

**To: The Deputy Leader and Members of the
Planning and Development Board**

**(Councillors Bell, L Dirveiks, Henney,
Humphreys, Jarvis, Jenns, Jones, Lea, Morson,
Moss, Phillips, Simpson, Smitten, Sweet and
A Wright)**

For the information of other Members of the Council

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

PLANNING AND DEVELOPMENT BOARD AGENDA

15 JUNE 2015

The Planning and Development Board will meet in The Council Chamber, The Council House, South Street, Atherstone, Warwickshire CV9 1DE on Monday 15 June 2015 at 6.30 pm.

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 Planning Applications – Report of the Head of Development Control.

Summary

Town and Country Planning Act 1990 – applications presented for determination

The Contact Officer for this report is Jeff Brown (719310).

5 Meaningful Gap Assessment Responses to Consultation Meaningful Gap – Report of the Assistant Chief Executive and Solicitor to the Council

Summary

This report informs members on the responses to the consultation held between 29th January and 12th March 2015 on the designation of the area that will constitute the “Meaningful Gap”, referred to in Policy NW19 of the Core Strategy, adopted October 2014 and to consider any amendments to the designated area as a result of the consultation.

The Contact Officer for this report is Mike Dittman (719451).

6 Corporate Plan Targets 2014/15 – Report of the Head of Development Control.

Summary

This report describes the action taken on a number of targets as set out in the 2014/15 Corporate Plan.

The Contact Officer for this report is Jeff Brown (719310).

7 Progress Report on Achievement of Corporate Plan and Performance Indicator Targets – April 2014 to March 2015 – Report of the Chief Executive and the Deputy Chief Executive

Summary

This report informs Members of the progress with the achievement of the Corporate Plan and Performance Indicator targets relevant to the Planning and Development Board for April to March 2015.

The Contact Officer for this report is Robert Beggs (719238).

Agenda Item No 5

Planning and Development Board

15 June 2015

Report of the Assistant Chief Executive and Solicitor to the Council

Meaningful Gap Assessment Responses to Consultation

1 Summary

- 1.1 This report informs Members on the responses to the consultation held between 29th January and 12th March 2015 on the designation of the area that will constitute the “Meaningful Gap”, referred to in Policy NW19 of the Core Strategy, adopted October 2014 and to consider any amendments to the designated area as a result of the consultation.

Recommendation to Board

- a To note the responses made to comments received during the consultation;**
- b That Areas 1, 2, 3, 7a, 6, 8, 9 and 10 (part) are designated as the “Meaningful Gap” for the purposes of Core Strategy Policy NW19;**
- c Areas 4 and 5, Area 7b and land west of the M42 south of the A5, are excluded from the Meaningful Gap and remain outside current Development Boundaries; and**
- d To apply the amended Report and Meaningful Gap area as a material consideration when applying adopted Core Strategy Policy NW19, for the purposes of determining planning applications within that area from the date of this Board meeting.**

2 Consultation

- 2.1 A copy of the report has been forwarded to Councillors Lea, Simpson, Humphreys and Sweet.

3 Introduction

- 3.1 The Borough Council has consistently worked to maintain the gap between Tamworth and Polesworth and Dordon as it is essential to ensuring the continuing identity of Polesworth and Dordon.

4 Core Strategy Policy

- 4.1 Following the examination of the Core Strategy the Inspector's modifications to Policy NW16 for Polesworth and Dordon amended the requirement for the 'land to the west of Polesworth & Dordon' to provide for a "Meaningful Gap". The Adopted Core Strategy Policy states;

NW19 Polesworth & Dordon

"The broad location of growth will be to the south and east of the settlements subject to there being no unacceptable environmental impacts from surface mining and that viable and practicable coal reserves are safeguarded.

*Any development to the west of Polesworth & Dordon must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a **meaningful gap** between them."*

- 4.2 There is therefore the need to define the areas that will constitute the Meaningful Gap in order to be able to apply the policy as set out in the Core Strategy Policy NW19. A study has been carried out to assess the area and to determine the area of the "gap". This was the subject of consultation earlier this year.

5 Meaningful Gap Assessment

- 5.1 The study and assessment subdivides the gap between Tamworth and Polesworth & Dordon down into a series of 10 areas that are defined by significant transport corridors, such as the B5000, A5, M42 and West Coast Main line (WCML) and by significant landscape features such as the spoil tip, existing small settlements and the canal and river corridors.

