DPSR21B	In considering this view account, with added weight, needs to be taken also of the views expressed elsewhere in this representation concerning housing needs suggested by the 2008 based forecasts and the possible implications of recent 2011 Census results. In the light of the foregoing it is considered appropriate to remove an area of land between Old Arley and the railway line from the Green Belt and define it as an Area of Development Restraint. The Green Belt policy NW2 will need to be adjusted to refer to the policy for this, and any other, Areas of Development Restraint.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt and within current development boundaries to deliver development need. No change proposed.
DPSR21			DPSR21B	Table 1 needs to be altered as it is considered that it makes insufficient provision for new housing over the plan period. Table 1 requires altering to achieve a total supply of a minimum of 4500 plus the needs of Tamworth to be accommodated in North Warwickshire. This is a minimum figure and ignores the needs arising from the inability of adjacent authorities to meet their indigenous needs. A further allowance of about 1500 dwellings would seem to be a suitable apportioning of accommodation of needs from surrounding areas. This would point to a total provision of about 6500 dwellings to be delivered during the plan period. This represents an increase of about 70% across the board. Without an increase to take account of the foregoing commentary it is submitted that the document is unsound, in that it fails to accord with Government policy as set out in the National Planning Policy Framework.	Disagree. The evidence base shows that the alternative levels of growth were considered (Housing and Employment Options 2028 - 2031) but that the extension of the RSS figure along with accommodating some of Tamworth's needs long term provided an appropriate positive balance between housing restraint in a rural area and supplying sufficient accommodation. The housing figure is a minimum, not maximum, and if growth and demand increases the Core Strategy is flexible enough to accommodate further growth. No further change or increase proposed.
DPSR21			DPSR21C	This requires revision in two respects. Firstly the amount of dwellings to be provided needs to be increased substantially. It is suggested in the analysis of Table 1 above that a figure of 6500 dwellings is appropriate. Secondly the policy as drafted introduces uncertainty which appears to result in internal conflict, both within this policy and in relation to other policies. This uncertainty could be removed by deleting the fifth bullet point.	Disagree. Following the consideration of a Housing Paper the Council adopted an approach to deliver a minimum of 3,300 for its needs up to 2028, while accommodating an additional 500 units from Tamworth. This is considered sufficient and adequate to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. No change
DPSR21			DPSR21D	This policy distributes the housing need based on a quantum of housing need which is considered to be deficient, and requires to be increased. If the increase were distributed on a pro rata basis this would point to a need for an increase in provision at Arley to a total of about 150 dwellings in the plan period. Figures for all the named settlements will need altering also.	Disagree. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries along with the potential of NPPF policy on rural exceptions and Community right to build approach. Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. Sufficient land is available outside the Green Belt to deliver development needs for the Borough.
DPSR22	Mr J Di Marco		DPSR22A	In looking at the total houses that are being suggested for the Hartshill area we feel that their wont be enough available land within the development boundary to fulfil these needs.	Disagree. The Core Strategy does not indicate that all the identified housing requirement has to be delivered within the development boundary but "in or adjacent to development boundaries". No change proposed.
DPSR23	J Millward	Woodland Trust	DPSR23A	Policy NW 8. Sustainable Development We support the ninth bullet point in this policy, highlighting the use of trees and natural vegetation in managing the impacts of climate change, and this is increasingly reflected in national policy - The new National Policy Planning Framework clearly states that: 'Local Plans should take account of climate change factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape	Support Noted.
DPSR24	J Millward	Woodland Trust	DPSR24A	Policy NW 12. Nature Conservation We are disappointed that Policy NW12 has not incorporated emerging national policy on protecting the irreplaceable semi-natural habitat of ancient woodland. Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full statutory protection: for instance 84% of ancient woodland in the West Midlands has no statutory protection. This is particularly relevant as ancient woodland is still facing considerable threats – research from the Woodland Trust shows that in the last decade 100 square miles (26,000 hectares or 5% of the total amount of ancient woodland remaining in the UK) of ancient woodland in the UK has come under threat from destruction or degradation.	Concern noted and partially agreed . Text in either Policy NW12 or supporting will be amended to reflect NPPF principle on Biodiversity and include reference to ancient woodland and/or similar 'irreplaceable habitats'.

DPSR24		DPSR24A	We would like to see Policy NW12 amended to reflect the precise wording of NPPF para 118 with a new separate bullet point specifically for ancient woodland: 'The Council will not permit any development proposal which would result in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss'. B Policy NW 12. Nature Conservation Whilst we are pleased to see the commitment in Policy NW12 (3rd bullet point) to the need for development to ensure no net loss of, and to enhance, biodiversity, it is also important to buffer and expand biodiversity habitats to both protect them from climate change and also so they can be used to further support peoples' quality of life, particularly via green space linkages. This element is missing from Policy NW12. A good example of this is native woodland creation as it is a robust habitat that can deliver a uniquely wide raft of benefits.	Concern noted but not considered necessary to duplicate NPPF policy and text . Text in either Policy NW12 or supporting will be amended to reflect NPPF principle on Biodiversity and include reference to ancient woodland and/or similar 'irreplaceable habitats'. Para 6.83 already seeks to protect and 'enhance' a diverse landscape to ensure species movement and biodiversity expansion.	
DPSR24		DPSR24A	The National Planning Policy Framework (NPPF) supports the need for more native woodland creation by stating that: 'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure', (DCLG, March 2012, para 114).	Noted. Considered Policy NW13 addresses this need/issue.	
DPSR24		DPSR24B	Policy NW19 Infrastructure Whilst we are pleased to see the reference to 'protection and enhancement of the environment', as set out in the response to NW12 (second bullet point) above, it is important that planning conditions and developer obligations include the ability to fund CREATION of new natural environment habitats like native woodland, as well as protection and enhancement of existing natural assets. • The CIL regulations cite the definition of infrastructure in the Planning Act 2008, section 216, specifying that 'open spaces' and 'flood defences' are eligible items for CIL. • The National Policy Planning Framework clearly states: 'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure' (DCLG, March 2012, para 114).	Noted but No Change proposed. There are currently no CIL provisions available for the Borough. The Borough is nevertheless part of the Biodiversity Offsetting Pilot (covering Warwickshire County) and Sub-regional Green Infrastructure Strategy. This strategy will establish criteria to identify sub-regional Green Infrastructure assets of Landscape, Accessibility and Biodiversity importance. The outcome of this work will be taken forward in other Development Management Documents.	
DPSR24		DPSR24B	The Government's just published Independent Panel on Forestry states: Recommendation: 'Planning policy and practice should:.... Encourage local authorities to look creatively, and across boundaries, at the use of S106 agreements, biodiversity off-sets and particularly the Community Infrastructure Levy. These levers could produce greenspace schemes, including trees and woodland, that make a significant difference to the landscape as a whole'. Defra, Final Report, July 2012). The new England Biodiversity Strategy also makes it clear that expansion of priority habitats like native woodland remains a key aim – 'Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England', (Biodiversity 2020: A strategy for England's wildlife and ecosystems services, DEFRA 2011, p.26). We would therefore like to see Policy NW19 amended (upper case text) to read (2nd bullet point): 'Protection, enhancement AND EXPANSION of the environment.	Noted but No Change proposed. The Borough is nevertheless part of the Biodiversity Offsetting Pilot (covering Warwickshire County) and Sub-regional Green Infrastructure Strategy. This strategy will establish criteria to identify sub-regional Green Infrastructure assets of Landscape, Accessibility and Biodiversity importance. The outcome of this work will be taken forward in other Development Management Documents.	
DPSR25	S West	DPSR25A	Last new development in Shustoke was 1990's - any new development and slight increase in population would help ensure the future of its educational facilities and also contribute to the sustainability of local businesses. Smaller dispersed developments have less impact on local health and welfare facilities and less impact on the natural environment thus maintaining the rural character. Smaller dispersed development help lessen the impact on local road systems. Any future development should be built ensuring minimal impact on the natural environment with the design similar to neighbouring properties.	Noted. Preferred option permits small scale dispersed development in rural settlements. No change proposed	
DPSR26	R A Bust	Coal Authority	DPSR26A	NW8 - Support –The Coal Authority supports the inclusion of text within policy NW8 to ensure that new development proposals take account of past coal mining related land instability issues and incorporate appropriate remediation measures. The inclusion of this text addresses the concerns that The Coal Authority raised in this respect during the previous stage of consultation. Reason – The inclusion of the additional text ensures that the Core Strategy meets the requirements set out in paragraph 121 of the NPPF.	Support noted.

DPSR26B	<p>Paragraph 1.7 - Support – The Coal Authority supports the inclusion of additional text within paragraph 1.7 of the Core Strategy to draw attention to the fact that Warwickshire County Council is currently preparing a Minerals Core Strategy and that the policies outlined within this document – including any defined Mineral Safeguarding Areas - will need to be considered the North Warwickshire Core Strategy. The inclusion of this text addresses the concerns that The Coal Authority raised in this respect during the previous stage of consultation. Reason – The inclusion of the additional text draws attention to the other parts of the statutory Development Plan for the North Warwickshire area and identifies the implications of this in respect of the North Warwickshire Core Strategy.</p>	<p>Support Noted . Additional text considered unnecessary and overly detailed. As both Borough Core Strategy and County Minerals Core Strategy progress the reference will rapidly be out of date. Specific reference already made in para 1.7 to Minerals Core strategy</p>
DPSR26C	<p>Paragraph 1.8 - Objection -Notwithstanding The Coal Authority's support for the inclusion of additional text relating to minerals issues within paragraph 1.7 of the Core Strategy, we have significant concerns with the text that appears in paragraph 1.8. This states that the Borough Council is opposed in principle to the use of opencasting within the Borough. It goes on to state that new development proposals within the North Warwickshire coalfield will only be accommodated where this is evidence that the potential impact on the coal resource has been addressed and that there are no viable reserves that will be sterilised or trigger the need to opencast. For reference, the term 'opencast' refers to a specific form of extraction that is no longer widely used by the coal industry. As such, and to reflect more modern mining techniques that are generally much less intensive and have a much lower environmental impact, it is considered that the term 'opencast' should be replaced with the term 'surface mining' throughout the Core Strategy.</p>	<p>Comment noted and accepted. Text will be amended to more accurately reflect NPPF and use revised term 'surface mining' within Core Strategy (include reference in Glossary also).</p>
DPSR26C	<p>The Coal Authority considers that the wording of paragraph 1.8 is unreasonable and unnecessary. In particular, The Coal Authority objects to the wording that “The Borough Council is opposed in principle to the use of opencasting within the Borough because of its environmental and visual impacts as well as the impact on residential amenity”. Paragraph 149 of the NPPF already sets out strict requirements that need to be satisfied in order for planning permission to be granted for the extraction of coal. In determining any applications for coal extraction, Warwickshire County Council will therefore need to be satisfied that these requirements have been addressed in order for planning permission to be granted, and this renders the text within paragraph 1.8 unnecessary. Moreover, by ignoring the potential benefits that coal extraction could bring (such as the removal of surface hazards associated with past underground coal mining activity) the text is considered to be prejudicial to the proper consideration of any future proposals for coal extraction.</p>	<p>See comment above</p>
DPSR26C	<p>Finally, the text ignores that fact that the prior extraction of shallow coal (i.e. the extraction of coal during ground works associated with other forms of surface development) is generally far less intensive than a surface mining operation in its own right, and can be undertaken over a much quicker timescale with far fewer environmental impacts. As noted previously, prior extraction of this nature can also often bring associated benefits such as the stabilisation of former underground shallow mine workings which can help to facilitate other forms of surface development. The proposed approach, which effectively seeks to stop development taking place in the surface resource area on the grounds that it might lead to the need to “opencast” and to prevent the extraction of coal resources in advance of other forms of development, is therefore fundamentally inconsistent with the guidance in paragraph 143 of the NPPF. This requires local planning authorities to “set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mir</p>	<p>See comment above</p>

			DPSR26C	As currently worded, the text at paragraph 1.8 is therefore unnecessary, prejudicial and is based on a flawed understanding of the concept and potential benefits of the prior extraction of shallow coal resources. For these reasons, it is considered that paragraph 1.8 of the Core Strategy should be amended as follows: "The North Warwickshire Coalfield covers a significant area of the Borough from Shuttington in the north-west to the boundary with Coventry to the south east. Some of the reserves identified within the coalfield are shallow and may be accessible by surface mining methods. Development proposals within the North Warwickshire coalfield will therefore only be accommodated where there is evidence to prove that the potential impact has been addressed and there are no viable, accessible reserves that may be sterilised or, where practicable and environmentally feasible, the prior extraction of shallow coal resources has been considered" Reason – To ensure that the Core Strategy text properly confirms with the guidance in paragraph 143 of the NPPF.	See comment above
			DPSR26D	Paragraph 2.63 - Objection- The Coal Authority generally welcomes the recognition within paragraph 2.63 of the Core Strategy that surface coal resources are present within the area around Polesworth, the text goes on to set out a general objection in principle to the working of these resources in any form. For the reasons outlined within the comment above, The Coal Authority considers that this is unnecessary, prejudicial and is based on a flawed understanding of the concept and potential benefits of the prior extraction of surface coal resources. As such, it is considered that paragraph 2.63 of the Core Strategy should be amended as follows: "Mineral reserves have been extracted to the north and north-west both by surface and underground mining. Coal reserves of the North Warwickshire Coalfield lie to the north, east and south-east of the village.	Comment noted and accepted. Text will be amended to more accurately reflect NPPF
			DPSR26D	Any development within the North Warwickshire coalfield will only be possible if there is evidence to prove that there is no pressure for opencast and there are no viable, accessible reserves that may be sterilised or, where practicable and environmentally feasible, the prior extraction of shallow coal resources has been considered . If any development were to take place in this area, further evidence would be required to balance the sterilisation and national need of coal reserves with the viability of extracting coal and local environmental concerns. There is possible potential for small scale housing developments along the eastern boundary of the town depending upon the resolution of the mineral issue." Reason – To ensure that the Core Strategy text properly confirms with the guidance in paragraph 143 of the NPPF	See comment above
DPSR27	K Brazier	NRS&NMHPC	DPSR27A	The Parish Council have commented that they are unhappy at the disproportionate amount of houses suggested for Newton Regis.	Suggested change from 40 dwellings to 15, which is in line with other settlements with a Development Boundary, but not in the Green Belt
DPSR28	L Treadwell	Austrey PC	DPSR28A	As a result of investigating community requirements in Austrey we believe that more emphasis should be put on the benefits of providing housing for older community members to allow them to move from large houses yet stay in Category 4 village communities. Section 6.15 needs to be more specific. Having identified a need for housing for older people within the Cat 4 villages it needs to be stated.... "That suitable elderly person's accommodation is needed to ensure older people can stay in an appropriate manner within the community. In the process this will free up larger housing to ensure a suitable progression of community residence." The PC query why the housing figure has been increased from 30 to 40	Comment Noted. The Core Strategy is a strategic planning document within which the supporting text has the same weight as Upper case/Bold Policy. It is not considered necessary to have a separate detailed policy on housing types, tenures, or specialist needs. This will be addressed on a settlement by settlement basis. Policy NW3 requires development to have regard to the needs of each location and should be of a variety of types and tenures that reflect settlement needs. Policy NW8 also requires that development should be adaptable for future uses and take into account the needs of all users. More detailed Development Management policies will be consulted on as part of the Development Management DPD process. No change proposed. Housing increase reflects extension of Core Strategy plan period to 2008 and household projections/growth.

	<p>DPSR28A There are a number of aspects of the description of Austrey in the document that are inadequate or inaccurate:- On page 13, sect 2.38: Comparing the description of Austrey to a number of other villages, there are a number of items missing. Missed off are: * Primary school and pre-school * 2 playgrounds * Village hall * The ancient earthworks in the field by the church, and ridge and furrow surviving in a few places. * Listed timbered buildings are believed to be 5 in number [these include the pub (grade II), Farthings (grade II), The Homestead (grade II), Bishops Farmhouse (grade II), Nether End (grade II)] The core strategy states there are only 3. * The core strategy also states there are "a few" older buildings in addition to the 3 timbered - in fact there are at least 14 listed buildings/structures in Austrey, and a large additional number of old houses that are not listed, including several timber framed ones</p>	<p>Noted and amended description</p>
<p>Austrey PC (previous comments)</p>	<p>DPSR28B The PC accepts that the three most significant factors that affect the need for more housing within the village are :- 1. The house cost inflation that means that a typical young family cannot afford to buy in Austrey (this will affect the viability of the school on a long-term basis as young families become a smaller proportion of the village population. The PC consider the school to be one of the foundation stones of the community and ensuring its longer term viability of strategic importance.</p>	<p>Noted. The Core strategy is a strategic document and will not address detailed site tenure issues. Nevertheless the Core Strategy Policy NW3 notes that development should be of a variety of types and tenures that reflect settlement needs and text in 6.15 can be amended to reflect the need for suitable elderly person's accommodation appropriate to their needs and the potential to free up larger housing.</p>
	<p>DPSR28B 2. The ageing profile of villagers is changing the needs of residents (this will increase the need for village sheltered housing. Most villagers would like to stay in the immediate community as they become old and infirm which would require provision within the village of dwellings appropriate to their needs. Amend section 6.15 to be more specific. Having identified a need for housing for older people within the Cat 4 villages it needs to be stated "that suitable elderly person's accommodation is needed to ensure older people can stay in an appropriate manner within the community. In the process this will free up larger housing to ensure a suitable progression of community residence". 3. The fierce desire of residents to retain the village character which pushes against any development within the village</p>	<p>See comment above</p>
	<p>DPSR28C The PC are adamant that NO housing development must be allowed on any green land around the village. This includes land that is actively farmed as well as growing gardens of properties in the village. It is this greenery that gives the village its rural character and as such must be considered as sacrosanct.</p>	<p>Disagree. Unlikely to be sufficient 'brownfield' and garden sites within the development boundary to accommodate the housing required. Character and impact on village is an issue that any proposal must take into account. No Change proposed.</p>
	<p>DPSR28D The Parish Council feel that the number of 30 proposed dwellings is beyond that needed to address the immediate needs of the community. This figure can however be achieved as "fill in" houses on existing sites within the development boundary or brown field sites on the boundary. No "Green Field" development permitted. The buildings required could be provided within other areas, including disused or run-down farm buildings around the village, without changing the character of the village. Any development requirement should be backed up by a housing needs assessment and this would be used to establish the quantity and timing for such development.</p>	<p>Noted. No change proposed. Where development can be accommodated within the development boundary or via farm re-development this will be encouraged. Level of services and facilities indicates Austrey can also accommodate some limited growth. An updated Housing Market assessment will be produced and Housing Needs surveys are currently underway across the Borough but existing identified needs and demand still have to be addressed.</p>
	<p>DPSR28E We would not want any developments of housing clusters of more than 6 individual properties in a single location. The only exception we would consider is if the development was for residences for retirement elderly community in a warden controlled environment. It is preferred that any new properties should be developed on existing "road frontage" and be part of the village.</p>	<p>Noted. No change proposed. The Core strategy is a strategic document and will not address detailed site issues. Nevertheless, it is not expected that sites would be larger than 10 units at any time. The NPPF seeks flexibility in policy and it is felt lowering this threshold to 6 or less would be too restrictive and limit the ability and viability of development to come forward. The Site Allocations Plan and Development Management Plan or a Neighbourhood Plan may be able to address this issue in more detail.</p>
	<p>DPSR28F The proposed number of houses should be spread across the entire village and not in any one particular developed location.</p>	<p>Noted. No change proposed. The Core strategy is a strategic document and will not address detailed site issues. Nevertheless, it is not expected that sites would be larger than 10 units at any time. The NPPF seeks flexibility in policy and it is felt lowering this threshold to 6 or less would be too restrictive and limit the ability and viability of development to come forward. The Site Allocations Plan and Development Management Plan or a Neighbourhood Plan may be able to address this issue in more detail.</p>

			DPSR28G	It is a strong desire of the Parish Council that any "local housing" should be for "local residents" within the village. In the event that new dwellings are created, it is crucial that preference be given to people who are currently part of the Austrey community (children of, or current / past residents). How this is done will be dependent on specific developments	Noted. No change proposed. The Core strategy is a strategic document and will not address detailed site tenure issues. Nevertheless the Core Strategy NW3 notes that development should be of a variety of types and tenures that reflect settlement needs.
			DPSR28H	We would also highlight the relevant viewpoints from local residents from our Village Plan conducted in 2009 that 52% think no further homes are needed but of the people that answered that Austrey needs more housing then 42% think it should be homes for young people.	Noted. No change proposed. The Core strategy is a strategic document and will not address detailed site tenure issues. Nevertheless the Core Strategy Policy NW3 notes that development should be of a variety of types and tenures that reflect settlement needs.
DPSR29	D Waithman	NRS&NMHPC	DPSR29A	Our initial findings are that we totally refute the findings of your Consultants, Knight, Kavanagh & Page as at no time can we find where they made any contact with this Parish Council, as owners of Newton Regis Playing Field, to ask for their input and, furthermore, we can find no confirmation that they even visited the site. The fact that they failed to contact the owners of this site to gain accurate information on it alone makes their report on it highly suspect. Therefore would you please change the information listed against Newton Regis Playing Field to one that accurately describes its usage and condition. This can be checked by asking two football teams, two cricket teams, a tennis club and a bowls club who use the field for their comments as well as ourselves	Although further improvements are desired by the Borough Council the description will be changed.
DPSR30	Mr M Lyon		DPSR30A	Ansley would like to keep its identity and not become integrated into the Nuneaton conurbation. The Community do not see the need for any large scale development within the village boundary as there is a large planning proposal for 130 dwellings to the West Edge of Galley Common in fields bordering Tunnel Road and this will bring the village closer to the conurbation.	Noted. No change proposed. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries. Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. Policy NW10 and supporting text address issue of quality of development and development impact on settlements character.
			DPSR30B	Any future housing must reflect the needs and aspirations of the whole community. Some people within the community cannot see a need for any new housing development, as there are empty properties within the village and with Daw Mill due to close - this may see a movement of younger people out of the village, which will need to be taken into account in the core strategy. The population of the village has been fairly stable for the past 30 years and at this present time there is unlikely to be any insignificant increase - there may be a slight decrease due to the pit closure.	Noted. No change proposed. Core Strategy Policy NW3 notes that development should be of a variety of types and tenures that reflect settlement needs.
DPSR31	R Snowling	Morton Assets	DPSR31A	Whilst we generally support the Borough Council's proposals to direct 400 homes to Hartshill with Ansley Common (draft Policy NW4) we do not support the proposed wording set-out under draft Policy NW4, that will restrict development to the edge of existing development boundaries; nor do we support the Council's proposed Spatial Strategy as set out in draft Policy NW1 (Settlement Hierarchy). The proposed Spatial Strategy seeks to direct housing growth to the existing Market Towns and Local Service Centres, as these are seen as being the most sustainable locations. However, this strategy fails to take advantage of existing brownfield sites that are located outside of these settlements. We believe that the Spatial Strategy, as currently drafted will result in the majority of the Borough's housing being delivered as single-use (as opposed to mixed-use) estates on Greenfield sites on the edge of existing urban areas.	Noted. No change proposed. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries. Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. Large brownfield sites outside of settlements may not be in most sustainable locations with access to services/facilities.
			DPSR31A	This pattern of development is perceived to be sustainable by virtue of its proximity to the edge of existing (primarily residential) built-up areas – these locations being deemed to encourage more sustainable patterns of movement. However, the reality is that by creating residential-only estates on the edge of existing settlements, future residents will be forced to make daily commutes to their places of work. These trips are likely to be in the form of sole-occupancy car trips, which are inherently unsustainable by their very nature. To continue the approach of allocating Greenfield sites on the edge of existing built-up areas is, we believe, counter-intuitive to the objectives of achieving sustainable development	Noted. No change proposed. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries. Delivery not restricted solely to residential only estates. Plan flexible enough to accommodate a wide range of solutions subject to issues of sustainability and infrastructure/service capacity.

	<p>DPSR31A The recently published National Planning Policy Framework (NPPF) sets out 12 core planning principles that should under-pin both planning decision making and plan-making (paragraph 17). Included in these core principles is the requirement to: “encourage the effective use of land by re-using land that has been previously developed (brownfield land)”...</p> <p>We consider that the Spatial Strategy, as currently drafted in the pre-submission Core Strategy, fails to take account of this core plan-making principle. We therefore wish to advocate an approach to the distribution of growth that allows mixed-use development to come forward on brownfield sites outside of the boundaries of the main towns and local service centres, rather than requiring development to be located adjacent to development boundaries, where the development of Greenfield sites is the inevitable outcome.</p>	<p>Noted. No change proposed. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries. Strategy and Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. Large brownfield sites outside of settlements may not be in most sustainable locations with access to services/facilities.</p>
	<p>DPSR31A We therefore consider that Policy NW1 should be amended so that the text under Category 3A states that:</p> <p>“Development will be permitted in or adjacent to development boundaries that is considered to be appropriate to its place in the settlement hierarchy. In addition, development on sites that are not adjacent to development boundaries will be permitted where all of the following criteria are fulfilled:</p> <ul style="list-style-type: none"> i) The proposed development is on previously developed land; ii) The development will deliver a mix of uses to provide opportunities to work on site; and iii) Evidence of measures to ensure acceptable levels of access to core services, such as health, education and convenience shopping can be provided. 	<p>Noted. No change proposed. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries. Strategy and Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. Large brownfield sites outside of settlements may not be in most sustainable locations with access to services/facilities. Neighbourhood Development Plans and/or Site Allocations DPD process may be a route to identify and assess opportunities alluded to in representation.</p>
	<p>DPSR31B Furthermore, we consider that the Core Strategy should plan for the delivery of new homes as part of sustainable mixed-use community hubs – also a policy objective set out in the NPPF (paragraph 38), which states that: “planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site.”</p> <p>It is unclear how the Core Strategy, in its current form, will deliver this National Planning Policy objective. Our representations to the 2011 Draft Core Strategy set out the benefits of delivering new housing in the form of sustainable mixed-use community hubs and the attached note (Purley Chase Sustainable Economic Community, August 2012) provides a summary of how we believe land at the Purley Chase Industrial Estate in Ansley Common could help to deliver a proportion of the proposed 400 homes that are directed to Hartshill with Ansley Common</p>	<p>Noted. No change proposed. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries. Strategy and Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. The large brownfield site proposed is not considered to be in a sustainable location with access to services/facilities and would involve significant loss of existing on-site employment uses/opportunities.</p>
<p>DPSR32 Rohan Torkilsde English Heritage</p>	<p>DPSR32A We welcome the Plan’s Vision and series of Objectives which demonstrate a commitment to the conservation of the Borough’s historic environment. Despite the many positive aspects of the Plan the following comments demonstrate a number of significant matters that still need to be positively addressed to ensure conformity with the NPPF expectations. Although many of my comments appear to repeat those made in previous correspondence I have no doubt that appropriate changes can still be secured by selective adjustments to the Plan</p>	<p>Support noted.</p>
	<p>DPSR32B NW8 - Protecting and enhancing the historic environment² and seeking positive improvements to it are key elements in the achievement of sustainable development³. Consequently English Heritage are concerned that this section on Sustainable Development fails to consider or refer to the historic environment at all. To accord with national planning policy and ensure the Plan’s soundness we strongly recommend the omission is rectified.</p>	<p>Concerns noted. Agreement over amendments to text will be made to ensure section on sustainable development accords with national policy.</p>

DPSR32C	Spatial strategy and strategic housing allocations - I note the Plan's strategy for the distribution of housing and an intention to identify specific locations within a future allocations plan. English Heritage endorses the Sustainability Appraisal's comment at paragraph 6.249 of the need to ensure potential adverse affects on the historic environment including designated heritage assets, particularly around Polesworth, and the north west of Atherstone and Mancetter, are avoided by the application of this Plan's policies. It should be appreciated that to ensure a sound Plan there has to be a demonstration that there has been a proper assessment of the significance of heritage assets in the area, including their settings, and of the potential for finding new sites of archaeological or historic interest, and there has been a proper assessment to identify land where development would be inappropriate because of its historic significance. It is important to bear in mind that some asset types are not currently well-recorded.	Concern noted. Issue can be addressed through Site Allocations DPD process which will help address some of concerns, giving clarity over potential site locations and likely impact and implications for historic environment. Warwickshire County Council and their Historic Environment Record have been consulted and assessed for implications. No objections raised. Developers will still need to accommodate and assess the potential of heritage assets on site proposals. More detailed Policies addressing this issue will be dealt with through the Development Management DPD process.
DPSR32C	The Register of Parks and Gardens of Historic in England, for example, is thought to represent only around two thirds of sites potentially deserving inclusion. There will be undiscovered archaeological sites in every area, many of which could be of national importance. Without these assessments the local authority cannot properly assert that the objectives for sustainable development have been understood and therefore cannot say whether the objectively assessed development needs of the area will be met or not in accordance with the presumption in favour of sustainable development	See comment above
DPSR32D	Green Infrastructure (GI) and Policy NW8 - The role of GI in enhancing both the natural and historic environment should be acknowledged. For example the canal network, historic landscapes, parks and gardens and archaeological features can all benefit from positive management initiatives derived from the GI strategy by, for example, improved maintenance, presentation and access.	Noted. Section on Green Infrastructure and Policy NW13 is considered adequate to address this issue. The Borough is nevertheless part of the Biodiversity Offsetting Pilot (covering Warwickshire County) and Sub-regional Green Infrastructure Strategy. This strategy will establish criteria to identify sub-regional Green Infrastructure assets of Landscape, Accessibility and Biodiversity importance. The outcome of this work will be taken forward in other Development Management Documents. No change proposed.
DPSR32E	Natural and Historic Environment section - The Plan currently includes three natural environment sections and policies. To avoid unnecessary duplication and improve the brevity and clarity of the Plan might the natural environment content of the Natural and Historic Environment section (paragraph 6.62 - 6.66) and in policy NW11 be removed and incorporated into the subsequent Nature Conservation section and policy NW12? In addition to the benefits for the planning of the natural environment this change will help to provide a clearer, distinct and focussed Historic Environment section and strategic Historic Environment policy (Policy NW11).	Noted. Will consider in light of other comments if this change can be made.
DPSR32F	Historic Environment section (paragraph 6.67 - 6.71, and policy NW11) - This welcome section of the Plan highlights the importance attributed to the Borough's historic environment. The strategy and policy for the historic environment appears to be as follows. It may be useful for policy NW11 to refer to the content of the policy as follows;	Noted. Amendment to text proposed agreed to address National Policy approach and guidance.
DPSR32F	* The historic environment will be conserved and enhanced, where appropriate, including historic features that contribute to local character *National Policy and Guidance for the historic environment will be applied to inform the planning, design and assessment of future development. The Warwickshire Historic Landscape Characterisation Project, Warwickshire Historic Town Study, and West Midlands Farmsteads Characterisation will also be applied. *North Warwickshire Borough Council will continue to work with owners to seek ways of securing the future of heritage assets on the national heritage at risk register. The final sentence in Policy NW11 doesn't appear to be very clear. I assume you mean that the reuse of historic buildings will be encouraged? This would need to be added to the above.	See above

DPSR32G	The NPPF requires Plans to include a clear and positive strategy for the conservation and enjoyment of the historic environment in the Plan including heritage assets most at risk through neglect, decay or other threats ⁷ . There is an expectation that the Plan should seek positive improvements in the quality of the historic environment in the pursuit of sustainable development. To help ensure that the Plan can adequately demonstrate the above could I suggest the following additions to your heritage strategy (the preamble to policy NW11) and the Policy itself.	Noted.
DPSR32G	*Recognition of how the historic environment can help to deliver wider economic, social and environmental objectives for the plan area. *The interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport works, infrastructure planning, tourism, town centres and climate change mitigation or *How conservation areas may be sustainably managed, including through the application of up to date Conservation Area Appraisals and Management Plans and Article 4 Directions where appropriate. I note most appraisals are now out of date having been issued in 1995. An intention to update them could form a component of your strategy.	Noted. Amendment to text proposed agreed to address National Policy approach and guidance.
DPSR32G	*Recognition of non designated heritage assets and the usefulness of local lists in identifying non-designated heritage assets. Non designated assets are important components of the historic environment and unless explicitly referred to in Local Plan policy can often, understandably, be overlooked. Reference in the Plan (and Development Management Plan Objective 7, 2nd bullet point) to the importance of non designated assets is therefore advisable. Likewise to ensure the conservation of valuable local non designated assets many local authorities are preparing local lists. Local lists play an important role in building and reinforcing a sense of local character and distinctiveness. Encouraging the use of local lists will strengthen the role of local heritage assets as a material consideration in the planning process. I refer to the PPS5 Practice Guide (extant) and the recent guidance issued by English Heritage.	Noted. See above.
DPSR32G	*Opportunities to improve historic streets, townscapes, landscapes and settings. How will the future transport proposals be expected to respond positively to the historic environment? How are traffic/street management, environmental improvements, paving, and street furniture going to be designed and managed in the historic street scene? Such matters can often be picked up in Design Statements which I believe are supported by the Plan. *The expectation of desk-based assessment and field evaluation in relation to sites of possible archaeological interest. * Areas where archaeological potential has already been identified.	Noted. Development Management DPD process may also provide an opportunity of providing more clarity as to how development will address more detailed, site specific heritage and design issues. Core Strategy is a strategic document within which such site specific design and management considerations are considered too detailed.
DPSR32G	*The means by which new development in Conservation Areas and within the setting of heritage assets are expected to enhance or better reveal their significance ¹¹ . This is clear about the importance of ensuring that the setting of heritage assets, including settlements, is properly considered and should as such be referred to explicitly. I note reference in Policy NW15 to an "improved historic environment in terms of maintaining local distinctiveness, respecting historic settlement morphology and retaining and enhancing the historic fabric". Might this be a generic expectation in policy NW11? *How CIL and/or S106 agreements could contribute towards the enhancement of individual assets or specific historic places. A material and relevant issue that relates to the Draft Infrastructure Delivery Plan.	Noted. Amendment to text proposed for 'identification of areas where development might need to be limited in order to conserve heritage assets or would be inappropriate due to its impact upon the historic environment' is agreed to address National Policy approach and guidance.
DPSR32G	*How an up to date and accessible Historic Environment Record (that includes the Warwickshire HLC et al) will be applied and expected to be used to inform development proposals. The strategy should also make clear that it will be applied to inform the identification of areas where development might need to be limited in order to conserve heritage assets or would be inappropriate due to its impact upon the historic environment.	Noted

			DPSR32H	Strategic Historic Environment Policy NW11- The strategic policy to conserve and enhance the historic environment needs to demonstrate how the presumption in favour of sustainable development should be applied locally. To ensure it is locally distinctive it needs to derive from the preceding preamble – the strategy as described above. Coventry’s Core Strategy Submission historic environment policy and those from Poole, Doncaster and Peterborough Core Strategies may be worth referring to see the scope and level of detail that may be included in your NW11 heritage policy	Noted. See text amendment responses above.
			DPSR32I	Monitoring of Policy NW11- The intention to monitor the effectiveness of this policy is welcomed however to clarify the indicators and targets could I suggest the following edit. *Indicator. Maintenance of Conservations Areas *Target. A progressive updating of the Borough’s Conservation Area Appraisals and the preparation of Conservation Area Management Plans.* · Indicator. Heritage at Risk *Target. A reduction in the number of assets on the national Heritage at Risk Register. Hopefully the above suggestions can help ensure appropriate adjustments. I would welcome the opportunity to discuss these with you before submission to ensure an effective, sustainable and sound Plan	Noted. Amendment to text proposed agreed to address National Policy approach and guidance.
DPSR33	R Freeman	Theatres Trust	DPSR33A	We find the document to be unsound because we believe it will be ineffective. There is too much focus on general policies rather than making clear where, when and how change will be delivered; an apparent lack of engagement with specific topics, a lack of clarity and coherence. The policies do not reflect the Objectives and are far from adequate in provide long-term guidance for the topics listed in the Objectives. For instance Policy NW17 could be applied to any local authority area in the UK and there are only two small paragraphs to explain and support this policy. Strategic Objective 9 states that the satisfactory provision of social and cultural facilities will be ensured. Presumably Policy NW17 is supposed to cover this? The accompanying text should be expanded to explain any deficiencies (or not) in the provision of services and community facilities in the Borough and the Policy to provide guidance s to how any deficiencies will be managed.	Noted. Disagree. The Core Strategy is a broad strategic document, not detailed or site specific for delivery purposes. The Site Allocations DPD and Development Management DPD process will address many of the detailed and site specific issues. Other programmes and strategies such as the Local Investment Programme will provide the method of delivery.
DPSR34	M Williams	WS Planning	DPSR34A	It is not clear from the Core Strategy how the Council has fulfilled its duty to co-operate. In paragraph 1.10 it states that Tamworth has identified a need to accommodate housing beyond its boundaries, however there is no mention of how this may be achieved in the Core Strategy. It is also not clear how much discussion with neighbouring authorities has taken place and whether any cross boundary strategic matters have been identified.	The duty to co-operate is reflected both in the accommodation of an element of housing requirement to address Tamworth’s needs, the "Memorandum of Understanding" that has been signed and agreed by Tamworth, North Warwickshire and Lichfield Councils and the Borough’s active involvement. Further work with adjoining Local authorities is on-going and in order not to delay delivery of the core Strategy, any critical issues that arise can be dealt with through the flexibility built into the core strategy or through early review where necessary.
			DPSR34B	2.9 - WS Planning & Architecture has already made comments in response to the draft Core Strategy in January 2012. The Submission Draft Core Strategy has not been significantly amended and our client’s previous concerns therefore remain. The Submission Draft Core Strategy has now included a paragraph which refers to the proposed route of the HS2 rail line. It is considered that even at this stage the Proposals Map should give some indication of the proposed route as this will have an impact on development proposals for the area.	Noted. Now decision on HS2 has been made (subject to outcome of judicial review) it is intended to amend Key Diagram to indicate proposed route of HS2.
			DPSR34C	2.12 - We have already made representations regarding the balance between growth in the employment sector which is to be welcomed, together with the provision of sufficient housing land in order to accommodate growth. The description of Water Orton is not disputed. However the “protectionist” wording in paragraph 2.68 is unrealistic.	The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF’s 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. The NPPF makes provision for sustainable development and rural exceptions development in the Green Belt and rural areas and it is considered unnecessary to duplicate that national policy provision in the Core Strategy or seek review of current Green Belt boundaries around Water Orton.

DPSR34D	2.67 - 2.68 - My client's land is located outside the development boundary. The route of the proposed HS2 rail link is will pass through my client's land. The details of how much of and how my client's land will be affected are not yet available. Some ancillary development to serve the HS2 rail link on my client's land may well be required. We have previously made representations to state that we consider that it would be appropriate to undertake a review of the Green Belt boundary around Water Orton to take on board the potential implications of the HS2 route. It is considered that it would be appropriate to re-word the above sentence to say: "a review of the Green Belt boundaries will be undertaken once the impact of the HS2 rail route is known."	Noted. See comment above.	
DPSR34E	5.4 - 5.8 - The thrust of the NPPF is to site development in the most sustainable locations and as we have previously stated Green Belt sites adjacent to existing settlements may well be more sustainable than other sites within development boundaries.It is considered that the Core Strategy does not take the correct approach to the Green Belt. Given the strategic nature of the Core Strategy and the importance of Green Belt as a policy tool, the policies in the plan should acknowledge the need for Green Belt releases, particularly sites that are affected by the proposed HS2 rail line and give guidance on their implementation. If as is suggested in this section of the Core Strategy, small scale Green Belt boundary adjustments are required, they would need to meet the criteria set out in paragraph 85 of the NPPF. The role of the Core strategy is to give clear guidance regarding the considerations to be taken into account when deciding at later DPD stage, whether, and where, Green Belt releases can be justified.	The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. The NPPF makes provision for sustainable development and rural exceptions development in the Green Belt and rural areas and it is considered unnecessary to duplicate that national policy provision in the Core Strategy or seek review of current Green Belt boundaries around Water Orton.	
DPSR34F	NW1 - The wording of this policy is too vague and should be amended to include a precise indication of which development boundaries will be reviewed because this is a strategic issue which should be included in the Core Strategy.	Noted. Disagree. The Core Strategy is a broad strategic document, not detailed or site specific for delivery or site identification purposes. The Site Allocations DPD and Development Management DPD process will address many of the detailed and site specific issues. Once specific sites are established for delivery of the housing requirement then development boundary reviews can be addressed.	
DPSR34G	NW2 - This policy states that in point 2 that "No changes to the Green belt boundary will be made." However this conflicts with the wording in Policy NW1 which states that changes to development boundaries will be made in the appropriate DPD, or once development has taken place.	Disagree, no change proposed. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. Green Belt boundary review is therefore not seen as part of the strategy or an option to pursue. Sites can still, nevertheless, come forward as Green Belt exception sites (NPPF route) or through the Community Right to Build route, but this is not an issue for inclusion or determining in the Core Strategy.	
DPSR34H	NW4 - My client believes that Water Orton has been wrongly classified as a Class 3B local service centre. Water Orton is in a highly sustainable location on the edge of Birmingham with access to a wide range of services. Water Orton has a railway station and therefore good transport links which could be improved. It is considered that the settlement could readily accommodate more than 50 dwellings over the plan period. This figure is too low. There are concerns regarding the robustness of the SHLAA. We put forward our client's land for consideration by email on 11 December 2009 enclosing a copy of the Title Plan. However the site has not been considered as part of the original SHLAA process. The SHLAA report was published in January 2010, however since that time it does not seem to have been revised and updated. It is considered therefore that the SHLAA is out of date and cannot be relied upon to properly inform the Core Strategy. As such the Core Strategy cannot be sound.	Disagree. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries . Strategy and Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt and within current development boundaries to deliver development need for the Borough. Green Belt boundary review is therefore not seen as part of the strategy or an option to pursue. Sites can still, nevertheless, come forward as Green Belt exception sites (NPPF route) or through the Community Right to Build route, but this is not an issue for inclusion or determining in the Core Strategy.No change proposed.	
DPSR34H	Furthermore the character of Water Orton may change as a result of the HS2 line and could bring about additional employment opportunities and therefore would be an appropriate location to accommodate more growth than is currently proposed. It is considered therefore that Water Orton should be re-designated as a Category 3A settlement. In conclusion the Council have submitted a Core Strategy which is based on evidence that is over 3 years old and has not fully taken on board the implications of HS2	Disagree. The same issues and implications were faced with the development and delivery of the Motorways and M6 Toll to a much greater level of impact than that expected via HS2. Yet Green Belt designations remained appropriate then and still do now. The Green Belt location does not prevent national infrastructure projects from being delivered but does strictly control local and sub-regional development and particularly the potential coalescence of the settlements of Water Orton, Coleshill and Birmingham/Castle Bromwich. The need for Green Belt designation remains.	
DPSR35	N Hansen Highways Agency	DPSR35A Further modelling work required to build up on development scenario work.	Noted.

	DPSR35	Comments relate to the Infrastructure Plan	No response required.
	DPSR35	Comments relate to the Infrastructure Plan	No response required.
DPSR36	J Sands	Ansley PC	
	DPSR36A	Support in principle but believes there needs to be more clarification in the housing section.	Noted
	DPSR36B	Para 5.7 - do not understand why Ansley Common and Hartshill are linked - Ansley Common is in Ansley Parish not Hartshill so would like clarification as to why this is or to amend it. Ansley Common is an area which scores highly in the deprivation indices and in our opinion is unsustainable. It doesn't have important local services as there is only one shop and a school. Hartshill has a lot more to offer and it makes sense to concentrate the target of 400 houses there - we are concerned that if Ansley Common is included in the same service centre then there is nothing to safeguard Ansley Common from having a large number of houses than it would otherwise if it has stood alone. The communities are very spread out and there are only a few residents in the middle that could walk into Hartshill to use their facilities. There is a lack of facilities, especially for young people, so a large number of additional housing would exacerbate the problem. We therefore request that Ansley Common is removed from the Service Centre and set its own small realistic target of housing	Noted. Issue reflects the contiguous boundaries of the two settlements. This has meant that, for planning purposes, due to the close proximity and availability of services and facilities servicing both settlements, they have been treated as effectively one developed area. Nevertheless it is not intended to seek large scale development to be situated in the more remote dispersed part of Ansley Common. The Site Allocations DPD process will help provide more detail and the housing requirement identified for Hartshill/Ansley Common will be targeted as close to existing services/facilities as possible to ensure a sustainable approach. No change is, however, proposed for the Core Strategy.
	DPSR36C	Para 2.17 should be amended and " However infill within the current development boundary on the Western and Southern boundary will be encouraged where appropriate" should be added to the paragraph - as if the businesses on the western side fail, we need the ability to redevelop those areas so request that development on this side will not be prohibited. Want to make it clear that Ansley will include both Market and Affordable Housing and suggest a mix of 33.3% affordable and 66.6% market housing would be acceptable as we would rather see 2 smaller market houses built than one large one as this would be in keeping with the rest of the village. If we were to stipulate a 50/50 split then developers would choose to build just one large house and no affordable element. Affordable element should also include part ownership. Would like to know how the calculation of 40 houses have been allocated to Ansley as the introduction states that Ansley will be catering for its own needs. Our own Housing Needs Survey identified 5 houses were needed.	Disagree, Sites already within the current development boundary can come forward for development now. There is therefore no need to "encourage" such sites to come forward. The Core Strategy is a flexible, strategic document and does not specify or detail individual site or settlement specific tenures, types and mix of housing. Nevertheless, it does require that there should be a variety of types and tenures that reflect settlement needs (NW3) as split according to the settlement hierarchy (NW4). This can be established through Local housing Needs surveys an updated Housing Market assessment. The 40% requirement is a Borough wide target and Local Housing Needs surveys, the Development Management DPD and Site Allocations DPD consultation processes will provide more detail on delivery and implementation. Neighbourhood Development Plans may also provide more site specific detail where necessary and appropriate.
	DPSR36C	Difficult to justify numbers to the electorate when no obvious logic has been used other than sites put forward in the SHLAA	As above
	DPSR36D	Paras 3.2, 4.1, 5.3, 5.7,5.8,6.3 and 6.15 all seem to support our original response. However, we cannot find any clarification in the document as to which settlements are going to be allocated a proportion of market value homes (5.8) and in view of the fact that Para 6.17 indicates that all the housing needs to be affordable and therefore we need clarification of this. Para 5.3 states that to achieve targets we might need to develop land adjacent the existing development boundary - does this mean that market value housing will be allowed or will it still be classed as an exception site and thereby restricted to affordable homes only. The Matthew Taylor report hit the nail on the head as we do need a proper mix of new housing to maintain the vitality of our rural settlements. We need to build houses other than just affordable - need small houses to accommodate first time buyers, plus some elderly peoples houses and facilities.	Noted. The HMA identified the significant need for affordable housing was greater than the housing requirement allocated to North Warwickshire. However, it recommended a mix of housing be maintained as to seek 100% affordable housing across the Borough would be unviable and impractical, while not delivering the open market housing need. The need to deliver a mix of housing types and tenures is addressed in the Core strategy (NW3) and allows for a mix in settlements such as Ansley Common. No change proposed.
	DPSR36D	We know what the people want and that is a mixture of housing. In principle the Core Strategy has got it right, as long as we have clarification about the type of housing which we are being allocated Pleased to note that in para 6.15 - you do not expect sites to come forward for more than 10 houses at a time - this is important to maintain the nature and character of the village. We fully understand that the point of this document is to support specified numbers of housing - we realise that we cannot use the Site Allocations DPD as a means of prohibiting future development.	Support noted for stance in Category 4 settlements. The Site Allocations DPD process will help provide more detail and the housing requirement identified for Hartshill/Ansley Common will be targeted as close to existing services/facilities as possible to ensure a sustainable approach.
	DPSR36E	NW9 - There are shifting issues around this and consideration must be taken as to how "green" these things are	Noted. No change proposed.

DPSR37	R Wheat	WWT	DPSR37A	6.51-6.53 AND NW9 - Warwickshire Wildlife Trust welcomes the balanced approach to delivering renewable energy proposals detailed in policy NW9. The Trust does recognise the need to move to more low carbon sources of energy generation as part of the Borough's commitment to mitigate against the causes of climate change. However we believe the benefits of renewable energy generation must be considered in the context of their impact on the natural environment and the subsequent 'knock on' effects this could have on the borough's long-term ability to adapt to the effects of climate change. The criteria based approach to assessing all new renewable energy proposals against their relative impact on the natural environment ensures that the borough only supports those renewable energy projects that are considered to be truly sustainable; therefore enabling a more integrated approach to climate change mitigation and adaptation.	Noted.
			DPSR37B	6.62-6.71 and NW12 - WWT is supportive of the changes made to policy NW12. Welcome the borough's approach to setting criteria based protection for both statutory and non-statutory sites within the policy wording as we believe this provides a more robust and defensible level of protection for the borough's most important biodiversity assets. However, with the recent release of the NPPF and ongoing progress with the sub-regional Green infrastructure strategy and biodiversity offsetting pilot in Warwickshire- believe there are a few minor amendments that could be made to the policy wording to make it more effective and consistent with national policy. Warwickshire Wildlife Trust recommends an additional clause in policy NW12 that specifically focuses on 'sites' of local and regional importance for nature conservation.	Noted.
			DPSR37B	At present the policy groups local sites with other habitats and features of biodiversity importance and so that protection of these assets is only applied where there are no alternatives for the development- NPPF now requires planning polices to make distinctions between site designations so that the protection is commensurate with the status and contribution to wider ecological networks. Local Nature reserves are statutorily protected under the National Parks and Access to the Countryside Act 1949 and are noted for providing essential access to semi-natural open space as part of green space strategies and accessible open space standards as well as supporting important habitats for biodiversity. Whilst Local Wildlife Sites are not statutorily protected, they receive recognition for the important contribution they make to supporting conservation objectives set out in Local Biodiversity Action Plans and for forming the fundamental building blocks of an ecological network throughout the Borough.	Noted. No change proposed. Policy NW12 addresses habitats and features of regional or local importance. The Borough is also part of the Biodiversity Offsetting Pilot (covering Warwickshire County) and Sub-regional Green Infrastructure Strategy. This strategy will establish criteria to identify sub-regional Green Infrastructure assets of Landscape, Accessibility and Biodiversity importance. The outcome of this work will be taken forward in other Development Management Documents. No change proposed.
			DPSR37B	The LWS designation makes them of at least county importance for nature conservation and so the policy protection provided for these sites should at least reflect this value. Subsequently, the Trust recommends that the policy should include an additional clause for Local Sites to specifically emphasise their importance for biodiversity and thus ensure that their protection is more appropriate to their status. We believe that adapting the template used for the first clause of the policy for SSSI's could provide more robust protection of these sites for example: "Development that affects Sites of Regional and Local importance for Nature Conservation will only be permitted where the benefits of the development outweigh the nature conservation value of the site and the contribution it makes to the borough's ecological network". We believe that the inclusion of such a clause will ensure that the borough can deliver additional protection for key biodiversity assets and components of the ecological network, whilst still maintaining the criteria based approach of the current policy that is considered to be both effective and consistent with national policy.	Noted. No change

<p>DPSR37B The existing second clause detailing the level of protection for habitats and features of local and regional importance should largely remain the same and so could comprise the third clause of the policy. However, to align the clause more effectively with the NPPF ambitions to create resilient ecological networks; the Trust would welcome a specific mention of enhancing these features as well as securing their management. This could be amended to read: "Where appropriate, developments will be required to help enhance these features and/ or secure their beneficial management." Furthermore, with the addition of a clause for Local Sites, it will be necessary to amend paragraph 6.71 of the supporting text to outline that the third clause now refers to: *Habitats and Species identified under Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC). *Ancient woodlands and veteran trees *River Corridors and canals * Linear features and wildlife corridors, such as hedgerows.</p>	<p>Noted. Agreed. Amend text to refer to resilient ecological networks and include reference in 6.71 to *Habitats and Species identified under Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC). *Ancient woodlands and veteran trees *River Corridors and canals * Linear features and wildlife corridors, such as hedgerows.</p>
<p>DPSR37B The Trust also recommends some minor amendments to the final clause of the policy to take account of the Borough council's participation in the Warwickshire Biodiversity Offsetting pilot. Biodiversity Offsetting provides a standardised mechanism for quantifying and delivering compensation where adverse impacts on biodiversity cannot be avoided or mitigated on site. It was not intended for the pilot to be used to make developments that adversely affect important biodiversity assets acceptable and so the policy must still set clear standards for when and how biodiversity offsetting may be used within the planning system.</p>	<p>Noted. Agreed. Amend text to take account of the Borough council's participation in the Warwickshire Biodiversity Offsetting pilot.</p>
<p>DPSR37B In principle, the first three clauses of the policy (including the recommended clause 2 above) set out the policy on how developments affecting statutory and non-statutory sites and features of biodiversity importance will be determined. If the reasons for the development on site are considered justified against these criteria, the NPPF still requires proposals to conserve and enhance biodiversity so that adverse affects are avoided first, then mitigated to reduce adverse impacts. Compensation should only be considered as a last resort and it is at this point where the use of biodiversity offsetting can be explored to prevent any net loss of biodiversity. In order to provide clarity about this process within the policy text, the Trust strongly recommends that reference to this avoid, mitigate, compensate hierarchy is included in the final clause of the policy.</p>	<p>Noted. Agreed. Amend text to take account of NPPF . Include reference to compensation only to be considered as last resort</p>
<p>DPSR37B Where biodiversity offsets are sought, it may be necessary to outline how and where the local authority will accept offsets being used. In principle, the Sub-regional green infrastructure strategy will provide more detailed guidance on this matter. However, it may be worth retaining a reference in the policy that offsets would be sought towards enhancements of the wider ecological network in line with local, regional and national priorities for nature conservation. This will demonstrate that the local authority is 'planning positively' for coherent ecological networks throughout the borough to accord with such requirements within the NPPF.</p>	<p>Noted . No change proposed.</p>
<p>DPSR37B Taking account of the above amendments, the Trust has provided a revised recommendation for the wording of policy NW12. This wording has been discussed with and broadly supported by the RSPB after they submitted their consultation response. "Sites of Special Scientific Interest (SSSI's) will be subject to a high degree of protection, in view of their national importance. Development adversely affecting a SSSI will only be permitted where the benefits of the development at this site clearly outweighs the likely impacts on the site and any broader impacts on the national network of SSSI's. *Development that affects Sites of Regional and Local importance for Nature Conservation will only be permitted where the benefits of the development outweigh the nature conservation value of the site and the contribution it makes to the borough's ecological network.</p>	<p>Noted. Agreed. Text to be amended</p>

DPSR37B	<p>*Development that damages habitats and features of importance for nature conservation will only be permitted where there are no reasonable alternatives to the development taking place in that location. Where appropriate, developments will be required to help enhance these features and/or secure their beneficial management *Development should help ensure that there is no net loss of biodiversity and geological interest by avoiding adverse impacts first then providing appropriate mitigation measures. Where this cannot be achieved, and where the development is justified in terms of the above criteria, the Local authority will seek compensation and will consider the use of biodiversity offsetting as a means to prevent biodiversity loss. In doing so, offsets will be sought towards enhancements of the wider ecological network in the borough or sub-region in line with local, regional and national priorities for nature conservation"</p>	Noted. Agreed. Text to be amended
DPSR37C	<p>6.72-6.75 AND NW13 - Warwickshire Wildlife Trust is supportive of the amendments to the green infrastructure policy wording in policy NW13. We believe that this sets out a more structured and straight forward approach for planning a borough wide green infrastructure (GI) network. However at present the policy has little supporting information to provide a context for the protection, enhancement and creation of GI that the policy aims to deliver. The absence of clear definition and description of GI and a subsequent study identifying local assets are both likely to reduce the effectiveness of this policy in its current form.</p>	Support noted. Glossary definition of Green infrastructure will help provide detail.
DPSR37C	<p>The GI policy refers to two levels of GI planning. At the sub-regional level, work is currently ongoing to identify sub-regional GI priorities and assets that are delivering benefits to North Warwickshire Borough. Indeed it is possible that some of these GI areas may actually be within the borough itself; however the exact areas will be summarised in the Sub-regional GI Supplementary Planning Document (SPD) in due course. The adoption of the SPD will subsequently provide a context for the provisions of the policy in which assets can be easily identified, maintained and enhanced and linked with other strategic assets in the network through development proposals. The SPD will also set out priorities for new creation and detail a delivery mechanism so that new GI creation within the borough can focussed to strategic areas accordingly. From a sub-regional perspective, the policy will align itself well with the SPD and with the requirement to positively plan for networks of green infrastructure detailed in the NPPF.</p>	Noted.
DPSR37C	<p>The Trust's main concern with the policy at present is the delivery of local green infrastructure. This is particular pertinent to North Warwickshire as the low levels of growth, coupled with its housing distribution across the borough makes it unlikely to be able to make a meaningful contribute towards strategic GI delivery at the sub-regional level. The issue at hand is that there is currently no study of local green infrastructure assets within the borough. Currently the Core Strategy has no point of reference for how developments at the local scale can contribute towards the protection, enhancement, linkage and creation of local assets. Therefore, without a clear definition of what GI assets are likely to constitute within a development proposal, the application of policy NW13 on a local level will be ineffective.</p>	Noted. Agreed, Glossary definition of Green infrastructure will help provide detail. Development Management DPD policy and Site Allocation DPD process will also help address GI issues and protection. Core strategy also provides some direction in para's 6.71 and 6.74 identifying Local Nature Reserves, Canal and PROW network as "contribute towards the provision of significant local and strategic Green infrastructure". A Local GI Study may be carried out in the future for all or part of the Borough.
DPSR37C	<p>Good green infrastructure planning has an important function in terms of delivering on issues and objectives identified throughout the development of the North Warwickshire Core Strategy, such as access to open space, biodiversity, flood risk, sustainable development and climate change mitigation and adaptation. The borough must therefore ensure that every opportunity to integrate GI within new developments is taken advantage of. However, to achieve this, the borough council must provide greater clarity about how and where the broad principles of policy NW13 can be applied. Ruling out the possibility of undertaking a district wide GI study, there a number of possible options to optimise local GI delivery. These are not mutually exclusive</p>	Noted. Agreed, Glossary definition of Green infrastructure will help provide detail. Development Management DPD policy and Site Allocation DPD process will also help address GI issues and protection. Core strategy also provides some direction in para's 6.71 and 6.74 identifying Local Nature Reserves, Canal and PROW network as "contribute towards the provision of significant local and strategic Green infrastructure".

			DPSR37C	<p>1) Provide a strong and clear definition of local green infrastructure in North Warwickshire in the glossary of the Core Strategy. When referencing local green infrastructure this definition will help to development proposals to clarify what the GI assets are on site and the surrounds so that the criteria of NW13 can be applied.</p> <p>2) Include a description and examples of local green infrastructure within the supporting text of the policy. As described above this will assist prospective developers to identify onsite GI assets so that the criteria of policy NW13 can be applied.</p> <p>3) Promote the principles of green infrastructure planning in policies NW8 or NW10 so that this is considered as part of good design and as an approach to achieving wider sustainability requirements within all new developments</p> <p>4) Incorporate further GI policies and guidance within the Development Management Development Plan Document (DPD). This will further expand on how local GI planning should and will be considered within new developments.</p>	<p>Noted. Partially Agreed, Glossary definition of Green infrastructure will help provide detail. Development Management DPD policy and Site Allocation DPD process will also help address GI issues and protection. Core strategy also provides some direction in para's 6.71 and 6.74 identifying Local Nature Reserves, Canal and PROW network as "contribute towards the provision of significant local and strategic Green infrastructure".</p>
			DPSR37C	<p>Useful definitions of green infrastructure may be available within the forthcoming sub-regional SPD; however Warwickshire Wildlife Trust would be happy to work with the council to identify GI assets within the borough and develop useful definitions that could be used to support policy NW13</p>	<p>Noted. Will consult with Trust over Glossary definition and forthcoming Development Management DPD policy and Site Allocation DPD process to help address this issue.</p>
DPSR38	Matt Smith	Marrons (on behalf of Redrow Homes)	DPSR38A	<p>SPATIAL PORTRAIT - Redrow is supportive of Atherstone's identified role "as a main town and civic focus of the Borough" as set out in the Spatial Portrait (Core Strategy paragraph 2.29), and in particular, the recognition of its importance "to the vitality of the Borough as a whole". It is considered this is consistent with policies contained within the RS, which when located outside of the major urban areas and larger settlements, seeks to direct growth to market towns, such as Atherstone. Support the acknowledgement that there is "the need to accommodate development necessary to promote Atherstone's role as a main town and the civic focus of the Borough".For Atherstone to retain and enhance its role within the Borough, the majority of new development will be directed to this principal settlement. This would help retain, and allow for the provision of new, community services and facilities which are accessible to local people.</p>	<p>Support to Spatial strategy noted.</p>
			DPSR38A	<p>Redrow agrees that development beyond the current settlement boundary is constrained in most directions and NWBC's identification of land to the north west of Atherstone as the only suitable area for development, is supported. This reflects the NPPF's requirement for Local Plans to be prepared in a positive manner, indicating where future development should be located, as well as, identifying land where development would be inappropriate (NPPF paragraph 157). Given the recognition that land to the north west of Atherstone is the only suitable area where development could be located adjacent to the settlement, there is a clear case for the Core Strategy to identify this area as a broad location for strategic development. Further, the identification of this land as a broad location is justified when the potential yield of this area is considered against the housing requirement for Atherstone. This approach would be consistent with policies set out in the NPPF, which states that Local Plans should indicate "broad locations for strategic development" (paragraph 157).</p>	<p>Support to Atherstone position in strategy and hierarchy noted</p>
			DPSR38B	<p>STRATEGIC OBJECTIVES - Whilst Redrow is, in general, supportive of the Strategic Objectives (Table 2) and considers that they underpin the Spatial Portrait, concern is raised over how they will be implemented. Strategic Objective 2 seeks to "ensure there will be a sufficient supply" of housing by securing sustainable development, giving priority to "re-using previously developed land and building in Market Towns" (Strategic Objective 1). It is considered these two objectives are in conflict. At present, NWBC is unable to demonstrate a deliverable five year supply of housing land. It is considered that by prioritising the re-use of previously developed land and regeneration opportunities, the delivery of Strategic Objective 2, in particular the need to "ensure a sufficient supply" of housing, is compromised.</p>	<p>Noted. Not Agreed. Brownfield priority first will not prevent greenfield sites coming forward where evidence of non delivery due to lack of 5yr supply and/or on-site physical constraints, financial viability prevent brownfield sites and consents being implemented. No change proposed.</p>

DPSR38B	<p>Redrow acknowledges the prioritisation of regeneration opportunities and the use of previously developed land, however, these brownfield sites often take considerable time to come forward and encounter a range of problems which can delay their delivery. This is even more apparent in the current economic climate. Given the stance taken in the NPPF over maintaining a five year supply of housing land, as set out in paragraphs 47 and 49, it is essential for the Core Strategy to identify enough land early on in the plan period for development. Therefore, there is a need to bring forward greenfield sites at an early stage of the plan to ensure Strategic Objective 2 is fully met. The slow development of brownfield sites will also further impact on the five year supply of land and, as a result, paragraphs 49 and 14 of the NPPF will apply.</p>	<p>Noted. Not Agreed. Brownfield priority first will not prevent greenfield sites coming forward where evidence of non delivery due to lack of 5yr supply and/or on-site physical constraints, financial viability prevent brownfield sites and consents being implemented. No change proposed.</p>
DPSR38B	<p>Redrow considers that greenfield sites should be identified and brought forward early in the plan period to enable the Council to fully deliver its Strategic Objectives and maintain a deliverable supply of housing land in line with the policies contained in the NPPF. It is, therefore, considered appropriate to identify land to the north west of Atherstone as a broad location for strategic development, which paragraph 157 of the NPPF indicates as "crucial" to the preparation of a Local Plan.</p>	<p>Noted. Early consultation on Site allocations DPD process and text references in Core Strategy will help provide direction and clarity sought. No change proposed.</p>
DPSR38C	<p>SPATIAL STRATEGY - Redrow generally supports the Spatial Strategy as set out. In particular, the acknowledgement that the "majority of new development will take place in the larger Settlements" (Core Strategy paragraph 5.2), and the designation of "Atherstone with Mancetter" as a main town (Core Strategy paragraph 5.7). It is considered this reflects the approach to development set out in the RS and the adopted Local Plan (2006), along with policies contained in the NPPF. It is a matter of concern that "specific locations" for growth have not been identified and will not be until the "preparation of Area Action Plans or Neighbourhood Development Plans" (Core Strategy paragraph 5.8). Paragraph 157 of the NPPF states that Local Plans should indicate land use designations on a proposals map and allocate sites to promote development. This should certainly apply to Category 1 Settlements, of which Atherstone is the largest main town. Failing this, broad locations for strategic development should be identified on the key diagram as part of the Core Strategy.</p>	<p>Support noted. Regarding site identification concerns, early consultation on Site allocations DPD process and text references in Core Strategy will help provide direction and clarity sought. No change proposed.</p>
DPSR38C	<p>Given the timescales for producing these documents, it is unlikely any Site Allocation DPD will be adopted before 2015, as indicated by the Local Development Scheme (2012). This could delay potential sites coming forward. Therefore, it is considered appropriate to identify land to the north west of Atherstone as a broad location for strategic development to rectify the current five year land supply shortfall in the short term (up to 2017/18) and to ensure policies contained in the Core Strategy are implemented.</p>	<p>Disagree, intention is to consult early on Site Allocations DPD and seek parallel process/consultation with Core Strategy adoption process. Also , Core Strategy Constraints map, Strategic Land Availability Assessment all provide direction and indication of likely sites and areas for development.</p>
DPSR38D	<p>NW1 - The identification of the Settlement Hierarchy is supported, in particular the recognition of Atherstone, with Mancetter, as a Category 1 Settlement. Further, the acknowledgement that over 50% of new development will be provided on or adjacent to the Market Towns is also supported in that it recognises the need to release greenfield sites adjoining the Category 1 Towns</p>	<p>Support Noted.</p>
DPSR38E	<p>NW3 - Policy NW3 sets a housing requirement of 3,800 dwellings (net) to be delivered between 2006 and 2028 following the targets set out in the West Midlands Phase Two Revision RS. This is also a reflection of the ONS household projections (2010). This scale of provision will necessitate the release of greenfield land for development, such as the land north of Rowland Way. Redrow is confident that this site, and land to the north, can be delivered over the plan period. However, it is considered by Redrow that the figure of 3,800 dwellings (net) should be seen as a minimum requirement over the plan period. This would ensure the Core Strategy "plans positively for development", as set out in paragraph 157 of the NPPF.</p>	<p>Noted. Agreed but no change proposed. The Core Strategy makes clear the housing requirement figure is a minimum (See NW4 wording).</p>

DPSR38F	NW4 - Redrow is supportive of Policy NW4 and considers that the approach taken meets both the Settlement Hierarchy established in Policy NW1 and the Spatial Portrait, which seeks to direct new development to the main Market Towns. Further, the allocation of 600 dwellings in Atherstone and Mancetter reflects its position as the Borough's principal settlement, which is also outlined in the Spatial Portrait. Directing growth to this settlement will enable the town to provide enhanced services and facilities that the local community can easily access. The specification of these particular housing requirements for Atherstone as a minimum is also strongly supported. This approach will ensure that where there is scope for new development, it is directed towards the principal settlements, such as Atherstone, according with the overall approach to the distribution of development advocated in the Core Strategy. The Borough's needs are likely to evolve and change over time and stating housing requirements as minimum figures enables the plan to be flexible and adapt to any changing circumstances	Support noted.
DPSR38G	NW5 - It is recognised that the Strategic Housing Market Area Assessment (SHMA) has identified the Borough as having a high need for affordable housing. The SHMA considered a minimum target of 40% of the dwellings completed over the plan period, as set out in Policy NW5, would help to meet the Borough's affordable housing needs. Previous representations by Redrow to the Core Strategy indicated that although there was general support for the affordable housing policy, the policy failed to take account of the impact of affordable housing on development viability or the difficulty in obtaining funding for such development. This has been rectified in the Draft Pre-Submission version of the Core Strategy and Redrow is supportive of Policy NW5 and the policy wording that sets out a variety of mechanisms to provide affordable housing, which would be subject to viability testing.	Support noted.
DPSR38G	It is considered this approach accords with paragraphs 173 and 174 of the NPPF, which seeks to ensure development is not rendered unviable by making the plan unimplementable. Redrow considers this to be a flexible approach to delivering affordable housing that takes account of the changing market position which can be anticipated over the plan period.	Comment as above
DPSR38H	NW8 - considers that Policy NW8 is not consistent with the approach taken to sustainable development advocated in the NPPF. Paragraph 7 of the NPPF sets out the role of sustainable development and the three dimensions it encompasses; economic, social, and environmental. Core Strategy Policy NW8 does cover some of the themes raised in paragraph 7 of the NPPF, however, they are not presented using the model policy for the presumption in favour of sustainable development, as set out in the Local Plans section of the Planning Portal.	Disagree. Core strategy as a whole addresses the issue of sustainable development. No need to duplicate NPPF text and policy on "presumption". Model policy wording is included in the Core Strategy in both the introduction and Delivery sections. The wording however is not seen as policy but a matter of fact and so has been included as such. No Change proposed.
DPSR38H	The model policy sets out the approach NWBC should take to promote sustainable development. Adopting this approach will ensure the Core Strategy is consistent with paragraph 15 of the NPPF and reflects the NPPF's aim of promoting sustainable development in the manner envisaged. By deviating from this policy, the Core Strategy risks being found unsound. It is noted that during the examination of Taunton Deane's Core Strategy the Inspector stated in his letter to the Council of 27 April 2012, that "in order to be regarded as fully up-to-date and consistent with the NPPF a Local Plan should include a policy along the lines set out in the model". Further, he went on to add "unless there is such a policy the plan will not be sound". At present, no such policy is contained in the Draft Pre-Submission Core Strategy.	Disagree. Core strategy as a whole addresses the issue of sustainable development. Strategy is considered to be flexible, positive and supportive of development that is sustainable, but constraining where NPPF indicates need, such as in Green Belt. No need to duplicate NPPF text and policy on "presumption". Text reference in para 1.3 and 7.1 considered sufficient. No Change proposed.

DPSR38H	Redrow requests that the text for Policy NW8 be replaced with the model policy for the presumption in favour of sustainable development set out below: "When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:	See comment above
DPSR38H	Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or* Specific policies in that Framework indicate that development should be restricted."Of particular concern to Redrow, is bullet point one of Policy NW8, which states that to achieve sustainable development, development should: "Be targeted at using brownfield land in appropriate locations and subject to maintaining a five year housing supply." As it stands, this is not clearly worded and appears to suggest sustainable development can only be achieved on brownfield land. This approach is not consistent with the NPPF and also appears to be in conflict with Core Strategy Policies NW1 and NW15, which indicate that development will be required adjoining settlement boundaries, which will, in nearly all instances, be on greenfield land. As indicated above, it is requested that Policy NW8 be deleted and replaced with the model policy, or at the very least, bullet point one within Policy NW8 be removed.	Noted. Not Agreed. Brownfield priority first will not prevent greenfield sites coming forward where evidence of non delivery due to lack of 5yr supply and/or on-site physical constraints, financial viability prevent brownfield sites and consents being implemented. Where supply of green field land means greater than 5 yr land supply, brown field first priority can help slow green field release. No change proposed.
DPSR38I	NW9 - Redrow supports the Council's aim to ensure that sustainable and efficient development is delivered. However, it is not considered necessary to secure this aim through a development plan policy, not least because many of these requirements will be secured through further significant improvements in energy efficiency and, specifically, the application of Building Regulations. In addition, the house building industry is trying to shift towards zero carbon as a mandatory standard. It should be recognised that any policy included in the plan that seeks to introduce local and more onerous standards will impact on development costs and will, therefore, have consequences for the viability of sites. This issue is addressed in paragraph 173 of the NPPF, where it is stated that "Plans should be deliverable" and not subject to policy burdens which threaten viability.	Not agreed. Policy NW9 deals with renewable energy and energy efficiency. Borough experience from major housebuilders, including Redrow, is a resistance to accommodating or delivering any additional sustainable energy or energy efficiency and generation improvements beyond basic building regulations. Need is for a positive, encouraging pro-active policy while taking account of cost and viability issues. This could be a factor for 'increased value' of properties. No change proposed.
DPSR38I	Further, paragraph 174 of the NPPF indicates that local planning authorities should assess the likely cumulative impacts on development of all existing and proposed standards when added to nationally required standards; the cumulative impact should not put implementation of the plan at serious risk and should, instead, facilitate development throughout the economic cycle.	Comment as above
DPSR38J	NW15 - The recognition of Atherstone as a Category 1 Market Town and its importance as the main town in the Borough is iterated throughout the Core Strategy. As such, Policy NW15 seeks to continue regenerating Atherstone to improve community facilities, energy efficiency whilst creating and protecting jobs. Although NWBC seeks to pursue a strategy which will initially involve the development of sites within the development boundary, it is recognised that "in order to maintain a five year housing supply that growth may need to take place beyond its current boundaries".	Support noted.

			DPSR38J	Redrow fully supports the recognition that development beyond the current settlement boundary should be directed to the north west of Atherstone. However, NWBC is currently unable to demonstrate a five year deliverable supply of housing land, therefore, sites must be brought forward now to address this issue. It is recognised throughout the Core Strategy that the only suitable area for growth in Atherstone is to the north west of the town. Given the pressing need to bring sites forward to address the shortage in housing land, Redrow considers it appropriate to identify the area to the north west of Atherstone as a broad location for strategic development within the Core Strategy.	Support noted.
			DPSR38J	For the reasons set out above, Redrow supports the principle of identifying the broad location of development to the north west of the settlement. However, it is considered the policy text should be amended to provide greater clarity and alignment with policies within the NPPF. It is considered that the text should be replaced with "Further growth of the Atherstone and Mancetter area, outside of the current boundaries, will be focused in a broad location for strategic development to the north west of the settlement, north of Rowland Way and east of Old Holly Lane. This broad location for strategic development is identified on the key diagram" It is considered this wording provides greater clarity over the proposed broad location for strategic development and would accord with the policy wording in paragraph 157 of the NPPF, which states "crucially" that Local Plans should: "Indicate broad locations for strategic development on a key diagram"	Disagree. Key Diagram clearly indicates Atherstone housing requirement and position on settlement hierarchy. Constraints Map provides information on areas least likely to generate policy or environmental issues/problems. More detailed sites and areas for development will be addressed in Site Allocations DPD process. No change proposed.
			DPSR38K	KEY DIAGRAM - For the Core Strategy to be found sound the key diagram must reflect the policies set out in the plan. At present, the key diagram does not reflect the identification of the area to the north west of Atherstone as a broad location for strategic growth as set out in Policy NW15. The requirement for broad locations for strategic development to be shown on the key diagram is set out in paragraph 157 of the NPPF. For this reason, Redrow consider it appropriate to identify the broad location for strategic development on the key diagram. This can be achieved through amending the current key diagram to show the broad location for development. Should this be unclear on the current key diagram, an inset map for Atherstone and Mancetter could also be provided identifying the suitable area for future development. Redrow considers this approach would set out clearly the area identified as a broad location for strategic development, whilst ensuring the plan is positively prepared in accordance with the policies contained in the NPPF.	Disagree. Key Diagram clearly indicates Atherstone Housing requirement and position on settlement hierarchy. Constraints Map provides information on areas least likely to generate policy or environmental issues/problems. More detailed sites and areas for development will be addressed in Site allocations DPD process. No change proposed.
			DPSR38K	The identification of this area formally on a plan would also give a greater level of certainty for sites in this location to come forward in the short to medium term to help the Council maintain a five year deliverable supply of housing land.	As above
DPSR39	G Day	Atherstone Town Council	DPSR39A	2.14 - With regard to new or increased extractions the authority will seek overt public consultation and insist on green travel plans with minimal local congestion	Noted. Core strategy does not deal with Open Casting or minerals extraction. This is a matter for the Minerals Core strategy.
			DPSR39B	2.24 - It is desirable that the retail area of Long St. should be encouraged in becoming a vital part of the draw of Atherstone. Wherever possible public facilities should be located in or near the town centre.	Noted. Core strategy is a strategic document and does not address site or street specific issues. Nevertheless, it seeks to protect the vitality and viability of Borough's town centres. Issue can be addressed in more detail in Site Allocations DPD process.
			DPSR39C	2.25 - The industrial buildings with merit will be required to be retained in the design of their inclusion or connectivity with new development. Many buildings such as schools, whose historical connections are important to the town's identity. Elizabethan architecture is also present in the Market Place.	Noted. Policies NW10, NW11 and section on Historic Environment provide the framework for assessing design issues and protecting/conserving the historic buildings, structures. Development Management DPD process will address these issues in further detail.
			DPSR39D	2.26 - Partnership with the town council could provide a warden. It is recognised that whilst the main street has a shop and go niche to the shops more long term parking is still required to access service industries located in the town centre. A balance should be obtained in decriminalisation to differentiate allowable parking time and dangerous obstructive parking. The split of housing allocations for Atherstone and Mancetter together with the allocation to local service centres that graduate to Atherstone for facilities shows that 1200 new homes and families will need to be catered for.	Noted. Disagree. 600 units is for the combined area of Atherstone/Mancetter. Core strategy is a strategic document. Detailed parking and town centre management are not issues for Core Strategy but could be part of an Area Action Plan.
			DPSR39E	2.27 - Including crime and disorder alleviation measures	Noted. Disagree. Core strategy is a strategic document. Crime addressed in policy NW10 and 6.57 through Secured by Design approach. Detailed Crime and disorder measures not an issue for Core Strategy. May be a design issue for consideration in Development Management DPD policy process.

DPSR39F	2.28 - A site adjacent to the TNT Hub, now existing as unkempt allotments might provide a suitable prestigious office as an entrance to the town	Noted. May be an issue for inclusion in Site allocations DPD process.
DPSR39G	2.29 - Any further development will put further pressure on public agency buildings and facilities and therefore careful consideration will be given to premature disposal of suitable town centre buildings	Noted. Policy NW8 will address availability and loss of services and facilities. Further detail may be addressed in development of policies in Development Management DPD process. No change proposed.
DPSR39H	2.57 - A Bridge over the boundary brook is the only visible separation on the northern side of the railway and canal whilst on southern side bounding the Forest of Arden boundary there may be scope for some residential development.	Noted. Not an issue for the Core strategy. Could be addressed through the Site Allocations Plan process.
DPSR39I	2.72 - 110, 00 square miles not hectares	Correct figure is 110 square miles.
DPSR39J	3.2 - The Town Council would like more explanation in the statement	No change proposed.
DPSR39K	6.2(New Para) - A large proportion of the population is elderly and in some cases occupying homes that would satisfy the need of families. There is a case that encouragement should be given for opportunities in development to allow downsizing in both affordable and commercial housing.	Noted. The Core Strategy notes the issue in para 2.76 and 6.15 and policy NW3 addresses the need for different types and tenures that reflect settlement needs. Delivering elderly housing, specialist, adapted and extra care will all help encourage downsizing opportunities. No change proposed.
DPSR39L	6.45 - Consultation with the Canal and River trust will highlight the advantages of using tow paths as natural interest and recreational exercise, directing resources to assist accessible use with safety	paras 2.10, 2.27, 6.57 and 6.74 notes the canal systems uses and importance for recreation, regeneration, tourism and as biodiversity corridors and Green infrastructure asset. No change proposed.
DPSR39M	6.49 - Consultation and traffic limiting is also an important part of environmental enjoyment for local residents where extraction is near settlements such as Mancetter	Noted. Core Strategy does not deal with Open Casting or minerals extraction. This is a matter for the Minerals Core Strategy. Environmental and traffic impact of development is addressed in policy NW8 and NW19. Further detailed traffic impact policies are likely to be addressed in the production and consultation of the Development Management Plan.
DPSR39N	6.57 - This should include increased illumination in areas where CCTV is operating at night	Noted. Detailed issues of design can be addressed in Policy NW10 (particularly crime), 11 and in the production and consultation on policies for the Development Management Plan document. No change proposed.
DPSR39O	6.59 - The design champions will have regard to not only design but historical connection to preserve identity where older buildings have connectivity with new developments	Noted. No change proposed. Historical connections will automatically be part of any design assessment or considerations. No need for additional text.
DPSR39P	6.60 - Recognition of the attraction of water will be reflected in the design of canal and riverside developments	Noted. No change proposed. Implications of waterside location would be expected a part of a site design assessment or statement. More detail may be provided in the production and consultation on policies for the Development Management Plan document.
DPSR39Q	6.61 - Developments will not be allowed to stop up footpaths and prescribed Rights of Way as in cases existing in Atherstone.	Disagree. Core Strategy will not deal with detailed individual rights of way closures or in specific settlements. Matter will be dealt with on a case by case basis. Issue can be addressed in the production and consultation on policies for the Development Management Plan document.
DPSR39U	6.63 - Particular attention will be given to minimise disturbance to wildlife along canal and riverside developments	Noted. No change proposed. Implications of waterside location would be expected a part of a site design assessment or statement. More detail may be provided in the production and consultation on policies for the Development Management Plan document.
DPSR39R	6.68 - Where there is a proposal which is concerned or connected to a site which is mentioned in the countywide historic town study this will be highlighted in the planning report by officers	Noted. No change proposed. Historic environment issues addressed in policies NW10 and 11. Implications of historic environment would be expected a part of a site design assessment or statement. More detail may be provided in the production and consultation on policies for the Development Management Plan document.
DPSR39S	NW11 - Local consultation or reference to neighbourhood plans will be important in this respect	Noted. No change proposed. Neighbourhood Plans covered by other regulations and need to be in conformity with Core Strategy.
DPSR39T	NW12 - This will include upgrade of river bank walks and canal towpaths	Noted. No change proposed. Changes suggested do not necessarily accord with improving nature conservation/biodiversity if engineered solutions are involved. Too detailed for inclusion in Core strategy but consider in Development Management Plan. Could be addressed through policy NW8 through enhancing provision for open space, recreation, healthier lifestyles.
DPSR39U	6.74 - Local consultation in conjunction with the riverside and canal trust will provide maximum recreational access with minimum disturbance	Noted. No change proposed.
DPSR39V	NW14 - To include provision for reducing fear of crime, and crime prevention	Noted. No change proposed. Policy NW10 and paras address crime prevention including reference to Secured by Design approach.
DPSR39W	6.80 - Whilst there is a need for separation between Atherstone and Grendon there is scope for improving the western entrance to the town with prestigious offices near the junction of Holly Lane and the A5	Noted. No change proposed. Area suggested lies outside the development boundary and with potentially a significant visual impact on the gateway entrance into Atherstone. Issue may be considered as part of consultation on Site Allocations document.
DPSR39X	NW15 - Using local historic buildings used or previously used as public agency buildings to bring these agencies together for easier access	Noted. No change proposed. Core Strategy is a strategic planning document that will not address individual building management or multiple building management across public sector ownership and control.