- 5.2 Each individual area was assessed as to the contribution it provides towards the function of a 'meaningful gap' with a recommendation to include or exclude that specific area. The areas are shown on Maps in Appendix 3 to the Study. In brief the areas can be described as follows;

- Area 1 – Comprising the river and canal corridor between Polesworth and the ridge leading to Pooley Park. The WCML forms the northern boundary.
- Area 2 – Land between the M42 and the ridge overlooking the canal, river and Polesworth. The WCML forms the northern boundary and B5000, off Pooley Lane, the southern boundary.
- Area 3 – Open land west of the M42, east of Robey's Lane with the WCML forming the northern boundary and B5000 the southern boundary.
- Area 4 - Open land west of Robey's Lane with the WCML forming the northern boundary and Woodhouse Farm and commercial units the southern boundary. The site adjoins Tamworth Golf Course to the west.
- Area 5 - Land west of Robey's Lane, north of the B5000 and east of the Golf Course, incorporating the Priory Park Karting Circuit.
- Area 6 – Open land south of the B5000, west of Polesworth (the Dexter Way and Ensor Drive estates) and east of the M42. The southern boundary is the Birchmoor settlement and Birchmoor Road. Hermitage Way cuts through this area.

- Area 7 – land between the Tamworth Borough boundary at Wilnecote (Green Lane) and the M42 with the B5000 forming the northern boundary and the Relay Drive Industrial Estate and motorway service area forming the southern boundary. The area includes some older residential development at Green Lane/Westfields and the Polesworth Town football club and pitch/cricket ground off the B5000.
- Area 8 – Large open fields west of Dordon, east of the M42. Birchmoor settlement and Birchmoor Road form the northern boundary and the A5 the southern boundary.
- Area 9 – Open land south of the A5, east of Junction 10 on the M42, west of the spoil tip and Birch Coppice Business Park and north of the small settlement of Freasley.
- Area 10 – Land incorporating Freasley settlement, forming the northern boundary of the area. The southern boundary is the freight line to the Birch Coppice Freight transfer station and the western boundary is Trinity Road and the M42. The site includes Planters Garden Centre. The land to the immediate south of this area is designated as Green Belt.

5.3 The only areas not considered as part of the study includes land recently granted planning consent immediately west of Junction 10 on the M42 and land between Hockley housing estate and the M42. The first site has planning consent as an extension to the existing Business Park at Centurion Way. Similarly land west of the M42, east of Hockley, Tamworth has recently been proposed for housing and is subject to a current planning application. Both of these sites are impacted significantly by the proposed HS2 route.

6 Consultation Responses

6.1 A total of 37 responses to the report and consultation were received. Of these 10 responses were primarily stating “no comment” or “no objection” although a number sought additional information or assessment to be included within the report to address areas of specific interest or responsibility, such as the role and environmental support that woodlands and trees could provide to the definition and function of the gap (Woodland Trust), some clarification sought on the role of the consultation in relation to the Duty to Co-Operate (Lichfield District Council) and how this may impact on assessing how to address Tamworth’s needs and the need to ensure that assets of national importance/significance are addressed/reflected by the Report (English Heritage and Natural England).

6.2 A total of 18 responses were supportive of the Report and Meaningful Gap area identified. However, a number of these responses sought the expansion of the area to cover the whole of the gap between the built up limit of Tamworth and the built edge of Polesworth/Dordon. It is considered that this approach cannot be supported as the Inspector reporting on the Inquiry into the Core Strategy did not consider that a blanket presumption against anything other than minor development was justified. The plan was modified to include an amended Policy NW19, seeking development to respect the separate identities of Polesworth, Dordon and Tamworth and maintain a meaningful gap between them.

- 6.3 The pressure from development on this gap area, both from the edge of Tamworth and on sites well within the gap, highlighted the need to address where the term “Meaningful Gap” could be robustly applied (in the interim between adoption of the Core Strategy and the delivery of the emerging Site Allocations Plan) and to try to identify those areas which did not perform as significantly as others in maintaining the separation of the settlements. It is within these latter areas that it is felt the potential for flexibility for development may be considered, which is also considered to broadly comply with/conform with the aims and approach sought by the Inspector and avoids placing a blanket presumption against development on the whole of this area.
- 6.4 This latter point is also one of the main issues raised in the 9 responses received, objecting to the Meaningful Gap Report and area in whole or in part. The full summary of representations received and the Council’s response is included as Appendix A to this Report.
- 6.5 The main issues raised by the objections are summarised with an officer response;

Table 1

	Summary of Main Objections	Response
1	The assessment and Report does not conform with the Inspector’s report into the Core Strategy in that the “Gap” should be explored through the Site Allocation Plan process.	The Inspector’s report does not prevent the planning authority from taking other actions and processes forward to address a specific planning issue. The Meaningful Gap report will help inform the Site Allocations Plan but the need to address the issue in the face of growing development pressure means the action is required in the interim, prior to the Site Allocations Plan moving towards its next stage of consultation.
2	The Report misinterprets the Inspectors report as it applies a “blanket presumption” against development on land between Tamworth and Polesworth/Dordon. The Council should not prevent more significant developments if it can be shown that they will maintain a ‘meaningful gap’.	Disagree, the Report does not apply a “blanket presumption” but does identify areas within which the Meaningful Gap will not apply, providing greater flexibility and enabling long term development needs to be addressed when these arise and are justified. The next stage of the Site Allocations Plan will be the appropriate document and process for addressing any significant developments and growth. The Meaningful Gap Report addressed a more specific policy and development pressure issue relating to Policy NW19 in the adopted Core Strategy.