	DPSR39Y	6.84 - The increase in housing and employment will necessitate multi agency consultation on the limitations and aspirations of current providers and steps taken to alleviate problems highlighted in the Key issues paper	Noted. No change proposed. Development will still need to address implications of service and facility/utilities provision and capacity on a site by site basis. No 'showstopper' deficiencies have been highlighted by any of the service providers or utilities to the Core Strategy or the levels of development proposed.
	DPSR39Z	6.86 - Public transport will be a major requirement if mobility to Market towns from local service centres is to maintain a viable economic local economy	Noted. Agreed. This is an issue of concern and policies NW17 and 18 aim to address the implications. Amend text help in 6.86 to re-inforce this issue along lines suggested.
DPSR40	R Freer	DPSR40A The split of housing allocations for Atherstone and Mancetter together with the allocation to local service centres that graduate to Atherstone for facilities shows that 1200 new homes and families will need to be catered for. 2.27. Including crime and disorder alleviation measures. 2.28. A site adjacent to the TNT Hub, now existing as unkempt allotments might provide a suitable prestigious office as an entrance to the town. 2.29. Any further development will put further pressure on public agency buildings and facilities and therefore careful consideration will be given to premature disposal of suitable town centre buildings. 2.57. A Bridge over the boundary brook is the only visible separation on the northern side of the railway and canal whilst on southern side bounding the Forest of Arden boundary there may be scope for some residential development. 2.72. 110, 00 square miles not hectares. 3.2. Ask for explanation and clarification	Noted. Disagree. Figure is 600 for the combined settlement area, as dealt with in planning terms. Core Strategy is a strategic document. Detailed parking and town centre management not an issue for Core Strategy.-2.27 - Crime addressed in policy NW10 and 6.57 through Secured by Design approach. Detailed crime and disorder measures not an issue for Core Strategy. May be a design issue for consideration in Development Management DPD policy process. -2.28 - No change proposed. Area suggested lies outside the development boundary and with potentially a significant visual impact on the gateway entrance into Atherstone. Issue may be considered as part of consultation on Site Allocations document. -2.29 - No change proposed. Core strategy is a strategic planning document that will not address individual or multiple building management across public sector ownership and control. 2.57 - No change. Issue for site allocations document. -2.72 - Disagree, correct figure is 110 square miles -3.2 - No change. Spatial Vision is a straightforward statement. Core strategy is document that explains and clarifies how to deliver this vision.
	DPSR40B	6.25. A large proportion of the population is elderly and in some cases occupying homes that would satisfy the need of families. There is a case that encouragement should be given for opportunities in development to allow downsizing in both affordable and commercial housing. 6.45. Consultation with the Canal and River trust will highlight the advantages of using tow paths as natural interest and recreational exercise, directing resources to assist accessible use with safety. 6.49. Consultation and traffic limiting is also an important part of environmental enjoyment for local residents where extraction is near settlements such as Mancetter. 6.57. This should include increased illumination in areas where CCTV is operating at night. 6.59. The design champions will have regard to not only design but historical connection to preserve identity where older buildings have connectivity with new developments... 6.60. Recognition of the attraction of water will be reflected in the design of canal and riverside developments	6.25 - Noted. The Core Strategy notes the issue in para 2.76 and 6.15 and policy NW3 addresses the need for different types and tenures that reflect settlement needs. Delivering elderly housing, specialist, adapted and extra care will all help encourage downsizing opportunities. No change proposed. - 6.45 - paras 2.10, 2.27, 6.57 and 6.74 notes the canal systems uses and importance for recreation, regeneration, tourism and as biodiversity corridors and Green infrastructure asset. No change proposed. - 6.49 - Noted. Core Strategy does not deal with Open Casting or minerals extraction. This is a matter for the Minerals Core Strategy. Environmental and traffic impact of development is addressed in policy NW8 and NW19. Further detailed traffic impact policies are likely to be addressed in the production and consultation of the Development Management Plan - 6.57 - Noted. Detailed issues of design can be addressed in Policy NW10 (particularly crime), 11 and in the production and consultation on policies for the Development Management Plan document. No change proposed.
	DPSR40B	As above	6.59 - Noted. No change proposed. Historical connections will automatically be part of any design assessment or considerations. - 6.60 - Noted. No change proposed. Unnecessary additional text details.
	DPSR40C	NW15. Using local historic buildings used or previously used as public agency buildings to bring these agencies together for easier access. 6.84. The increase in housing and employment will necessitate multi agency consultation on the limitations and aspirations of current providers and steps taken to alleviate problems highlighted in the Key issues paper.	NW15 - Noted. No change proposed. Core strategy is a strategic planning document that will not address individual building management or multiple building management across public sector ownership and control. - 6.84 - Noted. No change proposed. Development will still need to address implications of service and facility/utilities provision and capacity on a site by site basis.
	DPSR40D	6.86. Public transport will be a major requirement if mobility to Market towns from local service centres is to maintain a viable economic local economy.	Noted. Agreed. This is an issue of concern and policies NW17 and 18 aim to address the implications. Amend text help in 6.86 to re-inforce this issue along lines suggested.
	DPSR40E	NW 14. Reducing fear of crime and crime prevention	Noted. No change proposed. Policy NW10 and paras address crime prevention including reference to Secured by Design approach.
DPSR41	Mancetter PC	DPSR41A 2.8 - There is a danger that development may largely be biased towards Mancetter as it has been counted with Atherstone to account for 600 properties. Considering the likely development on the former school playing field, Mancetter should have reached a sensible quota of additional housing considering the existing infrastructure of shops and transport	Disagree. No bias expressed or identified in Core strategy. Situation will largely depend on site availability and current constraints. Area to north west of Atherstone has been noted as likely to accommodate most significant growth, not land at Mancetter. The integrated level of development and lack of clear boundary break between the two settlements makes it difficult to split them apart, they are effectively one built urban area with a number of small neighbourhood centres.
	DPSR41B	Policy NW6 amend wording as Mancetter already has a sufficient count of "gypsy" pitches within the Parish an further development of these sites should not occur	Disagree. Gypsy and Travellers Development Plan document will address number and location of pitches. Figure identified for pitches is a Borough figure and is not broken down by Parish. No change proposed.

DPSR42	B Sharples	Sport England	DPSR42A	Would be appropriate, in our opinion, to include the benefits of sport in the overall vision. It is also important to recognise that those working in and visiting business parks, villages and town centres will generate additional demand for sport and recreation activities. This tends to be at the peak times - early morning, at lunch time, late afternoon and early evening. Sport England recommends that this is fully assessed and that appropriate consideration is given in the Core Strategy to this issue. Recreational and sports facilities in or close to town or village centres can provide additional attractions that can support the viability of centres.	Disagree. Vision requires development to provide good access and provision of green infrastructure, open space, sports and recreational facilities. Unnecessary to add extra detail.
			DPSR42B	NW1 - In principle Sport England supports the thrust of this policy but would like Category 5 amended to include sports provision. i.e. <i>Outside development boundaries and except where other policies of the Plan expressly provide, development will be limited to that requisite for agriculture, forestry, sport or other uses that can be shown to require a rural location.</i> Reason for this is that a large number of sports do take place outside settlements e.g. equestrian sports, as well as a number of motor sports. This would also meet the council's Strategic objectives 5, 8 and 9.	Noted. No change proposed. Unnecessary detail. Policy focuses on relating development to the specified Settlement Hierarchy. The NPPF (Chpt 8 and paras 81, 89 & 92) provides the framework for development outside of this hierarchy, including sports and recreation. No need to duplicate policy provision.
			DPSR42C	NW2 - Again in principle Sport England supports this policy, however there is a concern that the policy does not reflect paragraph 89 of the National Planning Policy Framework particularly in relation to sport. Therefore we would advise a 6th bullet point is added: <i>6. provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purpose of including land within it. Reason - to conform to the National Planning Policy Framework</i>	Noted. No change proposed. Unnecessary detail. Policy focuses on Green Belt boundary and issue of review. The NPPF (Chpt 8 and paras 81, 89 & 92) provides the framework for recreational development outside in the Green Belt. No need to duplicate policy provision.
			DPSR42D	NW7 - We have outlined the economic benefits of sport earlier in our letter. We therefore would ask North Warwickshire to consider widening the use classes in this policy to include for sport, where employment is clearly being generated by the development. It can be shown that the same number of jobs can be created for a B8 100,000 m2 development as for an internal cricket or football centre of a 1/5 of the size. Therefore we would advise the changing of the first bullet point to the following with an explanation after the last bullet point: Between 2006 and 2028 68.5 hectares of local employment land will be provided of which 20 hectares will be specifically for high density employment creating uses falling within Use Class B1 (b & c), B2, B8 and B8 and D2* Uses (*An employment strategy would have to be submitted showing how the employment would be created and sustained as part of any planning application. Pre-application discussions with North Warwickshire's planning department and Sport England would be encouraged. Reason Sport has proven to be a sustainable employer in the last decade and has made a significant contribution to Objectives 1,2,3 and 8	Noted. Disagree. Policy NW7 deals specifically with employment and economic uses for which a land requirement has been identified (reflecting previous RSS allocation within a specified land use type). The Core Strategy has inbuilt flexibility that enables recreation and sport uses to come forward where justified and evidenced, including on employment estates and in countryside. However, no specific evidence of demand or need for the scale of facilities proposed is provided. Also specific inclusion of D2 uses is too broad and would include uses and development more appropriately located in town centres or close to residential areas. Permitting such uses large employment sites is not considered sustainable or appropriate, generating additional unnecessary traffic. No change proposed.
			DPSR42D	6.45 - gives us some cause for concern as the North Warwickshire Green Spaces Strategy is in our opinion not robust when dealing with playing fields and sport. We would suggest that the work done by KKP on behalf of the council is referenced along side this document. i.e. 6.45 spaces within the settlements, and will seek to protect and enhance them. The Council's Open Space, Sport & Recreation Audit and Green Space Strategy4 and the Playing Pitch Strategy and outdoor Sports Assessment (both May 2012,) identify existing shortfalls in provision, as well as further classifying the importance of existing open spaces. Reason These works are more up to date and follow the approved methodology for determining the amount of playing fields and sports facilities required. Without the robust evidence it is our view that Policy NW8 is unsound. Therefore it is our opinion that the KKP studies are referenced and form part of the evidence base to underpin this policy. Notwithstanding this, we do support the aims and objective of Policy NW8, but hope that our comments are taken on onboard.	Noted. Agreed. Text will be amended to reflect KKP study.

			DPSR42E	NW11 and 12 - Policies NW11 & NW 12, Natural & Historic Environment and Nature Conservation - Sport England has some concerns over these two policies that they could be used to prevent sport from happening. A number of sports require the natural environment in order for it to take place, e.g. sailing and rock climbing. Some of these sites do have SSSI or other designations. Sport England believes that any application within the natural environment where there is either a historical or some other designation should be accompanied by a management plan, showing how the sport will not create a negative impact on the environment and should also be supported by the Sport's National Governing Body.	Disagree. The policy seeks to constrain development that damages or adversely affects the natural or historic environment or asset. Clearly if a recreational development can be shown not to damage or adversely affect the designated asset then appropriate development can be accommodated. To allow any, unrestricted type of sport and recreational development may enable proposals that will damage or adversely affect the natural or historic environment or asset, contrary to aims of NPPF Chapters 11 (Paras 116 to 120), 12 (paras 132 & 133). No change proposed.
			DPSR42F	NW14 - We would just reiterate our comments above where sport has been proven to have economic benefits and can assist in economic regeneration.	Disagree. NPPF addresses the need for balance and evidence where development affects Natural and Historic environments and assets. Generalised economic benefits of sports and recreation cannot in isolation be the sole justification for destruction and loss of nationally designated and protected sites and buildings. Evidence of National or Regional benefit that outweighs the importance of retaining the Natural and Historic environment and asset is required. This can be addressed on a case by case basis rather than allowing a blanket, generalised support for all types of sport and recreation development to override National and Regional designations. No change proposed.
			DPSR42G	NW17 - Sport England supports this policy, but would suggest in order to make it more robust, that alongside the phrase disproportionate, one can perhaps add that a robust justification along with a sequential test would be required to prevent a disproportionate concentration of uses	Support Noted.
			DPSR42H	NW19 - Sport England supports this policy, however to just to reiterate a point which we have made above, there needs to be a robust evidence base in order to ensure that the correct levels of S106/CIL can be generated from developments, in which we would also include commercial and retail developments as well as all forms of housing, and that the right level of sporting infrastructure is provided, in the appropriate locations.	Support noted. Issue of CIL will be addressed in future consultations. Draft SPD may also be brought forward based on Green Space strategy and Playing Pitch strategy studies and work.
DPSR43	M Pearson	Tweeddale (on behalf of IM Properties)	DPSR43A	NW2 -Concern about the approach proposed in relation to the line and impact of HS2, which will have a significant potential impact within the Plan period on the Borough. Once finalised a Policy should be included in the Core Strategy to enable replacement of a similar scale of development in the general locality, along the same principles as has previously been accepted within the Greenbelt. Another concern relates to the lack of any response in the Core Strategy to the growth pressures which already exist in relation to the economic and employment growth points, around the NEC, Birmingham Airport - this will be further reinforced with the development of the HS2 Terminal during the plan period. The potential economic benefits and associated implications for growth in this general area should not be ignored but should be facilitated and steered in an appropriate manner within the Borough.	Concern noted. This issue is difficult to assess until outcome of HS2 project and legal challenge is known. In interim, where necessary the impact on existing facilities will be addressed through the 'exceptions to Policy' method to enable replacement/reconstruction locally of uses/buildings affected/demolished by the route. However, as the area affected is Green Belt national constraints on wider development will continue regardless of HS2. NPPF seeks to protect Green Belt and only accommodate "appropriate" development, which can include types of sport and recreational development. The Core Strategy seeks to deliver the Borough's development needs outside of designated Green Belt, for which there is considered to be sufficient land available. No change proposed.
			DPSR43A	This could be undertaken in a comprehensive manner and could potentially involve both employment development in appropriate locations (Coleshill Office Campus) and the provision of housing development in nearby settlements (for instance Water Orton) in order to assimilate these development pressures in a balanced and sustainable manner without detriment to the principle of the Greenbelt	
			DPSR43B	NW1 - The principle is supported but the unsustainable nature of the current detailed proposals involving dispersal of development across a large number of small settlements, the Policy is subject to objection.Greater weight should be given to the future viability and realities of service provision and retention, and also to existing and proposed employment provision which would ensure the settlement hierarchy is firmly based on creating a more sustainable settlement pattern which considers the housing, employment and social and community requirements of the population of each main settlement and its immediate catchment area, and these should become the focus of the Policy. Category 1 is appropriate as the location for the largest allocations of development. Category 1 settlements should provide significantly greater amounts of development of housing and employment than 50% in order to strengthen their importance and accord with the requirements of achieving improved sustainability.	Support welcome and concern noted. However, the policy and hierarchy of settlements approach is considered sustainable, targeting the majority of development towards the larger more sustainable settlements outside of the Green Belt yet allowing a limited amount of growth to smaller settlements to help sustain and maintain their services, facilities and address their local needs. No change proposed.

DPSR43B	This in turn suggests that the lower categories within the hierarchy should have lesser provision made - the exception to this would be Water Orton, because of its close location to major economic and employment growth points. It is considered that significant changes to category 1 settlements are inevitable in view of the contents and implications of the emerging locational policies	See comment above
DPSR43C	NW4 - It is considered the proposed split of housing between the Category 1 Market Towns (beyond the Greenbelt) and the lower category settlements is not an appropriate balance and the upper level should have increased allocations, which would provide a more sustainable settlement pattern over all. It would also accord generally with the most appropriate distribution of both existing and proposed employment provision, thereby lessening the need for lengthy journeys to work.	Disagree. The policy and hierarchy of settlements approach is considered sustainable, targeting the majority of development towards the larger more sustainable settlements yet allowing a limited amount of growth to smaller settlements to help sustain and maintain their services, facilities and address their local needs. No change proposed.
DPSR43D	NW5 - A target of 40% of dwellings to be affordable is considered to be unrealistic, over ambitious and impractical. The Affordable Housing SPD (2011) accepted that in economic and viability terms a lesser figure is likely to be justified. With the current economic situation likely to last for some time, there should be an acceptance by the Borough within any Policy requiring affordable housing that a lesser requirement be sought and a more flexible approach introduced. generally along the lines of the amendment made to the Policy in 2011. The 40% figure seems to be arbitrary as there was a need in the Borough for 286 affordable units per annum, when in fact only 150 units in total have been proposed for the whole of the plan period (excluding the Tamworth allocation).	Disagree. The figure is a Borough target than can be achieved through on-site provision and off-site contribution that help deliver 100% provision on public owned sites. Past trends show it is achievable and has also been achieved on larger sites. The viability assessment identifies the continued potential delivery through the Local Investment Programme and the flexibility built into the policy allows viability and on-site exceptional costs/constraints to be addressed. Further detail on policy thresholds, off-site contribution methods will be dealt with through the Development Management Plan process. No change proposed. 40% figure taken as a target, reflecting past trends to maximise the potential affordable housing delivery in view of the significant need identified in the Housing Market Assessment study.
DPSR43E	NW7 - The statement included in Pra 6.34 is supported - yet it is considered that the proposals do not address or adhere to these principles. It is believed the elements for making up the employment land come from the RSS, which the evidence for this document is still valid. The circumstances have not changed considerably - however the 20ha of land for Logistics at Hams Hall has not come forward, but the principle for requirement still remains and could be provided for at Birch Coppice. Mira Technology Park may well bring changes near to the eastern edge of the Borough, but there is no justification whatsoever for redesignating 20 hectares of land in the manner proposed. The Sustainability Appraisal at Para 7.10 states that the Core Strategy Document is an unjustified proposition. It is considered the belief that the switch from logistics use to these more rarer and specialist uses is inappropriate and undeliverable - and this is supported by the Councils own consultants. The RSS Panel report expressed a clear view that part of the Tamworth employment allocation should be considered for locating in North Warwickshire. It is noted that discussions have taken place in relation to North Warwickshire taking an element of Tamworth's housing requirement - but no such evidence has been provided regarding any discussions concerning a similar approach to employment. It is considered that unless this is addressed there is a potential further shortfall in provision. The additional housing from Tamworth will surely require to be balanced by an additional employment provision.	Concern noted. The evidence for the RSS may still enable an additional 20ha's of logistics to be provided at or within an alternative site outside the Green Belt or along the A5. However, the opportunities for widening the employment base provided by the proposals at MIRA are considered sufficient to outweigh the need to specifically identify the additional 20ha's, particularly in view of the impending abolition of the RSS. The NPPF indicates and supports the need for sustainable economic growth and flexibility for emerging sectors (para 21 NPPF). Widening the employment use type and base will give the Borough greater economic and employment flexibility, make it more capable of weathering the recession and be in a strong position for future growth when economic improvement in whatever sector is forthcoming. Less focus on a single economic/employment sector (logistics) will ensure the Borough has a more robust and flexible economic and employment base. The issue of cross border employment land is only addressed in the Panel report as a footnote that states "part of the provision <u>may</u> need to be located in Lichfield or North Warwickshire Districts" but no allocation is required or specified. Until evidence is forthcoming that land is required it is not intended to identify/include sites or a specific hectarage for Tamworth's needs. The Borough has signed a memorandum of understanding to address any future issues and to address the duty to co-operate. Review of both Borough's Core Strategies will come forward based on changes to evidence, demand and need. Tamworth Borough Council have indicated there is no employment requirement within this Borough at the current moment. No change proposed.
DPSR43F	NW8 - add a further bullet point * Achieve a more sustainable settlement pattern	Noted. Unnecessary text addition. No change proposed.
DPSR43G	NW10 - Recognises the importance of this Policy	Noted.
DPSR43H	NW11 - The recognition that regeneration of the market towns will assist in the protection and enhancement of the natural environment is to be welcomed. Recognition that "growth" is "expected" "beyond defined settlement boundaries" is also welcomed	Noted

DPSR43I	NW14 - Policy is welcomed in principle but there appears to be a contradiction built into the statement in paragraph 6.76, in the manner in which the Council propose to address the "fragile economy" The Spatial portrait notes that over 90% of firms in the Borough employ 10 or less people, whilst at the same time the Borough is home to many national and international companies, each with a significant work force. It does appear that this reflects a reasonable balance between small and larger companies, with a potential for growth and that this "high dependency on a narrow range of companies" needs further consideration to assess the accuracy of the statement. It appears these traditional groups have the greatest potential for further growth and economic regeneration and areas with potential should be supported, and this would include B8 as well as B1 and B2.	Noted. Partially agreed. Data indicated a significant portion of small to medium sized firms were struggling to survive and a number of high profile closures such as Avondale caravans added to a significant increase in numbers of jobseekers over the recessionary period, appear to indicate the fragility of the economy. The statement regarding a "high dependency on a narrow range of companies" relates primarily to the logistics sector. The term/text should be amended to state "sectors" rather than "companies" to better reflect the situation.
DPSR43I	The consultants acknowledge there are difficulties in delivering a radical switch to "research and development and other knowledge based companies/facilities" A more balanced approach to regeneration would be more appropriate and of greatest benefit. This would involve seeking to create the full range of employment activity rather than concentrating on a very limited and more specialised area.	As above
DPSR43J	NW16 - The contents are noted and in principle supported. It would be of benefit to amplify the policy further by referring specifically to the employment potential for the expansion of Birch Coppice and to the availability of the Strategic Rail Freight Interchange (SRFI) located there and of its importance to the future growth of the area. The designation of Birch Coppice as a SRFI should be included specifically as a Policy within the Core Strategy. Reference to the benefits of a mixed use development to the south and east of the settlements to create a stronger more sustainable settlement would also clarify matters and support the future development and regeneration of the area in a comprehensive manner.	Noted. Partially agreed. Clearer reference will be made to rail freight provision in text. No designation of Birch Coppice as a "Strategic Rail freight Interchange proposed. This is more appropriate for inclusion in a Regional or national document not a local Core Strategy. Hams Hall interchange would fall in same category. Designation may encourage inappropriate levels of development to address a National or Regional demand that would be better and more appropriately located elsewhere to promote regeneration, rather than accommodate on green field or green belt land. No further change proposed
DPSR43K	NW18 - The references within the paragraphs 6.86-6.89 particularly concerning the A5, paint a more negative picture than the A5 Strategy Report. The Policy and associated contents should be amended to reflect the emphasis on this report.	Disagree that the para's paint a negative picture. They simply state need to develop an A5 Strategy and for development and growth to carefully consider the implications of additional traffic. No change proposed
DPSR43L	NW19 - In terms of the Borough Council seeking agreements/obligations from developers in relation to Section 106, there is a need for realism relating to viability during this period of economic difficulty, and this should be referred to	Noted, agreed. Text will be amended in para 7.6 or 7.7 to reflect need for S106 obligations and CIL levy to take account of viability.
DPSR43M	Both diagrams should be amended as they omit the existing residential development to the South of the A5 at Dordon and also the existing development site at Coleshill Office Campus	Disagree. Key diagram indicates broad housing requirement by settlement and size/position of settlement in the hierarchy, not locations or sites for development. This will be addressed in the site allocations document process. The development Constraints diagram is just that, a Diagram identifying the key Constraints on development. No development potential is included. No proposed change.
DPSR44	G Mitchell	Framptons
DPSR44A	SPATIAL PORTRAIT - Acknowledge the Borough has low housing growth and whilst expansion of employment land has been large compare to the rest of the West Midlands. It is encouraging that the document is seeking to revise the development strategy that prevailed the current local plan. Paragraph 2.17 - it is encouraging to see that is acknowledged that Ansley should accommodate new development.	Noted.
DPSR44B	SPATIAL STRATEGY - Agree with the conclusions in paragraph 5.4. Also agree with the conclusion of the Matthew Taylor Review on the Rural Economy and Affordable Housing. Support the principles outlined in 5.7 and 5.8. Acknowledge that the document allocates strategic housing numbers to places but does not give a specific location. In the absence of Area Action Plans/ neighbourhood plans, the Core Strategy should acknowledge the potential for development to come forward through the development control process provided it is in accordance with the other Policies of the LDF.	Noted. The Site Allocations plan will be coming forward as soon as possible to identify sites for development. In the interim the core strategy notes that this may result in development adjacent to development boundaries but only outside of the Green Belt. The Core strategy notes that development will be delivered on sites within or adjacent to the development boundary in Local Service Centres. Where necessary, changes to development boundaries will be made in the appropriate Site Allocations Development Plan Document, or once development has taken place, whichever is the earlier. Sites may also come forward through Neighbourhood Development Plans. No further changes proposed.

DPSR44C	NW1 - Support the identification of New and Old Arley as a Category 3B settlement. An additional reference should be added to give consideration to a review of greenbelt boundaries in Category 3B settlements to identify potential development opportunities that would be suitable to provide new housing. Support the identification of Ansley, Austrey and Warton as "other settlements" with a development boundary where development can be accommodated. However greater clarity should be provided in NW1 in terms of the scale of acceptable development. Also the terminology between Policies NW1 and NW4 should be consistent, especially for Category 4 - Smaller rural villages is referred to in Policy NW4 and NW1 should be the same (is other settlements with a development boundary).	Disagree on Green Belt review. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. Partially agree on terminology consistency between NW1 and NW4. NW4 reference will be amended to reflect NW1 terminology.	
DPSR45D	NW3 - Object to the amount of housing development proposed in NW3. 3,300(plus 500 to cater for Tamworth's needs) dwellings for the plan period - appears to be based on a pro rata increase of the WMRSS provision by an extra 2 years. This level is inadequate and does not reflect the level of housing growth that should be provided having regard to the most up to date evidence base (such as the DCLG Housing projections 2008 - which indicates a rise of 4000 households- when this is converted to a housing requirement it would be in excess of 4,500 dwellings and not the 3,800 as proposed) It is considered that the Core Strategy does not take proper account of the NPPF. It has not been positively prepared and is not consistent with National Policy. The strategic priorities for the delivery of homes and jobs in the area fall short of that which is required and importantly the document does not plan positively for the development and infrastructure required in the area. The plan has not used a proportionate evidence base and therefore is unsound after failing to meet the tests of Paragraphs 158-161 of the NPPF. The inadequacy of the level of housing is a major shortcoming and will potentially result in the housing needs of the Borough not being met and in turn the plan will fail to meet its strategic objectives and the government's objectives for significantly boosting housing supply. The document provides no robust explanation as to the details of evidence base that has been used to determine housing requirements and latest Government policy objectives for housing have not been taken into account. In respect and having regard to the NPPF, the Core Strategy is not sound.	Disagree. Following the consideration of a Housing Paper the Council adopted an approach to deliver a minimum of 3,300 for its needs up to 2028, while accommodating an additional 500 units from Tamworth. This is considered sufficient and adequate to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. No change Disagree. The Core Strategy is considered to be positively prepared, with a flexible, accommodating approach to development and, in particular, economic development. The housing figures provided are taken as a minimum and, where evidence of need arises, can accommodate increased growth. The evidence base shows that the alternative levels of growth were considered but that the extension of the RSS figure along with accommodating some of Tamworth's needs long term provided an appropriate positive balance between housing restraint in a rural area and accommodating economic growth.	
DPSR45E	NW4 - Support the settlements split of housing in category 4 as a minimum figure. Object to category 5 proposals that it expects the sites that come forward to be 100% affordable - this is unrealistic as evidenced by past performance in the Borough. There will be instances where the opportunity arises to facilitate development within the built up area of a settlement. In practical terms affordable housing in such locations can only take place as part of a balanced provision of both market and affordable housing, albeit small scale. NW4 should be amended to reflect this in category 5 settlements.	Disagree. Category 5 settlements are those that are either classed as hamlets or are villages only in name, without any services or facilities to support housing development. In such unsustainable locations only a proven local need for (100%) affordable housing is considered appropriate. Nevertheless, sites can still come forward where delivered through the Neighbourhood Development plan process and Community Right to Build. In most cases the delivery agent for such housing would be via a Registered Social landlord, Housing Association or the Council itself. Actively encouraging and enabling open market housing in such locations is considered unsustainable and unnecessary, especially in view of the relaxation of the 100% affordable housing requirement in category 4 villages as well.	
DPSR45F	NW5 - Object to this policy in context that the 40% target is applied Borough wide and seems to be regardless of site size. Paragraph 6.22 seems to be more flexible and allows for variations to occur on a site by site basis. The policy should be amended to reflect this flexibility. With regards to comments in respect of NW4 it is appropriate to consider making amendments to NW5 to allow for greater flexibility across all settlements to provide for a reasonable level of a mix of both market and affordable housing capable of meeting local needs.	Disagree. The 40% target is Borough wide and can be adapted to site circumstances, viability and need. Core Strategy Policy gives strategic target, not detailed application. More detailed Development Control policy will be developed through the Development Management Plan process. All sites will be expected to address and contribute to delivering affordable housing priority. No Change proposed.	
DPSR46	A R Yarwood National Federation of Gypsy Liaison groups	DPSR46A Policy NW6 is inadequate. The provision for Gypsy and Travellers needs to be kept under review and this should be recognised in the wording of the policy	Disagree. Gypsy and Travellers Plan will address site provision and detailed policy criteria. Core Strategy provides strategic policy requirement based on needs assessment. No change proposed.

DPSR47	G Yardley	Nuneaton & Bedworth BC	<p>DPSR47A NW3 - Putting aside the 500 dwellings for Tamworth, the proposed allocation of 3300 dwellings in the plan 2006 to 2028 is about 20% less than the 2008 household projections figure of 4180. If the household projections are accurate there is a shortfall of 880 dwellings allocated. This may have impacts for Nuneaton and Bedworth in terms of additional pressure to provide housing to meet any shortfall.</p> <p>The housing target appears in part to have been informed in part by past completion rates. The actual average completion rate should be considered against the context:</p> <ul style="list-style-type: none"> • Was the supply tightly constrained by local plan policies and so a higher level of growth prevented? • Was there a good supply of housing land to meet demand but development did not take place? <p>This will help determine what level of growth is realistic over the longer term. North Warwickshire should meet the demand for housing arising within its own area. NWBC should clearly demonstrate:</p> <ul style="list-style-type: none"> • Why it considers the ONS 2008 household projections to be optimistic; • Why it considers that a level of completions above 150 is not achievable; • Its approach to balancing employment and housing growth 	<p>Disagree. Following the consideration of a Housing Paper the Council adopted an approach to deliver a minimum of 3,300 for its needs up to 2028, while accommodating an additional 500 units from Tamworth. This is considered sufficient and adequate to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. No change</p>
DPSR47B			<p>There are two issues related to the way sites identified in the RSS for logistics uses are treated in terms of meeting regional as opposed to local needs. This has implications for the employment target.</p> <ol style="list-style-type: none"> 1. Existing planning permissions at Birch Coppice and Hams Hall are not taken into account within employment target. This land was identified for regional needs and should be considered separately from local needs. 2. 20 hectares was identified through the RSS for logistics to meet regional needs at Hams Hall. Due to changed circumstances and the opportunities arising from MIRA, NWBC propose to re-allocate 20 hectares for high density (employment) uses. This land is added to the employment target. It will be located in a non-Green Belt location and so not at Hams Hall. 	<p>With the impending abolition of the RSS, monitoring on a regional basis has changed. Therefore it is important that the Borough Council now monitors these sites locally. It would now be unjustified to exclude the 20 hectares from the targets as the situation has changed and appropriate action is required to take account of this. Also the Borough Council recognises that it is not a major conurbation so has to use the available employment land imaginatively in order not to receive objections from those conurbations on taking economic opportunities away from them. The cross border partnership working with Nuneaton and Bedworth and Hinckley Borough Councils and the Coventry and Warwickshire LEP have been closely involved in the issues and support around the MIRA Technology Park and the benefits that could accrue from the development to all adjoining Local Authority areas. As a result the opportunities for widening the employment base provided by the proposals at MIRA are considered sufficient to outweigh the need to specifically identify the additional 20ha's for logistics alone, particularly in view of the impending abolition of the RSS.</p>
DPSR47B			<p>The background evidence, accompanying the RSS, identified the site at Hams Hall land for logistics for regional needs. If such a strategic need still exists, the retention of the site for logistics uses is required. However, North Warwickshire considers that the site is no longer required for a regional use and that the land should be incorporated into its employment land requirements. This is related to MIRA Technology Park which is a site relevant across a wider area than North Warwickshire. The loss of Hams Hall for regional logistics is a strategic issue that should be discussed through the Duty to Co-operate with neighbouring authorities. Also, appropriate evidence is required to justify the loss of a site for regional logistics, whether a suitable replacement is needed and to justify whether there is a local or sub-regional need for employment land to support MIRA Technology Park and where this should be located.</p>	<p>The NPPF indicates and supports the need for sustainable economic growth and flexibility for emerging sectors (para 21 NPPF). Widening the employment use type and base will give the Borough greater economic and employment flexibility, make it more capable of weathering the recession and be in a strong position for future growth when economic improvement in whatever sector is forthcoming. Less focus on a single economic/employment sector (logistics) will ensure the Borough has a more robust and flexible economic and employment base. The Policy will not prevent Logistics development coming forward but will focus and encourage that which delivers a high employment density. However, the duty to co-operate notwithstanding, it is unclear as to why North Warwickshire, a rural Borough with significant Green Belt coverage, should be expected to deliver wider than local needs. The needs identified in the Core Strategy relate to local employment needs and the relic base line allocation from the RSS Phase 2 review, for which the evidence base still exists.</p>
DPSR47B			<p>North Warwickshire should make clear the difference between local needs and strategic needs meeting a wider area. NWBC should provide appropriate evidence to support their approach. To ensure the Duty to Co-operate is met, discussions should take place with neighbours about the need for and appropriate location of employment sites meeting strategic needs</p>	<p>The adaptation of the RSS allocation to provide for a wider variety of higher employment density employment uses as well as the delivery of Logistics, much of which has already received planning consent through Phase 2 of Birch Coppice, is seen as a positive, pro-active method of delivering sustainable economic growth and flexibility for emerging sectors (para 21 NPPF). Widening the employment use type and base will give the Borough greater economic and employment flexibility, make it more capable of weathering the recession and be in a strong position for future growth when economic improvement in whatever sector is forthcoming. Less focus on a single economic/employment sector (logistics) will ensure the Borough has a more robust and flexible economic and employment base. The Policy will not prevent Logistics development coming forward but will focus and encourage that which delivers a high employment density. No change proposed.</p>

			DPSR47C	NW3 AND NW7 - <u>Balancing employment and housing growth</u> - The level of employment growth does not appear to be linked to the level of housing growth proposed for North Warwickshire. The Core Strategy nor its supporting evidence make no reference to balancing housing and employment needs. In fact, the report 'Housing and Employment Options to 2028 and 2031' raises concerns in this respect. The report makes reference to North Warwickshire drawing the highest proportion of its working population from outside Warwickshire and that North Warwickshire is operating as a sub-regional or regional focus for employment.	Noted. The circumstances of historic significant brown field site redevelopment/regeneration (via redundant ex mining and energy generation sites) have left North Warwickshire with a legacy of significant employment sites. The demand generated both by these sites and the significant transport links (including 2 major multi modal rail freight interchanges) the Borough benefits from have inevitable led to significant inward employment migration. However, the rural character and Green Belt coverage have severely limited the capacity and ability of the Borough to balance that employment growth with matching levels of housing growth for which there was limited identified local need. contd..
			DPSR47C	Furthermore, it states that NWBC is concerned that the demand and pressure for increasing the employment land supply is coming from outside the Borough and does not reflect local need or demand. North Warwickshire need to consider whether the level of employment growth it is promoting compared to the level of housing is appropriate given the current levels of in-commuting into the area. This does not appear to be a sustainable approach. Under provision of housing compared to the level of employment provision will place pressure on neighbouring authorities such as Nuneaton and Bedworth to provide housing to support employment growth in North Warwickshire	See above contd. The impact of arbitrarily and simplistically matching housing growth to historic rates of employment growth, delivered as a result of specific regional and national policies to regenerate and rejuvenate depressed ex mining and similar areas, would have a significantly adverse impact on the rural character of the Borough, resulting in loss of Green Belt and merging of settlements, and, in view of the limited services and facilities within the Borough, particularly health, retail and education sectors would deliver unsustainable, unsupported housing. The need to seek improved public transport provision to provide more sustainable links to these areas (included as part of A5 strategy approach) is considered a more appropriate reponse than to significantly increase housing numbers that would, inevitable, be providing for a much wider regional/sub-regional need, not simply a local need. No change proposed but the need for improved public transport or similar services will be strengthened and emphasised in the supporting text.
			DPSR47D	RETAIL - There is no reference to retail development in terms of either a need for growth or not or in terms of a hierarchy of centres. It is unclear whether North Warwickshire intends to influence the scale and location of retail development	Noted. Partially agreed. None of the main towns in North Warwickshire are significant enough to fall within the previous RSS network of strategic town/city centres. As such the scale of retail development will be limited. The Core Strategy does not, therefore, make any significant provision for retail development. The NPPF addresses any significant retail proposals through paras 26 & 27. Duplication of this national policy approach is not considered necessary.
			DPSR47E	NW19 - North Warwickshire has not identified specific sites for development but set development targets for individual settlements. This means that there is a lack of certainty over the specific location for housing and how this may impact infrastructure in Nuneaton and Bedworth. Given the Core Strategy has reached pre submission stage NBBC is concerned that a lack of evidence around infrastructure may result in pressures on the Nuneaton and Bedworth's infrastructure during the Plan period. It is noted the Infrastructure Plan will be updated annually as further information presents itself, however this will not overcome the issue where development comes forward in the areas identified and limited infrastructure evidence has been collected. In collecting infrastructure information, from infrastructure providers, it has been indicated that the specific location of development can make a significant impact on the need for different types of infrastructure. North Warwickshire should provide more accurate information for the specific sites to meet growth needs through a more detailed planning document such as a site allocations document. In addition, NBBC would welcome the opportunity to work together in the development of assessing cross border infrastructure implications, as well as the development of any CIL work that affects cross border sites	Noted. The Borough Council consulted with all the service and utility providers indicating those settlements where growth may be significant in local terms. No significant showstoppers have been identified or raised although there may be some local infrastructure impacts that proposals will have to address as part of their impact assessments. Where significant detrimental impacts arise it is expected that new development will address any deficiency, make good or provide alternative provision. The situation will be kept under review and will also be addressed in future CIL assessment and provision.
DPSR48	Ginny Hall	MONO Consultants	DPSR48A	No specific comments to make as we understand that this is a strategic document. We would however comment that we consider it important that there remains a telecommunications policy within the emerging LDF. It is recognised that telecommunications play a vital role in both the economic and social fabric of communities and this is supported by the NPPF.	Noted. A Site Allocations Development Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State. The Borough Council will consult widely on that document. Nuneaton and Bedworth will be fully consulted and involved in that process. The joint Strategic Land Availability Assessment, undertaken in partnership with Nuneaton and Bedworth previously, also provides clear direction and evidence as to the likely sites that may come forward through the Site Allocations document. Noted. No change proposed.
DPSR49	Edward Wrench Barton Willmore		DPSR49A	Spatial Portrait - The North Warwickshire Development Constraints map on page 9 would benefit from being expanded to show broad locations where development should be sited. These broad locations could indicate where the Council aspire to encourage development over the Plan Period. We consider that this would help facilitate many of the key policy recommendations and create a clearer vision for the Core Strategy. It would also create a sound basis for the Allocations DPD that is being prepared by the Council.	Noted. This will be addressed more specifically through the Site Allocations Plan process which will be progressed in parallel with the Core Strategy submission later this year. No further change proposed.

- DPSR49B DORDON - Paragraph 2.42 suggests that Long Street would be a constraint to any growth in Dordon. It is not explained in the Core Strategy why this is the case and we would welcome further clarification on this point. Long Street is aligned north-south and runs the entire length of Dordon, with buildings along both sides of the Street. Clearly, developing further west of Long Street will increase the potential coalescence with Tamworth and, therefore, our Client's land east of Dordon is undoubtedly the preferred option to provide development in the area. Furthermore, in developing this area, mitigation measures can be identified and developed in order to address the issues along Long Street, including the potential to create pedestrian links through to Long Street, which will mean better utilisation of existing village centre amenities.
- We welcome the recognition that development in Polesworth and Dordon can make a positive contribution to its sustainability if it embraces a mix of housing and other uses and is supported by the necessary infrastructure and services. However, we would comment that to ensure new development can provide the necessary infrastructure; the scale of development will need to be such that improvements remain economically viable.
- Noted. The narrow nature, limited capacity, congestion and on street parking are the constraint issues that affect Long Street. Alternative access provision or improvements or traffic management methods will be sought through any consideration of future development sites impacting on Long Street. However, the Site Allocations Plan process will be the route used for site identification and allocation. No change proposed.
- Noted. Partially agreed. The need to emphasise viability will be added to the supporting text for section on sustainable development. Nevertheless, housing and other development will still be expected to address their infrastructure needs regardless of size. If development would significantly impact adversely on a location due to infrastructure deficiencies it is likely to be resisted. Scale of development proposed and limited development proposed for North Warwickshire will, nevertheless limit what improvements to provision or service deficiencies can be expected. Larger more viable sites will be sought where significant deficiencies in provision are known and the settlement's position in the hierarchy enables appropriate, significant land release and development to come forward to address that deficiency. The Site Allocations development plan process and Development Management Plan policy development will address some of these issues.
- DPSR49C POLESWORTH - In previous drafts of the Core Strategy, Polesworth and Dordon have been mentioned together regarding the issue of the North Warwickshire Coalfield reserves. However, it now appears in paragraph 2.63 that the coal reserve area concerns are highlighted as solely an issue for Polesworth. This section does not appear consistent with the later Core Policy section for Polesworth & Dordon, which presents the issue of coal reserves as a joint issue for Polesworth and Dordon. Clarification and consistency therefore needs to be made throughout the Core Strategy in order to convey the exact areas in question
- Noted. The coal reserves stretch over a significant area of Polesworth, Dordon and Baddesley Ensor. It is therefore a wider issue than simply affecting Polesworth alone. Para 2.63 relates to Polesworth alone and hence the more specific reference. Brief reference to the issue will be added to other sections where appropriate section for Dordon to help clarify the situation.
- DPSR49D Strategic Objectives - Agree with the priority being given to re-using previously developed land within Market Towns and Local Service Centres, however, it should also be noted that in order to achieve the level and rate of development required to meet housing demand within the Borough, carefully selected greenfield sites will also need to be released. In particular, Polesworth with Dordon is tightly constrained by settlement boundaries and the release of greenfield sites will be necessary to maintain sustainable growth and housing delivery in line with the plan period targets. This should be reflected in objective number 1.
- This is particularly the case if other regeneration sites within the settlement are not as quick to come forward as the Council would like. Identifying flexibility within the Core Strategy for greenfield sites to come forward in sustainable locations will ensure a comprehensively planned settlement and maintain a five year land supply.
- Noted . The Core strategy makes allowance for the potential release of green field sites adjoining current development boundaries in Policy NW1. Nevertheless, the Site Allocations Development Plan process will be the route used for site identification and allocation. No change proposed.
- DPSR49E Spatial Strategy - We support the statement in paragraph 5.7. It is inconsistent that the reference is made to main towns, as opposed to Market Towns, which is the definitive reference in Policy NW1.
- Paragraph 5.7 goes on to state that housing growth has been distributed to the Main Towns, then to the Green Belt Market Town and then to Local Service Centres. Thereafter, villages and hamlets beyond these are to receive growth. We are concerned that the distribution of development is not correct, with just 1,015 of the 3,300 dwellings allocated to the three Main/Market Towns. We consider that too much development has been distributed to too many 'smaller rural villages', in particular.
- Noted. 54% of land left to be delivered will be in the Market Towns.
- DPSR49F NW1 - We welcome the reference to Dordon within the Category 1 listing of 'Polesworth & Dordon'. Furthermore, we also support the statement that, where necessary, changes to development boundaries will need to be made. However, we believe the Core Strategy needs to be clearer on the mechanisms and signals that will inform any potential boundary changes so that it is apparent where key growth areas need to be located and how and when they will come forward.
- Noted. The Site Allocations Development Plan process will be the route used for site identification, allocation and any subsequent development boundary revisions. No change proposed.

<p>DPSR49G NW3/ NW4 - undertaken a review of the latest Household Projections (2008 based), in accordance with advice contained within paragraph 47 of the NPPF. Official DCLG Household Projections (2008 based) have estimated household growth of 4,000 (182 per annum) for the period 2006 to 2028 (the period referred to in paragraph 6.4) within the North Warwickshire Borough from the 2008-based series (November 2010). If a 22 year Plan Period is rolled forward, to reflect current positions, and is applied to 2010-2032, household growth would be 4,200 (191 per annum). We consider the Council should have taken account of the latest available data, including household projections, to prepare the updated housing requirement. We consider the Core Strategy figure is not significantly greater than the abolished Regional Spatial Strategy, which was based upon Household Projections dating back to 2004 and is now not considered to be a true reflection of current local housing needs. .</p>	<p>Disagree. Following the consideration of a Housing Paper the Council adopted an approach to deliver a minimum of 3,300 for its needs up to 2028, while accommodating an additional 500 units from Tamworth. This is considered sufficient and adequate to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. No change</p>
<p>DPSR49G Furthermore, by taking the base date for the housing requirement back six years to 2006 artificially reduces the amount of housing that will actually be delivered through the Core Strategy because almost half of the 3,300 dwellings have either been built or already have planning permission. The Core Strategy should be planning for the future of North Warwickshire and not using the past to constrain future development needs.</p>	<p>As above</p>
<p>DPSR49G Paragraph 6.7 of the Core Strategy states that 'The Borough Council will monitor its housing delivery to ensure that good delivery is maintained. There has been two years of lower than expected performance but this is expected with the recession. However with the production of this Core Strategy and the forthcoming other Development Plan Documents and especially the Site Allocations, this is expected to change. There is therefore a 5% flexibility included in the five year housing supply.' We would assert that the Borough Council has a history of under delivery and therefore have no 'good delivery' to 'maintain'. This is shown in the Annual Monitoring Report Housing Completions from 2006-2011, where housing delivery has underperformed over all of these years. Furthermore, it is not clear within the text exactly what processes the Council is instigating in order to turn this poor record around.</p>	<p>Disagree. It is projected that as the housing market moves out of recession this figure will significantly increase. Applications and discussions over for significant site proposals are already underway and it is considered unnecessary to extend the flexibility required to the 20% suggested. There are sites with planning consent or within current development boundaries that are still yet to be developed and this would appear to indicate it is the market and finance constraints that are delaying or restraining development from coming forward not the lack of available land or the "underperformance" of the planning authority. contd..</p>
<p>DPSR49G The NPPF states that 'Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.' In this context, a 20% buffer for under performance should be included within the Core Strategy. Paragraph 6.8 makes reference to land available through the SHLAA being 'more than sufficient to cater for the housing requirement up to and beyond 2028'. The wording of this paragraph implies that there is a ready supply of land to come forward, as required. However, there is no guarantee of land identified through the SHLAA coming forward and in order to achieve the housing completion targets needed, and meet demand; allocated sites and areas for growth need to be identified so that future development can be comprehensively planned and encouraged.</p>	<p>As above contd.. This is reflected also in the lack of applications for sites outside development boundaries, on green field sites that subsequently go to appeal. If demand was that great where are the refusals, appeals and applications? Simply allocating more land will not guarantee more on-site delivery if market confidence and financial support/resources are significantly lacking. The Site Allocations process will be the route used for site identification and allocation and is programmed to run parallel with the Core Strategy submission i order to avoid further delay in new site provision. No change proposed.</p>
<p>DPSR49G We welcome the reference to the importance of the gap between Tamworth and Polesworth and Dordon in paragraph 6.12 and agree that development should not be encouraged in this area. It is evident that if 500 dwellings are to be allocated within the Borough to meet Tamworth's needs, then the nearest settlement to Tamworth is Polesworth and Dordon. Working within the constraints identified in paragraph 6.12, the land to the east and south of Dordon should be strongly considered as the most feasible location for development.</p>	<p>As above</p>

DPSR49H	NW5 - Paragraphs 6.16 to 6.24 and Policy NW5 are concerned with affordable housing. Paragraph 6.17 introduces the term, 'local affordable housing' and suggests this is socially rented housing provided by a RSL, or housing of a similar standard that is available at an equivalent or lower cost. It acknowledges that socially rented housing is not the only provision of local affordable housing. However, it does not explain what other forms are acceptable within this much localised definition. We consider that affordable housing sought through the Core Strategy meets the definition of affordable housing in the NPPF. Intermediate housing should be embraced by the definition.	Noted
DPSR49H	Considering the scale of affordable need, which the Council estimates at 286 units per annum (paragraph 6.17), the residual allocation of 3,319 (207 per annum new homes over Plan Period) (Table 1, Core Strategy), is clearly not going to be enough to address affordability in North Warwickshire. We agree that the affordable housing target should be set at 40% to present a strong and challenging figure for the Borough to aim for, where it is supported by robust, up-to-date evidence and does not impinge on site viability. However, at the prescribed residual allocation, only 83 affordable units per annum would be built. To achieve the Borough's desired level of affordable units in line with 40%, they would need to commit to an annual figure of 715 dwellings (15,730 dwellings over Plan Period 2006-2028). Increasing the overall level of housing requirement in the Borough is the only real solution to tackling affordability and, as a result, the supply of affordable housing. Without this, affordable housing need will continue to not be met.	Agree that affordable housing is a major issue. However increasing housing numbers purely to provide more affordable housing does not take in to account other factors such as the rural nature and character of the area as well as the size of many of the 50 settlements. A balance needs to be struck.
DPSR49I	NW8 - The first bullet point within the Policy states that 'development should be targeted at using brownfield land in appropriate locations and subject to maintaining a five year housing supply'. We consider that this should be reworded to 'development should use brownfield land in sustainable locations where it is available, suitable and achievable and maintain a five year housing supply by enabling deliverable greenfield sites in sustainable locations to also come forward, as appropriate.' This would then accord with paragraphs 52 and 111 of the NPPF. We believe that the fifth bullet point should be balanced in favour of sustainable modes of transport, such as walking, cycling and public transport, giving people a real choice about how they travel, rather than focusing on a reduction in the use of cars. The point could be reworded to 'encourage alternative modes of sustainable transport through providing a wide range of travel choices in order to reduce single occupancy car based trips'. This would then align to paragraph 29 of the NPPF.	Noted. It is considered that the current wording does not conflict with NPPF paras 52 and 111. Additional text unnecessary. No change proposed. Regarding bullet point 5, the Policy already refers to encouragement of alternative forms of sustainable transport. No further detail considered necessary.
DPSR49I	Finally, the eleventh bullet point should state that 'development should not sterilise known material reserves where these resources could be viably extracted'. This would then mean that sites with resources that could not be viably extracted could be made available for development and contribute to the Borough's housing targets over the Plan Period in the Core Strategy	Noted, agreed. Text will be amended to take account of viability.
DPSR49J	Polesworth and Dordon - Paragraph 6.81 suggests that coal reserves to the north and east present an issue. The paragraph should be more flexible and acknowledge that only some of the coal may be viable to extract. In addition, it has not been made clear what evidence base the Borough is using to support its assessment of the constraints to the growth of Polesworth and Dordon. The Local Development Framework evidence base documents do not appear to include either a minerals study or a transport study. Furthermore, in paragraph 6.82 it should be noted that although access is stated as an issue, if a comprehensive scale of development was encouraged in the area, this could provide opportunities for identifying the scale and nature of access improvements required and how they could be funded	Noted. The evidence base is the current Minerals Safeguarding areas study provided for the Minerals Core strategy review. This will be made cleared on the evidence base links. The Site Allocations Development Plan process will address site specific allocations that could come forward to deliver access improvements for Long Street but it is not appropriate to identify whether there is any potential in the Core Strategy which is a strategic document. No change proposed.

			DPSR49J	In response to paragraph 6.83, we have met with officers regarding coal reserves in the area and the potential for development. In addition, we have produced a report (Land at Dordon, North Warwickshire, Coal Safeguard Area, Wardell Armstrong, T.D. Froman FRICS, May 2012) to consider the coal geology and whether, in the view of past surface and underground coal mining known to have occurred within the proposed development land, a coal resource can still be considered to exist; and, if so, whether the extraction of the remaining coal would be practical or environmentally feasible if the area were to be developed. This report concluded that whilst some coal remains at shallow depth within areas north and south of Church Road, to the east of Dordon, it is unlikely to occur in sufficient quantities ever to be considered commercially viable. Any future surface development would not therefore be sterilising a surface coal resource. Therefore, the first paragraph of policy NW16 should be changed to 'the sterilisation of any viable coal reserves is proven'.	Disagree. The justification submitted in support of the site proposal is currently under assessment by the County minerals planning section. No formal decision has yet been made. The case is not confirmed 'proven' as yet. This is an issue that will be dealt with through the Site Allocations plan process. No change proposed
			DPSR49J	The final paragraph of Policy NW16 is unclear. The first sentence states that land to the west of Polesworth and Dordon shall remain undeveloped in order to maintain the separation between Tamworth. However, the next sentence appears to contradict this by stating that any proposals will be expected to be limited in size and maintain the separation between the urban area of Tamworth and the settlements of Polesworth and Dordon. We do not agree with any development to the west of Polesworth with Dordon which could diminish the open space between Tamworth and the settlement. It is simply not necessary to direct growth to the west when there is sufficient land to the east of Polesworth and Dordon	Noted. No change proposed.
			DPSR49K	We consider that directing growth to the east and south east of Dordon maximises the opportunity to sustain this settlement as part of the Polesworth & Dordon Market Town and not at the expense of coalescence with Tamworth, which growth to the west of the settlement would otherwise result in. Our Client's control land to the east and south east of Dordon, with numerous opportunities for access from the main transport routes. Our Client's land, if released, would not breach the southern boundary to Dordon, provided by the A5, and could be delivered within five years.	Support noted.
DPSR50	T Bradford	Father Hudsons Society	DPSR50A	2.39 - We welcome the Councils recognition of the Father Hudson's Society's site ('the Site') as one of the key development sites in Coleshill.	Support noted.
			DPSR50B	4.1 - The Strategic Objectives set out at Table 2 are supported by the Society. In particular, recognition of the importance of the re-use of previously developed land within Market Towns is important as set out in Strategic Objective 1; this objective is realistic and deliverable as demonstrated by the proposed redevelopment of the Site	Support noted
			DPSR50C	NW1 - The identification of Coleshill as a Category 2: Green Belt Market Town to accommodate employment and housing growth within the development boundary is supported. Given Coleshill's location in the Green Belt, it is crucial that the Council proactively supports development proposals within the development boundary of Coleshill on key redevelopment sites, such as the Society's site	Support noted.
			DPSR50D	NW4 - This policy identifies Coleshill as settlement to deliver a minimum of at least 275 dwellings over the plan period. We support this approach and consider that the Society's site is of key importance to assisting delivery of these housing numbers	Support noted.
			DPSR50E	NW11 - We are concerned about the lack of detail in this policy in respect of heritage assets and consider greater clarification should be provided to ensure that it reflects the policy criteria set out at paragraphs 126 – 141 of the National Planning Policy Framework ('NPPF'). There are instances where a flexible approach to proposals impacting on heritage assets is required when this can be robustly justified in either heritage or viability terms; this flexibility should be acknowledged within this policy	Disagree. The Core Strategy does not need to duplicate the policy and provisions of the NPPF unless there is some specific local issue or difference that needs to be addressed. The policy is considered flexible enough to comply with the NPPF but robust enough to avoid adverse impacts on natural and historic environment. The Glossary can provide some additional detail and definition of what constitutes a heritage asset and the historic environment. No further change to Core Strategy text proposed.
			DPSR50F	NW14 - As a significant employer in the Borough, we fully support the delivery of employment generating uses, including the redevelopment of existing employment sites.	Support noted.

DPSR51	J Vero	Atherstone Civic Society	DPSR51A	We welcome the thrust of this document and have no issues with the policies proposed. We strongly support the firm line against placing Tamworth's 'overspill' west of Dordon (6.11 and 6.12), and also the move away from logistics as the prime source of employment (6.37). Logistics is a wasteful use of land, creating proportionally few jobs and putting a strain on the local environment. We also strongly support the Borough's recognition of the importance of the Historic Environment (6.70). However, some of the text in the document is unclear and much of the writing bears evidence of haste and lack of proof reading. There are a number of spelling mistakes, repetitions, inappropriate words and clumsy syntax – too numerous to point out individually. So, in our view, whilst the content of the document is good it could do with some re-writing	Support noted. Text corrections and repetition will be addressed as part of the amendments prior to submission.
			DPSR51B	2.10. 2.63, 6.83, NW16 In references to sterilisation of coal reserves due to development, and the prospect of opencast, the Council's policy is unclear and needs to be worded far more precisely than it is here. It would appear to us that the Council is trying to say that development should not be carried out on land above coal reserves, as the coal could be needed in extreme cases of national emergency	Noted. Text will be amended to more accurately reflect the NPPF and British Coal authority preferred policy text. (See response to DPSR26).
			DPSR51C	2.47 It would be more accurate to say that modern-day Grendon developed from the 1920s as some of the houses which line the A5 are of that era and the majority close to Boot Hill appear to be from the 1930s and 40s.	Noted. The text refers to development from early to mid 1900's which would address the point of detail. No change proposed.
			DPSR51D	2.70 (line 9) Isn't this more correctly known as the 'North Arden Heritage Trail'?	Noted. Will check and amend to use most appropriate, current title for the Right of Way
			DPSR51E	5.9 At NW1 (line 4) it states that 'changes to development boundaries will be made in the appropriate Development Plan Document, or once development has taken place, whichever is the earlier.' This implies that applications will be approved which do not accord with the Development Plan. In the past, 'premature' applications tended to be refused and asked to await the development plan process At Category 3A, it states that 'Development will be permitted in or adjacent to development boundaries that is considered to be appropriate to its place in the settlement hierarchy.' This is unclear. Would it not be more safely worded, 'Development that is appropriate to its place in the settlement hierarchy will be permitted within the development boundary. Outside the development boundary applications will be considered according to their scale and merit.' Something along these lines would give a little more control. Otherwise the Council could be leaving itself wide open to development in the countryside.	The Core strategy enables development to come forward to address the needs identified and where there is a deficiency in the 5yr supply. Outside of the Green Belt this can be adjoining/adjacent to current development boundaries. The Strategic Land Availability assessment provides some information and directions as to the most likely appropriate sites. These will feed into the Site Allocation Plan process, which will be the formal route used to identify/allocate sites. This route/process will help avoid delay in housing sites coming forward but provide protection from unsustainable development in the open countryside. No change proposed.
			DPSR51E	At Category 3B, we would suggest removing the words 'considered to be'. This would word the policy as, 'Within the development boundary, development appropriate to the settlement's place in the settlement hierarchy will be permitted.'	as above
			DPSR51F	6.1 From line 2 we would re-word, '... and there is a presumption against inappropriate development unless very special circumstances can be proved.'	Noted. Unnecessary text change. No change proposed
			DPSR51G	6.5 There appears to be some missing text at the end of the last line, after 'Borough's'	Noted. Agreed. Additional text "housing supply".
			DPSR51H	6.50. NW8 (second bullet point). We are unsure what this means. What sort of development does it relate to? It does not appear to be residential development?	Seeks/encourages <u>all</u> development to be adaptable to accommodate potential for alternative or multi uses and users including disability adaptations. No change proposed.
			DPSR51I	6.68 There is some repetition around line 6	Agreed. Text duplication will be amended.
			DPSR51J	6.72 It might be a good idea to take out 'providing excellent opportunity to build upon' (line 7) in case anyone takes it literally!	Agreed. Text will be amended to "providing an excellent basis from which to develop a (GI?) network".
			DPSR51K	6.75 Surely links across the corridor of the HS2, such as footpaths and roads, will be restored as part of the development.	Noted. In some cases it has been indicated that links may be lost. Wherever possible the Borough will seek the re-instatement of links but where cost of re-instatement outweighs any local access, transport or wildlife corridor benefits this may be difficult to resist. No change proposed.

DPSR52	J Haywood	Centro	DPSR52A	All plans within the West Midlands should demonstrate that full consideration has been given to sustainable transport. Emphasise that there is a strong correlation between the CS and relevant Policy Documents. Welcomes the references to the document Warwickshire Local Transport Plan, believes that reference should also be made to West Midlands Local Transport Plan as well as centros own Integrated Public Transport Prospectus. Highlight the need to ensure efficient and reliable movement of freight and logistics which would be required to support economic development and growth.	Noted. Reference to West Midlands Transport Plan and multi modal rail freight facilities will be improved.
			DPSR52B	HS2 is of strategic importance in particular the proposed HS2 Interchange station at Birmingham airport which is expected to act as a catalyst for economic development. The proximity of the Interchange means that the CS could provide the opportunity to address how North Warwickshire can benefit from the improved accessibility that HS2 will bring and make provision for high quality public transport accessibility	Borough's current stance is in opposition to HS2 and partners but, in event project goes ahead, will work with HS2 to ameliorate and address its environmental, social and economic impacts. Until confirmation of its delivery is clarified, following the High Court challenge, the Core Strategy will reflect but not actively encourage
			DPSR52C	Believe that the CS should recognise the importance of the proposed Tamworth rail enhancement, which is highlighted as an aspiration for Centro within the West Midlands Local transport Plan	Noted. Reference to Tamworth rail enhancement is included in Kingsbury section. This is considered sufficient. No change proposed.
			DPSR52D	2.37 - Note that Hams Hall Site B could be used in the future for power generation. The West Midlands Regional Logistics study, demonstrated the need for the equivalent of up to 6 regional Logistics Sites across the West Midlands - Centro would welcome comment that any proposed power generation on site B is not at the expense of Hams Hall in terms of physical encroachment nor site access to the rail network	Noted. Unable to confirm in absence of any clear proposals. Not expected that power generation would affect site access to the rail network.
			DPSR52E	North Works may wish to note that Network rail have highlighted in the West Midlands Utilisation Strategy and the Initial Industry Plan the need to improve rail access to Birch Coppice/Kingsbury depot which would facilitate new and enhanced passenger rail services on the Birmingham - Tamworth rail corridor	Noted. Reference is included in Kingsbury section. No change proposed.
			DPSR52F	A greater emphasis on walking and cycling routes could also support the wider health and sustainability agenda.	Policy NW8 on Sustainable Development seeks "encouragement of alternative forms of sustainable transport," and para 7.5 supports the "promotion of health and well being by making provision for physical activity". This can be supported by adding text "including walking and cycling" here to provide greater emphasis and support to sustainability agenda.
DPSR53	R Williams	Alder Mill	DPSR53A	The proposals are an improvement on the existing policies and strategies. However, the proposed policies are always open to interpretation they are often interpreted by planning officers in a way which does not reflect plain English. As you are aware some 65% of North Warwickshire is within the Green Belt. Some 10% of land use is within the floodplain and a further 10% is undevelopable due to poor highways. The document skewers development to areas not associated to where people actually live within the borough. This affects the following: Housing within existing villages and hamlets in all areas. 1.The proposed policy will transfer wealth from the poor to the rich in all areas. The lack of planning opportunities for housing in rural areas means the poorer section are priced out of the market. The local people cannot compete with the affluent, so villages are no longer an indigenous population. When properties are transferred, the new owners protect their investment by forming groups to dissuade any form of development which affects their property.	Noted. The Core Strategy tries to address the lack of supply in the rural settlements through removing thresholds and releasing the requirement for 100% affordable housing, which has prevented open market supply increasing, and seeking delivery of affordable housing via off-site contributions (from all housing developments subject to viability assessments) and/or 100% on-site delivery on public owned sites (supported by those off-site contributions). The Core Strategy housing targets are a minimum which means settlements cannot reduce that figure, only increase it through Neighbourhood development plans and orders. This is considered will significantly address the lack of supply affecting rural settlements but will still need to be managed/controlled to minimise impact on the open countryside and reflect or address any shortfalls in services and facilities and the sustainability of the settlement. No change proposed..
			DPSR53A	2.The previous policies of not allowing any extension to individual villages or hamlets has caused schools, shops and pubs to close down and has also affected the congregation and the viability of churches. It has de-stabilised the indigenous population of villages who are now outnumbered by more affluent incomers. This means that often the family unit which would have supported each other if close at hand, is now fragmented. 3.The increase in density in house building in towns has seen the loss of open spaces with many buildings converted into flats, which brings with it other social problems. The damage already done to villages should be reversed by less building within the towns and an even spread of new buildings in villages and hamlets providing a mixture of housing to meet the needs of the local people.	As above

			DPSR53A	Whilst the motivation for building in towns within the borough is set out in the documents, this is a failed policy which takes no account of technology. Local Authorities like yours are generally the organisations that inform Government on policy. With this in mind, it has been easy to centralise services which local government provides. However, the internet provides online shopping, internet banking, post office services and many other local government services which would at one time require a fixed position in the high street. Local Authorities are losing their role as providers, so the need for constant easy links to small towns will become less of a requirement. The larger cities and out of town developments will still provide the visitor experience that smaller towns cannot offer	As above
			DPSR53B	Employment - A major strategy for employment set out in your document is for large areas of industrial sites populated by major companies in the main providing storage and transport links throughout the country. This leaves the employment situation vulnerable. It is interesting to note that Ocado to be based at Birch Coppice, which is one of the largest potential employers in the area, is a home delivery provider of groceries etc., purchased from a internet site. Often major transport type depots which make up a considerable proportion of employment opportunities in this area are vulnerable to takeovers. This includes major transport delivery companies within the area and some closures are inevitable. Most of the land and buildings where development is proposed is owned by large organisations backed by pension funds. They offer little in the way of assistance to small and medium companies.	Noted. Issue addressed in Policy NW7. Core Strategy does not prevent the potential or opportunities for appropriate economic development in rural areas. The Development Management Plan process will consult on the detailed policies that will help manage such development potential. No change proposed.
			DPSR53B	This is a particular problem when a new company has established itself within a rural building and it looks to expand in its current location this is very difficult due mainly to Green Belt policy. As most businesses employ just a small number of people, in my view it is the new initiative businesses that will provide new employment opportunities and these should be able to locate within a location within easy access to various villages and hamlets. Further emphasis should be given to people working from home either by the provision of live-work units or an easing of planning regulations to provide extensions or outbuildings to existing properties for this purpose. Many businesses can be run from home using the internet. With the current trend of part-time working and shared working, it is this area which will continue to grow, there appears no appropriate policy to make provision for this	As above
			DPSR53C	There needs to be a clear emphasis to what is proposed. I draw your attention to Strategic Objective numbers 6 and 7. How many of these objectives have to be achieved before the planning permission is granted? If it is all of them, then this objective should say so. Some of the existing policies have up to 10 scenarios, so any application can easily fall foul of any of these. The continued complexity of the objectives also mean applicants are required to provide reports from various specialists. These can be costly and can mean that unless the applicant can afford to pay for them, no development will take place. The latest guidance from the government has reduced the planning policy because they had become ever more complex. With all the policies proposed, preregistration documents, etc., the danger seems to be the local authority are reversing this situation. Taken with my comments on housing and economy, you may consider the proposals are better than previous, but are more akin to the past than to the future	Noted.
DPSR54	O Taylor	Framptons (on behalf of KNG Developments)	DPSR54A	Spatial Portrait - Note acknowledgement that the Borough has low housing growth and large expansion of employment compared to the rest of the West Midlands which also brings its own problems of ensuring there s enough housing in the right location to suit the needs of the residents as well as making sure they have the right opportunities to training and skills, access and additional jibs. Encouraging to see this document is seeking to revise the development strategy that prevailed in the Local Plan. Acknowledge that Kingsbury is a large settlement	Noted.

<p>DPSR54B Spatial Strategy - Agree with the conclusions in Paragraph 5.4 and also with the conclusions of the Matthew Taylor Review - an approach my client has been advocating for years. Support the principles outlined in Paragraph 5.7 and 5.8. Acknowledge that there are allocated strategic housing numbers but not specific locations - these will come through further documents. However in the absence of such documents, the Core Strategy should acknowledge the potential for development to come forward through the development control process.</p>	<p>Noted. Core Strategy policy NW1and supporting text notes that development will be permitted in or adjacent to development boundaries. No change proposed</p>
<p>DPSR54C NW1 - Support the identification of Kingsbury as a category 3B settlement. An additional reference should be added to give consideration to a review of Green Belt boundaries to identify potential development opportunities that would be suitable to provide new housing having regard to the objectives of the Spatial Strategy.</p>	<p>Noted. Review of Green Belt not considered necessary.</p>
<p>DPSR54D NW2 - does not seek to review the change of Greenbelt boundaries. Consideration needs to be given to a review of Greenbelt boundaries so that potentially suitable development opportunities at categor 3B settlements can be identified having regard to the objectives of the spatial strategy. The reasons being that there is evidence that advocates the need for additional housing and employment land. development will continue to be directed to urban areas and infill sites where appropriate - however the existing urban areas and settlements will accommodate substantially less development than is needed within the area. It is inappropriate to provide growth only in these existing settlements, as it would result in over development - this could also arise should the Council only seek to direct development to settlements outside of the current Greenbelt. The Council wants to provide sustainable development in the most appropriate places - to achieve this, some locations (such as Kingsbury) will need to provide land currently identified as Greenbelt.</p>	<p>Disagree, no change proposed. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. Green Belt boundary review is therefore not seen as part of the strategy or an option to pursue. Sites can still, nevertheless, come forward as Green Belt exception sites (NPPF route) or through the Community Right to Build route, but this is not an issue for inclusion or determining in the Core Strategy.</p>
<p>DPSR54E NW3 - Object to the amount of housing proposed in NW3 - consider it to be inadequate and does not reflect the level of housing growth that should be provided having regard to the most up to date evidence. The latest CLG figures show the number of households projects a 4000 increase - when converted to a housing requirement that should be met in the Core Strategy, it is likely that this figure would be in excess of 4,500. The NPPF has a presumption in favour of sustainable development - it is considered that the Core Strategy does not taker proper account of this guidance.</p>	<p>Disagree. Following the consideration of a Housing Paper the Council adopted an approach to deliver a minimum of 3,300 for its needs up to 2028, while accommodating an additional 500 units from Tamworth. This is considered sufficient and adequate to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. No change</p>
<p>DPSR54E The Core Strategy has not been positively prepared and is not consistent with National Policy. The strategic priorities for the delivery of homes and jobs in the area fall short of that which are required. The plan has not used a proportionate evidence base and therefore fails to meet the tests of soundness. The inadequacy of the level of housing provision is a major short coming and will potentially result in the housing needs of the Borough not being met and therefore it will fail to meet its and the Governments strategic objectives. It provides no robust explanation as to the details of evidence base that has been used to determine the housing requirements and latest Government Objectives for housing have not been taken into account - so is not sound as it is not positively prepared, not justified, not effective and not consistent with National Policy</p>	<p>Disagree. The evidence base shows that the alternative levels of growth were considered (Housing and Employment Options 2028 - 2031) but that the extension of the RSS figure along with accommodating some of Tamworth's needs long term provided an appropriate positive balance between housing restraint in a rural area and supplying sufficient accommodation. The housing figure is a minimum, not maximum, and if growth and demand increases the Core Strategy is flexible enough to accommodate further growth. No further change or increase proposed.</p>
<p>DPSR54F NW4 - Object to the settlement by settlement split in category 3B - no justification for the proposed apportionment other than refer at paragraph 6.14 to the number of units directed to each settlement being dependent on the sites that have been identified through the SHLAA. Within the evidence base no capacity assessment has been undertaken which looks at the scale of development which individual settlements can reasonably accommodate. The Policy is therefore not JUSTIFIED</p>	<p>Disagree. Settlements capacities have previously been assessed through the Strategic Land availability assessment, a review of planning consents and enquiries and a review of other Urban Capacity studies. Settlement service/facility provision and availability has also been assessed. Where settlements have more site potential, particularly within existing development boundaries, this has resulted in higher housing figure expectation and potential. No change.</p>

		DPSR54G	NW5 - Object to this policy in context that the 40% target is applied Borough wide and seems to be regardless of site size. Paragraph 6.22 seems to be more flexible and allows for variations to occur on a site by site basis. The policy should be amended	Noted. The objector is correct and the Policy is Borough wide. All applications for housing will be expected to address this key priority. Past trends show it is achievable and has also been achieved on larger sites. The 40% target is Borough wide and will be applied on a flexible, viable site by site basis. The figure can be achieved through both on-site provision and off-site contributions that help deliver 100% on-site provision on public owned site to offset any shortfalls. The viability assessment identifies the continued potential delivery through the Local Investment Programme and the flexibility built into the policy allows viability and on-site exceptional costs/constraints to be addressed. Further detail on Policy thresholds, off-site contribution methods will be dealt with through the Development Management Plan process. No change.
DPSR55	JVH Consultants JVH(on behalf of Mr Neachell)	DPSR55A	NW1 - The settlement hierarchy as drafted fails to allow for development outside boundaries, unless required for agricultural or rural uses. This is an unreasonable restriction to apply to schemes such as barn conversions, replacement dwellings and other instances where new development can reasonably be allowed. There is no reason why the re use of buildings should be limited in the way set out in this policy. It is unreasonable and contrary to the NPPF. The policy needs to be amended to be more flexible in the rural areas and take account of national planning policy The hierarchy as drafted fails to take into account of the potential of settlements in close proximity to the Hams Hall site, which is a major employment location of strategic importance. Land for both residential purposes and employment purposes is available to the north of the site, in close proximity to Lea Marston and the settlement hierarchy should consider how the role of Hams Hall can be supported by new development	Disagree. Core Strategy policy NW1 and supporting text notes that development will be permitted in or adjacent to development boundaries. Policy NW14 addresses farm diversification. The NPPF enables conversions where this supports sustainable economic growth in rural areas in order to create jobs and prosperity. The Development Management Plan consultation process can address more detailed policies on implementation of farm diversification and rural economic growth. No change proposed Noted. None of the settlements in close proximity to Hams Hall are considered of sufficient size, with sufficient services and facilities to be sustainable or accommodate significant housing or employment development. No change proposed.
		DPSR55B	NW2 - OBJECT - The policy needs to be clear about if all the villages will have an infill boundary, if washed over by the green belt. Otherwise it is not clear how the policy will be read with NW1 for the avoidance of doubt, we consider that all villages should have an infill boundary to assist in making the plan clear and to allow reasonable developments in some of the smaller settlements.	Noted. The Site Allocations Development plan will address this issue and consult on options. No change proposed to Core Strategy.
		DPSR55C	Table 1 and NW3 - Object - NW3 defines the wrong plan period. There is no point in starting the plan at 2006. The plan should go from 2012 or 2013, for a 20 year period to 2032/33. The number of homes proposed fails to take account of the up to date population projections and household formation rates, currently released and proposes a low number of 3,800 over the plan period. The plan should explain how the target figure is arrived at on up to date data and should cover the next 20 year period.	The Plan period reflects the evidence base and start date for the soon to be abolished Regional Spatial strategy and is consistent with other adjoining Boroughs in Warwickshire and the West Midlands. The Core Strategy has tried to take account of changing household growth projections and adjoining Borough's needs (see evidence base) without further delaying the process. If growth and demand significantly changes in forthcoming years this will be addressed through monitoring and Strategy review. Flexibility is built into the system through identifying the housing figure as a minimum, not maximum. No further change proposed.
		DPSR55C	Table 1 of the plan indicates that the residual land requirement is 2,376 homes but it is unclear if the commitments identified are deliverable and in any event the calculation is ill founded given the plan should be looking forward, not backwards. Table 1 appears to indicate that the housing land requirement is 859 units for 5 years, yet only 743 sites are available meaning that the authority does not have a 5 year supply of land. It is known that the population of the West Midlands conurbation is higher in the recently published data than was anticipated and authorities bordering the West Midlands conurbation will have to make provision for migration from the conurbation. It is not clear from the plan how this is factored into the strategy and how it affects the hierarchy and proposed split of housing. The under provision in previous years should indicate to the Local Planning Authority that a further 20% should be added to the land supply, not 5% as proposed.	The annual monitoring reports and 5yr housing supply reports will indicate whether commitments are considered deliverable. The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment. The Borough is confident the housing figure can be met and are actively discussing or considering sites coming forward for development. This is exacerbated by North Warwickshire being a Borough with limited land values and returns compared with other Warwickshire Districts/Boroughs. It is not therefore considered necessary to extend provision to 20% unless clear evidence indicates a significant deficiency in 5yr supply and availability of deliverable sites. No change proposed.

DPSR55C	<p>The 500 units proposed for the housing needs of Tamworth are not to be available until Anker Valley is 75% complete. Given the location of Tamworth to the North Warwickshire boundary, it is unclear from the settlement hierarchy where these dwellings may be located. There would be little point in distributing them to settlements at some distance from the Tamworth urban area when they are proposed to meet Tamworth's housing need. The draft Core Strategy should at least identify where this significant development should take place, as a broad location.</p> <p>The house hold projections based on the 2008 figures show that between 2013-2033 North Warwickshire would need 4,000 new homes. This does not yet take into account of the more recent population increases from the 2011 census. The requirement, therefore, set in the plan is an under provision and this 4,000 is without any commitment to deal with growth from Tamworth. So, if North Warwickshire is to have 500 new homes, then the requirement would be at least 4,500 (to be updated on the latest population forecasts).</p>	<p>Disagree. The Core strategy makes it clear in Policy NW3 that the housing to be potentially accommodated for Tamworth's needs will be delivered in accordance with the Core Strategy policies, based on the settlement hierarchy and that development will not be located in the area west of Polesworth and Dordon. Tamworth BC agree with this approach. The Site Allocations Plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment. No change.</p>	
DPSR55D	<p>NW5 - Object - The plan period is wrong. The target is too high and how the viability of sites is assessed is not set out. The core strategy should inform how viability will be assessed and this needs to be tested. The fact that the need for affordable homes is higher than the overall annual requirement does cause concern. In order to achieve more affordable homes, you need to have more homes and this means that the overall housing requirement should be greater, if there is to be any prospect of delivering a reasonable amount of affordable housing. Affordable housing should not apply on sites of less than 15 dwellings and should not apply to conversion schemes.</p>	<p>Disagree. Past trends show it is achievable and has also been achieved on larger sites. The 40% target is Borough wide and will be applied on a flexible, viable site by site basis. The figure can be achieved through both on-site provision and off-site contributions that help deliver 100% on-site provision on public owned site to offset any shortfalls. The viability assessment identifies the continued potential delivery through the Local Investment Programme and the flexibility built into the policy allows viability and on-site exceptional costs/constraints to be addressed. Further detail on policy thresholds, off-site contribution methods will be dealt with through the Development Management Plan process. No change proposed.</p>	
DPSR55E	<p>NW7 - Object - The plan period is wrong and the amount of employment land should be calculated from 2012/12 – 2032/33 and should be sufficient to allow for growth of the existing strategic employment locations. The policy should specifically consider the need for potential extensions to the Hams Hall site and how to maximise the employment potential for that location. Land is available in close proximity which can support the role of the strategic location and support the economic growth of the district.</p>	<p>Disagree. Plan period reflects evidence base provided as part of RSS Phase 2 review work and is consistent with other Planning Authorities in Warwickshire and the West Midlands. No green belt review is proposed. Core Strategy makes sufficient provision for employment development to address needs outside of the Green Belt. No change proposed.</p>	
DPSR55F	<p>NW14 - Object - The re use of farm buildings for economic uses is sometimes the most appropriate use given the location/nature of the buildings. However, this is not always the case. The NPPF recognises that rural buildings can usefully be reused for housing and is considering a paper that will allow the re use of buildings for some commercial purposes without planning permission. The plan as a whole should reflect national policy and be as flexible as possible to secure the most appropriate use of buildings without an over prescriptive cascade effect of uses and marketing exercises, which are of little practical value and take up time.</p>	<p>Disagree. Core Strategy policy NW1 and supporting text notes that development will be permitted in or adjacent to development boundaries. Policy NW14 addresses farm diversification. The NPPF enables conversions where this supports sustainable economic growth in rural areas in order to create jobs and prosperity. The Development Management Plan consultation process can address more detailed policies on implementation of farm diversification and rural economic growth. No change proposed</p>	
DPSR55G	<p>Page 62 - KEY POINTS - The housing levels proposed are inappropriate and too low.</p> <ul style="list-style-type: none"> • The settlement hierarchy fails to recognise any development in rural areas outside development boundaries. • It fails to give a clue as to where 500 new homes from Tamworth are to be located. • Employment areas shown hatched do not show potential for expansion or direction of growth 	<p>Comments made in responses above.</p>	
DPSR56 JHV Consultants JVH(on behalf of Mr & Mrs Webb)	DPSR56A	<p>NW1 - The settlement hierarchy as drafted fails to allow for development outside boundaries, unless required for agricultural or rural uses. This is an unreasonable restriction to apply to schemes such as barn conversions, replacement dwellings and other instances where new development can reasonably be allowed. There is no reason why the re use of buildings should be limited in the way set out in this policy. It is unreasonable and contrary to the NPPF. The policy needs to be amended to be more flexible in the rural areas and take account of national planning policy</p>	<p>Disagree. Core Strategy policy NW1 and supporting text notes that development will be permitted in or adjacent to development boundaries. Policy NW14 addresses farm diversification. The NPPF enables conversions where this supports sustainable economic growth in rural areas in order to create jobs and prosperity. The Development Management Plan consultation process can address more detailed policies on implementation of farm diversification and rural economic growth. No change proposed</p>

	The hierarchy as drafted fails to take into account of the potential of settlements in close proximity to the Hams Hall site, which is a major employment location of strategic importance. Land for both residential purposes and employment purposes is available to the north of the site, in close proximity to Lea Marston and the settlement hierarchy should consider how the roll of Hams Hall can be supported by new development	Noted. None of the settlements in close proximity to Hams Hall are considered of sufficient size, with sufficient services and facilities to be sustainable or accommodate significant housing or employment development. No change proposed.
DPSR56B	NW2 - OBJECT - The policy needs to be clear about if all the villages will have an infill boundary, if washed over by the green belt. Otherwise it is not clear how the policy will be read with NW1 for the avoidance of doubt, we consider that all villages should have an infill boundary to assist in making the plan clear and to allow reasonable developments in some of the smaller settlements.	Noted. The Site Allocations Development plan will address this issue and consult on options. No change proposed to Core Strategy.
DPSR56C	Table 1 and NW3 - Object - NW3 defines the wrong plan period. There is no point in starting the plan at 2006. The plan should go from 2012 or 2013, for a 20 year period to 2032/33. The number of homes proposed fails to take account of the up to date population projections and household formation rates, currently released and proposes a net number of 3,800 over the plan period. The plan should explain how the target figure is arrived at on up to date data and should cover the next 20 year period.	The Plan period reflects the evidence base and start date for the soon to be abolished Regional Spatial strategy and is consistent with other adjoining Boroughs in Warwickshire and the West Midlands. The Core Strategy has tried to take account of changing household growth projections and adjoining Borough's needs (see evidence base) without further delaying the process. If growth and demand significantly changes in forthcoming years this will be addressed through monitoring and Strategy review. Flexibility is built into the system through identifying the housing figure as a minimum, not maximum. No further change proposed.
DPSR56C	Table 1 of the plan indicates that the residual land requirement is 2,376 homes but it is unclear if the commitments identified are deliverable and in any event the calculation is ill founded given the plan should be looking forward, not backwards. Table 1 appears to indicate that the housing land requirement is 859 units for 5 years, yet only 743 sites are available meaning that the authority does not have a 5 year supply of land. It is known that the population of the West Midlands conurbation is higher in the recently published data than was anticipated and authorities bordering the West Midlands conurbation will have to make provision for migration from the conurbation. It is not clear from the plan how this is factored into the strategy and how it affects the hierarchy and proposed split of housing. The under provision in previous years should indicate to the Local Planning Authority that a further 20% should be added to the land supply, not 5% as proposed.	The annual monitoring reports and 5yr housing supply reports will indicate whether commitments are considered deliverable. The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment. The Borough is confident the housing figure can be met and are actively discussing or considering sites coming forward for development. The under provision in previous years perhaps also indicates the fragility of the market as a result of the recession, lack of development and mortgage finance, lack of investment in development. This is exacerbated by North Warwickshire being a Borough with limited land values and returns compared with other Warwickshire Districts/Boroughs. It is not therefore considered necessary to extend provision to 20% unless clear evidence indicates a significant deficiency in 5yr supply and availability of deliverable sites. No change proposed.
DPSR56C	The 500 units proposed for the housing needs of Tamworth are not to be available until Anker Valley is 75% complete. Given the location of Tamworth to the North Warwickshire boundary, it is unclear from the settlement hierarchy where these dwellings may be located. There would be little point in distributing them to settlements at some distance from the Tamworth urban area when they are proposed to meet Tamworth's housing need. The draft Core Strategy should at least identify where this significant development should take place, as a broad location. The house hold projections based on the 2008 figures show that between 2013-2033 North Warwickshire would need 4,000 new homes. This does not yet take into account of the more recent population increases from the 2011 census. The requirement, therefore, set in the plan is an under provision and this 4,000 is without any commitment to deal with growth from Tamworth. So, if North Warwickshire is to have 500 new homes, then the requirement would be at least 4,500 (to be updated on the latest population forecasts).	The Core Strategy makes it clear in Policy NW3 that the housing to be potentially accommodated for Tamworth's needs will be delivered in accordance with the Core Strategy policies, based on the settlement hierarchy and that development will not be located in the area west of Polesworth and Dordon. The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment.
DPSR56D	NW5 - Object - The plan period is wrong. The target is too high and how the viability of sites is assessed is not set out. The core strategy should inform how viability will be assessed and this needs to be tested. The fact that the need for affordable homes is higher than the overall annual requirement does cause concern. In order to achieve more affordable homes, you need to have more homes and this means that the overall housing requirement should be greater, if there is to be any prospect of delivering a reasonable amount of affordable housing. Affordable housing should not apply on sites of less than 15 dwellings and should not apply to conversion schemes.	Disagree. Past trends show it is achievable and has also been achieved on larger sites. The 40% target is Borough wide and will be applied on a flexible, viable site by site basis. The figure can be achieved through both on-site provision and off-site contributions that help deliver 100% on-site provision on public owned site to offset any shortfalls. The viability assessment identifies the continued potential delivery through the Local Investment Programme and the flexibility built into the policy allows viability and on-site exceptional costs/constraints to be addressed. Further detail on policy thresholds, off-site contribution methods will be dealt with through the Development Management Plan process. No change proposed.