3	<p>That the Report and Gap identified so significantly reduces the Meaningful Gap remaining that it would no longer operate sufficiently as a gap, particularly in Areas 5 and 7.</p>	<p>This concern is noted and agreed/supported in part, in relation to Area 7. The proximity of development in Tamworth at Stonydelph, with existing development along Green Lane at Westfields, Birchmoor, and the narrowness of the gap between development at the junction of Chiltern Rd with Tamworth Rd/B5000 to development in Polesworth at the Lynch and Kiln Way estates, (which is already affected by some sporadic development at Tamworth Rd, the Hermitage on Hermitage Lane), support the suggestion that the northern part of Area 7 is the most critical in terms of where future development could result in the coalescence of the two settlements. It is therefore proposed that northern element of Area 7 (Area 7b) should be included within the Meaningful Gap as a direct change/amendment to the original proposals following the consultation but the southern part, Area 7b, remain outside the meaningful gap. Area 5 is not considered as critical and is therefore proposed to be kept outside of the identified Meaningful Gap.</p>
4	<p>Sufficient land is available adjoining Polesworth and Dordon in Areas 6 and 8 to accommodate development for future needs and still maintain a meaningful gap.</p>	<p>The Report was not dealing directly with the availability or suitability of land for development, simply as to whether it should be viewed as performing appropriately as Meaningful Gap for the purposes of Policy NW19. Areas 6 and 8 are largely open and undeveloped up to the M42. Any development within these areas, particularly any significant level of development, will have an impact on the Meaningful Gap that would set a precedent to justify further loss up to the M42 and the long term loss of separation between Tamworth and Polesworth/Dordon.</p>
5	<p>The assessment ratings and traffic light system used are too crude to apply and do not take into account differences within the Areas identified that may be able to accommodate development.</p>	<p>The concerns are noted however the method of assessment is considered appropriate. It is considered to be an easy way to explain the conclusions that have been arrived at. The issue is to try and define the Meaningful Gap, not simply to consider how this area can accommodate development. Development needs will be addressed through the Site Allocations Plan and Core Strategy review process.</p>

6	The assessment fails to adequately address/reflect the “width” of the gap and distances between the settlements (or lack of). This should be included or reflected as part of the assessment.	This concern is noted and reflected in amendments proposed including the retention of part of Area 7 as Meaningful Gap, see notes above. The Meaningful Gap Report will be amended to reflect greater weight being given to geographical proximity of existing development and the potential impact of future development on the gap in these areas.
7	The Core Strategy Inspector was seeking to relax the restrictions applying to development between Polesworth/Dordon and Tamworth to enable significant employment land to be delivered to address the local and sub-regional employment needs. He was not seeking to create a development free corridor and would have designated and defined one if that was the case.	The Inspector was not seeking to determine where development should be located to address a need. That is up to the relevant Local Planning Authority. He was seeking to examine whether the Council’s planning document, The Core Strategy, which does address that issue/need in strategic terms, was sound. The Inspector was not in a position to be able to formally designate or define a Meaningful Gap and left the consideration and judgement of what constitutes that Gap up to the Borough Council to determine, through appropriate processes which may include the Site Allocations Plan but does not preclude or prevent other methods and options being considered.
8	The term Meaningful gap should only apply to areas 1, 2, 6, 7 and 8. Areas south of the A5 and west of the M42 above the B5000 do not contribute or are poorly related towards maintaining the separation of the settlements affected.	Disagree. The Areas sought to be excluded from the assessment, lying either north west of the B5000 or south of the A5 are still considered to contribute to the function of a Meaningful Gap. The land to the south of the A5 is considered particularly critical and sensitive as it adjoins a major gateway into the Borough, along the A5 from M42 Junction 10, The land to the south is open and runs up to a major developed area at Birch Coppice Business Park, clearly an integral part of Dordon and contributing to the functioning of the settlement. There is clearly therefore the need to assess the impact of development in this area and the potential for significant development resulting in the coalescence of the settlements. Land to the north of the B5000 also adjoins a gateway into North Warwickshire from Tamworth. However, the larger geographical scale of this area, the distances between the existing built area of Tamworth and Polesworth and the lack of any significant sporadic development along the northern