		DPSR56E	NW7 - Object - The plan period is wrong and the amount of employment land should be calculated from 2012/12 – 2032/33 and should be sufficient to allow for growth of the existing strategic employment locations. The policy should specifically consider the need for potential extensions to the Hams Hall site and how to maximise the employment potential for that location. Land is available in close proximity which can support the role of the strategic location and support the economic growth of the district.	Disagree. Plan period reflects evidence base provided as part of RSS Phase 2 review work and is consistent with other Planning Authorities in Warwickshire and the West Midlands. No green belt review is proposed. Core Strategy makes sufficient provision for employment development to address needs outside of the Green Belt. No change proposed.
		DPSR56F	NW14 - Object - The re use of farm buildings for economic uses is sometimes the most appropriate use given the location/nature of the buildings. However, this is not always the case. The NPPF recognises that rural buildings can usefully be reused for housing and is considering a paper that will allow the re use of buildings for some commercial purposes without planning permission. The plan as a whole should reflect national policy and be as flexible as possible to secure the most appropriate use of buildings without an over prescriptive cascade effect of uses and marketing exercises, which are of little practical value and take up time.	Core Strategy policy NW1 and supporting text notes that development will be permitted in or adjacent to development boundaries. Policy NW14 addresses farm diversification. The NPPF enables conversions where this supports sustainable economic growth in rural areas in order to create jobs and prosperity. The Development Management Plan consultation process can address more detailed policies on implementation of farm diversification and rural economic growth. No change proposed
		DPSR56G	Page 62 - KEY POINTS - The housing levels proposed are inappropriate and too low. <ul style="list-style-type: none"> • The settlement hierarchy fails to recognise any development in rural areas outside development boundaries. • It fails to give a clue as to where 500 new homes from Tamworth are to be located. • Employment areas shown hatched do not show potential for expansion or direction of growth 	Already covered in responses above
DPSR57	Max Whitehead Bloor Homes (also on behalf of Merevale Estates)	DPSR57A	Paragraph 2.29 - The amended wording proposed by the Council does not reflect the explicit acknowledgement in the Core Strategy that in order to meet its housing needs Atherstone will need to expand using greenfield land beyond existing settlement boundaries to the north west of the town. The five year supply of housing land position is irrelevant to this situation. As such we suggest that the sentence "However depending...for development" is deleted.	Disagree. The Core Strategy seeks to deliver brownfield sites within development boundaries first where 5 yr supply is available, subject to viability and deliverability. When supply is in deficiency green field sites can come forward adjacent to the development boundary. The Core Strategy clearly indicates this are is likely to be to the north west of Atherstone. The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment and is intended to be consulted on in parallel with the Core Strategy submission to the Secretary of State to help evidence availability of sites. No further change proposed.
		DPSR57B	NW1 - The alteration made to Policy NW1 that has removed the requirement to have exhausted development opportunities within the settlement boundary of Atherstone prior to releasing development land beyond the settlement boundary is welcomed. As such, the policy insofar as it relates to Atherstone is supported	Noted.
		DPSR57C	NW3 & Table 1 - The extension of the plan period to 2028 is supported, as this will allow for a 15 year time period for operation (provided the Core Strategy is adopted next year) as required by the National Planning Policy Framework (NPPF) (paragraph 157). We remain concerned as to how the Council has derived its overall dwelling requirement – it is not clear from the published evidence on the Council's website. This should be made clear for stakeholders to comment on and clearly the Inspector appointed to examine the Core Strategy will require detailed information on this matter. As previously suggested, we remain of the view that it would be appropriate to make a minor addition to the wording policy to state that: "...Development will only occur if the appropriate infrastructure is available or can be delivered..." This reflects the fact that new development is often delivered alongside required infrastructure improvements.	Noted. Partially agreed, Policy text to include "...Development will only occur if the appropriate infrastructure is available or can be delivered...". The Core Strategy has tried to take account of changing household growth projections and adjoining Borough needs (see evidence base) without further delaying the process. If growth and demand significantly changes in forthcoming years this will be addressed through monitoring and Strategy review. Flexibility is built into the system through identifying the housing figure as a minimum, not maximum. No further change proposed.

			DPSR57C	Furthermore, this particular bullet point appears to suggest that there may be phased release of development land. This is clearly inappropriate for the higher order settlements identified for (relatively) significant amounts of development given the clearly stated aim of national planning policy to significantly boost the supply of housing land. The Council should confirm that it does not intend to artificially phase the release of residential development land, certainly with regard to strategic development land at the higher order settlements such as Atherstone. There is a slight error in Table 1, presumably due to the addition of the 500 dwellings to meet the long term housing needs of Tamworth – 3800 dwellings divided by 22 years equals 173 dwellings per annum, not 150. To reflect the wording of Policy NW3, Table 1 should also confirm that the overall and annual housing requirements are minimums to be achieved.	In response above. Also in Table 1 figure does not need to change as it is to show a five year housing supply. It would be wrong to include the Tamworth figure as it is beyond 2022 at the earliest that this would come forward outside of the five year window.
			DPSR57C	It would also be appropriate to note that the 'Housing in the Pipeline' and consequently 'Land to be found in remaining plan period' are not fixed given the uncertainty surrounding delivery of certain 'pipeline' sites and the possibility of unidentified sites coming forward	In response above
			DPSR57D	NW4 - We support the Policy NW4 insofar as it directs the most growth at a single settlement to Atherstone. This suitably reflects its sustainability credentials and the status of Atherstone as the main administrative and service centre in the Borough	Noted.
			DPSR57E	NW5 - We continue to object to the Council's affordable housing policy as it has not been subject to any strategic viability appraisal as required by the NPPF. Paragraphs 173 and 174 set out a clear requirement for local planning authorities to undertake an assessment of the impacts of the standards and requirements they propose to impose on new development to ensure they do not jeopardise the delivery of the growth planned for in their development plans. The Council has not undertaken this essential, mandatory assessment, and as such the Core Strategy cannot be regarded as justified or consistent with national policy. The Local Housing Delivery Group has recently published guidance on how these assessments should be carried out, 'Viability Testing Local Plans – Advice for Planning Practitioners' (June 2012). We commend the advice set out in this document to the Council. We do however support the alterations to the Policy relating to affordable housing targets (rather than requirements) and that viability will be taken into account on a site by site basis	Affordable Housing Viability Assessment has now been completed and published. Past trends indicate this figure is achievable. The 40% target is Borough wide and will be applied on a flexible, viable site by site basis . Delivery will be supported by contributions sought from developments below thresholds or not delivering on-site provision with 100% delivery on Public Sector/Council owned sites to offset any shortfalls. More detailed threshold criteria will be considered as part of the Development Management DPD policies consultation.
			DPSR57F	NW9 - As with the Council's affordable housing policy, the requirement for new development to obtain 10% of its operational energy requirements from renewable sources should be subject to strategic viability testing as requirement by the NPPF.	Noted. Disagree. Delivery is subject to viability testing as indicated in the policy text. In view of the multiple methods of energy generation and efficiency available assessing strategic viability to apply to individual developments will be difficult, too generalised and inaccurate. The threshold is also set so low it is unlikely to be difficult to deliver particularly larger developments. A lower threshold would be so insignificant and irrelevant in terms of the sustainable benefit it would generate that it would effectively make the policy redundant. The NPPF actively supports energy efficiency improvements to existing buildings; and when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. No change proposed.
			DPSR57G	NW15 & Key Diagram - We welcome the addition to Policy NW15 confirming that the broad direction of growth of Atherstone is to be to the north west of the town. However, the Council should amend the Key Diagram accordingly to reflect this identified direction for growth in accordance with the requirements of the NPPF. We believe that improvements could be made to the key diagram to make it clearer, starting with increasing its size	Noted. Core Strategy text indicates most likely area/direction of growth in Atherstone. No change to key diagram proposed.
DPSR58	Mark Andrews	Coventry City Council (officer response only)	DPSR58A	For clarification this is not a formal view of the Council, but is provided as an officer response to assist with the development of NWBC's Core Strategy It is considered that in general terms the proposed Core Strategy is sufficiently flexible to meet the needs of North Warwickshire Borough Council's administrative area. It also appears to offer suitable flexibility to support the additional needs of Tamworth Borough Council. NWBC's approach to protecting the Green Belt is supported, particularly the approach to protecting such designations around the Coventry and North Warwickshire border	Noted.

			DPSR58B	Para 5.9 is noted, and the continued sub-regional working arrangements between Coventry, North Warwickshire and other sub-regional authorities is supported. We are confident that our history of joint working will be maintained and be sufficient to discharge the Duty to Cooperate, established by the Localism Act.	Noted.
			DPSR58C	In addition to these general observations, a number of more detailed, technical points are provided to support the further development of your Core Strategy. These are provided in the spirit of helpfulness. 1. Para 6.5 and 6.6 and Table 1 appear to present an inconsistent view of windfall allowances. Given your apparent under performance against the 150 a year target since 2006, NWBC need to be comfortable defending their position with regards Para 47 of the NPPF. 2. Policy NW5 appears to set no threshold for sites to contribute to affordable housing. This requires clarification. Reference also needs to be made to appropriate evidence relating to viability testing of a 40% requirement. 3. There does not appear to be any policy steer on retail or town centre uses. Policy NW17 is vague and it is recommended that adding greater clarity to the 2nd paragraph in particular will support a stronger policy, less susceptible to challenge	Noted. Current site proposal and planning application discussions indicate sufficient supply is coming forward. Situation will be monitored. All housing development expected to address affordable housing needs either through on-site delivery or off site contributions. Thresholds for on-site delivery will be addressed in the Development Management Plan. No change proposed. Retail issue noted. Partially agreed. None of the main towns in North Warwickshire are of a significant size to fall within the previous RSS network of strategic town and city centres. As such the scale of any retail development will be significantly limited. This will be based on the hierarchy of centres established in Policy NW1. The Core Strategy does not, therefore, make any significant provision for retail development. Town centre uses and proposals will also be addressed through the Site Allocations Plan process and Development Management Plan policy consultation.
DPSR59	P Davies	Severn Trent	DPSR59	Comments relate to Infrastructure Delivery Plan and not the Core Strategy	No comment required
DPSR60	P King	HS2	DPSR60A	The references to the proposed high speed railway (HS2) in the Draft Core Strategy are noted. I would however make the following points: In paragraph 2.9 it is stated that "The full impact of the proposals will not be known for some time..." It is currently anticipated that the hybrid Bill for the railway will be put before Parliament before the end of 2013. The impacts associated with the proposed scheme will be identified and considered in the Environmental Statement that will support the Bill. In preparing the design and environmental impact assessment for the line of route. HS2 Ltd is working with relevant local authorities to explore mitigation measures and we welcome reference in paragraph 2.9 to the Council discussing these issues with us.	Noted. The Borough Council is currently involved in discussions over impact and will be discussing mitigation measures. The outcome of the High Court Challenge is nevertheless awaited. No change proposed.
			DPSR60B	Paragraph 6.2: The proposed line of route was published in January 2012 and is unlikely to change significantly in the future. It is therefore unclear as to what "implications" need to be fully assessed with regard to the Green Belt. This should be made clear in the Core Strategy	The "implications" referred to include how to address/treat existing buildings and businesses or uses affected by the route and that wish to relocate within the Borough and/or Green Belt (in view of the National constraints the policy applies).
			DPSR60C	Paragraph 6.75, Green Infrastructure: HS2 Ltd will be looking to maintain appropriate access across the railway.	Noted
			DPSR60D	Key Diagram (p 62): Given the longevity of the Core Strategy it is recommended, in line with Paragraph 162 of the NPPF, that the proposed line of route of HS2 is included on the Key Diagram	Noted. Until the Hybrid Bill has passed through parliament and the route finally confirmed, including the location of the "Y" junction, it is not intended to include the route on the Key Diagram. No change proposed. This may be a matter for inclusion in a subsequent review.
DPSR61	B Wroe		DPSR61A	* no need for any large scale housing development * future housing development must reflect the needs and aspirations of the whole community * take account of availability of empty properties. * population of the village is stable, unlikely to be any significant increase and may decrease as result of Daw Mill closure. * recent survey identified a need for more retirement homes/bungalows * Nuthurst Crescent or Tunnel Rd are considered inadequate to accommodate access to significant development proposals * use small scale development rather than large scale development to meet the housing needs of the villagers	Noted. The housing figure is considered to reflect a good balance between addressing the Borough's housing need and reflecting the need for restraint in a rural countryside area with significant Green Belt coverage. Other comments are site specific issues more appropriately addressed through the Site Allocations Plan process. No change proposed.

DPSR62	W Nazir	Birmingham City Council	DPSR62A	The City Council does not object to the overall approach and takes the view that it meets the soundness test - however, this is subject to the following; - We are looking at ways to increase our own capacity - the RSS was clear that some of Birmingham's future housing will need to be accommodated within other Authority areas. The Core Strategy takes no account of this longer-term requirement which is understandable given that the issue has only recently emerged - you will recall that I have recently written to you requesting a meeting to begin discussing this in line with the principles of the "Duty to Co-operate". For this reason the Councils support for the Draft pre-submission is conditional on the inclusion within the Strategy of a recognition that further work will be needed to identify whether additional housing provision is required in North Warwickshire to meet needs generated in Birmingham and a commitment to review the Strategy at an early stage if it is shown that the need exists.	Noted. In view of how late in the day this issue has arisen and been identified to the Borough council it is considered that this will be an issue for the long term review of the Core strategy and to delay the Core strategy process now would significantly jeopardise potential developments and control over development elsewhere in the Borough. Further discussions will be undertaken with Birmingham to consider these issues. A new paragraph will be included relating more widely to the Duty to Co-operate.
DPSR63	J Hollyman	Harris Lamb Ltd	DPSR63A	Paragraph 4.1 - We support Strategic Objective 1 of the draft pre-submission core strategy (page 27) in that it seeks to focus the majority of new development within the borough on previously developed land in the Market Towns and the Local Service Centres such as Kingsbury. However, as stated in our previous representations to the core strategy, we propose that sites adjacent to the existing settlement boundaries of the Local Service Centres can assist in maintaining and enhancing the sustainability of the borough, contributing to the creation of sustainable communities as required by national planning policy	Noted. Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough.
			DPSR63B	The SHLAA Final Report, March 2010 identifies our client's site as one of 19 potential "priority" employment sites within the borough. The table states that the site is a potential rail freight location and should be investigated specifically for this use. Our client's land should be removed from the Green Belt and allocated for employment use so as to fulfil the above objective identified in the SHLAA. Within this context, we note that the immediately adjoining site was removed from the Green Belt in connection with potential plans for a new railway station. In terms of the purposes of Greenbelt land as set out in the NPPF, my clients site would be compliant	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. Nevertheless, the potential for a new railway station and freight improvements are noted in the text and could come forward as an exception to Green Belt policy. NPPF makes allowance for local transport infrastructure which can demonstrate a requirement for a Green Belt location. No change proposed.
DPSR64	A McMullan	Knight Frank(on behalf of Diocese of Birmingham)	DPSR64A	Spatial Portrait - Paragraph 2.30 provides a spatial analysis of Austrey. It notes in the final paragraph that, 'there is some potential for small scale redevelopment or expansion (my emphasis).' By implication, this analysis of Austrey suggests that small scale residential development would be acceptable outside and on the edge of the existing development boundaries. However this acceptance is not continued elsewhere within the Core Strategy (referenced below). Policy NW1 separates the settlements into five categories in the form of a settlement hierarchy, with Category 1 being the larger market towns including Dordon and Atherstone, down to Category 5, which relates to outside of development boundaries. Austrey and Newton Regis, where the Diocese have landholdings are proposed as Category 4 settlements. The text associated with this category states as follows: 'Development will be limited to that identified in this Plan or has been identified through a Neighbourhood or other locality plan.' Policy NW1 also relates to 'outside development boundaries' (category 5)	Noted. The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment. The Site Allocations Development Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State to avoid further delay.
			DPSR64B	The acknowledgement from the Council that private market housing in addition to affordable housing is required in the interest of sustainable growth of smaller rural villages is welcomed. This is supported in paragraph 5.8 of the Core Strategy which notes that small scale housing developments help regenerate and support the rural economy proving affordable housing needs can still be considered. In the interest of providing clarity to users of the document, it would be useful to confirm the required mix of private housing and affordable housing	Noted. No specific mix proposed. The Core Strategy will enable a flexible approach subject to viability assessments. Further detail will be addressed in the development Management Plan policy consultation.

			DPSR64C	<p>The subtext regarding Category 4 villages and the text regarding 'outside development boundaries' detailed above implies that all residential development to Austrey and Newton Regis must be confined to within the settlement boundaries. This stance reduces the flexibility for the growth of these settlements and indeed contradicts that text relating to the spatial portrait of Austrey. It also assumes that there is capacity within the settlement boundaries to facilitate this growth. It is proposed that further text stating the following is added: 'Development outside and on the edge of the current development boundaries will only be permitted as and when evidence shows there are no suitable development opportunities within the development boundary.'</p> <p>This sequential approach for site selection will still ensure that the principles of sustainable development are adhered to in Category 4 villages, whilst allowing for limited growth outside and on the edge of the existing settlement boundaries when the requirement exists.</p>	<p>Disagree. The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment. The Site Allocations Development Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State to avoid further delay. No change proposed.</p>
			DPSR64D	<p>NW4 - The provision for a minimum of 40 no. residential units for both Austrey and Newton Regis is fully supported. However, the wording relating to category 4 villages should be amended to facilitate development on the edge and adjoining these settlements, to read: "The following settlements and edge of these settlements will cater for the following amount of development on sites of no more than 10 units and at any one time unless a Neighbourhood Plan allocates more:" Accordingly the heading to category 5 villages should also be amended to reflect the above and read: "Category 5 – Outside of the above settlements and not adjoining a settlement boundary"</p>	<p>Support noted. The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment. The Site Allocations Development Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State to avoid further delay. No further change proposed.</p>
			DPSR64E	<p>The above representations support the acknowledgment that the incremental growth of rural settlements is necessary to ensure their longevity and viability. However, there needs to be more flexibility regarding their growth and an acceptance that not in all cases development can occur within the settlement boundaries. The proposed housing and settlement hierarchy policies should be amended accordingly to reflect this</p>	<p>Noted. The Core Strategy and Site Allocations Development plan will not restrict housing development to that solely within the development boundary of those settlements outside of the Green Belt. Where necessary green field sites will be expected to come forward, particularly where there are few deliverable or available sites within the development boundary and the 5yr housing supply is deficient.</p>
DPSR65	Y Bosseva	Renewable UK	DPSR65A	<p>RenewableUK is concerned that the policies on wind energy are negatively written and are likely to unduly restrict wind energy development, contrary to national policy and the EU Directive 2009/28/EC. Additionally, provisions on sustainable development do not refer to renewable energy. In our comments below we include an outline of renewable energy's contribution to climate change objectives, the security of energy supply and stable electricity prices, as well as to job creation and the green economy. We are concerned that these benefits of renewable energy are not reflected in the pre-submission document, and seek that they be adequately included in the subsequent versions of the CS.</p>	<p>Noted. No change proposed</p>
			DPSR65B	<p>In order to develop a low-carbon economy and contribute adequately as a nation to addressing climate change, we need to plan and accept major social, cultural and economic change. This point is crucial, and landscape change will be a major part of that process. One aspect of this is the manner in which we must plan for and manage and allow for change within the landscape. Areas which have good resources should be producing as much renewable energy as possible. This approach should be supported in the CS.</p>	<p>Noted. Approach supported in so far as it delivers non wind farm related renewable energy facilities such as Biomass/Biogas. Possible future site at Hams Hall for low carbon energy production. No change proposed</p>
			DPSR65C	<p>There is a raft of relevant national level policy documents which should be referenced within the CS, and are considered important material considerations in the determination of renewable energy projects. These documents emphasise the key role that the planning system has to play in delivering an increasing proportion of renewables necessary to meet national targets. There is a clear steer to planning professionals and local authority decision-makers to look favourably on renewable energy developments and to give the wider environmental and economic benefits significant weight in deciding whether to grant consent. The CS should be aligned with national policy.</p>	<p>Noted. No change proposed</p>

DPSR65D	Spatial Vision - In our view the vision needs to include provision for energy needs, to support its housing and employment aspirations. In line with the NPPF, sustainable development and renewable energy as a key element should be at the heart of all development in the area.	Disagree. Spatial Vision notes new development will be designed following sustainable development and construction principles, which will include issues of energy efficiency and generation. Not considered necessary to add extra detail. No change proposed.
DPSR65E	Strategic Objectives - Similarly to the Spatial Vision, this section is missing the very important climate change and energy objectives, including renewable energy. Such objectives could read along the following lines: <ul style="list-style-type: none"> • To recognise the challenge of climate change, reduce greenhouse gas emissions and promote the sustainable use of natural resources to support the use of renewable energy. • To provide for and support the development of the low-carbon economy. 	Disagree. Strategic objectives 1, 6 and 7 combined are considered sufficient to address these issues. No change proposed.
DPSR65F	NW2 - In our view the potential for wind energy generation in the Green Belt should also be considered and provided for in this section of the CS. Paragraph 91 of the NPPF states that special 5 circumstances exist for allowing renewable energy in the Green Belt, and these may include the 'wider environmental benefits associated with increased production of energy from renewable sources	Disagree. The limited wind speed available in most of the Borough's Green Belt areas and concerns over the potential significant visual impact and residential impact, particularly cumulatively, indicates there are better options and alternatives available that would deliver greater energy levels without the same level of adverse impacts. The NPPF notes that; 'When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed.' No change proposed.
DPSR65G	NW8 - Renewable energy is a key element of sustainable development and provisions for it should be included in the Sustainable Development core policy. A bullet point along the following lines is suggested: <ul style="list-style-type: none"> • Seek to reduce greenhouse gas emissions and maximise opportunities for the deployment of renewable energy 	Noted. Policy NW9 adequately addresses this issue. No change proposed
DPSR65H	NW9 - The first paragraph of this policy on renewable energy is very negatively written and should be amended to reflect the benefits of renewable energy. In accordance with the NPPF, local authorities should have a positive strategy for the deployment of renewable energy. Suggested wording to reflect that is as follows: "The Council will seek the wider deployment of renewable energy, which is essential for: <ul style="list-style-type: none"> • Reaching the UK's renewable energy generation targets; • Climate change mitigation; • Ensuring the security of energy supply; • Stabilising energy prices and reducing fossil fuel dependence; and • Job creation and other economic benefits (including local benefits). 	Noted. It is considered the policy is sufficient to address local needs that will contribute to national targets. No change proposed
DPSR65H	Renewable energy projects will be supported where they provide a local energy benefit and they respect the capacity and sensitivity of the landscape and communities to accommodate them. In particular, they will be assessed on the balance of their national and local benefits and their potential individual and cumulative impact on landscape quality, sites or features of natural importance, sites or buildings of historic or cultural importance, residential amenity, and the local economy".	See comment above
DPSR65I	NW19 - should include provision for renewable energy. The following bullet point should therefore be included: <ul style="list-style-type: none"> • Provision of renewable energy infrastructure to maximise renewable energy generation and reduce carbon emissions. 	Disagree. Unnecessary detail. No change proposed

DPSR66	R Crow	Barton Willmore (On behalf of Taylor Wimpey)	<p>DPSR66A 2.14-2.44 - The Core Strategy (CS) refers to the relationship of the area of Dordon north of the A5, and its relationship to Polesworth. It makes clear that although the villages are close geographically, the separate identity of Polesworth and Dordon is important to people locally, and separation should be maintained. This is in addition to an overall strategy in the CS of maintain separation between Tamworth and villages in North Warwickshire. When considering the directions for growth around Polesworth and Dordon it is clear that development on the western side would increase the potential coalescence with Tamworth. The gap between the villages is small and to maintain a gap development to the north of Dordon or south of Polesworth should also be ruled out. Finally it is notable that to the south of Dordon and the north of Polesworth there are significant physical boundaries (A5 and Railway line respectively). This means that the best direction for growth to Polesworth and Dordon is on the eastern side.</p>	<p>Noted. The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment. The Site Allocations Development Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State to avoid further delay. No further change proposed.</p>
			<p>DPSR66A It is also suggested that Long Street would be a constraint to any growth, however, it is not clear why this is a constraint and neither is it explained in the CS. If this comment is to remain then the Council should clarify the evidence behind this constraint and the level of constraint that there is on Long Street for future development. We welcome the recognition that development in Polesworth and Dordon can make a positive contribution to its sustainability, by embracing a mix of uses and by necessary infrastructure and services. We would comment that, to ensure new development can provide necessary infrastructure and assist the Council in meeting its aims, the scale of development will need to be such that it remains viable.</p>	<p>Noted. The narrow nature, limited capacity, congestion and on street parking are the constraint issues that affect Long Street. Alternative access provision or improvements or traffic management methods will be sought through any consideration of future development sites impacting on Long Street. However, the Site Allocations Development Plan process will be the route used for site identification and allocation. No change proposed.</p>
			<p>DPSR66A * It is recommended that the text in this section should reiterate the Council's stance from paragraph 2.14, making it clear that on land near to the existing residential areas new open cast mining operations will not be supported. * It is recommended that the text in this section should end in a consistent way with the Polesworth section, i.e. stating how (Site Allocations DPD) and where (eastern side) development is most acceptable. * It is recommended that the comment relating to Long Street being a constraint is clarified. It should be made clear the amount of housing that can take place without improvements to Long Street and what improvements are required to enable further growth.</p>	<p>Noted. Unnecessary detail . The Site Allocations Development plan will be addressing future site specific provision, much of which is derived from existing evidence such as the Strategic Land Availability Assessment. The Site Allocations Development Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State to avoid further delay. No change proposed.</p>
			<p>DPSR66B 2.61-2.63 - In order for consistency with the section relating to Dordon it would be beneficial to acknowledge the close relationship between Polesworth and Dordon. In addition, the CS appears to overly focus on the former coal workings associated with land surrounding Polesworth/Dordon. We understand that prior to being owned by the Taylor Wimpey UK Ltd, UK Coal confirmed that they had no further interest in the area due to any remaining reserves being unviable to extract. Therefore the development of these former coal mining areas for residential purposes would not be contrary to National Policy concerning coal reserves, because viable resources would not be sterilised.</p>	<p>Noted. Site lies within the Minerals Safeguarding area and the issue of sterilisation of reserves needs to be addressed and clarified by landowners/developers. Insufficient information available currently to be sure development would not trigger potential opencasting. No change proposed.</p>

<p>DPSR66B Furthermore, the document states in Paragraph 2.14 that, 'In terms of the coal reserves from the Northern Warwickshire Coalfield the Council will not support open cast operations especially where it will have a direct effect on local residents.' Given the proximity of the land in Taylor Wimpey's ownership to existing residential areas it is not considered that North Warwickshire would be in support of open cast operations, in this location, even if there were viable coal reserves available.</p> <p>Finally, this section refers to 'small scale' developments on the eastern edge of Dordon. The Council's definition of 'small scale' is not stated and in order to provide clarity to people reading the document it should be. In addition, given the aims of the Council in achieving mixed growth and also the requirements for housing numbers in Polesworth and Dordon it is not considered that the Council should be limiting developments to those of a 'small scale'. The potential for the comprehensive planning of an area and dealing with infrastructure requirements is by focusing on small scale developments</p>	<p>The Borough does not have the power to prevent opencasting operations if reserves are viable and accessible. This would be a County Minerals planning authority matter. Nevertheless, the Borough would not support such operations. Information is unavailable to confirm whether this is, or may be the situation. Guidance from the Coal authority indicates that modern methods of extraction could permit operations to come in close proximity to existing residential areas, and even small scale developments of less than 10 dwellings have the potential to "trigger" extraction unless access to the reserves is impractical/expensive. Small scale is difficult to define as this will depend on location, size and scale of existing settlement, but may be greater than 10 dwellings in some circumstances so no further clarification is proposed and flexibility of approach is retained. contd.. below</p>
<p>DPSR66B Re paras 2.61 -2.63 -* It is recommended that the text in this specifically comments on the close relationship between Polesworth and Dordon so as to maintain consistency with previous paragraphs (2.41-2.44).</p> <p>* It is recommended that the text in this section should reiterate the Council's stance from paragraph 2.14, making it clear that on land near to the existing residential areas new open cast mining operations will not be supported.</p> <p>* It is recommended that the phrase 'small scale' is removed or the Council's view of what is 'small scale' is defined in the document. In defining the scale of development it is important that the Council consider their aspirations for achieving mixed growth and the housing requirement in this area.</p>	<p>Contd from above...Nevertheless, if the coal issue cannot be resolved and development is constrained in this broad area there may be some opportunities for small infill or rounding off sites that, due to access difficulties for plant and proximity immediately between and adjoining existing residential development, could still come forward without triggering operations. This will have to be assessed on a case by case basis. No change proposed.</p> <p>Noted. Partially agreed. This section will be amended to ensure clarity and consistency with section on Dordon. No change to small scale reference.</p>
<p>DPSR66C NW3 - The Council is planning for total growth of 3,800 dwellings over the period 2006-2028, with 500 of these dwellings being delivered to assist Tamworth in meeting their needs. The technical note, which is appended to this document, demonstrates that this level of growth is below the 2008-based DCLG household projections which suggest that the number of households will grow by 4,000 over the same period. Furthermore, as 500 of the 3,800 dwellings are to meet Tamworth's needs it can be reasonably suggested that in order to adopt a robust housing growth target for the Borough a higher figure should be considered. As covered in the technical note, development at the 2008-based DCLG projections rate will lead to a decline of the working age population over the plan period. Again this suggests that a higher figure should be considered so as to comply with national and local aspirations for economic growth</p>	<p>Disagree. Following the consideration of a Housing Paper the Council adopted an approach to deliver a minimum of 3,300 for its needs up to 2028, while accommodating an additional 500 units from Tamworth. This is considered sufficient and adequate to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. No change</p>
<p>DPSR66C Meeting Tamworth's Needs - The wording in Policy NW3 lacks the flexibility required in Local Plans by the NPPF. Policy NW3 states that, 'The delivery of 500 units from the total 3800 units will not commence until at least 75% of the 1150 proposed at Anker Valley Sustainable Urban Neighbourhood and 75% of the remaining Tamworth housing target are completed, or by 2022 whichever represents the later date.'</p> <p>However, North Warwickshire can assist in helping meet Tamworth's needs in the short-term or long-term and it is not considered that this assistance should be artificially delayed through policy.</p>	<p>Disagree. North Warwickshire should not start accommodating growth meant for Tamworth until it is categorically clear and evidenced that this growth cannot be accommodated within its current area. Otherwise the availability of easily and more economically developable green field sites in North Warwickshire will be seized on and sites within Tamworth's area, with potential for development but requiring greater on-site or infrastructure costs, will not get delivered. This will have a 'Catch 22' situation of encouraging even further incursions into North Warwickshire green field sites to the detriment of delivering urban regeneration or sites requiring significant infrastructure investment in Tamworth. No change proposed.</p>

DPSR66C	Windfall development - The role of windfall development in the Core Strategy is not clear. Paragraph 6.5 suggests that there has been a historic delivery rate of 60 windfall dwellings per annum, however, there is no allowance made in Table 1 for windfall development. The NPPF is in favour of growth and positively planned provision to meet housing needs, given that the number of windfall developments is likely to continue to reduce as a result of the plan-led system and a less permissive house building regime in rural areas it is agreed that no provision for windfall development should be included in Table 1. The non-implementation rate of 5% would seem to be reasonable, provided that the Council can show robust evidence of this rate. If there is no up-to-date and robust evidence for the 5% figure then it is considered that this should be raised to take account of the unprecedented economic conditions in which this plan is being prepared to ensure that there is a suitable level of new housing to meet local needs.	Noted. No allowance is included.
DPSR66C	Appropriate Buffer - The NPPF states that when calculating five-year supply Council's should include a buffer of at least 5%, and where there is evidence of 'persistent under delivery' the buffer should be increased to 20%. It is apparent from North Warwickshire's 2010/11 AMR the housing supply is recorded against the West Midlands Preferred Option of 150 dwellings per annum. Since 2006 the Council has only met this target once, in the 2006/07 monitoring year. In spite of exceeding the target in the 2006/07 monitoring year, the following four monitoring years have led to an overall shortfall of 144 dwellings; nearly a whole year's supply. It is considered that this amounts to persistent under delivery and that the Council should maintain a five-year supply with a 20% buffer and not the 5 % buffer proposed in this document.	Disagree, current site and application discussions indicate that sites are coming forward and there is no necessity to extend the buffer to 20%. The market fragility and impact of the recession and lack of finance (mortgages and commercial loans) over the period covered identified will have had a significant effect on supply and build rates to a greater extent than land supply. No change proposed.
DPSR66C	<p>* It is recommended that the Borough-wide housing target is increased to at least 4,000 dwellings (plus the 500 dwellings to meet Tamworth's needs).</p> <p>* It is recommended that the Council considers raising the housing target further to ensure that the working age population is sufficient to meet national and local economic growth aspirations.</p> <p>* It is recommended that the time constraints on delivering housing to meet Tamworth's needs are removed so as to provide flexibility across the wider area.</p> <p>* It is recommended that the non-implementation rate is evidenced and takes account of current economic conditions.</p> <p>* It is recommended that a buffer of 20% is included in the five-year supply calculations to take account of persistent under delivery since 2007/8 against the West Midlands RSS figure</p>	Disagree. Following the consideration of a Housing Paper the Council adopted an approach to deliver a minimum of 3,300 for its needs up to 2028, while accommodating an additional 500 units from Tamworth. This is considered sufficient and adequate to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. No change
DPSR66D	NW4 - As is detailed in the appended technical note, it is suggested that the housing requirement for Polesworth and Dordon be increased to a minimum of 640 dwellings per annum in order to be compliant with the 2008-based DCLG household projections and to take full account of the significance of Polesworth and Dordon within the Borough. Furthermore, Policy NW4 should be amended to show clearly where the 500 dwellings for Tamworth would be most sustainably located within North Warwickshire. Given that Polesworth with Dordon is the closest market town geographically to Tamworth it can be expected that growth in these two villages will be the preferred location for meeting a significant proportion of this need. As discussed above, any significant development should be on the eastern side of these villages in order to prevent the erosion of the gap between the two villages or with Tamworth (a key issue consistently raised by the Council).	See comments below
DPSR66D	Furthermore, the strategy continues to rely heavily on small-scale development in small villages. The level of growth suggested for some of the smaller settlements is as low as 5 dwellings. Adding 5, 10, 15 or even 20 dwellings to a rural village is not going to be sufficient to maintain a shop or service for example. Simply put, it is adding more homes to already small, often unsustainable rural villages, when the focus of the CS should be on the Main/Market Towns – as per the Strategic Objectives.	Disagree. It is not expected, nor would it be viable for these small amounts of development in themselves to be able to deliver new services, whether that be a shop or a school. Nevertheless, small levels of development, open market and affordable housing, will help sustain existing village services and facilities and accommodate natural, incremental growth. Settlements in the hierarchy were identified in view of the services and facilities they already contained. No change proposed

<p>DPSR66D * It is recommended that the total housing requirement for Polesworth and Dordon should be increased to a minimum of 640 dwellings to acknowledge that in addition to its own strategic role as a market town it is also the most sustainably located suitable settlement for accommodating Tamworth's growth. * The policy should clearly show where the 500 dwellings to assist in meeting Tamworth's requirements are being delivered. * It is recommended that the strategy removes allocations for settlements of 20 dwellings or less. This level of development can be met through in fill development and conversions and allocations of this size will not have a strategic impact in terms of maintaining or creating a new service to improve a settlements sustainability.</p>	<p>Noted. Housing figures will be amended to increase Polesworth/Dordon requirement, taken form smaller village requirement. This will provide a more appropriate and sustainable balance of the percentage split between larger and smaller settlements.</p>
<p>DPSR66E NW5 - The aspiration to achieve 40% of all housing delivered to be affordable is commended, however, it is important that the overall viability of a scheme remains a key consideration. The NPPF is clear in Para. 173 that development should not be 'subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'. Furthermore, the Council's Housing Market Assessment is from 2008 and as such is out-of-date considering the current economic circumstances. If the Council does not intend to update this document then flexibility of any policy relating to affordable housing is vital given the questionable robustness of the document.</p>	<p>Noted. Affordable Housing Viability Assessment has now been completed and published. Past trends indicate this figure is achievable. The 40% target is Borough wide and will be applied on a flexible, viable site by site basis . Delivery will be supported by contributions sought from developments below thresholds or not delivering on-site provision with 100% delivery on Public Sector/Council owned sites to offset any shortfalls. More detailed threshold criteria will be considered as part of the Development Management DPD policies consultation.</p>
<p>DPSR66E * It is recommended that the Council update their Housing Market Assessment so that their affordable housing policy is based on robust and up-to-date information. * The policy wording in NW5 should me made clearer so as to provide certainty to developers that the affordable housing requirement will be agreed using an up-to-date viability assessment at the time of the development</p>	<p>Noted. Cross border partnership work is underway to update the Housing Market Assessment. However, it is critical to maintain the progress of the Core Strategy and any subsequent updates and recommendations from a revised HMA will be fed into future strategy reviews. The Core Strategy is considered flexible enough using minimum figures to enable/address additional growth if it arises. No change proposed</p>
<p>DPSR66F NW8 - Sustainable development is defined in the NPPF as being about positive growth; that which makes economic, environmental and social progress for this and future generations. The PINS model policy should be included at this point to ensure that the document is consistent with the NPPF. The bullet points within the policy provide greater detail than the PINS model policy but could be included as supporting text to the policy to make it clear what the Council considers to be relevant to Social, Economic and Environmental growth in the context of North Warwickshire. Within the policy the bullet points are unnecessarily prescriptive and not supported by any financial viability evidence. In terms of the bullet points, whether maintained in the policy itself or used as supporting text, they should be amended as follows:</p>	<p>Noted. Many of the requirements in the policy are those already applied as standard to planning applications and delivered without requiring detailed viability assessments. How would viability be assessed when dealing with matters of overlooking and privacy or providing satisfactory means of access for instance. Unclear as to the necessity for such a detailed approach. Where unexpected or onerous costs affect viability this can be taken into account on a case by case basis. Other elements such as affordable housing are subject to specific viability assessments. No change proposed. On mineral reserves Text will be amended to more accurately reflect NPPF .</p>
<p>DPSR66F • The first bullet point should make it clear that the Council will maintain a five-year supply of deliverable housing land using a mix of brownfield and Greenfield land as required; and • The eleventh bullet point should state that 'development should not sterilise known material reserves where these resources could be viably extracted'. This would take account of local circumstances and not prevent the development of suitable sites.</p>	<p>See above.</p>
<p>DPSR66G NW16 - Paragraph 6.81 suggests that coal reserves to the north and east of Polesworth and Dordon present a constraint to development (see our response above to paragraph's 2.61-2.63 outlining why this is not the case across the whole area). Whilst the document may need to acknowledge the potential for the loss of some viable coal reserves, it needs to be flexible so as to not prevent development in suitable locations. The Local Development Framework evidence base documents do not appear to include a minerals study. Furthermore, in paragraph 6.82 it should be noted that although access is stated as an issue, with the junction of Long Street and the A5 noted as a constraint. However, the Local Development Framework evidence base documents do not appear to include a transport study. It is considered that no development should be allowed that would close the gap between the villages and Tamworth, regardless of the scale, and that development to the south and east of the villages away from these areas should not be limited in scale given the Council's aspirations over the plan period.</p>	<p>Text will be amended to more accurately reflect NPPF and use revised term 'surface mining' within Core Strategy (include reference in Glossary also) as recommended by Coal authority. The evidence base is available through the County Council Minerals Core Strategy work, including Minerals safeguarding areas study which the Borough reflected in the Core strategy text. The County Council are also undertaking transport assessments based on the Core Strategy development levels and have indicated no "showstoppers" to development although infrastructure improvements will be needed in some locations to address development growth. The Core strategy makes specific reference to avoiding development growth to the west of Polesworth/Dordon. No change proposed.</p>

			<p>The first paragraph of Policy NW16 should be amended to state that: "The Broad location of growth will be to the south and east of the settlements subject to there being no opencast operations and the sterilisation of no viable coal reserves is proven."</p> <p>The Local Development Framework should provide clear evidence to justify the policies relating to mineral extraction and the traffic constraint relating to Long Street. The final paragraph of Policy NW16 is unclear. The paragraph should be reworded to make it clear where development will and will not be acceptable and also the reference to scale (as discussed in our response paragraph's 2.61-2.63) needs to be clarified.</p>	<p>Partially agreed. Amend 'retain' to 'remain'. The final paragraph will be split and amended to make it clear that developments will not be delivered to the west of Polesworth and Dordon to maintain the separation with Tamworth. In addition, the narrow nature, limited capacity, congestion and on street parking are the constraint issues that affect Long Street. Alternative access provision or improvements or traffic management methods will be sought through any consideration of future development sites impacting on Long Street. However, the Site Allocations Plan process will be the route used for site identification and allocation. No change proposed.</p>
DPSR67	G Fergus	First City	<p>DPSR67A Hartshill - Support the increased housing figures set out within the Core Strategy and the scale of housing proposed at Hartshill.</p> <p>DPSR67B Spatial Vision - The increase of housing allocated to Hartshill is in accordance with the Spatial Vision. Pleased to see that our representations have been taken into consideration in connection to the capability of Hartshill to accommodate a higher number of dwellings</p> <p>DPSR67C We fully support the Council's removal of the statement which featured in the Spatial Portrait for Hartshill, draft Core Strategy, September 2011 which stated the Borough Council would consider development once the quarries have been commissioned.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
DPSR68	J Montgomery	Aspen Retirement Ltd	<p>DPSR68A There is an increasing awareness of the issues arising from our ageing population. There are now 8.76 million people aged 65 or over in the United Kingdom which represents 11% of the total population. This is projected to increase to 11.6 million or 33% by 2025. This presents significant challenges to the nation as a whole. The 2006-based household projections show that, by 2013 32% of households in the UK will be headed by someone aged 65 or over. This has enormous cost implications as although people are living longer, many will experience a long term period of deteriorating health. Britain current spends £12.8 billion on hospital and community health care for the over 65s. It is significant to note that it has been estimated that these older households own £1 trillion in housing equity and this will rise to £1.4 trillion by 2026. Research carried out by the Department of the Environment in 2009 revealed that over a million older people feel trapped in their own homes, lack social interaction and feel lonely and isolated.</p> <p>DPSR68A Under occupation of family housing is a significant problem. In recognition of the issues the Government has now put forward specific planning policies in the National Planning Policy Framework. Firstly older people are identified and defined as a specific group in society. Secondly paragraph 50 requires that Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community such as the elderly. To that end paragraph requires that Strategic Housing Market Assessments should identify the mix of housing and range of tenures which addresses the need for all types of housing, including for the different groups in the community such as older people. In November 2011 the Government published its Housing Strategy for England with its stated intention of unlocking the housing market and getting Britain building again.</p> <p>DPSR68A The Government will encourage local authorities to make provision for a wide range of housing types including retirement housing, sheltered and Extra Care. It follows from the above that it is incumbent on the Local Planning Authority to include specific policies to ensure the delivery specifically designed accommodation for older people including sheltered accommodation, extra care developments and continuing care retirement communities in appropriate and sustainable locations within its administrative area. Policies should recognise the specific characteristics of such developments including location, environment, amount, layout and design.</p>	<p>Noted. Core strategy addresses need for a variety of types and tenures that reflect settlement needs and for developments that are adaptable and take account of the needs of all users.</p> <p>See comment above</p> <p>See comment above</p>
DPSR69	L Perry	Environment Agency	<p>DPSR69A We are broadly supportive of the submitted document, however we believe there is the opportunity to make final amendments to help ensure that it delivers sustainable development in North Warwickshire, and is in conformity with the National Planning Policy Framework</p>	<p>Noted.</p>

<p>DPSR69B NW8 - We are supportive of Policy NW8 because it recognises the need for water efficiency measures though no specific targets such as a particular level of the Code for Sustainable Homes or a BREEAM rating are given. Specific water use targets would strengthen the policy and give a clear steer to Developers to deliver sustainable development and use natural resources prudently. Severn Trent Water propose to meet future demand in the water supply zone that covers Warwickshire through demand management i.e. a water efficiency programme. Any council policies that require efficient use of water will therefore support Severn Trent's programme.</p>	<p>Noted. Unnecessary detail for Core strategy. This is an issue that can be addressed through the Development Management Plan policy consultation. No change proposed.</p>
<p>DPSR69C We recommend that the document be strengthened by including specific water quality policies within the core strategy document. Although the incorporation of sustainable drainage is mentioned within Policy NW8 (Sustainable Development), it states that the quality and hydrology of ground or surface water are protected to reduce the risk of pollution. We would seek the inclusion of measures to ensure that water quality is enhanced and improved, and recommend a policy relating to the prevention of deterioration to watercourses in line with your role as a co-deliverer of WFD actions. The Water Framework Directive requires all water bodies to achieve 'Good Ecological Status or Potential' by 2015.</p>	<p>Noted. Unnecessary detail for Core strategy. This is an issue that can be addressed through the Development Management Plan policy consultation. No change proposed.</p>
<p>DPSR69D We recommend that policy NW6 (Gypsy and Travellers) be strengthened to include giving preference for sites to be located within flood zone 1. The supporting text describes the preferred locations for development of new sites, and we recommend that this text includes consideration of flood risk.</p>	<p>Noted. Unnecessary detail. All development is required to take into account flood risk. See strategic objectives 1 and 7 and NPPF para 100. Constraints Map indicates extent of flood plains. This will be taken into account when considering sites through the Site Allocations Development Plan and Gypsy and Travellers development plan process. Unsure as to why objector feels that Policy NW6 excludes Gypsy and Travellers sites from that standard approach/assessment. No change proposed.</p>
<p>DPSR69E We recommend that the text supporting Policy NW8 (Sustainable Development) should include a direction to encourage development away from areas of flood risk to land classified as lower risk of flooding (Flood Zone 1) Although we are support the inclusion of sustainable drainage within new development, we are disappointed that policy NW8 does not include the direction for developers to naturalise or de-culvert watercourses wherever feasible. This could be through the creation of a policy with would not permit development that would compromise the delivery of the River Severn Basin Management Plan</p>	<p>Noted. Unnecessary detail. All development is required to take into account flood risk. See strategic objectives 1 and 7 and NPPF para 100. Constraints Map indicates extent of flood plains. This will be taken into account when considering sites through the Site Allocations Development Plan and in more detailed policy consultation in the Development Management Plan process and can include opportunities for naturalising or de-culverting watercourses. No change proposed.</p>
<p>DPSR69F We support strategic objective, particularly the aspiration 'To protect and enhance the quality of the natural and historic environment across the borough' and the application of this objective to core strategy polices. We notice however objective 7 is absent from Policy NW8, which details developments should 'protect the quality and hydrology of ground or surface water sources so as to reduce the risk of pollution and flooding, on site or elsewhere.' We believe this policy can strive to facilitate delivery of strategic objective 7.</p>	<p>Noted. Consider NW8 bullets points 9 and 10 address this issue sufficiently. No change proposed.</p>
<p>DPSR69G Given the above we would like to recommend the document detailed below, which highlights best practice and would make a suitable reference to support achievement of strategic objective 7. * Groundwater Protection: Policy and Practice (GP3) Part 1-5 (Revisions to Parts 4 and 5 are currently being finalised) We would like to draw your attention to Part 4, which details our position and the policies we adhere to in our approach to groundwater protection. Owing to the predominantly rural nature of your borough you may find the following sections in Part 4 of particular relevance; * Section 1 - General approach to groundwater protection (including storage of pollutants) * Section 4 - Discharge of liquid effluents into the ground * Section 5 - Diffuse sources</p>	<p>Noted. The document will be considered in consultations on detailed policy consultation in the Development Management Plan process . No change to Core strategy proposed.</p>

DPSR70	A Shirley	CLA	DPSR70A	In summary the CLA believes that whilst the North Warwickshire Core Strategy is a great step forward from the previous Local Plan there is still much that needs to be achieved before the core strategy is deemed to be "sound" and fully reflect the positive nature of encouraging sustainable development that is reflected within the national planning policy framework. CLA suggests that the following areas should be looked at in greater details	Noted .
			DPSR70B	Housing - whilst the policies cater well for larger settlements there is a real lack of vision as to how housing might be delivered in smaller settlements. The reliance on just affordable housing would be quite adequate providing that there was sufficient funding to deliver these house in the locations required. However, the CLA has severe concerns that going in to the future such funding will not be available from central government and therefore a more innovative approach to affordable housing provision needs to be taken. One option that should be considered, even on smaller sites is cross subsidising affordable housing with the receipts from small scale open market housing within the rural areas might be a way forward. However, housing is required in the rural area, and this should be delivered in order to maintain sustainable dynamic rural communities	Disagree. The Core Strategy is not simply relying on or seeking solely affordable housing in smaller settlements. The affordable housing need will have to be assessed but removal of the 100% requirements, particularly in category 4 settlements to accommodate "enabling" cross subsidising development is consider to address this issue. See 5.8, Policy NW1, NW4, para 6.14-6.15 and section on Affordable Housing. No change proposed.
			DPSR70C	The CLA believes that there is insufficient encouragement for rural employment provision within the core strategy. By providing employment within rural areas for those people that live there it is possible to turn the tide of commuting into urban areas. However this requires good design which impacts little on the wider landscape providing good quality workspace whether this is for offices, or workshops or specialist rural retail premises (e.g. farm and craft shops and galleries).	Disagree. The Core Strategy makes allowance for small scale employment development to be delivered in rural areas in policy NW7 and through farm diversification proposals in NW14. No change proposed.
			DPSR70D	The policies for the Green Belt are insufficiently clear and do not demonstrate how any future housing or employment land use would be granted planning consent. The Green Belt policy should be more proactive setting out what the green belt needs to preserve and what sorts of development in which locations might be most appropriate. If the policy does not address these issues then worthy development in the Green Belt, which benefits those particular communities will not be able to take place.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. The NPPF makes provision for sustainable development and rural exceptions development in the Green Belt and rural areas and it is considered unnecessary to duplicate that policy provision in the Core Strategy. More detailed Development Management policies dealing with implementation of farm diversification, re-use and conversions in rural areas will be considered as part of the Development Management DPD consultation. No change proposed.
			DPSR70E	There needs to be a policy dealing with leisure and tourism within North Warwickshire. It cannot be argued that these activities are sufficiently catered for within the policies for economic regeneration or employment. It is necessary for there to be an individual policy that promotes leisure (i.e. facilities for people living within the borough) and tourism (facilities for those visiting the borough). The policy should encourage the provision and expansion of a wide range of leisure and tourism opportunities that are appropriate given the location of North Warwickshire both within the borough and also taking into account the proximity of the larger urban areas	Noted. Tourism and leisure uses are considered part and parcel of the term Employment Generating Uses. This will be made clearer in the Glossary. No additional specific policy is considered necessary. However, more detailed Development Management policies dealing with implementation of appropriate rural uses including tourism and leisure for farm diversification will be considered as part of the Development Management Plan consultation. No change proposed.
			DPSR70F	Spatial Portrait - 2.2 This paragraph states that the rural nature of the Borough is "created by a number of rivers". The CLA would argue that the rural nature of the Borough may be enhanced by the presence of rivers but is mainly due to the agricultural, rural diversified business use of the land and the settlement patterns which have framed the landscape that we see. Historically these would have been dictated by, amongst other things, water availability. 2.9 In addition to community benefits, landscaping, and noise barriers there will also be a need to consider sufficient crossing points, either over or under the HS2, to ensure that communities that have enjoyed strong links with each other are not severed. Consideration should be given within the Local Development Framework to the impact on individual businesses, residences and agriculture within the countryside. They will be affected both by the construction and the long-term existence of HS2, this is more acute as the majority of the rural area, which is somewhat distant from the stations, will see no benefit from the scheme	Noted. Text will be amended to better reflect impact of use of land and dispersed settlement pattern in creating rural character.

DPSR70F	<p>2.71 Any policy for "other villages and hamlets" needs to protect the unique nature of these settlements, however it should not prohibit development, even communities across small settlements will require both employment and housing provision. Arguably this is best provided within the settlement where the need arises rather than in the local market town. It is extremely important that whilst these villages may not be considered in planning terms as being sustainable they still need a future as viable dynamic communities.</p> <p>2.74 The CLA welcomes the recognition that a thriving rural economy is important for the Borough and the challenge is to fit in appropriate development that maintains the character of the countryside but also provides employment and housing that live within it.</p>	<p>Noted. These settlements have little or no services and facilities and are considered as unsustainable locations to be encouraging new build development. However, this does not prevent re-development, conversion and change of use where appropriate. More detailed Development Management policies addressing these issues will be considered as part of the Development Management Plan consultation. No change proposed.</p>
DPSR70G	<p>Spatial Vision - 3.2 The CLA welcomes the spatial vision that in accordance with the National Planning Policy framework (NPPF) there should be an emphasis on encouraging sustainable development this should be a focus on employment. It is also important in this area to consider potential leisure and tourism opportunities within this spatial vision.</p>	<p>Noted.</p>
DPSR70H	<p>Strategic Objectives - Table 2 - 1. The policy of restricting all development to the market towns and local service centres would disadvantage the rest of the Borough by providing no housing, no infrastructure and no further employment and potentially lead to the stagnation of rural communities and greater travelling. It is considered, in the light of the NPPF, that such an objective would be unsound.</p> <p>2. Housing needs should be addressed in the same or adjacent settlement as to where the need arises. This is particularly important in rural areas where house prices are often high and there is a desire to remain within the settlement rather than having to move many miles away to the market town for suitable accommodation. However, development in smaller rural settlements will need to be carefully planned to ensure that it does not detract from the unique character of that settlement.</p>	<p>Disagree. The Core Strategy objectives do not solely restrict all development to the market towns and Local Service centres. Housing and employment needs in rural areas are being addressed and will help maintain vitality of settlements. No change proposed.</p>
DPSR70H	<p>3. Welcome</p> <p>4. The CLA is concerned within this paragraph that there is nothing about improving the vitality of rural settlements and believes this omission makes the core strategy unsound.</p> <p>5. The CLA welcomes this objective of promoting rural diversification which should include not only employment, leisure and tourism facilities.</p> <p>6. This objective should include renewable energy e.g. growing the land for biomass, anaerobic digestion, as well as renewable energy generation.</p>	<p>see response above.</p>
DPSR70I	<p>Spatial Strategy - 5.2 Section 86 of the NPPF defines a clear distinction about villages which should be included within the Green Belt and those that need protection for other reasons which should be excluded from the Green Belt. It is suggested that North Warwickshire look at all the village settlements within the Green Belt area and define as to whether these need protection and whether the Green Belt or whether other policies deliver this protection adequately. There should be a clear policy which demonstrates that just because a settlement or an area is within the Green Belt that it does not prohibit all development. The NPPF sets out quite clearly the purposes of Green Belt and the types of development that might be appropriate and this needs to be reflected within the Core Strategy.</p>	<p>Noted. The Site Allocations Development plan consultation will address the issue of appropriate infill in smaller settlements within Green Belt. All other development will need to be appropriate as defined through the NPPF or an exception such as delivered through Community Right to build. No review of Green Belt boundaries is proposed.</p>
DPSR70I	<p>5.3 The CLA welcomes the recognition of the needs of smaller rural settlements. However, further thought needs to be given as to how housing needs in particular could be delivered within settlements within the Green Belt boundaries. NW1 Category 4 needs to allow infill development where this is appropriate to the settlement.</p>	<p>See response above</p>
DPSR70J	<p>NW1 - Category 5 needs to recognise the requirement to permit development connected with diversification of the rural economy which, by its nature, could be located in the main outside the settlement boundaries.</p>	<p>Disagree. NW14 addresses farm diversification. Category 5 accommodates economic development that requires a rural location but the Borough is not encouraging unsustainable new build employment development in rural locations. No change proposed.</p>

DPSR70K	NW2 - the CLA considers this policy to be unsound as whilst it refers to the Green Belt there is not a clear vision as to how rural settlements in the green belt will maintain sustainability or indeed how any housing or employment provision will be provided. The NPPF, we believe, departs from PPG 2 in that it concentrates on what the greenbelt aims to achieve and what might detract from those aims. This is in contrast to the proceeding which was used to prevent of development even where this preserves or contributes to the overall openness of the green belt whilst providing employment opportunities.	Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. The NPPF makes provision for sustainable development and rural exceptions development in the Green Belt and rural areas and it is considered unnecessary to duplicate that policy provision in the Core Strategy. No change proposed.
DPSR70L	NW4 - within category 5, there is only a provision for affordable housing needs a more flexible approach needs to be taken. This could allows some open market housing which could be used to cross subsidise affordable housing provision. Decisions on this should be taken on a settlement by settlement basis dependent on the needs and character of that individual settlement. Without these changes this policy should be deemed as unsound	Disagree. The Borough do not consider it appropriate to accommodate open market housing in unsustainable rural locations. Even provision for affordable housing needs to provide evidence of local need. No change proposed.
DPSR70M	NW7 - the CLA believes this policy to be unsound as it does not adequately reflect the needs for a fully diversified rural economy. Either the rural economy wants to be dealt with within this policy, or a separate policy within the employment section, but it should reflect national policy as set out in section 28 of the NPPF. This policy should deal with employment provision both within and outside the Green Belt	Disagree. The policy makes provision for small scale employment development down to Category 4 settlements and Policy NW14 addresses farm diversification. However, more detailed Development Management policies dealing with implementation of appropriate rural uses including tourism and leisure for farm diversification will be considered as part of the Development Management Plan consultation. No change proposed
DPSR70N	NW8 – is unsound - whilst there is an enthusiasm for concentrating development on brownfield sites it should be recognised that in the rural areas the location of brownfield sites may not coincide with appropriate locations for development and therefore green field sites will need to be considered and without . Whilst paragraph 6.43 deals with rural transport the problems of delivering development within the rural area (e.g. diversified enterprises) will be made difficult as this is not recognised within policy NW8. In the majority of rural settlements there is very little public transport and it is important that both employment and housing development proposals are not frustrated because of the lack of public transport provision	Noted. The need for improved public transport will be emphasised in the appropriate section. However, the need to ensure development is targeted towards the most appropriate and sustainable locations will mean some brownfield rural sites will not be considered as appropriate locations for development. No change proposed.
DPSR70O	NW9 - the CLA is concerned that this policy will restrict renewable energy provision and therefore this policy is unsound. By restricting renewable energy generation to those that provide a "local energy benefit" there is a concern that the majority of renewable energy generation facilities will not meet this criteria as they sell electricity directly into the grid. However they do deliver an important source of income which can allow investment in other areas of their businesses. So whilst there might not be a local energy benefit there is a clear financial benefit.	Noted. The delivery of cheaper energy to a settlement or towards a farm diversification proposal could be considered as of "local energy benefit" and would be accommodated by the policy . However, larger, commercialised/industrialised proposals are likely to be affected and the aim of the policy is to constrain such proposals that have an adverse impact on the rural character and landscape of the Borough. No change proposed.
DPSR70P	6.61 Whilst development can adversely affect public rights of way there needs to be a flexible approach taken to the diversion and screening of public rights of way from potential development sites. The fact that development can be seen from a public right of way or may impact on that right of way, it should not mean that the development cannot take place, but just that the development needs to accommodate the needs of the users of that right of way and better solutions may be required in the desire to facilitate that	Disagree. The intention is to avoid loss in current provision of Public rights of Way, not prevent diversions or be inflexible in assessing development impact. The text and Policy do not indicate that development cannot take place if it can be seen from a right of way, simply that development should avoid adverse effects and protect existing network. Consideration will be given to amending "protect" to conserve" to reduce expectation that current network routes are unchangeable and inflexible. Where appropriate changes will be necessary but no net loss to the overall network should result.
DPSR70Q	NW14 - this policy is welcome but should not just be confined to farm diversification but also diversification of the wider rural economy within the countryside	Noted. No change proposed
DPSR70R	NW19 - this policy should reflect that the legal nature of planning conditions and obligations which should only be imposed where they are directly relevant to the individual application and seek to mitigate or fund the costs of that development, rather than existing poor provision	Disagree. Too detailed and technical for a broad strategic document to address. Further detailed Policy development will be consulted on as part of the production of the Development Management Plan document. No change proposed.
DPSR70S	Monitoring - Unless the monitoring of policies NW2, 3, 4, 5, 7 & 14 quantifies the impact of these polices on the rural areas separately this policy will be unsound . At the point of monitoring it should be possible to measure the changes within the rural area that these policies have contributed to, and whether that change is positive or detrimental. The CLA does not consider that borough wide figures will demonstrate the changes satisfactorily.	Noted. Document has been subject to a Rural impact assessment. No change suggested?

DPSR71	D Hodgetts	Hodgetts Estates	DPSR71A	My client supports large parts of the NWBC Draft Pre-Submission Core Strategy and, as such, these written representations should not be considered as an overarching opposition to the document. The specific areas of support and opposition are listed and commented upon in turn below. However, there are some key elements of the Strategy that are simply not supported by adequate evidence and, as a result, are challenged in these representations.	Noted.
			DPSR71B	Para 1.8 - Here the Borough Council states it has an "in principle" opposition to the use of opencast mining within the Borough. The excavation of coal reserves is a matter of national importance that is supported both at national and county level through the Minerals Planning Guidance and Minerals Local Plan for Warwickshire respectively. It is not for the Council to take a position in relation to this matter unless it is based on sound evidence; this has not been produced in this instance and, as a result, the position is not adequately justified	Comment noted and accepted. Text will be amended to more accurately reflect NPPF and use revised term 'surface mining' within Core Strategy (include reference in Glossary also) as suggested by Coal Authority response.
			DPSR71C	Spatial Portrait - We reiterate our client's earlier representations submitted with regard to the Draft Core Strategy in January 2012, in stating that the "Spatial Portrait [still] goes beyond its legitimate remit as a factual account of the spatial context". For example, it includes inappropriate judgements on the suitability of specific locations for development that are unsupported by the evidence base	Disagree. The Core Strategy can indicate/suggest broad directions and areas that could accommodate development, particularly where existing constraints highlight most suitable areas, subject to more detailed being consulted on the the relevant Site Allocations Development plan, Neighbourhood Plan or Action Plan. No change proposed.
			DPSR71D	Para 2.6 - We acknowledge that "Over 90% of firms in the Borough employ 10 or less employees." Given the substantial proportion of firms employing such a small workforce, this would appear to be at odds with the Borough Councils particular support for the growth of small to medium sized enterprises found within Para. 6.76	Noted. The number of firms employing 10 or less employees may be large but the overall no of employees they support is still less than the larger employers. The concentration on small to medium firms acknowledges this situation, seeking to improve employment diversity, viability and reduce reliance on a small number of very large employers. No change proposed.
			DPSR71E	Para 2.12 - We generally support this paragraph, particularly in relation to the acknowledgement of the need for „sufficient housing of the right type and in the right location".	Noted.
			DPSR71F	Para 2.14 - We agree that national guidance dictates that "Where development is proposed on land with mineral reserves consideration must be given to the extraction of minerals before development takes place". However, we object to the statement in relation to the Councils position as to open cast operations within the Borough, for the reasons outlined above.	Comment noted and accepted. Text will be amended to more accurately reflect NPPF and use revised term 'surface mining' within Core Strategy (include reference in Glossary also) as suggested by Coal Authority response..
			DPSR71G	Para 2.42 & 2.44 Here the Borough Council refers to the area between Tamworth and Dordon and the need to maintain the separation between the two, thus ensuring that "when entering North Warwickshire, the area retains its rural character". This is a reoccurring theme in the Draft Pre-Submission Core Strategy, both within Policy and accompanying supporting text. The requirement to maintain the separation between Tamworth and Dordon is not supported by the evidence base and as such the Councils development strategy in this regard has not been properly or adequately substantiated. In our opinion, the land is excluded from proper and balanced consideration against alternative options and its alleged importance in maintaining the separation between the settlements neglects any potential planning benefits that would be realised through its development.	Disagree. Consultation with the communities and Parish/Town councils has indicated the level of concern over potential development to the west, encouraging merger of the settlements. There is considered to be sufficient potential housing sites to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. The Borough is predominantly rural and the implications of accommodating the growth suggested would have detrimental impacts on the rural character of the Borough, particularly outside of the Green Belt areas and result in reinforcing and merging settlement development to the west of Polesworth/Dordon along the A5 corridor . This area is seen as essential in maintaining the separation between rural North Warwickshire and urban Tamworth. No change proposed
			DPSR71G	Such benefits include the close proximity of potential housing to employment at Birch Coppice Business Park and the inherent sustainable transport patterns associated with this. An appropriate amount of housing development in this location could facilitate sufficient landscaping north of the A5 and along Dordons western boundary to actually reinforce the separation of the two settlements and provide an opportunity to screen existing skyline development associated with Dordon. Indeed, this point was acknowledged by the Inspector, in his report on the North Warwickshire Local Plan, 2005. He states:"That is not to say that landscaping here would not be beneficial because plainly it would be...in the interests of improving the quality of the view between Tamworth and this part of Dordon and adding to nature conservation interests in the area.	The situation and policy approach has changed since the Local Plan Inquiry. The Localism Act and National Planning Policy Framework allow local communities to identify those areas they see of particular local concern and sensitivity and to protect them from development. This is one such area. No change proposed.

	Once fully established, it may also create a physical and visual barrier to further outward expansion of the settlement." Such landscaping would not be possible without enabling development of some description and in the case of my clients land holding north of the A5/west of Dordon; it would certainly not be readily available for landscaping purposes should there be no enabling development associated with the proposals. C&P therefore suggest a more appropriate approach whereby the Borough Council supports development within this location, where it both reinforces the divide between Tamworth and Dordon and also enhances the rural character of North Warwickshire in a way that is consistent with the Councils aim.	See response above.
DPSR71H	Para 2.41-2.44 - These Paragraphs of the Spatial Portrait all refer to Dordon and yet no acknowledgement is made of the subterranean coal reserves found within this area, particularly those with potential for opencast mining, predominantly to the east of the settlement. This is considered to not paint a true reflection of Dordon, especially considering the substantive references to coal reserves made in relation to Polesworth in Paragraph 2.63. In addition, although reference is made to Birch Coppice Business Park as a Regional Logistics Site (RLS), no importance is placed upon the regional and national significance of the site, particularly the importance of meeting sustainable travel patterns through increased use of the rail freight terminal.	Noted. Agreed, text additions will be inserted to refer to presence of reserves in Dordon, addressing consistency between the two settlement sections.
DPSR71I	Para 2.63 - This paragraph acknowledges that the coal reserves of the North Warwickshire Coalfield lie to the north, east and south-east of Polesworth – effectively including the land to the east of Dordon. However, the next two sentences seek to add a "gloss" on existing minerals policy. Irrespective of the Council's own concerns about future opencast mining in North Warwickshire, these policies will continue to govern the potential exploitation of these reserves. The "gloss" in this paragraph is both inconsistent with national planning policy guidance and prevailing strategic planning policy and should be deleted. The adopted Minerals Local Plan and associated "Distribution of Minerals Map" forms part of the statutory development plan and contains several policies that indicate that this land should be safeguarded for mineral extraction. Additionally the Distribution of Minerals Map shows that the extent of the Exposed Coalfield in this area envelops both Polesworth and Dordon and much of the land directly to the east of the settlements	Comment noted . Text will be amended to more accurately reflect NPPF and Minerals policy, as suggested by Coal Authority response. Housing proposals that are submitted within the coal safeguarding area will need to address the coal issue but if it is considered that opencasting will be triggered these proposals will be resisted. The Council still consider that there are sufficient sites likely to be available within the Borough to address the housing requirement in the event the sites affected by Coal reserves cannot come forward. Nevertheless, if the coal issue cannot be resolved and development is, in general, constrained in this broad area there may be some opportunities for small infill or rounding off sites that, due to access difficulties for plant and proximity immediately between and adjoining existing residential development, could still come forward without triggering operations. This will have to be assessed on a case by case basis. No change proposed.
DPSR71I	The Mineral Safeguarding Areas for Warwickshire report was produced by the British Geological Survey and published in 1999. Within this the Warwickshire Mineral Safeguarding Areas (MSAs) are shown within map Figure A12. This clearly shows that the whole of Polesworth and Dordon, as well as a significant area of land to the east, is covered by the MSA for shallow coal. Allowing housing development to the east of Polesworth and Dordon that sterilises the land for future coal mining purpose would go against the principle of sustainable development, now enshrined within the National Planning Policy Framework. Whilst it may meet present housing need it would curtail the ability of future generations to meet future need for coal extraction. Moreover this would also contradict the provisions of draft Core Strategy Policy NW8 Sustainable Development, which states that "Development should...be adaptable for future uses and take into account the needs of all users [and] not sterilise known mineral reserves".	see above
DPSR71I	The position could not be clearer. Both adopted and emerging minerals policy makes clear that any development to the east of Polesworth and Dordon would sterilise the potential for future exploitation of coal resources in the future. As a result, were opencast coal mining to take place, it would be several years before extraction was complete, subsequent remedial works finalised and development could take place. As a result the Council would be unable to meet its housing delivery target which would add to the National Planning Policy Guidance buffer as listed within Paragraph 6.7 of the Core Strategy. Not only that, an opportunity would be missed to address Strategic Objective 2 in relation to housing needs of the Borough. The final sentence of paragraph perpetuates that notion that There is possible potential for small scale housing developments along the eastern boundary of the town depending upon the resolution of the mineral issue. In our opinion the position on possible mining in this area is clear. The sentence should be deleted.	see above

DPSR71J	Para 2.80 - Key quality 7 acknowledges that The Borough is the location for national and regional headquarters of both national and international companies with two rail freight facilities. In acknowledging the 'unique' nature of accommodating two rail freight facilities, it should follow that these are supported in planning policy and their potential should be maximised.	Noted. Additional emphasis on presence and benefit of Multi Modal freight facilities will be made in the appropriate section. No further change proposed.
DPSR71K	Spatial Vision - 3.2 - The spatial vision again refers to the importance of retaining and reinforcing the rural character of North Warwickshire to ensure that when entering the Borough, it is distinctive from the surrounding urban area. It also acknowledges the importance of locating new homes and new employment with local services and community facilities in an integrated manner. This adds further weight to the case for locating a quantum of new housing development west of Dordon, adjacent to both Birch Coppice Business Park and existing services and community facilities.	Disagree. Borough consider that weakening the gap between Tamworth and Polesworth/Dordon through accommodating significant development will adversely impact upon and diminish this rural character, particularly at a significant gateway point into the Borough. No change proposed.
DPSR71L	Spatial Strategy - Para 5.2 - We agree with this component of the Spatial Strategy, „that the majority of development will take place in larger settlements “. This approach will direct development towards locations with existing services and community facilities, as well as employment opportunities, thus creating more sustainable lifestyles	Noted.
DPSR71M	NW1 - It is agreed that the market towns (outside of Green Belt) of Atherstone with Mancetter and Polesworth with Dordon are correctly identified as Category 1 settlements and are the priority focus for development. We would reiterate the previous concerns of our client that, an "expectation" that more than 50% of the housing and employment requirements will be provided at the market towns is insufficiently robust for delivering the intended spatial vision. As such, the strategy should include a clear target for development in accordance with the settlement hierarchy, and should aim to ensure that development is distributed at least in accordance with that target. A more suitable target would therefore be "at least" 80% of development should be at the market towns, reflecting their status and delivering development in a more sustainable way.	Noted. 54% of the remaining housing is targeted at the Market Towns.
DPSR71M	The presumption that development will be restricted "outside" the development boundaries, except where other policies of the Plan expressly provide, does not allow for sufficient flexibility in the interim between adoption of the Core Strategy and adoption of subsequent Development Plan Documents (DPD), such as the proposed Site Allocations DPD. The National Planning Policy Framework (NPPF) states that, "where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted." The policy vacuum within the Core Strategy could therefore lead to inappropriate development being permitted or worse still, stymieing appropriate sustainable development from coming forward in a timely fashion. Policy NW1 should therefore be amended to allow for at least 80% of housing and employment requirements to be provided at the market towns.	Disagree. Key Diagram clearly indicates housing requirement and settlement position in hierarchy. Constraints Map provides information on areas least likely to generate policy or environmental issues/problems. Policy NW1 and 4 are not silent and give clear direction for levels of development targeted to an appropriate scale for the settlements in the hierarchy. A Site Allocations Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State. The Borough Council will consult widely on that document. No change proposed.
DPSR71N	Para 6.2 - Paragraph 6.12 again refers to the importance of the gap between Tamworth and Polesworth and Dordon. Although no evidential reasoning is given for this position, there is reference made to the source from both a Borough and local perspective from those that live in the Polesworth and Dordon area. We would again point out that this position has no founding within the evidence base and as such is not based upon an impartial and considered appraisal of the alternative options. As such, potential development options have effectively been pre-determined and therefore omitted from proper consideration as development options in the Core Strategy. Such an appraisal should weigh up the relative planning merits of the various sites ready and available for housing development, in coming to a conclusion on the most appropriate location. As such, the Core Strategy is unsound since it is not based on a robust and impartial spatial evidence base.	See response to 71G above.

	Indeed, in appraising the various sites put forward for housing development in Polesworth and Dordon for the Local Plan in 2005, the Inspector concluded that my client's land holding west of Dordon was "the next best option" behind the former Orchard Colliery east of Dordon. Having regard to national planning policy guidance and prevailing local policy contained in the adopted Minerals Local Plan and draft Minerals Core Strategy, it is clear that the Orchard Colliery site cannot be considered available until the mineral reserves located there have been first excavated. As such, in the short to medium term, my client's landholding west of Dordon should be considered to provide the best option to provide an appropriate and sustainable urban extension to Polesworth and Dordon. The words "will not be located within this important gap" should therefore be deleted from this paragraph.	see response to 71G above.
DPSR71O	NW4 - In line with our comments above with regard to Policy NW1, 80% of housing requirements should be directed to Market Towns to ensure that development is delivered in the most sustainable way possible.	See response to 71M above.
DPSR71P	Para 6.37 - We can find no basis within the evidence base to suggest that the MIRA Technology Enterprise Park will create significant opportunities for similar or associated development further afield. It is therefore unsound for the draft Strategy to place significant reliance on these types of development coming forward. In contrast, the Council should be acknowledging the existing "unique" employment features located within the Borough, namely the two Regional Logistics Sites (RLS) at Hams Hall and at Birch Coppice. These RLS's should be afforded appropriate support from local planning policy in order to maximise their potential to expand and provide additional local jobs in the future. The RLS's are of regional and nationally significance and should be considered as such.	Disagree. The Regional Growth Fund Bid indicated that for every job created at MIRA there would be at least 3 jobs created outside of the site. It is this potential and growth the Core Strategy seeks to address, encourage and capture. No change proposed.
DPSR71Q	NW7 - We fully support the proposition that employment land should be directed towards settlements appropriate to their size and position in the hierarchy. As such, "at least" 80% of the employment land requirement should be directed to Market Towns, in line with our comments with regard to Policy NW1 above. This will again ensure that development is delivered in the most sustainable way possible	Noted. See response to 71M. No change proposed.
DPSR71R	NW8 - In this Policy, emphasis is correctly placed on ensuring that development is adaptable for future uses, takes into consideration the needs of all users and does not lead to the sterilisation of known mineral reserves.	Noted.
DPSR71S	Para 6.76 - Reference is made here to a perceived dependency upon a narrow range of companies. This is clearly at odds with Paragraph 2.6 where the Borough Council state that "Over 90% of firms in the Borough employ 10 or less employees." Moreover, the Employment Topic paper is cited as evidence of this perceived dependence when in reality that document contains no appraisal of the spatial portrait of employment throughout the Borough and consequently cannot be upheld as a basis upon which to formulate planning policy. Reference is also made to the Boroughs focus on providing "long lasting skilled employment generating uses rather than traditional B1 (offices and light industrial), B1 (research and development), B2 (general industry) and B8 storage and distribution." In actuality, the use classes listed above cover the majority of businesses and industries within the UK, including those that create skilled and long lasting employment. A distinction cannot be drawn between B1use classes and "research and development and other knowledge based companies / facilities". This is because in planning terms, they are one and the same. Whilst the Council may well have a preference for research and development companies/businesses in preference to "traditional" B1 research and development, the fact remains that there is no basis in planning policy for distinguishing between different types of employment within individual use classes and as such, these references should be deleted.	Partially agreed. The number of firms employing 10 or less employees may be large but the overall no of employees they support is still less than the larger employers. The concentration on small to medium firms acknowledges this situation, seeking to improve employment diversity, viability and reduce reliance on a small number of very large employers. No change proposed. The issue around "long lasting skilled employment generating uses rather than traditional. uses" is noted and additional clarification is required to indicate the type of uses alluded to outside of the traditional B1, 2 and 8 and the text should be amended to include "in addition to" instead of "rather than". see above.
DPSR71T	Para 6.81 - Further reference is made here to the importance of the gap between the built up boundary of Tamworth and Polesworth and Dordon, to both the Borough and locally. This point is made without any reference to supportive evidence that justifies its inclusion in planning policy terms. As stated above, this position is not supported within the evidence base and should therefore be deleted.	See response to 71G above.