		<p>edge of the B5000 from Robey's Lane to Pooley Lane, means there is the opportunity to allow some flexibility while still maintaining a significant meaningful gap. The Areas 4 and 5, west of Robey's Lane are therefore proposed to lie outside the Meaningful Gap. These areas will be treated as open countryside for planning purposes. It should also be noted that this area immediately adjoins the Tamworth Golf Course which is currently the subject of a planning application for significant levels of development.</p>
9	<p>The assessment confuses policy objectives with other issues. The main issue is a 'geographical consideration' and the use/application of issues of landscape quality, sensitivity, environmental constraints including natural and heritage assets, or buried infrastructure are inappropriate and not relevant to determining what constitutes a 'meaningful gap'. The methodology is therefore flawed.</p>	<p>The concern is noted, however it is considered that issues of landscape, topography and the sensitivity of natural or built assets all contribute and are relevant towards how a Meaningful gap is perceived. No single assessment or criteria is used to judge whether an area performs well as Meaningful Gap but a planning judgement is made supported by those assessment criteria. Similarly the likely impact and inherent constraint imposed by significant physical infrastructure whether existing, proposed, buried or exposed and in operation is also considered and used to support that planning judgement. It is not therefore considered that the methodology is flawed but is a reasonable and appropriate approach to determine the extent and area of the Meaningful Gap.</p>
10	<p>The significant pressure from development arising from local and sub-regional needs may necessitate review of Green Belt boundaries. The Meaningful gap report seeks to apply an equivalent constraining approach, which is inappropriate in advance of such a review.</p>	<p>The Inspector noted that the Core Strategy addressed the Borough's development needs but that the Council acknowledged that if and where growth planned in the Core Strategy may not be able to be accommodated a review of Green Belt boundaries may be necessary. The Meaningful Gap Report will not prevent such a review occurring if it is deemed necessary and justified in the future. It is simply to address a current localised issue in relation to the Adopted Core Strategy policy NW19, is not a Borough wide strategic issue and is not therefore considered premature or inappropriate in advance of any such review.</p>

11	<p>The assessment is premature and the adoption of Meaningful Gap as policy compromises the emerging Site Allocations Plan process. The report should be withdrawn.</p>	<p>It is considered that the Meaningful Gap report can help contribute towards and inform the Site Allocation Plan process and in no way compromises the ability of the Site Allocations Plan to consider and address future development needs as expressed in the Core Strategy or emerging elsewhere. It addresses an interim period/issue of how to apply the requirements Policy NW19 while the development of the Site Allocations Plan is underway.</p>
12	<p>Too much weight is given in the assessment to landscape considerations, so the overall conclusion is flawed. The Developers Landscape Consultants note that Areas 3 and 4 cannot be justified as “Gap” on landscape grounds.</p>	<p>It is not considered that landscape considerations are given too great a weight, but simply contribute towards the overall planning judgement of whether the individual area performs as Meaningful Gap or not. It is nevertheless noted that the report should be clarified and greater emphasis given to the geographical considerations, proximity of development and settlements to each other. This may address the issue and concerns raised over assumed priority being given to landscape considerations and quality.</p>
13	<p>Tamworth Borough Council was not invited to discuss or inform the exercise. The determination of the Gap involves cross boundary issues (such as housing and employment needs) and the Report does not indicate that North Warwickshire have been working in a “collaborative manner” as required by the Inspectors Report to the Core Strategy.</p>	<p>Disagree. The Council are fully involved with Tamworth and have a current agreed Memorandum of Understanding addressing the issue of future development needs. The Meaningful Gap Report will help inform the Site Allocations Plan, which is the appropriate document and process for addressing any cross boundary issues and growth in development needs. Tamworth and North Warwickshire are involved in collaborative discussions with their adjoining neighbours and work to address future needs is ongoing through the Greater Birmingham and Solihull Local Enterprise Partnership. The Meaningful Gap Report simply addressed a more specific Policy and development pressure issue relating to Policy NW19 in the current Adopted Core Strategy. There was therefore no requirement/need to involve Tamworth in the determination of how to apply an Adopted North Warwickshire Planning policy. Tamworth Borough Council were nevertheless consulted on the Report and have commented.</p>