			DPSR71U	Para 6.83 - It is clear in both the adopted and emerging mineral planning policy framework, that the potential development of land affecting the coal reserves on land to the east of Polesworth and Dordon cannot be contemplated until the reserves themselves have been excavated and remedial works undertaken to restore the land to a state ready for development. Reference is made in this Paragraph to broad locations suitable for growth being to the south and east of the settlements. As evidenced above, no development can be provided to east of Polesworth and Dordon within the short and medium term so alternative locations should be explored. In this regard, the suitability and availability of land immediately to the west of Dordon to accommodate a quantum of housing development has been established within an Inspector"s Report and through the SHLAA respectively and this should be reflected within the Core Strategy. In terms of the suitability of land South of the A5 for housing purposes, the Inspector at the Local Plan Inquiry concluded it was on the "wrong" side of the A5.	Disagree. It is not currently clear that the potential development of land affecting the coal reserves on land to the east of Polesworth and Dordon cannot be contemplated until the reserves themselves have been extracted. Conflicting arguments and claims of viability and non-viability of reserves are not backed up by adequate ground work and geotechnical survey and analysis in most cases. Further assessment and review is underway. That is why the issue needs addressing by landowners or developers. Once addressed any potential can be considered through the Site Allocations Plan consultation process. No further change proposed.
			DPSR71V	NW16 - As reasoned above, this Policy should clearly differentiate between housing and employment development and refer to the appropriateness of each within specified locations. Land to the south of the A5 should be targeted primarily for employment uses whereas housing should be directed north of the A5. Furthermore, the reference to land west of Polesworth and Dordon remaining „undeveloped" should be categorically deleted from this Policy as it is not supported by the evidence base and has not been substantiated through a fair and balanced consideration against alternative options. As such, the numerous benefits in planning terms of developing this land have been dismissed without due consideration. In this regard the Core Strategy is considered to be unsound.	Disagree. There is potential for mixed use developments on land to the south of Dordon and provision of employment uses does not preclude or prevent residential, retail or recreational developments from coming forward on adjoining sites/land. No change proposed.
DPSR72	J Montgomery	Tanner & Tilley Planning Group (on behalf of retirement Housing Group)	DPSR72A	The Retirement Housing Group represents a range of providers of accommodation for older people both in the private and public sectors. The Group's remit is to promote awareness of this sector of the market and ensure planning policies are put in place so as to ensure the delivery of an adequate supply of accommodation specifically designed to meet the diverse needs of older people. There is an increasing awareness of the issues arising from our ageing population.	The Core Strategy is a strategic planning document within which the supporting text has the same weight as Upper case/Bold Policy. It is not considered necessary to have a separate detailed policy on housing types, tenures, or specialist needs. This will be addressed on a settlement by settlement basis. Policy NW3 requires development to have regard to the needs of each location and should be of a variety of types and tenures that reflect settlement needs. Policy NW8 also requires that development should be adaptable for future uses and take into account the needs of all users. More detailed Development Management policies will be consulted on as part of the Development Management DPD process. No change proposed
			DPSR72A	the Government has now put forward specific planning policies in the National Planning Policy Framework. Firstly older people are identified and defined as a specific group in society. Secondly paragraph 50 requires that Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community such as the elderly. To that end paragraph requires that Strategic Housing Market Assessments should identify the mix of housing and range of tenures which addresses the need for all types of housing, including for the different groups in the community such as older people. In November 2011 the Government published its Housing Strategy for England with its stated intention of unlocking the housing market and getting Britain building again.	see above
			DPSR72A	The Government will encourage local authorities to make provision for a wide range of housing types including retirement housing, sheltered and Extra Care. It follows from the above that it is incumbent on the Local Planning Authority to include specific policies to ensure the delivery specifically designed accommodation for older people including sheltered accommodation, extra care developments and continuing care retirement communities in appropriate and sustainable locations within its administrative area. Policies should recognise the specific characteristics of such developments including location, environment, amount, layout and design.	see above.
DPSR73	J Hockley	Birmingham Airport	DPSR73A	Welcome the acknowledgement now provided in paragraph 2.11 on Birmingham Airport.	Noted.

			DPSR73B	The proximity of the airport and in the future of the new HS2 lie and associated Birmingham International Station provide a unique opportunity to capitalise on the economic benefits these pieces of infrastructure can bring to the Borough and can help with achieving the aims of NW14. Access to air travel is critical for companies engaged in high technology and some recognition of the opportunities the Boroughs location provides for in this text would be useful	Noted. No change proposed.
			DPSR73C	Given the proximity of Birmingham Airport, the location should be noted on the Key Diagram	Noted. Outside of Borough area and control. No change proposed.
DPSR74	H Pankhurst	Natural England	DPSR74A	In general Natural England is pleased to support the North Warwickshire Core Strategy pre-submission draft. We would however like to recommend a number of minor amendments, most notably to policy NW12 Nature Conservation. These recommendations are intended to improve compliance with the National Planning Policy Framework.	Noted.
			DPSR74B	Spatial Vision - Natural England supports the spatial vision. We welcome the incorporation of the recommendations we made previously	Noted.
			DPSR74C	Strategic Objectives - Natural England supports those strategic objectives affect the natural environment. We welcome the incorporation of the recommendations we made previously	Noted
			DPSR74D	NW8 - Natural England supports this policy. We welcome the incorporation of the recommendations we made previously	Noted
			DPSR74E	NW10 - We note that an important point which was included within the previous iteration of this policy has now been removed, namely, the requirement for development to "provide, conserve and enhance biodiversity and create linkages between green spaces and wildlife corridors". Natural England had previously expressed our support for this point, stating that integrating biodiversity is an important element of quality development, as is the creation, protection and enhancement of green corridors and other linking features. We are not clear why this point has been removed, and recommend that it is reinstated. We welcome the inclusion of an additional point regarding public rights of way, as per our previous recommendations.	Noted. Will check previous amendment.
			DPSR74F	Natural Environment - Paragraph 6.62 contains an out of date reference to Regional Geological Sites (RIG's); RIG's are now simply referred to as Local Sites or Local Geological Sites. We recommend that this is updated.	Noted and amended
			DPSR74G	NW11 - Natural England fully supports this policy	Noted
			DPSR74H	NW12 -Unfortunately we cannot as it stands fully support this policy. We are disappointed to note that our previous recommendations have not been fully followed. We consider that the adoption of the new National Planning Policy Framework adds further weight to our recommendations and would therefore like to reiterate them. With regard to wider biodiversity, we previously recommended that the second paragraph in the policy should be amended to make it clear that it also applies to other nationally and locally important biodiversity assets, with specific reference to Habitats and Species of Principle Importance	
			DPSR74H	We recommended adding the following wording: "Habitats, species and features of importance at national level, together with those of regional and local importance for nature conservation will be protected and where possible, enhanced through beneficial management. These include: Habitats and species identified under Section 41 of the Natural Environment and Rural Communities Act as of principal importance; proposed and designated Local Wildlife Sites and Local Geological Sites; Local Nature Reserves; ancient woodlands; networks of natural habitats and legally protected species (our ref: 36439, para. 31).	Noted. Amendment supported. Will check previous amendment recommended .
			DPSR74H	The NPPF states there ia a clear requirement for the planning system to protect and enhance priority habitats and species. We consider that the wording which we had previously recommended would ensure better compliance with the NPPF paragraph 117 and 118, and would therefore like to reiterate our recommendation	Noted. See above.
			DPSR74I	Green Infrastructure - The first sentence of paragraph 6.73 contains a typographical error, we suggest that is should read region rather than regional.	Noted and amended

			DPSR74J	NW13 - Support this Policy	Noted.
			DPSR74K	NW19 - We welcome the addition of green infrastructure, in line with our previous recommendations	Noted.
DPSR75	O Taylor	Framptons (on behalf of Asford developments)	DPSR75A	Para 2.5 recognises that the economy of the Borough has seen an increase in employment land, particularly logistics. - and acknowledge that the Borough has seen the expansion of employment land, particularly for logistics, a large increase when compared to the rest of the West Midlands and this should be applauded. North Warwickshire is considered an important administrative area for the West Midlands region and for this reason, the spatial strategy should have regard to the wider regionally economic structure and should not consider North Warwickshire in isolation.	Noted.
			DPSR75A	Para 6.37 acknowledges the Borough is keen to exploit the opportunities associated with the Mira Technology Park. NW7 states "that local employment land will be provided of which 20 hectares will be specifically for high density employment creating uses falling within Use Class B1, B2 and B*" Para 6.37 notes that these high density employment uses will be provided for on land outside of the greenbelt. This provides the source of two objections, namely what constitutes a high density use and why is it necessary to exclude sites from the greenbelt	Noted. Definition of high density employment uses will be clarified and included in Glossary. No further change proposed.
			DPSR75B	There is a misconceived perception that employment within the logistics market is a low density employment use. The employment densities at distribution centres vary according to individual occupiers and their operations and the level of employment is generally in excess of most peoples expectations. (evidence provided). The lower density can be attributed to the nature of these operations which require sophisticated mechanisms, including investment in IT infrastructure. Failure of this infrastructure is business critical and as such there is a further requirement for engineers to be on-site. Based on this, it cannot be suggested that logistics use is a low density employment use.	Noted. Focus will be on high density uses, regardless of whether these are through specialist logistics, light or general industrial or high tech/research and development. The latter will, nevertheless, be encouraged to maximise the potential spin off benefits from MIRA. No further change proposed.
			DPSR75C	B8 occupiers require location/sites strategically positioned in relation to the wider highway network such as the site at Curdworth) - a failure to provide land in the right locations will restrict future economic growth within North Warwickshire. With regards to paragraph 19 of the NPPF, I submit that the current spatial strategy and Policy NW7 is not effective because it shuts out development opportunities for the Regional Market. To this end the document has not been positively prepared.	Disagree on Green Belt review or location for B8 uses. The preferred option seeks delivery of development outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. No change proposed.
DPSR76	R Crow	Barton Willmore (on behalf of St Modwen development)	DPSR76A	It is not considered that the North Warwickshire Core Strategy Pre- Submission Version (June 2012) document complies with the duty to cooperate as set out in the Localism Act 2011 due to the lack of consideration of strategic cross-boundary employment matters. The Memorandum of Understanding that has been drawn up between Tamworth and the neighbouring authorities of Lichfield and North Warwickshire is listed as having objectives in the document and was taken to committee by the three authorities in May/June 2012: It is clear that the Memorandum of Understanding was designed to focus exclusively on residential development. However, the Localism Act 2011 requires Local Authorities, when preparing development plan documents, to cooperate on strategic matters,	Disagree. The duty to co-operate is reflected both in the accommodation of an element of housing requirement to address Tamworth's needs, the "Memorandum of Understanding" that has been signed and agreed by Tamworth, North Warwickshire and Lichfield Councils and the Borough's active involvement (although not necessarily accepting and adopting recommendations). The involvement of the Borough in cross border partnerships including the A5 Strategy, the LEP, support for the Regional Growth Bid at MIRA, the Gypsy and Travellers accommodation Assessment and Housing Market assessment review all point towards the borough addressing the "duty to co-operate". Further work and discussions with adjoining Local authorities is on-going and in order not to delay delivery of the Core Strategy, any critical issues that arise can be dealt with through the flexibility built into the core strategy or through early review where necessary.
			DPSR76A	It is clear that the amount and location of land with the potential for employment generating uses is a strategic matter as outlined by the Localism Act 2011. The Pre-submission publication document, as produced by Tamworth BC, states in Paragraph 2.13 that opportunities for expansion of the town are constrained by a tight administrative boundary and environmental constraints and that this will lead to a significant proportion of Tamworth's housing and employment opportunities coming forward within the existing urban area, with some needs being met elsewhere. contd..	Tamworth Borough Council have indicated there is no employment requirement within this Borough at the current time. No change proposed.

<p>DPSR76A contd. - The current North Warwickshire Draft Pre-Submission Version of their Core Strategy, does not mention Tamworth's employment needs and this has been produced following North Warwickshire's October 2011 'Preferred Options for Economic Development' document which stated that North Warwickshire's preferred approach was to: 'To accommodate part of Tamworth's Employment needs within North Warwickshire only where evidence indicates all opportunities for provision within Tamworth's administrative area, including land within Lichfield Borough adjoining Tamworth's Boundary, have been exhausted.'</p> <p>In order to successfully meet the requirements of the duty to cooperate it is of great importance that North Warwickshire Borough Council works with its neighbouring authorities to make decisions based on the overall sustainability of sites with the potential for employment generating uses. The extension of highly-rated sites, such as Centurion Park, should not be held back due to the location of a Local Authority boundary, and in doing so there is a risk of both Authorities Local Plans being found unsound.</p>	<p>Tamworth Borough Council have indicated there is no employment requirement within this Borough at the current moment. No change proposed.</p>
<p>DPSR76B NW7 - The Council has opted to continue with the employment land target that was set out in the Phase II revision of the West Midlands RSS. However, the West Midlands RSS Phase II revision evidence base is now out-of-date and was produced before the Government's stated growth agenda. The requirement for Policy NW7 is also based on there being over 30 hectares of land which is either allocated for development or is an unimplemented planning permission. There are no details of these sites so as to gauge the likelihood of their delivery, however, it is noted that an allowance of 1ha per year is made for planning permissions expiring. In Policy NW7 it is stated that North Warwickshire will look to direct employment development, 'towards settlements appropriate to their size and position in the hierarchy', however, this ignores the possibility that the most sustainable employment sites may be located within North Warwickshire on land adjacent to employment areas on the edge of neighbouring authorities.</p>	<p>Noted. The Borough Council consider the Core strategy proposes sufficient levels of employment land to serve the Borough's local needs and take advantage of potential emerging sectors and markets such as from MIRA. The Site Allocations Development Plan consultation provides the opportunity and process for identifying and allocating sites to deliver this requirement. The Core Strategy is a broad strategic document, not detailed or site specific for delivery purposes. The Site Allocations Development Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State to avoid further delay. No further change proposed. contd...</p>
<p>DPSR76B contd... This approach would prevent the delivery of employment generating uses on land such as that which is located between the existing Centurion Way employment site in Tamworth and the M42 motorway.</p> <p>Given the Government's growth agenda it is also recommended that the Council adopts a more relaxed position to the future uses on extensions to employment sites. The development of leisure uses, such as a hotel, can be significant generators of employment and should not be prevented by policy if they are the most viable and marketable use on land that is considered suitable for employment generating uses. This approach would assist in meeting the conclusions set out in the Preferred Options for Economic Development paper (October 2011) which states that there is a need to 'diversify the range of employment available in order to encourage a more robust economic base which is more resilient to change, and which will raise aspirations locally as well as encouraging wider investor confidence in the area' (Para. 3.2).</p>	<p>See response above. Noted. The Borough consider the Core Strategy has sufficient flexibility to address the potential of alternative employment uses, outside the traditional B1, 2 and 8 employment uses, particularly where these are or deliver high density employment uses. Nevertheless, such uses should be appropriate to the location and avoid potential conflict with adjoining industrial and commercial uses. The policy consultation for Development Management Plan will address these detailed issues. No further change proposed.</p>
<p>DPSR76B In order to produce a sound and robust Core Strategy policy NW7 and the supporting text should be amended as follows:</p> <ul style="list-style-type: none"> • The Council should update their employment land evidence base so as to adopt a Core Strategy based on a robust and up-to-date evidence base as is required by the NPPF. • Policy NW7 should be re-worded so as to offer greater flexibility and describe the employment land requirement as a minimum and not a limit. • The Council should consider carefully the deliverability of all sites with planning permissions or allocations over the plan period, which have been included in Policy NW7 as commitments, and show evidence for when they are expected to come forward. • All land which would form suitable extensions to existing employment areas should be shown on the Allocations Map; even if the existing employment areas are within a neighbouring authority. 	<p>See response above.</p>

			DPSR76B	<ul style="list-style-type: none"> To provide clarity for all it should be made clear in the supporting text that the Site Allocations DPD document will allocate employment land to meet the Council's requirements; including sites on the edge of Tamworth where appropriate. Adopt a more relaxed position to the future uses on extensions to employment sites, promoting the growth of the leisure industry (I.e. hotels) where they are the most viable and marketable use on land that is considered suitable for employment generating uses. 	see response above.
			DPSR76C	NW14 - Policy NW14 is related to economic regeneration and describes North Warwickshire as a 'fragile economy, with a high dependency on a narrow range of companies' and in this context states that 'growth of the small to medium sized enterprises, in particular, will continue to be supported'. Furthermore, Policy NW14 states that the delivery of employment generating uses includes the redevelopment of existing employment sites and should reflect the need to broaden the employment base and improve employment choice and opportunities for local people	Noted. See response to 76B
			DPSR76C	The land between the existing Centurion Way employment site in Tamworth and the M42 motorway is an excellent example of land that can broaden the local economic base and increase employment opportunities for local people. Due largely to the sites location on the strategic highway network the site has excellent potential for leisure uses, such as a hotel development. We support the Council's approach to economic regeneration and suggest that the scope for leisure uses to co-exist with employment developments on suitable sites is stated.	Noted. See response to 76B
			DPSR76D	NW16 - Policy NW16 is related to the settlements of Polesworth and Dordon and states that 'Land to the west of Polesworth & Dordon shall remain undeveloped in order to maintain the separation between Tamworth and the settlements of Polesworth & Dordon'. The M42 provides a significant physical barrier in this location, which is well landscaped, and the potential to provide sustainable extensions to Tamworth on the western side of the M42 should not be disregarded. It is not considered that the development of land in this location would result in the perception of the gap between Tamworth and Polesworth / Dordon being reduced	Tamworth Borough Council have indicated there is no employment requirement within this Borough at the current moment. It is also considered that sufficient land and sites are available elsewhere within the Borough to negate the need to develop land to the west of Polesworth/Dordon. The Site allocations Development plan consultation will address site provision in more detail. No change proposed.
			DPSR76D	The distance between the Tamworth urban area and the M42 varies significantly. At the point of the M42/A5 junction (i.e. adjacent to Centurion Park employment site) there is such a small gap that it cannot be considered to assist in preventing the coalescence of Tamworth and settlements in North Warwickshire. As such we consider that little harm would result from development in this location. To allow for development take place in this location the policy should be re-worded to state that to the south of the A5 appropriately scaled development on the edge of Tamworth should be allowed where it would not lead to the coalescence of Tamworth with settlements in North Warwickshire. This would ensure that Tamworth and North Warwickshire could take advantage of sustainable development opportunities.	See response above. Tamworth Borough Council have indicated there is no employment requirement within this Borough at the current moment. No change proposed.
DPSR77	T Sanders	Warwickshire Police	DPSR77A	Sustainability is clearly an important theme in the draft Core Strategy. Every crime has an associated carbon cost, including the need for police incident response and follow up visits. Warwickshire Police recommends the adoption of Secured By Design standards in any new housing or business developments	Noted. Secured by design referred to in Core strategy supporting text para 6.57. No further change proposed.
DPSR78	L Matthewson	The Planning Bureau (on behalf of McCarthy Stone)	DPSR78A	Commend the Councils willingness to positively address the projected rise in the elderly population in North Warwickshire and the serious issues this raises with regards to the future provision of adequate support and accommodation for elderly persons	Noted.
			DPSR78B	Support Policy NW3 - commend the Councils recognition of the particular need for elderly persons accommodation within the Borough in the justification to Policy NW3 (paragraph 6.15)	Noted.

			DPSR78C	The wording of NW3 should however be amended to specifically mention the need for specialist accommodation for the elderly within the Borough. We suggest that bullet point 4 be amended to the following "There should be a variety of housing types and tenures to reflect that settlements needs including meeting specialist housing needs such as those of the disabled or the elderly"	Noted. Consider current wording "variety of housing types" is sufficient and accommodates specialist disabled and elderly housing. Nevertheless, consultation on detailed policies for the Development Management Plan process will address some of the detailed issues and topics raised. The Glossary can include clarification on what the terms housing types and tenures actually covers. No further change proposed.
DPSR79	L Baudet	Curdworth PC	DPSR79A	Para 6.86 - As a rural village, Curdworth has limited access to local transport in order to access services and facilities as well as jobs and training. Accepting issues regarding cost effectiveness, any improvements to transport connections would be of benefit to the village. It should be recognised that HS2 will have an impact on all areas of North Warwickshire, and the knock effect particularly on rural and main roads with possible congestion	Noted. Additional emphasis on need to improve public transport services is being added in the appropriate section. The potential impact of HS2 is noted in para 2.9. No change proposed.
			DPSR79B	Para 6.15 - Curdworth would like to see their allocation of housing (15) and combined mix of market and also affordable housing – suggesting 40% of 15 properties to be affordable	Noted. Consultation on detailed policies for the Development Management Plan and the Site Allocations Development Plan process will address the detail of affordable housing delivery in smaller settlements and site specific issues. The Core Strategy makes provision for a flexible approach to delivering affordable housing, which can include off-site contributions as well as on-site delivery. These are matters of detail to be negotiated on a site by site basis. No change proposed.
DPSR80	A Crawford	ATH Resources	DPSR80A	Para 1.8 - ATH Objects: ATH considers paragraph 1.8 contrary to NPPF chapter 13. ATH believes that North Warwickshire Borough Council should consider carefully the wording of paragraph 1.8 as no local authority can impose a blanket principle to refuse all surface coal mine development within their administrative area due to it being a surface coal mine development. North Warwickshire Borough Council, in administrative partnership with Warwickshire Country Council must identify and include policies for extraction of mineral resource of local and national importance in their area. No Government policy is in existence that states coal is not of local or national importance.	Noted. Agreed. Text will be amended to more accurately reflect the NPPF and use revised term 'surface mining' within Core Strategy (include reference in Glossary also) and Coal Authority preferred policy text. (See response to DPSR26).
			DPSR80A	Para 1.8 should be fundamentally altered to reflect national policy and facilitate the sustainable economic growth of England. ATH rightly believes surface coal extraction should not have unacceptable adverse impacts on the natural and historic environment or human health; however each application has to be judged on their merits and determined in accordance with NPPF paragraph 144 and 149. Warwickshire Borough Council cannot presume surface coal extraction will deliver the impacts stated (environmental, visual and residential amenity). It should be for the industry to prove through the planning application process that any potential adverse impacts can be negated and managed within standards imposed through nationally or locally policy.	See above.
			DPSR80A	In addition, clarity is needed to explain what is meant by development proposal. It is assumed that this is implying a non-mineral development and is in some way aiming to address the prior extraction requirement of NPPF paragraph 143. This sentence should conform to NPPF paragraph 143 and encourage the prior extraction of minerals, where practicable and environmentally feasible. Again, the blanket refusal to enable surface coal mining is contrary to NPPF and should be removed.	see above.
			DPSR80B	Spatial Portrait - Para 2.14 - ATH Objects: North Warwickshire Borough Council makes it clear that it will not support any surface mining development within the North Warwickshire Coalfields. ATH believes this is contrary to national policy paragraph 147. It is in our view that each case should be judged individually and on merit, rather than the negative view of instantly presuming against surface coal mine sites. The industry is fully aware of the negative impacts towards local residents and will mitigate for these impacts within environmental impact assessments.	See response to 80A.

DPSR80B	It is important that North Warwickshire council recognises that mineral developments and especially coal make up a big part of its own spatial portrait and this should be fully represented in the core strategy. North Warwickshire council will effectively sterilise vast amounts of coal reserves by imposing this blanket ban on surface coal mining. Surface mining companies can provide various forms of mitigation within planning applications to counter any negative effects suffered by the district and the local community. This paragraph is also contrary to paragraph 149 of the NPPF.	See response to 80A.	
DPSR80C	Para 2.63 - ATH Objects: ATH welcome the discussion on the potential sterilization of coal in the district, however this paragraph seems completely disjointed and is again contrary to NPPF paragraph 147. Surface mining does not have to be considered a 'threat' to the area. Surface mining can bring significant improvements to local communities and the environment through well thought out restoration management schemes, which not only improve the visual appearance of the area, but also lead to thriving flora and fauna, whilst providing benefits to the local economy	Noted	
DPSR80D	Sustainable Development - ATH would like to refer the Borough Council to NPPF paragraph 142 that states minerals is essential for sustainable economic growth and with the economic role being integral and not isolated to achieving sustainable development, as explained within paragraphs 6-8 of NPPF. Policy NW8 sustainable development should make reference to the sustainable economic use of minerals and how they are important to provide the infrastructure, buildings, energy and goods that the country needs, including the needed for indigenous coal extraction for our energy needs	Noted.	
DPSR80E	Economic Regeneration - ATH refers the Borough Council towards NPPF paragraph 142, no mention has been made to the contribution the minerals industry has on economic regeneration. ATH believes the economic regeneration section should give passing acknowledgement to the role the minerals industry can have on sustainable economic growth	Noted	
DPSR80F	Para 6.83 - ATH Objects: ATH objects to the presumption that surface coal mining development will be restricted within the area where known coal reserves are situated. As previously alluded to within this consultation letter, North Warwickshire Borough Council, in administrative partnership with Warwickshire County Council should be developing their local plans in accordance with NPPF paragraph 143 and if not already done with consultation with the Coal Authority and the coal industry.	Noted	
DPSR80G	NW16 - ATH Objects: ATH feels the first sentence is contrary to NPPF chapter 13 and does not give any justification to why surface coal extraction would be fundamentally unacceptable. The Government has clearly shown within NPPF mineral extraction can be ATH also asks for clarity of what is meant by 'the sterilisation of any coal reserves is proven'	Noted	
DPSR80H	In conclusion, although there is recognition of the presence of coal within North Warwickshire, the core strategy fails to accept the need and benefits it can provide to the Borough and instead presents a much more negative view. The paragraphs listed are in direct contrast to national policy, which present a more pragmatic and positive approach. Although mineral developments and the mineral core strategy are within the administration of the Minerals Planning Authority (Warwickshire County Council), it is important that North Warwickshire Borough Council does not create policy conflicts and inconsistencies within the two tier authority structure.	Noted	
DPSR81	Baddesley Ensor & Grendon PC DPSR81A	Yes in theory but both councils have severe doubts re delivery. We have already expressed concerns re delivery none of which seem to have been acted on. Our housing numbers are practically doubled (180 from 100). You have now split the 2 villages but given no indication of development numbers for each village. A further concern is that this has been done ahead of neighbourhood planning. Both councils would want assurance that this plan is for local use and not to accommodate an ever growing Birch Coppice and Tamworth housing need.	Noted. The figure allocated is not intended to provide for Tamworth's housing need. It is difficult to attribute/separate housing numbers between each settlements as the two settlements are effectively combined and sites that come forward could reasonable provide for the needs of both settlements. The Core Strategy is a broad strategic document, not detailed or site specific for delivery purposes. The Site Allocations DPD and Development Management DPD process will address many of the detailed and site specific issues. The Strategic Land Availability Assessment provides background information as to the likely sites that will come forward. No change proposed.

			DPSR81B	The document is based on out of date information, ie transport has since been reduced. It shows no reflection of rural life. An industry based not amenities based plan. Health issues are again out for consultation There would seem to be no evidence of linking the documents supporting this strategy with the strategy, ie 6.11 p 35 sites in NW not seen as quick wins....development for Tamworth seen as a last resort. Councils would want assurances on this as currently residents don't believe this statement.	Noted. The local service cuts were determined, agreed and implemented after the initial draft document and supporting evidence base had been completed. Where changes have occurred these will be reflected through amendments to the Core strategy text. The criteria for addressing Tamworth's needs are clearly stated in the document. It is unclear what stronger re-assurance the Borough can provide. No further change proposed.
DPSR82	M Jackson	DTZ (On behalf of EON)	DPSR82A	NW7 - E.ON respectfully request that the Pre-submission Core Strategy be amended to reflect the existing evidence base for employment land provision and strategic regional logistics site provision. The core Strategy employment land policy should closely reflect the wording set out in NWBC's „Draft Employment Policy Option document (January 2010), which concludes a preference for delivering the RSS requirement for regional logistics of 60 hectares on two strategic sites (Hams Hall B Station site and Birch Coppice Phase 2). Reflecting the fact that Birch Coppice phase 2 now benefits from planning permission, it is requested that policy NW7 be re-written as follows	Concern noted. No change proposed. The evidence for the RSS may still enable an additional 20ha's of logistics to be provided at or within an alternative site outside the Green Belt. The opportunities for widening the employment base provided by the proposals at MIRA are considered sufficient to outweigh the need to specifically identify the additional 20ha's at Hams Hall, particularly in view of the impending abolition of the RSS. The NPPF indicates and supports the need for sustainable economic growth and flexibility for emerging sectors (para 21 NPPF). Widening the employment use type/base will give the Borough greater economic and employment flexibility, make it more resilient and be in a strong position for future growth. Less focus on a single economic/employment sector (logistics) will ensure the Borough has a more robust and flexible economic and employment base. In addition previous discussions around options for development on the site have concentrated on its potential for energy generation, including alternative renewable methods rather than logistics, hence the subsequent reference in para 2.37.
			DPSR82A	* Between 2006 and 2028 48.5 hectares of local employment land will be provided * 20 hectares at the former Hams Hall B station site will be specifically identified for strategic logistics development Use Class B8; * Employment land will be directed towards settlements appropriate to their size and position in the hierarchy; * In Category 4 settlements sites will be no greater than 0.2 hectares; and, * In all cases development will only occur if the appropriate infrastructure is available.	see above.
			DPSR82B	NW2 - E.ON consider it is entirely appropriate for the Borough Council to review Green belt boundaries through the emerging Core Strategy. Consequently, E.ON objects to criteria 2 of Policy NW2.	Disagree on Green Belt review. The preferred option seeks delivery of development outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt to deliver development needs for the Borough. No change proposed.
DPSR83	L Perry	Environment Agency	DPSR83	Comments only relating to the Infrastructure Delivery Plan	No comments required
			DPSR83	Comments only relating to the Infrastructure Delivery Plan	No comments required
			DPSR83	Comments only relating to the Infrastructure Delivery Plan	No comments required
			DPSR83	Comments only relating to the Infrastructure Delivery Plan	No comments required
			DPSR83	Comments only relating to the Infrastructure Delivery Plan	No comments required
			DPSR83	Comments only relating to the Infrastructure Delivery Plan	No comments required
			DPSR83	Comments only relating to the Infrastructure Delivery Plan	No comments required
DPSR84	Haydn Jones	Pegasus Planning (on behalf of Richborough Estates)	DPSR84A	Para 1.10 - Makes reference to the "Duty to Cooperate" - at this advanced stage of preparation the 'Duty to Cooperate' process should have been fully explored and engagement with all the neighbouring authorities undertaken. Apart from Tamworth, there is no indication in the Pre-Submission document that this has taken place	The duty to co-operate is reflected both in the accommodation of an element of housing requirement to address Tamworth's needs, the "Memorandum of Understanding" that has been signed and agreed by Tamworth, North Warwickshire and Lichfield Councils and the Borough's active involvement (although not necessarily accepting and adopting recommendations). The involvement of the Borough in cross border partnerships including the A5 Strategy, support for the Regional Growth Bid at MIRA, the Gypsy and Travellers accommodation Assessment and Housing Market assessment review all point towards the borough addressing the "duty to co-operate". Further work and discussions with adjoining Local authorities is on-going and in order not to delay delivery of the core Strategy, any critical issues that arise can be dealt with through the flexibility built into the core strategy or through early review where necessary.
			DPSR84B	Para 2.40 - We are concerned about the apparent lack of a 'Duty to Cooperate' between the Borough and its adjoining local authorities, and as such do not believe the Plan meets the positively prepared test of soundness in relation to this issue	See response to 84A

<p>DPSR84C Para 2.68 - A recurring theme throughout the Pre-Submission Core Strategy is that the whole of North Warwickshire is rural. However, this is far from the case and there are a number of urbanised areas within the Borough. Water Orton itself, it is apparent from any aerial map that it is surrounded by urbanising features including the Castle Vale residential area, the 26 hectare Prologis Midpoint Park employment site, the substantial Minworth Sewage Treatment Works, Hams Hall, Coleshill, the M6, M6 Toll, M42 and the Birmingham-Leicester Railway Line. Water Orton is not a rural settlement and has many suburban characteristics in terms of its built form, services and facilities The Pre-Submission Core Strategy spatial strategy is significantly influenced by the misnomer that North Warwickshire is a rural Borough when this is only true in part.</p>	<p>Disagree, the elements of development referred to are isolated pockets of development, both significant and insignificant in size which lie within a predominantly rural and agricultural setting and landscape. There are urban elements on the margins of the Borough, referred to by the objector, but the majority of these lie <u>outside</u> the Borough area. The objector appears to suggest that the principle and existences of any type of development will, in itself, change the character of an area to "urban" from rural. Yet the provision of a railway line, for example, through the countryside surely does not, of itself, turn that countryside into an "urban" character. Where cumulative development pressure and proposals risks diminishing the rural character the Core Strategy aims to address this and seek the enhancement and re-instatement of rural character through appropriate development restraint, design and landscaping. No change proposed.</p>
<p>DPSR84C A development strategy predicated on the assertion that one is dealing with a rural authority is unsound as it is neither justified nor effective. In view of the fact that Water Orton is already heavily influenced by urbanisation and is no longer a rural settlement, the reference at the end of Paragraph 2.68 to any new development outside of its development boundary further eroding its rural character should be deleted because in reality Water Orton is already suburban settlement.</p>	<p>Disagree, see response above. The Borough and the settlement of Water Orton are still considered to be rural in character.</p>
<p>DPSR84D Para 2.80 - there are a number of urbanised areas within North Warwickshire, and these do not only include settlements but the large employment areas of Hams Hall, Kingsbury Link and Birch Coppice, and the significant transport infrastructure within the Borough. The first point under Paragraph 2.80 suggests that North Warwickshire "has a pleasant rural character distinct from its growing urban neighbours". This is not the case and settlements such as Hartshill and Water Orton are heavily influenced by their respective larger urban neighbours of Nuneaton and Birmingham simply because of the locational relationship they have with them. Our assertion is that taking forward a development strategy in the Core Strategy based on North Warwickshire being rural is not robust and is therefore neither justified nor effective.</p>	<p>Disagree, see response to 84C</p>
<p>DPSR84D The reference to the Borough having a "pleasant rural character" which is "distinct from its growing urban neighbours" should be deleted from Paragraph 2.80 to reflect the fact that it is simply not the case that the entire Borough is rural. It is doubtful that any local authority can truly claim that they are rural because all have at least one urban area of some form. It is even more difficult to claim that North Warwickshire is rural when part of it adjoins the Birmingham/Solihull/Black Country conurbation, which is the largest urbanised part of the Midlands</p>	<p>see above.</p>
<p>DPSR84E Spatial Vision - In our representations to Paragraphs 2.68 and 2.80 we objected to the suggestion that North Warwickshire as a whole is rural in character. We do not again rehearse our arguments to support this view except to say that a strategy based on this 'rural' ascertain is unsound because it is not justified or effective. The rural point again arises in the Spatial Strategy and this needs to be amended to recognise that North Warwickshire is a mix of urban a rural. In addition to this point about the Spatial Strategy we also wish to object to the reference to new development being integrated into existing areas.</p>	<p>see above</p>
<p>DPSR84E Clearly it is important that new development is integrated but there is not enough land within existing settlement boundaries to accommodate all the new development required over the Plan period. This is further explored in our representations to Policies NW2, NW3 and NW4 but the failure to accommodate enough development means the Plan has not been positively prepared because it is not based on a strategy which seeks to meet the objectively assessed development requirements of the Borough</p>	<p>Noted, the Core Strategy does not indicate that all development will be delivered within current Development Boundaries and that some green field release will be likely. Policy NW1 refers to development permitted in or adjacent to development boundaries. The Site Allocations Development Plan is under preparation and will be consulted on in parallel with the submission of the Core Strategy to the Secretary of State to avoid further delay. No further change proposed.</p>

DPSR84F	<p>SO1 - Our objection to Strategic Objective 1 is not about the need to secure a sustainable pattern of development but rather that it seeks to give priority to previously developed land and buildings. Although the NPPF encourages the re-use of previously land, it does not do is prioritise it over greenfield land. It should also be noted that the supporting text to Strategic Objective 1 considers that by prioritising previously developed land and buildings within the market towns and local service centres there will be a reduction in the overall need to travel, it will limit exposure to flood risk, and it will protect the Borough's environmental assets and rural character. Firstly, using greenfield land on the edge of a settlement will have the same travel benefits as re-using land and buildings within a settlement boundary if that settlement is sustainable. Secondly, there are many examples of previously developed sites being located within the floodplain.</p>	<p>Noted. This prioritisation of brownfield sites does not prevent green field sites coming forward where the 5yr housing supply is deficient and evidence shows the delivery of the brownfield sites is financially unviable and/or on-site physical constraints, prevent brownfield sites and consents being implemented. No change proposed.</p>
DPSR84F	<p>Thirdly, as noted above, the NPPF is clear that previously developed sites can be of high environmental value. Fourthly, notwithstanding there are a number of non-rural urbanised parts of North Warwickshire, just because a previously developed site is re-used it does not mean that the new development would be in keeping with a rural character. Sustainable development has always been about environmental, social and economic issues but in recent years many people saw it as a battle between brownfield and greenfield land. The NPPF has re-emphasised the three strands of sustainable development but Spatial Objective 1 has failed to take this on board. There is no mention of the social and economic elements of sustainable development within the Objective's supporting text or how they will influence a sustainable pattern of development. Strategic Objective 1 fails to reflect up-to-date national policy and is unsound. It needs to be amended to include all three strands of sustainable development and indicate how they will influence sustainable patterns of development.</p>	<p>Disagree. Spatial objectives 3 to 9 address social, economic and environmental issues. No change proposed.</p>
DPSR84G	<p>NW1 - We object to the settlement hierarchy. The policy as currently written fails to differentiate between sustainable settlements and Green Belt settlements. Settlements can be sustainable and surrounded by the Green Belt. As the NPPF is very clear, a presumption in favour of sustainable development should be a golden thread running through plan making. The main consideration in defining a settlement hierarchy should be sustainability. In the case of North Warwickshire there are essentially four categories of settlement - market towns, local service centres, small settlements with a development boundary and hamlets/other settlements. The fact that some of these are either surrounded or washed over by Green Belt is not an issue when identifying the most sustainable locations to direct new development to. In the first instance the sustainable settlement hierarchy should be established and then each settlement reviewed to determine how much development could, and should, be accommodated taking into account various factors including Green Belt.</p>	<p>Disagree. Hierarchy and housing targets made reflecting past development trends, review of availability of services and infrastructure within settlements, and assessment of potential sites within current boundaries along with the potential of NPPF policy on rural exceptions and Community right to build approach. Policy intention is to focus development to within boundaries first, or adjacent where 5yr supply is deficient, and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. Settlements lacking all levels of services and facilities are generally considered to be unsustainable locations within which to encourage unrestricted, open market development. Sufficient land is also available outside the Green Belt to deliver development needs for the Borough, to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Unnecessary to prioritise land outside development boundaries of smaller settlements beyond targets identified. No change proposed.</p>
DPSR84G	<p>The NPPF recognises the need for sustainable development in Green Belt areas, and allows for Green Belt boundaries to be reviewed at the local plan preparation stage. A settlement hierarchy policy should rank settlements against their sustainability credentials and not where they are located. Policy NW1 should therefore be amended as follows: Category 1 Market Towns * Atherstone with Mancetter * Coleshill * Polesworth with Dordon Category 2 Local Service Centres * Baddesley with Grendon * Hartshill with Ansley Common * Kingsbury * Old and New Arley * Water Orton Category 3 Small Settlements With Development Boundaries * Ansley * Austrey * Curdworth * Fillongley * Hurley * Newton Regis * Piccadilly * Shustoke * Shuttington * Warton * Whitacre Heath * Wood End Category 4 Hamlets/Other Settlements * Alvecote * Bassetts Pole * Corley and Corley Moor * Freaseley * Furnace End * Middleton * Ridge Lane</p>	<p>see above</p>

- DPSR84G Each settlement should be assessed for the amount of development that could be accommodated, based on its ability to deliver sustainable development. If a settlement surrounded by Green Belt can sustainably integrate new development then its Green Belt boundary should be amended at this stage of the Plan preparation to incorporate the relevant sites. Any settlements currently washed over by Green Belt are unlikely to be in a position to accommodate anything more than infill development but if it is found that a small amount of development would be suitable then it is at this time that a consideration should be given to taking that particular settlement out of the Green Belt and putting a Green Belt boundary around it. see above
- DPSR84G Whilst the Reasoned Justification to the policy in Paragraph 5.2 suggests that the spatial strategy and pattern of development has been influenced by considering how the Borough functions as well as the impact of surrounding cities and towns; it is not readily apparent how this is achieved in the settlement hierarchy. The paragraph continues that by directing the majority of development to those settlements not in the Green Belt there will be benefits for those who currently live, work and visit the Borough and to future generations, and it will ensure that development is directed to the most appropriate place. There appears to be no evidence to support this 'benefit' claim or indeed why sustainable settlements in the Green Belt are not appropriate places for development. Disagree. By focussing development on sustainable settlements where the availability of services and facilities exist to serve the development and residents has a number of benefits. It discourages car travel, reducing carbon emissions and pollution. Encourages/enables walking and cycling, which promotes health and well being and reduces health costs. Through more efficient land use and less dispersed, service provision and delivery it reduces service delivery and management costs, thereby controlling Council Tax and other service cost rises. Restricting development in the Green Belt also helps maintain the rural character of the Borough which also benefits health and well being, preventing merger with adjoining metropolitan urban areas while reflecting one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. No change proposed.
- DPSR84G At present the emerging settlement hierarchy significantly skews development to the north of the District, notwithstanding that the south east adjoins the West Midlands conurbation and is home to both the large employment site of Hams Hall and the settlement of Coleshill, as well as Water Orton and its locational relationship with Birmingham. Water Orton is a sustainable settlement that can accommodate development over and above that proposed in the Pre-Submission Core Strategy, taking into account its size, existing services and facilities, and ability to integrate without adversely affecting the openness of the Green Belt in this specific location, thus resulting to no material harm to it. Noted. See response above.
- DPSR84H NW2 - We object to this policy because it fails to review Green Belt boundaries. In our representations to Policies NW3 and NW4 we have set out our objections in relation to the North Warwickshire housing requirement and the level of new housing proposed for Water Orton, the latter supported by a Sustainability Compendium showing how our client's proposals for housing, sport pitch and allotments at the settlement can be accommodated. As highlighted in our NW4 representations, the suggested 50 dwellings within the settlement boundary of Water Orton is not based on robust evidence. Our client's proposals for circa 119 dwellings adjoining the settlement boundary can be accommodated without having an adverse impact on the openness of the green belt Disagree. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt and within current development boundaries to deliver development need. No change proposed.
- DPSR84H Water Orton can deliver sustainable development commensurate with its size. Taking into account NPPF advice, now is the time for the Borough Council to be reviewing Green Belt boundaries, not only for this Local Plan period but beyond to accommodate future development post-2028. It is apparent from the NPPF that the delivery of sustainable development is fundamental in reviewing Green Belt boundaries. Taking into account both NPPF Paragraphs 83 and 84, Green Belt boundaries should be set now to provide enough land to bring forward sustainable development both in this Plan period and beyond see above

DPSR84H	<p>As set out in our representations to Policy NW3, there is the need to find more residential development land in North Warwickshire. The NPPF provides the policy basis for reviewing Green belt boundaries in North Warwickshire as part of the emerging Core Strategy. It is our contention that a review is required to accommodate development in the most sustainable locations, both now and into the future.</p> <p>Without this review the Core Strategy is unsound as it will not have been positively prepared because it does not accommodate North Warwickshire's objectively assessed development requirements and it is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives. The policy needs to be amended to allow specific changes to the Green Belt boundary.</p>	see above
DPSR84I	<p>NW3 - Objection is raised to the entire Housing section of the Draft Pre-Submission Core Strategy (DCS) because it fails to address the NPPF requirement. The DCS bases its assessment of the housing requirement on a Housing Market Assessment exercise undertaken in 2008 and using population and household data deriving from 2003 and 2004. By the time the Plan is proposed to be adopted that information will be almost a decade old. Specifically the figures used in the HMA Household Projections (HMA Table 46) are 2004 based and whilst the RSS Phase 2 Revision eventually used the 2004 and 2006 based household projections those reported in HMA Table 49 are 2003 based. It is worth noting that 2008 based household projections are now published and available from CLG and 2010 based population forecasts are published by ONS which provide assistance in determining the latest direction of travel. This information is essential to a full objective assessment of the housing requirement and has not been accounted for in NW3.</p>	<p>Disagree. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries . Strategy and Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. The preferred option seeks delivery of housing outside of Green Belt to reflect one of the NPPF's 12 core land-use planning principles of protecting the Green Belt. Sufficient land is available outside the Green Belt and within current development boundaries to deliver development need for the Borough. Green Belt boundary review is therefore not seen as part of the strategy or an option to pursue. Sites can still, nevertheless, come forward as Green Belt exception sites (NPPF route) or through the Community Right to Build route, but this is not an issue for inclusion or determining in the Core Strategy. No change proposed.</p>
DPSR84I	<p>The 150 per annum figure for the NW requirement is the figure which came out of the West Midlands Regional Strategy Phase 2 review. The DCS does not explain why this figure should be used. The DCS does not explain why this figure should be used. There is no analysis of household projections or population projections in the evidence base other than the 2008 HMA. The HMA analyses population change at Table 47 indicating a 2026 population figure for NWBC of 63,800. The 2010 based population projection (source ONS 2010 population projections) is 66,500 – whilst this is not alone a robust indication of household formation rates it shows a significant disparity between the evidence base used in the DCS and latest evidence. It is understood that the evaluation and determination of the Annual Housing Requirement was undertaken at the LDF Sub-Committee on 6 July 2011. It is important to recognise that the 150 per annum RSS Phase 2 Requirement was a constrained figure. It did not meet the full assessment of need. The intention to abolish Regional Strategies is a material consideration</p>	<p>Disagree. Following the consideration of a Housing Paper the Council adopted an approach to deliver a minimum of 3,300 for its needs up to 2028, while accommodating an additional 500 units from Tamworth. This is considered sufficient and adequate to accommodate the Borough's needs in view of its character, level of available services and facilities and transport infrastructure. No change proposed.</p>
DPSR84I	<p>Reliance on constrained requirement figures from the RSS Phase 2 Revision fails these requirements. The data is not up to date – the requirement was a constrained requirement figure (owing to Green Belt and Environmental constraints) – and no up to date economic, social or environmental evidence has been prepared. To this extent the housing requirement figure in the DCS cannot be considered to have been arrived at on a sound basis. The resolution to accept the recommendation to the LDF Sub Committee on 6 July 2011 predates the NPPF. It was taken in the light of aged data and without knowledge of the new Planning Policy environment. .</p>	see above.