14	Area 7 should be included in the Meaningful Gap as, if developed, it would have the greatest impact on the coalescence of the settlements. It is the closest area remaining between the settlements, has the narrowest points and distances between existing developments, particularly Birchmoor/Green lane area.	This issue has already been noted above. It is agreed that greater emphasis and account should be taken of the geographical proximity of development in the Report. As a result further amendments will be necessary to the Meaningful Gap report, involving and including part of Area 7 within the Meaningful Gap. Areas 4 and 5 will also be excluded from the Gap, reflecting their less critical impact on and contribution to the Meaningful Gap in geographical terms.
15	Areas 3 and 4 provide no real function as gap and are similar to Area 5, which is excluded from the Gap. These areas are overly large and unduly restrictive and should also be excluded from the Gap.	This issue is partly supported in that it is considered some justification can be made for Area 4 (west of Robey's Lane) performing less critically as Meaningful Gap than other areas. However, it is still considered that the open, undeveloped aspect of Area 3, with significant open views to the north and east, cut by the M42 to the east and limited to the north by Pooley Park, still performs as part of the Meaningful Gap. As noted in relation to comments for Areas 6, 8, 9 and 10, any development within these areas, particularly any significant level of development, will have an impact on the Meaningful Gap that would set a precedent to justify further loss up to the M42 and the long term loss of separation between Tamworth and Polesworth.
16	The Assessment and Report cannot be considered as a planning policy document under the Local Plan Regulations, does not include a Sustainability Appraisal and should only therefore be considered as policy advice with no formal status.	This issue is noted and acknowledged and it is not considered that the Report in its own right functions as a Development Plan document for the purposes of the Local Plan Regulations. It does however, form part of policy advice towards clarifying the Council's application and approach to the Adopted Core Strategy Policy NW19. It forms part of the "material considerations" to be made in determining any planning application likely to be affected/impacted by the adopted Planning Policy and will subsequently feed into the development of the Site Allocations Plan. It has been subject to a significant public consultation exercise which, it is considered, gives the Report and identification of the Meaningful Gap Area greater weight than other planning policy advice that has not undergone such an open public process.

7 Conclusion

- 7.1 The results of the original assessment recommend that Areas 1, 2, 3, 4, 6, 8, 9 and 10 should be designated as the Meaningful Gap. Following the consultation and having taken into account the responses received it is considered that the Area 4 should be removed from the designation whilst Area 7a should be included in the designation. This means that Areas 1, 2, 3, 6, 7a, 8, 9 and 10 (excepting the area west of M42 adjoining Area10) should be maintained as the Meaningful Gap.
- 7.2 The areas not to be included within the Meaningful Gap are Areas 4, 5 and 7b. It is recommended that they should currently be treated like other sites that lie outside of development boundaries. The remaining areas south of the A5/Junction 10 but west of the M42, affected by planning consent, current applications and potentially significantly by the route of HS2 Phase 2 also remain outside the Meaningful Gap as noted in the original report.
- 7.3 The Meaningful Gap assessment study has been amended to reflect the above changes with clarification and justification in the supporting text. It is attached as Appendix B. The amended Report and Meaningful Gap area will then be used as a material consideration when applying adopted Core Strategy Policy NW19, for the purposes of determining planning applications within that area.

8 Report Implications

8.1 Environment and Sustainability Implications

- 8.1.1 The designation of a meaningful gap will contribute towards the Council's Spatial Vision, retaining and re-enforcing the Borough's rural character and retaining the distinctiveness of existing communities. Similarly it will help meet the Council's corporate aim 'seeking to protect, conserve and improve the quality of the local environment'.

The Contact Officer for this report is Mike Dittman (719451).

Meaningful Gap Consultation Responses June 2015

Appendix A

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT
MG1	P Sharpe	Inland Waterways Association	YES	The Inland Waterways Association is pleased to note that the Assessments recognise the heritage value of the Coventry Canal and the landscape and environmental value of the waterway corridor. IWA supports the recommendations to include areas 1,2,3 & 4 in the designated Meaningful Gap and the exclusion of these areas from any significant built development. The Inland Waterways Association is pleased to note that the Assessments recognise the heritage value of the Coventry Canal and the landscape and environmental value of the waterway corridor. IWA supports the recommendations to include areas 1,2,3 & 4 in the designated Meaningful Gap and the exclusion of these areas from any significant built development.	Noted
MG2	K Smith			I feel that its most important to keep and maintain a meaningful gap between settlements or we shall just end up with urban sprawl	Noted
MG3	S E King		NO	I am at a loss to understand the terminology of a "Meaningful Gap" between Tamworth and Polesworth, when North Warwickshire Borough Council themselves intend to fill part of that gap by excluding Areas 5 and 7 from the status. Tamworth Borough Council are unable to expand further due to the county boundaries – fair enough, and I'm very pleased about it. However, North Warwickshire has possible alternative directions in which to expand around the area of Polesworth. So why are you intending to "link up" with Tamworth in Areas 5 and 7 if your wish is to create a "Meaningful Gap" between Tamworth and Polesworth? I reiterate – if North Warwickshire Borough Council are planning to MAINTAIN the "Meaningful Gap" between Tamworth and Polesworth, then why are North Warwickshire Borough Council themselves intent on REDUCING that same	Noted. The assessment aims to clarify the areas that could reasonably be termed or considered as "meaningful gap", a form of strategic gap in planning terms. This means that not all the land within this area between Tamworth and Polesworth/Dordon, will perform or act as a gap to the same extent. The area identified and retained as Meaningful Gap will nevertheless contribute to maintaining the separation of the settlements. The areas outside the gap designation will still be classed as open countryside. Following consideration of the representations part of Area 7 is to be retained as Meaningful Gap (performing more crucially as a gap in terms of distance between settlements) and Area 4 is to be excluded in view of the significant distance between settlements at this point.
MG4	D Clarke	Network Rail		No comments	Noted

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT
MG5	Mr & Mrs Palin		YES	<p>We are in favour of keeping the Meaningful Gap. Mainly affected by Areas 6, 7, 8 (disruption due to be caused by HS2 running adjacent to land & M42 Motorway, also along with the current building work for more housing at the end of our main road along "Pennine Way").</p> <p>The Meaningful Gap serves many purposes :- Separation of Tamworth to North Warwickshire, farm land for horticultural & arable purposes for farmers livelihood - open land for shielding & noise form M42, shielding & noise barrier from soon to be HS2 - open fields and land for wildlife habitat.</p> <p>In many areas in todays' society there is little "green" land left due to the ever increasing demand for 1) housing 2) industry development. In our opinion it would be a shame to loose this band of land we have. Villages and small hamlets will lose their sense of worth and individuality and all be put together to form, basically, Tamworth - which is overstretched as it is. We're sure the people of the villages of Alvecote, Birchmoor, Dordon & Poleworth would agree. While we are all probably in favour of better roads & transport links, non of us want that to impact on the actual villages themselves. Living on the fringe of Stoneydolph / Wilnecote right on the North Warwickshire border of Birchmoor we do have "the best of both worlds" convenience for Motorway links, a nearby town but also 5 minutes walk into the heart of the country, as yet unspoiled (except for the M42).</p> <p>We do not want to loose this area to any more development than is strictly necessary.</p>	<p>Noted. The assessment aims to clarify the areas that could reasonably be termed or considered as "meaningful gap", a form of strategic gap in planning terms. This means that not all the land within this area between Tamworth and Polesworth/Dordon, will perform or act as a gap to the same extent. The area identified and retained as Meaningful Gap will nevertheless contribute to maintaining the separation of the settlements. The areas outside the gap designation will still be classed as open countryside. Following consideration of the representations part of Area 7 is to be retained as Meaningful Gap (performing more crucially as a gap in terms of distance between settlements) and Area 4 is to be excluded in view of the significant distance between settlements at this point.</p>
MG6	J Field	Environment Agency		<p>The Environment Agency has no objection to the proposed definition of the term 'meaningful gap' of the land between Tamworth and Polesworth/Dordon as referred to in Policy NW19. We note that land towards the north of the 'gap' in Areas 1, 2 and 3 are affected by floodplain to some extent therefore support the protection of this land from development in line with the NPPF's sequential approach to allocating land with regards to flood risk.</p>	Noted
MG7	J Hardwick	Grafton International		<p>Thanks for the excellent information and inclusion in your consultation</p>	Thanks welcomed
MG8	L Williams	HS2		<p>Given the current stage of design and the on-going consideration of consultation responses on the Phase Two route, HS2 Ltd would not wish to make any specific comments on this consultation</p>	Noted
MG9	L Maric	Highways Agency		<p>Whilst the HA can offer no view on the relative contribution of the assessment sites to the 'meaningful gap' or to the effectiveness of Policy NW9 – it nonetheless welcomes the acknowledgement given that the M42 and A5 are potentially significant infrastructure constraints. Their presence and proximity (particularly in respect of sites 8 and 9, which adjoin the M42 junction 10) will clearly influence the form and scope of future development within the assessment area.</p>	Noted