DPSR84I	The DCS fails therefore to address contemporary guidance or the up to date evidence base. It is also incumbent on the Authority to consider the 'Duty to co-operate' and some measure of recognition of that situation is reflected in the proposed allocation for 500 units to meet Tamworth's needs should circumstances require that provision. North Warwickshire abuts the West Midlands conurbation and parts of its administrative area (Water Orton in particular) are very well served in terms of employment and service facilities and transport connections. The adjacent authority, Birmingham City, has a significant housing requirement to meet which arguably is inadequately provided for in the emerging Birmingham Core Strategy. It is also clear that the other main settlements in the area, Coventry and Solihull are also planning to under-provide for their indigenous housing requirements so the wider housing market is being severely restricted.	See above and response to 62A. The duty to co-operate is reflected both in the accommodation of an element of housing requirement to address Tamworth's needs, the "Memorandum of Understanding" that has been signed and agreed by Tamworth, North Warwickshire and Lichfield Councils and the Borough's active involvement. The involvement of the Borough in cross border partnerships including the A5 Strategy, support for the Regional Growth Bid at MIRA, the Gypsy and Travellers accommodation Assessment and Housing Market assessment review all point towards the borough addressing the "duty to co-operate". Further work and discussions with adjoining Local authorities is on-going and in order not to delay delivery of the core Strategy, any critical issues that arise can be dealt with through the flexibility built into the core strategy or through early review where necessary.
DPSR84I	No evidence is provided concerning co-operation with other neighbouring Authorities than Tamworth and this is considered a significant flaw in the preparation of the Plan particularly in the light of evidence of problems for Birmingham. The housing requirement figure in the DCS should be reconsidered in the light of a proper evaluation of up to date evidence and a parallel exercise in examining the suitability of sites (including those in the Green Belt) to meet higher development needs. If the DCS is to proceed without such a fundamental review then as a minimum it should seek to meet the housing demand and need levels identified in the HMA Table 52 of 225 units per annum being the best reported evidence in relation to the housing requirement in the Council's evidence base.	see above.
DPSR84J	NW4 - Having established a need for more housing land in Policy NW3, there is now a need to consider the distribution of residential development to settlements. This representation relates specifically to Water Orton and we object to the very small proposed housing requirement of 50 dwellings as set out in NW4. Even if Water Orton does deliver 50 infill dwellings over the course of the Plan period, it is a settlement that can accommodate additional development. Water Orton is a sustainable location for development commensurate with its size, services and facilities, and its location. Paragraph 83 of the NPPF states that Green Belt boundaries should be established in local plans and once they are established should only be altered in exceptional circumstances through local plan preparation or review. Importantly it continues that boundaries should be capable of enduring beyond the plan period. Amending the greenbelt boundary is consistent with a spatial strategy that recognises the need to deliver more sustainable development in the south of the Borough as advocated by our representations	See response above.
DPSR84J	It is not considered that attaching a very specific quantum of development to each settlement is the most appropriate way forward with this policy. Instead the Core Strategy should make provision for sustainable development and specifically revise Green Belt boundaries to accommodate this where necessary, such as along Plank Lane in Water Orton. The policy should be amended to reflect this. There is no real physical linkage between the north and south of the Borough. The north is focussed around the A5 whilst the south has a strong relationship with the West Midlands conurbation. By directing a significant amount of development to the north the Plan fails to maximise sustainable locations in the south. It also has implications for the level of affordable housing that could be delivered in the south of the Borough as these will in the main come on the back of market housing. By not allocating a specific number of dwellings to individual settlements the Core Strategy would be flexible to respond to changes throughout the Plan period.	See response above.

			DPSR84J	Flexibility to adapt to rapid change is specifically mentioned in NPPF Paragraph 14. Once allocations are made and required Green Belt boundaries amended normal open countryside or Green Belt policies would provide the development management tool to delivering housing under the umbrella of the housing requirement. The low level of development proposed for Green Belt settlements such as Water Orton and Coleshill does not promote sustainable development and is therefore not justified. The policy should be amended to reflect (i) the settlement hierarchy proposed in our representations to Policy NW1, and (ii) the fact that some settlements such as Water Orton can assimilate further development	See response above.
			DPSR84K	NW8 - In line with our objection to Strategic Objective 1, national policy no longer sequentially requires previously developed land to come forward before greenfield land, and as such the reference to targeting brownfield land in NW8 should be amended to 'encouraging' brownfield land to bring it into conformity with the NPPF.	Noted. No change proposed. Targets made using past development trends, review of availability of services and infrastructure, and assessment of potential sites within current boundaries . Policy intention is to focus development to within boundaries first and target larger main settlements to accommodate majority of development with smaller levels appropriate to the scale and size of the smaller settlement. Large brownfield sites outside of settlements may not be in most sustainable locations with access to services/facilities. Brownfield priority first will not prevent greenfield sites coming forward where evidence of non delivery due to lack of 5yr supply and/or on-site physical constraints, financial viability prevent brownfield sites and consents being implemented. No change proposed.
			DPSR84L	NW9 - This policy requires that major developments provide a minimum of 10% of their operational energy needs from a renewable energy source. Whilst the policy allows viability and suitability to be taken into account when considering the most suitable type of renewable energy, there will be sites where viability influences whether 10% renewables could be achieved in the first place. It is already a well established principle that viability can be considered when addressing a number of planning aspects, for example affordable housing. Indeed the Pre Submission Core Strategy affordable housing policy target of 40% is subject to viability testing.	Noted. Disagree. Delivery is subject to viability testing as indicated in the policy text. In view of the multiple methods of energy generation and efficiency available assessing strategic viability to apply to individual developments will be difficult, too generalised and inaccurate. The threshold is also set so low it is unlikely to be difficult to deliver, particularly for larger developments. A lower threshold would be so insignificant and irrelevant in terms of the sustainable benefit it would generate that it would effectively make the policy redundant. The NPPF actively supports energy efficiency improvements to existing buildings; and when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. No change proposed.
			DPSR84L	Renewable energy is no different to other elements of development and the policy should make provision for viability testing to assess whether 10% renewable energy is achievable or whether a lower figure is more appropriate. Without viability testing the development strategy of the Plan may not be deliverable if it makes sites uneconomic to develop. This would mean the policy is not effective. As well as viability influencing the type of renewable energy the policy should be amended so that it is also taken into account with the level of renewable energy provided	See above
DPSR85	J Harmon	WCC	DPSR85A	In terms of educational provision a dispersal policy for housing developments across the District would generally be welcomed. With declining pupil numbers for many small village schools new residential developments will help ensure the continuing financial viability of many rural primary schools.	Noted. The provision of new schools will also be addressed through the Site Allocations Plan consultation process.
			DPSR85B	The aggregated effect of increased primary school numbers together with proposed development for significant new residential build in Atherstone and Hartshill will require the expansion of secondary school provision in those centres. A new school to replace Queen Elizabeth School in Atherstone is already planned but is based on previous forecasts of population. The effect of new residential development will require a review of the size of the planned new school provision. At Hartshill, numbers are forecast to rise from existing population growth; the effect of proposed residential development is that the school will require further expansion	See response above.
DPSR86	J Kaur	WCC	DPSR86A	We will look to support planning policies that encourage technological Infrastructure and in particular in rural areas. We will support the strategic employment sites of the strategy. We will support planning policies that support a competitive economy for inward investment(NW7,8 and 14)	Noted.

			DPSR86B	We will support positive planning policies that embed co-location of services with the voluntary sector, private sector providers and other public bodies. Planning policies on extra housing and affordable is provided with the necessary long term supporting services. We will support proposals and policies for co-location of services. The County Council is also responsible for Public Health and we would seek overarching planning policies in the Local Plan which will support health and well-being as part of new developments in the Borough area (support for NW19)	Noted.
			DPSR86C	We will support planning policies that support and sustain the key town centres. (NW15,16 and 17)	Noted.
			DPSR86D	NW18 - Our strategic policies contained in the Local Transport Plan and Growth strategies support the improvement and the provision of strategic infrastructure such as junction improvements to strategic highway network and provision of new railways stations	Noted.
			DPSR86E	There should be an overarching policy that promotes health	Noted. Current Strategic Objectives and Policies proposed are considered sufficient to address and promote the health and well being issue.
			DPSR86F	Para. 143 of the National Planning Policy Framework (NPPF) requires that in preparing Local Plans, local planning authorities should define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific mineral resources of local and national importance are not needlessly sterilised by non-mineral development,	Noted. Not appropriate for the Borough Core strategy. The local authority for minerals and waste in the County council and Minerals safeguarding areas will be specified through the Minerals Core strategy process. Reference is made to the Minerals Core Strategy. No change proposed.
DPSR87	N Rushton	NWBC	DPSR87A	6.49 It would be very helpful if you could add reference to the type of development that is considered to be a sensitive end use. This can be taken from the former PPS 23 and is described in that document (Appendix 1, para 1.27) as "housing, schools and hospitals etc.". This is often misinterpreted in planning applications. 6.50 Please be aware that the legislation imposing the preparation of Site Waste Management Plans is to be scrapped. Policy NW8 includes: "be adaptable for future uses and take into account the needs of all users;" Does this mean that wrt remediation, all brownfield remediation should be assumed to be remediated to most sensitive end use standards as opposed to the specific end use proposed? I am not sure this would end up being sustainable or workable. Perhaps this is not what you mean but that is how it reads to me - maybe this needs to be considered further?	Noted. This may be an issue for the Development Management Plan . Too detailed for inclusion in Core strategy strategic planning document. No change proposed. Will check updated situation regarding Site Waste Management Plans and amend if required.

1 Introduction

- 1.1 This paper sets out what North Warwickshire Borough Council has done to ensure that it has co-operated with adjoining local authorities and organisations.

2 Background

- 2.1 Section 108 of the Localism Act gives the Government the powers to remove Regional Governance from planning. Upon gaining Royal Assent on 15th January 2012, the eight Regional Strategies outside of the London Metropolitan area will be revoked, following completion by the Government of an 'environmental assessment'.

- 2.2 This move, however, did not remove the requirement to undertake strategic planning previously done at the regional and sub regional level. The Localism Act replaces this tier of governance with the 'Duty to Co-operate', to be fulfilled at the local level. S110 of the Localism Act inserts S33A into Part 2 of the Planning and Compulsory Purchase Act 2004 (as amended).

- 2.3 The Duty to Co-operate does not just include Local Planning Authorities (LPA), but other public bodies, which are required to cooperate with authorities on issues of common concern to develop sound plans. The National Planning Policy Framework provides more detail on how the Duty to Co-operate affects the soundness of a plan undergoing examination. If a local planning authority cannot demonstrate they have co-operated on strategic issues, then the submitted plan will fail the tests of soundness and cannot be adopted.

a) Town and Country Planning Regulations (Local Planning) (England) Regulations 2012

- 2.4 The final Town and Country Planning Regulations 2012 have been published and reflect the changes to the planning system contained within the Localism Act. It consolidates the 2004 Town and Country Planning Regulations and the amendments to them by the 2008 and 2009 Regulations.

- 2.5 The Regulations also insert the duty to cooperate into the Town and Country Planning Act, making it a statutory duty for Local Planning Authorities. The list of bodies who have a Duty to Co-operate is expanded to include the Local Enterprise Partnership (LEP). The Regulations also require the Inspector of a Development Plan Document must consider whether a Local Planning Authority (LPA) has complied with the Duty to Cooperate in advance of the examination of the DPD, through Regulation 23.

b) National Planning Policy Framework (NPPF)

2.6 Published in March 2012, paragraphs 178 – 181 of the final NPPF detail the expectations from Local Planning Authorities with regard Duty to Co-operate as follows:

- Have a Duty to Co-operate on cross boundaries planning issues, particularly when they relate to strategic priorities (as listed in paragraph 156 of the NPPF). These must be properly coordinated and clearly reflected in individual local plans. Different geographical areas such as travel to work areas must also be considered.
- Work jointly to deliver development that cannot wholly be accommodated within administrative areas. Consideration should be made to the joint production of policies on strategic matters and informal strategies such as joint infrastructure and investment plans
- collaborate on strategic planning priorities to enable delivery of strategic development in consultation with the Local Strategic Partnership and Local Nature Partnerships
- Two tier authorities should work together on relevant areas and work collaboratively with private sector bodies and infrastructure and utility providers.

2.9 At examination it is the Inspector's role to assess whether the plan has been prepared in accordance with the Duty to Co-operate. LPAs need to be able to demonstrate either through the production of joint policies, plans, memorandum of understanding or a jointly prepared strategy presented as evidence of an agreed position that they have continuously engaged from initial thinking through to implementation.

2.10 Although not formally part of the Duty to Co-operate requirement, one of the tests of soundness at examination of a plan requires that a plan delivers unmet requirement of adjacent authorities where it is reasonable to do so.

3 The Borough

3.1 The Borough of North Warwickshire lies within the County of Warwickshire and has over a number of years worked with the local authorities in the Coventry, Solihull and Warwickshire sub-region to

4 Inspector's consideration

- How has the duty been met?
- What sub-regional assessments have been done in consultation with others?
- Can identified needs be met within the area?
- If not, how will they be met elsewhere?
- Will the cooperation deliver the right outcome?

5 **Adjoining Local Authorities**

5.1 **Coventry, Warwickshire & Solihull**

5.1.1 Throughout the Coventry, Warwickshire and Solihull area that are a number of groups that the Borough Council works within. The two main ones relating to planning are CSWAPO and CSWACE.

- CSWAPO (Coventry, Solihull & Warwickshire Association of Planning Officers) – this group of Planning Officers meets at least quarterly and has been in existence since the 1980's. This group is currently working towards a Memorandum of Understanding for the sub-regional area.
- Warwickshire District Lead Officers (This group is made up of Chief Executives or Managing Directors of the local authorities), who meet with Coventry City Council when issues arise.

5.1.3 The Borough Council has worked on a number of joint evidence bases. These include:

- Strategic Flood Assessment – all five Warwickshire Districts and the County Council
- Strategic Housing Market Assessment – Nuneaton & Bedworth BC, Rugby BC and Coventry CC
- Sub-regional Employment Land review – all sub-regional authorities

5.2 **Birmingham**

5.2.1 In previous consultation responses the City Council has agreed with the Core Strategy. This support has continued. However this support is now conditional. Birmingham City Council commissioned a report on their housing numbers and this has resulted in a final report in which it suggests that it cannot cater for its predicted housing requirements and it needs to look outside of its boundaries. The City Council is looking for a change in wording to say that the Borough Council will consider an early review of the Core Strategy if there is a requirement that needs to be catered for.

5.3 **Coventry City Council**

5.3.1 Generally supportive

5.4 **Nuneaton and Bedworth Borough Council**

5.4.1 Consulted and responded seeking reassurance that North Warwickshire cater for its own requirements. They also wish to continue discussion on any cross-border infrastructure requirements.. NBBC is also part of the Cross Border Partnership with Hinckley & Bosworth Borough Council which is primarily aimed at ensuring the benefits of the MIRA Technology Park Enterprise Zone are considered and taken advantage of.

5.5 Solihull Metropolitan Borough Council

5.5.1 Consulted and no response

5.6 Tamworth Borough Council

5.6.1 A Memorandum of Understanding has been signed to provide for 500 housing units subject to policy requirements. There is no requirement to find land for other uses.

5.7 Hinckley & Bosworth Borough Council

5.7.1 Cross Border Partnership working with Nuneaton and Bedworth Borough Council, which is primarily aimed at ensuring the benefits of the MIRA Technology Park Enterprise Zone are considered and taken advantage of.

5.8 North-East Leicestershire

5.8.1 Consulted and no response

6 Wider Groups

6.1 In addition to the joint work that has been carried out for the Coventry, Solihull and Warwickshire sub-region the Borough Council has worked with wider groups to prepare the following:

- Gypsy & Traveller Needs Assessment (Lichfield, Tamworth, Nuneaton and Bedworth, Rugby BC, Coventry CC, Warwickshire CC, Staffordshire CC, Cannock DC
- A5 Corridor Strategy -14 local authorities along the A5

7 Other agencies / organisations

Civil Aviation Authority

An email on 11th June 2012 confirming that NWBC has fulfilled its Duty to Co-operate under section 110 of the Localism Act 2011 as regards consultation with the CAA.

Coal Authority

Responded. Guidance given on approach and assessment of mineral reserve implications.

English Heritage

English Heritage has sent a long response seeking a number of changes. A meeting is needed to agree the most acceptable wording.

Environment Agency

Generally supportive but have some additional final amendments.

Homes & Community Agency

No response. The Borough Council is actively engaged with the HCA in the delivery of the Local Investment Plan.

Highways Agency

The Highways Agency has carried out some work on behalf of the Council testing some high level scenarios of growth. This has indicated that there are no showstoppers although more detailed work is now required before the Examination in Public to provide the most up to date evidence for the Inspector and highlight any areas where mitigation is required.

Natural England

They are generally supportive but with a number of amendments to ensure compliance with the NPPF.

Primary Care Trusts

Consulted and no response

Office of Rail Regulation

Consulted and no response

Integrated Transport Authorities

Centro have responded

WCC have responded

8 Other Organisations and Agencies

- 8.1 There are additional organisations and agencies that are particularly important to the Borough:

Sport England

Responded with suggested changes and approach.

Birmingham Airport

They are supportive of the Core Strategy. They also see major benefits to the Borough by their own expansion plans but also because of HS2. This is particularly in the R & D and knowledge based industries. Request to put the airport on the Key Diagram.

CWLEP

Generally supportive, particularly on flexibility on 20ha's previously targeted at Hams Hall.

Rural Proofing for Submission versions of Core Strategy September 2012

- 1 Rural proofing is a tool for taking in to account rural circumstances and needs. The Rural White Paper in 2000 introduced the concept of 'rural proofing' to contribute in the delivery of rural mainstreaming. It is a process for ensuring that the needs of rural communities are taken into account when developing and implementing local policy like the Local Development Framework.. It was recommended that as policies are developed, policy makers should:
 - Consider whether their policy is likely to have a different impact in rural areas, because of particular circumstances or needs;
 - Make proper assessments of those impacts, if they're likely to be significant;
 - Adjust the policy where appropriate, with solutions to meet rural needs and circumstances.

 - 2 The Rural Strategy 2004 provided a response to the White Paper, explaining the Government's policy objectives in detail. Three priorities were set out to develop sustainable rural communities:
 - Economic and Social Regeneration – Supporting rural enterprise and targeting greater resources in areas of need.
 - Social Justice for All – Tackling social exclusion and providing access to services and fair opportunities to all rural people.
 - Enhancing the Value of our Countryside – Protecting the natural environment.

 - 3 In 2006, the Borough Council agreed a Rural Proofing checklist. This Checklist was specifically targeted at North Warwickshire. It had 11 main areas for consideration and these were:
 - 1 *Targeting*
 - Is the policy, service or initiative targeted on particular groups?
 - Is it flexible enough to meet rural need where disadvantage tends to be scattered rather than concentrated on neighbourhoods and confined by restrictive boundaries?

 - 2 *Bidding rounds*
 - Will this involve a bidding round?
 - Will small rural communities and institutions need longer timescales or extra support to put together successful bids?

 - 3 *Partnerships*
 - Will there be consultation on the service with local people or groups?
 - Is the method used capable of reaching those with poorer access to information points such as libraries or post offices?
 - Is there scope for specifically targeting rural groups and identifying their views? How will these views be accounted for?
 - How is the information given out, and how will it reach all of those who need it?

 - 4 *Pilots*
 - Will the service be tested through pilots?
-

Rural Proofing for Submission versions of Core Strategy
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- What are you aiming to achieve through the pilot?
 - Are there examples of good practice from elsewhere that can be applied?
- 5 *Sparsity costs*
- Will the service cost more than for urban areas, where travel times to clients may be longer and outlets may be smaller and lacking economies of scale?
 - Is there scope to introduce a sparsity factor within funding allocations to take account of any higher (unit) delivery costs
 - Is there scope to overcome extra costs through other means such as sharing premises with other service providers.
- 6 *Market Driven*
- Is the existence and cost of the service dependent upon the market economy?
 - What can be done to ensure that services are still delivered in rural areas where costs may be higher, the market smaller because of the scattered and small population, and the potential for profit lower?
 - Is it possible to stimulate demand for a service, perhaps by joining with other services?
 - Could the private sector be encouraged to take on less profitable markets, perhaps by arranging for less profitable areas to be 'bundled' with those that are more profitable?
- 7 *Accessibility*
- Will the service depend on local service outlets and / or a good transport network for users?
 - Do these already exist?
 - If not, how will this be addressed?
 - Could joint provision, telephone or IT based delivery, mobile or outreach delivery or flexible transport options be used to reach populations where transport links are poor and service outlets few?
 - Will users, eg for business advice or training, have the time or spare capacity to access them and, if not, is it possible to provide a temporary 'relief service'?
 - Is there a strategy for 'signposting' to relevant information: how will information reach those who need it?
 - How will use of existing services be maximised / how will new services be developed where there is a proven need?
 - How is the service or facility provided in respect of addressing the needs of all sections of the community?
- 8 *Joined up working*
- Is it possible to link with others in the area? What opportunities are there for joint working?
- 9 *Rural variations*
- Will the initiative be applied in different types of area? (eg market towns and more remote rural areas).
-

Rural Proofing for Submission versions of Core Strategy
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- If so does it need to be tailored to different circumstances and needs?
 - Is there sufficient flexibility to allow this?
- 10 *Flexibility*
- Can service delivery be adapted easily so if one method of delivery is shown not to work, a different means of delivery can be adopted instead?
- 11 *Equality and Diversity*
- Has the service been assessed for the following aspects of equality and diversity: age, disability, gender, race, sexual orientation, religion?
 - If the answer to any of the above is 'no', then an Equalities Impact Assessment must be undertaken.
- 4 In May 2009, Government published a revised Rural Proofing Toolkit. This toolkit recommended the use of a series of 14 questions. For each question, the toolkit gives examples of the types of evidence required, and of possible rural solutions. The questions are as follows:
1. Will the policy affect the availability of public and private services?
 2. Will the policy rely on existing service outlets, such as schools, libraries and GP services?
 3. Will the policy rely on the private sector or a public private partnership?
 4. Will the cost of delivery be higher in rural areas where clients are more widely dispersed and economies of scale can be harder to achieve?
 5. Will the policy rely on local institutions for delivery?
 6. Will the policy affect travel needs or the ease/cost of travel?
 7. Does the policy rely on infrastructure (e.g. broadband ICT, main roads, utilities) for delivery?
 8. Will delivery of the policy be challenging at the 'edges' of administrative areas?
 9. Is the policy dependent on new buildings or development sites?
 10. Does the policy rely on communicating information to clients?
 11. Will the policy impact on rural businesses, including the self-employed?
 12. Will the policy affect land-based industries and, perhaps, rural economies and environments?
 13. Will the policy affect people on low wages or in part-time or seasonal employment?
 14. Will the policy target disadvantaged people or places?
- 5 Both the 2006 and 2009 checklists cover similar issues but in different ways. In terms of assessing the overall impact of the Draft Core Strategy, it was considered more relevant to use the 2006 Checklist as this was specifically written for North Warwickshire.

Rural Proofing for Submission versions of Core Strategy
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A checklist for ensuring equality and inclusion for rural communities

Targeting	<ul style="list-style-type: none"> • Is the policy, service or initiative targeted on particular groups? • Is it flexible enough to meet rural need where disadvantage tends to be scattered rather than concentrated on neighbourhoods and confined by restrictive boundaries? 	<p>No – the Core Strategy is a Borough wide document. However, it does allow limited local flexibility as determined by the local community.</p>
Bidding rounds	<ul style="list-style-type: none"> • Will this involve a bidding round? • Will small rural communities and institutions need longer timescales or extra support to put together successful bids? 	<p>Not applicable</p>
Partnerships	<ul style="list-style-type: none"> • Will there be consultation on the service with local people or groups? • Is the method used capable of reaching those with poorer access to information points such as libraries or post offices? • Is there scope for specifically targeting rural groups and identifying their views? How will these views be accounted for? • How is the information given out, and how will it reach all of those who need it? 	<p>Yes - The consultation process was aligned to the Statement of Community Involvement and included:</p> <ul style="list-style-type: none"> • Information on the web • Documents physically available in libraries and one stop shop • Manned and unmanned displays in various locations throughout the Borough • Mail shot, either by post or by email, letting those on LDF database know of consultation process • Article in North Talk • Press releases • Presentations to Area Fora • Manning a stall at Dickens Night and Coleshill Farmers Market • Talks / presentations to specific groups and partners, such as Warwickshire Race Equality Partnership, Old People's Forum, various Disability Groups, CAVA, Parish Councils and other voluntary organisations, etc.
Pilots	<ul style="list-style-type: none"> • Will the service be tested through pilots? • What are you aiming to achieve through the pilot? • Are there examples of good practice from elsewhere that can be applied? 	<p>No - Pilot projects will not be implemented but the policy has had extensive consultation in order to ensure its applicability to the Borough.</p>
Sparsity costs	<ul style="list-style-type: none"> • Will the service cost more than for urban areas, where travel times to clients may be longer and outlets may be smaller and lacking economies of scale? • Is there scope to introduce a sparsity 	<p>Not applicable</p>

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	<p>factor within funding allocations to take account of any higher (unit) delivery costs</p> <ul style="list-style-type: none"> • Is there scope to overcome extra costs through other means such as sharing premises with other service providers? 	
Market Driven	<ul style="list-style-type: none"> • Is the existence and cost of the service dependent upon the market economy? • What can be done to ensure that services are still delivered in rural areas where costs may be higher, the market smaller because of the scattered and small population, and the potential for profit lower? • Is it possible to stimulate demand for a service, perhaps by joining with other services? • Could the private sector be encouraged to take on less profitable markets, perhaps by arranging for less profitable areas to be 'bundled' with those that are more profitable? 	<p>The recession has already to have an impact on the local market. The Borough Council is proactively working with partners to ensure that delivery can still take place. One example is the provision of affordable housing, where there is close working between divisions and external partners, including Registered Social Landlords. In addition, the Borough Council considers the viability of schemes and will consider new ways of delivery.</p>
Accessibility	<ul style="list-style-type: none"> • Will the service depend on local service outlets and / or a good transport network for users? • Do these already exist? • If not, how will this be addressed? • Could joint provision, telephone or IT based delivery, mobile or outreach delivery or flexible transport options be used to reach populations where transport links are poor and service outlets few? • Will users, eg for business advice or training, has the time or spare capacity to access them and, if not, is it possible to provide a temporary 'relief service'? • Is there a strategy for 'signposting' to relevant information: how will information reach those who need it? • How will use of existing services be maximised / how will new services be developed where there is a proven need? • How is the service or facility provided in respect of addressing the needs of all sections of the community? 	<p>Local service provision is a key part of the Core Strategy in terms of retention, enhancing and maintaining them for the long term in a wide range of locations.</p> <p>Although many of the other issues are outside of the direct scope of the Core Strategy, the Core Strategy can influence them through the type and nature of developments.</p>

Rural Proofing for Submission versions of Core Strategy
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Joined up working	<ul style="list-style-type: none"> Is it possible to link with others in the area? What opportunities are there for joint working? 	<p>In order to deliver the Core Strategy it will be essential there is joint working with a wide range of partners from statutory undertakers, developers, local communities to local interest groups. The partners will be wide and varied and will depend on the project or issue.</p>
Rural variations	<ul style="list-style-type: none"> Will the initiative be applied in different types of area? (eg market towns and more remote rural areas). If so does it need to be tailored to different circumstances and needs? Is there sufficient flexibility to allow this? 	<p>The settlement hierarchy reflects the different places and recognises that not all development is appropriate in all areas. There is greater flexibility in the Core Strategy than in the Local Plan 2006 as there are now references to local decisions being taken through such means as Neighbourhood Plans.</p>
Flexibility	<ul style="list-style-type: none"> Can service delivery be adapted easily so if one method of delivery is shown not to work, a different means of delivery can be adopted instead? 	<p>It is intended that the Core Strategy includes flexibility to reflect the local circumstances and distinctiveness of the locality. The opportunity will exist to further detail this through future Development Plan Documents or Neighbourhood Plans.</p>
Equality and Diversity	<ul style="list-style-type: none"> Has the service been assessed for the following aspects of equality and diversity: age, disability, gender, race, sexual orientation, religion. If the answer to any of the above is 'no', then an Equalities Impact Assessment must be undertaken. (For advice, contact the Policy team at North Warwickshire Borough Council on 01827 719331, or Email PolicySupport@northwarks.gov.uk) 	<p>A full Equalities Impact Assessment has been carried out.</p>

6 In conclusion the Rural Proofing process was not designed to assess high level strategic documents but rather specific projects or policies. Although this made the process difficult, the Rural Proofing Statement generally indicates that the Core Strategy is not detrimental to the more rural areas of the Borough. One of the main roles of the Core Strategy is to establish and confirm the settlement hierarchy to help consolidate and improve local service provision in rural areas. It will be important how the Core Strategy influences other partners and stakeholders in finding solutions to issues.

Equalities Impact Assessment

September 2012

1 What is the name of the service policy procedure or project to be assessed?

1.1 Submission version of Core Strategy prepared by the Forward Planning Team

2 Briefly describe the aim of the service policy procedure or project

What needs or duties are it designed to meet?

2.1 To provide a spatial planning framework to guide development in the Borough up to 2028. The Core Strategy will deliver the Vision and Objectives of the community and enable the spatial element of the Sustainable Community Strategy to be realised.

2.2 The Strategy includes the following Core policies:

- Amount of Development including for Gypsies, Travellers and Travelling Showpeople
- Affordable Housing
- Sustainable Development including climate change, flood risk and water management as well as sustainable travel and accessibility
- Local Distinctiveness
- Natural & Historic Environment
- Nature Conservation
- Green Infrastructure
- Economic Regeneration
- Regeneration of Atherstone
- Local Services & Facilities
- Adjoining Authorities

3 List your customers /stakeholders

3.1 People, who live in, work in and visit North Warwickshire, now and in future years. Other stakeholders include: landowners, developers, Environment Agency, Natural England, other wildlife organisations, English Heritage, Warwickshire County Council (as Highway and Education Authority), NHS Trust, and Emergency Services

4 How do you know who they are?

4.1 Database of key stakeholders - National Planning Guidance requires specific (statutory consultees) and general stakeholders to be consulted (see Planning Advisory Service web site for guidance on consultee lists: <http://www.pas.gov.uk/pas/core/page.do?pageId=116396>)

4.2 In addition to the specific consultees identified above, local residents, businesses and other parties who have expressed an interest in previous Local Plan related

Equalities Impact Assessment

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matters and current Core Strategy related matters also from part of the consultee database.

- 4.3 A Statement of Community involvement, has been produced which was a requirement of the Planning and Compulsory Purchase Act 2004. It sets out the Council's proposals for involving the community, stakeholders and outside bodies in planning issues in the Borough. Specifically, it identifies who will be involved, how, for what purpose and at what stage of the planning process in relation to the preparation or revision of planning policy documents.

5 Do any of your customers / stakeholders have the following protected characteristics?

Protected Characteristics	Yes	No	Further Evidence Needed
Race Minority Ethnic Groups	✓		
Disability	✓		
Gender (Male/Female)	✓		
Gender Re- assignment Trans-sexual	✓		
Marital Status	✓		
Sexual; Orientation	✓		
Religion /Belief	✓		
Age	✓		

6.1 What activities have you undertaken to establish the information to answer questions 4 and 5?

- Equalities Impact Assessment on the Draft Core Strategy
- Review of legislation/ database
- Feedback/monitoring forms from previous consultation periods
- Demographic information on North Warwickshire Borough Council

6.2 Who have you consulted and what methods have you used?

- 6.2.1 Consultation with citizens and stakeholders comprising letters and emails, consultation forms and leaflets, displays and public exhibitions, on-line content, focus groups, workshops, newspaper coverage and press notices. In addition the Forward Planning Team would be available to give talks / presentations at specific groups and partners, such as Warwickshire Race Equality Partnership,

Equalities Impact Assessment

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Old People's Forum, various Disability Groups, CAVA and other voluntary organisations, etc.

7 Is there any evidence that any groups are being treated unfairly directly or indirectly?

<i>Protected Characteristics</i>	Yes	No	<i>Further Evidence Needed</i>
Race Minority Ethnic Groups		✓	
Disability		✓	
Gender (Male/Female)		✓	
Gender Re- assignment Trans-sexual		✓	
Marital Status		✓	
Sexual; Orientation		✓	
Religion /Belief		✓	
Age		✓	

8 Please detail the information you have gathered to support the answers to question 7.

<i>Protected Characteristics</i>	<i>Evidence</i>
Race / Minority Ethnic Groups	Taken account of as a potential issue in review of baseline information (social information) in the Sustainability Appraisal Scoping Report (April 2010). Core Strategy policies are inclusive of all equality groups. No policies in the Core Strategy are specifically targeted towards or against this Equality Group.
Disability	Taken account of as a potential issue in review of baseline information (social information) in the Sustainability Appraisal Scoping Report (April 2010). Core Strategy policies are inclusive of all equality groups. Specifically, the Housing Provision policy will positively address the changing needs of occupiers by seeking to make homes more flexible, convenient, safe, adaptable and accessible. The Health policy will positively support the principle of the provision of new

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	or improved primary healthcare facilities in accessible locations.
Gender (Male/ Female)	Taken account of as a potential issue in review of baseline information (social information) in the Sustainability Appraisal Scoping Report (April 2010). Core Strategy policies are inclusive of all equality groups. Although not specifically targeted at women, some Core Strategy policies will positively seek to address previously identified safety concerns.
Gender Re-assignment (Trans-sexual)	No evidence exists to suggest that any Core Strategy functions could negatively or positively impact on this equality group. Core Strategy policies are inclusive of all equality groups. No policies in the Core Strategy are specifically targeted towards or against this Equality Group.
Marital Status	Taken account of as a potential issue in review of baseline information (social information) in the Sustainability Appraisal Scoping Report (April 2010). Core Strategy policies are inclusive of all equality groups. No policies in the Core Strategy are specifically targeted towards or against this Equality Group.
Sexual Orientation	No evidence exists to suggest that any Core Strategy functions could negatively or positively impact on this equality group. Core Strategy policies are inclusive of all equality groups. No policies in the Core Strategy are specifically targeted towards or against this Equality Group
Religion/ Belief	Taken account of as a potential issue in review of baseline information (social information) in the Sustainability Appraisal Scoping Report (April 2010). Core Strategy policies are inclusive of all equality groups. No policies in the Core Strategy are specifically targeted towards or against this Equality Group.
Age	Taken account of as a potential issue in review of baseline information (social information) in the Sustainability Appraisal Scoping Report (April 2010). Core Strategy policies are inclusive of all equality groups. Specifically, the Housing Provision policy will positively address the changing needs of occupiers by seeking to make homes more flexible, convenient,

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	safe, adaptable and accessible; building on the requirements for 'Lifetime Homes'
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9 Is there any justification for any unfairness identified in question 7 - Describe the supporting evidence

9.1 Not unfairness, but more information is required to understand the full effects of the Core Strategy on some of the equality groups.

10 If you have identified any area of unfairness that cannot be justified how will you eliminate or minimise this

10.1 None identified at this time.

11 The results of your research and any justification must be easily available to the public. Explain when where and how will you publish this information

11.1 Scoping Reports form part of the Core Strategy evidence base and are updated annually. These are available on the Borough Council website for public access. Monitoring the progress of planning policies is carried out annually (1 April) and is published on Borough Council web site and as part of Core Strategy evidence base. Equality implications will be reported in all committee reports relating to the Core Strategy which are publicly available.

Agenda Item No 6

Executive Board

24 September 2012

**Report of the
Chief Executive**

Exclusion of the Public and Press

Recommendation to the Board

That under Section 100A(4) of the Local Government Act 1972, the public and press be excluded from the meeting for the following item of business, on the grounds that it involves the likely disclosure of exempt information as defined by Schedule 12A to the Act.

Agenda Item No 7

Coleshill Leisure Centre – Project Management and Appointment of the Architect Led Design Team - Report of the Assistant Director (Streetscape)

Paragraph 3 – by reason of the financial affairs of another organisation

The Contact Officer for this report is David Harris (719222).