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT
MG10	A Madge	Cllr for Stonydelph	NO	<p>I do not understand your terminology of a Meaningful Gap which you say is to retain the different identities of NWBC and TBC, yet you select areas 5 & 7 as NOT part of the Meaningful Gap and it would appear by doing this you are leaving these two areas open for development. This would mean that TBC and NWBC would have no gap between each other and the only meaningful gap would be to the east side of areas 5 & 7. This would mean the "meaningful" part of the phrase will have to be removed from your document as the only gap will be between any new NWBC development and your present developments. I do not understand the reasons for not promoting land in area's 6 & 8 although the pipeline runs through this section it is further away from HS2 and there is plenty of available land (more than area 5 & 7) that is not restricted by the pipeline. This land also has better infrastructure regarding road access onto the A5.</p> <p>Areas 5 & 7 will not have suitable infrastructure as the B5000 will be the only way of accessing routes such as the A5 and M42. The B5000 is already operating at a high capacity and cannot support the potential extra development your plan points to.</p> <p>It would appear that these areas you have identified as not part of the meaningful gap are to be regarded as potential development land and suits NWBC as you would satisfy the needs of extra housing without affecting residents of NWBC and any potential issues that will cause you, the issues of any developments will be felt by the residents of Tamworth.</p> <p>I find this "Meaningful Gap" document to be anything but a meaningful gap as I have previously stated the gap is in the wrong place therefore I would be interested to see how you have come up with this terminology??</p> <p>No specific comments to make at this stage</p>	<p>Noted. The assessment aims to clarify the areas that could reasonably be termed or considered as "meaningful gap", a form of strategic gap in planning terms. This means that not all the land within this area between Tamworth and Polesworth/Dordon, will perform or act as a gap to the same extent. The area identified and retained as Meaningful Gap will nevertheless contribute to maintaining the separation of the settlements. The areas outside the gap designation will still be classed as open countryside. Following consideration of the representations part of Area 7 is to be retained as Meaningful Gap (performing more crucially as a gap in terms of distance between settlements) and Area 4 is to be excluded in view of the significant distance between settlements at this point. Areas 6 and 8 are considered to be significant contributors to the Meaningful Gap east of the M42 and no further reduction/amendment is proposed. The reference to the term 'meaningful gap' comes directly from the Core Strategy Planning Policy NW19 and the Inspectors Report on the Examination into the Core Strategy. It is the planning term used by the Inspector to describe the maintenance and retention of what is often also termed as a "strategic gap". The planning policy simply reflects the terminology used by the Inspector in his Final Report.</p>
MG11	R Bust	The Coal Authority			Noted
MG12	J Moore			<p>Support in principle. Disappointed that Area 7 is recommended not to be in the gap. If this area is not included then no doubt it will be available for development, thus narrowing the gap still further - how does this contribute to establishing a gap?. As Area 5 is also recommended for exclusion, then the need to preserve Area 7 is greater. Point 9.6 says the physical separation of Area 7 reduces its relationship with and contribution to the meaningful gap is untrue. I recommend that Area 7 is maintained as part of the Meaningful Gap</p>	<p>Noted and agreed in part. The assessment aims to clarify the areas that could reasonably be termed or considered as "meaningful gap", a form of strategic gap in planning terms. The areas outside the Gap designation will still be classed as open countryside. There is no current proposal to allocate these sites for development. Following consideration of the representations part of Area 7 is to be retained as Meaningful Gap, performing more crucially as a gap in terms of distance between the settlements.</p>
MG13	1 D Hodgetts	Hodgetts Estates (HE)		<p>The MGA contradicts the council's own Local Plan evidence base and is therefore not soundly based. Other assessment criteria are absent from the MGA and should be included in any reasonable assessment, including the relative width of the Meaningful Gap, existing and emerging planning policy allocations, and public opinion. The purpose of the modification (NW19) was to prevent there being a moratorium on development of land to the west of Polesworth & Dordon, which could conceivably undermine delivery of apportioned 'housing requirement' at the settlement(s), now enshrined at Policy NW5 of the Core Strategy – 440 dwellings per annum</p>	<p>Disagree in part. The issue over reinforcing distance/width of the gap is noted and, following consideration of the representations, part of Area 7 is to be retained as Meaningful Gap, performing more crucially as a gap in terms of distance between the settlements. Area 4 is to be excluded in view of the significant distance between settlements at this point. Areas 6 and 8 are considered to be significant contributors to the Meaningful Gap east of the M42 and no further reduction/amendment is proposed.</p>

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support Comments	NWBC COMMENT	
MG13	2	D Hodgetts	Hodgetts Estates (HE)	<p>Policy NW19 is significant, allowing that some major or even strategic development could, in principle, be appropriate in this location so long as a meaningful gap is preserved. The MGA proposes a blanket designation across the entire gap between Polesworth & Dordon and Tamworth on the land within the ownership of HE. This would be a misinterpretation of the Inspector's recommendations, the purpose of which was to ensure some development could to take place there in the future if required. It is inaccurate to say that only 'small-scale changes' should be allowed within the gap, as stated at paragraph 2.3 of the MGA, as the alteration to draft Policy NW19 explicitly relaxes the control to allow more significant developments.</p>	<p>Disagree. The inspectors report does not indicate that significant strategic development should be targeted to this area, simply that options could be explored. The Site Allocations Plan is currently addressing the housing and employment needs for the Borough and in the interim there is the necessity to clarify the Meaningful Gap in the face of continued development and application pressure that would eradicate this gap. This designation will subsequently be fed in to the Site Allocations Plan revisions. A blanket presumption is not, nevertheless, implied and areas left outside the Meaningful Gap could address future needs where evidenced and justified and this will be clarified. Within the Meaningful Gap the proposed policy advice and approach (para 10.1) will not specify only "small scale changes" but will require the retention of the undeveloped character of the area and to maintain the separate identity/separation of the settlements. It is unclear how the provision of significant built development within this area would contribute to maintaining a meaningful gap and the separation between the settlements.</p>
MG13	3	D Hodgetts	Hodgetts Estates (HE)	<p>Appropriate development should be allowed between the settlements of Polesworth & Dordon and Tamworth, and that this was the intention of the Inspector when suggesting a principal modification to Policy NW19. The MGA accepts, at Area 8 (table), 'Development along the eastern edge [of Area 8] may also provide the opportunity for softening the urban edge through appropriate landscaping'. An appropriate amount of development immediately to the west of Dordon could facilitate and include substantial landscaping north of the A5 and along the western boundary of the settlement to reinforce the edge of Polesworth & Dordon and provide a better transition into the large gap that would remain between there and Tamworth. It would also provide an opportunity to screen existing skyline development associated with Dordon. These points were acknowledged by the Inspector, in his report on the North Warwickshire Local Plan, 2005. In terms of landscape value Area 8 contributes little to the meaningful gap whilst presenting opportunity to enhance the landscape in this area</p>	<p>Noted. The assessment will permit development that is considered "appropriate", whether within the gap to maintain openness and separation of the settlements or outside the gap subject to NPPF and Core Strategy policies. The objector's assumption/understanding appears to be that the term "development" only applies to significant built form of housing or employment structures. The term also covers other uses and forms such as recreation and open space. Such development along the eastern edge of Area 8 could provide the opportunity for soft landscaping and planting.</p>
MG13	4	D Hodgetts	Hodgetts Estates (HE)	<p>There are significant areas of land within Area 8, that are unaffected by the gas pipeline or the proposed High Speed 2 'Y Route'. These areas (to the east and west of the HPGP), would in effect have a Green 'Low Sensitivity/Impact' rating put them on a par with Area 5 and 7 in terms of assessment score</p>	<p>Noted. The Area is not subdivided by any clear or significant boundaries and is a large open aspect field. It is therefore difficult to subdivide in the manner sought by the objector and can only be assessed as a whole. Nevertheless, given the size of the area it may be more appropriate to reflect this with an amber sensitivity score for infrastructure impact. A Green score would be inappropriate / inadequate and not reflect the presence and impact that the High Pressure Gas Pipeline may have.</p>

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT	
MG13	5	D Hodgetts	Hodgetts Estates (HE)	The width of the undeveloped/partially developed area between Polesworth & Dordon and Tamworth is the most obvious means by which to compare the relative importance on the proposed Meaningful Gap Area for Assessment. This assessment criterion should be included in future drafts of the MGA. With specific regard to Area 8, the gap is significantly wider in this location, meaning the area is better able to accommodate development without harming the Meaningful Gap.	Noted. The assessment looks at other issues and not just the width of the gap or distance between settlements. The issue is to try and define the Meaningful Gap, not simply to consider how this area can accommodate development. Development needs will be addressed through the Site Allocations Plan and Core Strategy review process. The Meaningful Gap Report will however be amended to reflect greater weight being given to geographical proximity of existing development and the potential impact of future development on these areas.	
MG13	6	D Hodgetts	Hodgetts Estates (HE)	The 'Site Allocations Plan Draft Pre-submission June 2014' identifies land to the west of Dordon (identified as DOR13), as suitable for 'open space/recreation uses. The Site Allocations Plan has been through 2 rounds of consultation and should be given due weight and consideration. the proposed allocation at DOR13 should be removed from the Meaningful Gap. The MGA and Site Allocations should be assessed/consulted upon in tandem. During the Site Allocation Pre-Submission consultation, 12 responses supported the land to the west of Dordon, constituting over 6.5% of the total responses. Contrary to the statement by the Council, there is a weight of local support for allocating land west of Dordon for residential development. This land should be removed from the proposed Meaningful Gap allocation accordingly.	Disagree. The allocation and use of part of this area for recreation and open space development (DOR13) is not considered inconsistent with its location within the designation of a meaningful gap. Any open space/recreation development will maintain the open undeveloped aspect and character, through use as allotments and playing fields. The issue is to try and define the Meaningful Gap, not simply to consider how this area can accommodate development. Development needs will be addressed through the Site Allocations Plan and Core Strategy review process not through the Meaningful Gap assessment report.	
MG13	6 (cont)	D Hodgetts	Hodgetts Estates (HE)	<ol style="list-style-type: none"> 1. The following assessment criteria are absent from the MGA and should be included in future drafts of document. Namely, relative width of the Meaningful Gap; existing and emerging planning policy allocations; and public opinion; 2. The emerging Site Allocations DPD and MGA should be assessed/consulted upon in tandem; 3. An area immediately to the west of Dordon, bound by the settlement boundary to the east, A5 to the south and school playing fields to the north should be removed from the Meaningful Gap Assessment area and designated for residential development, incorporating significant landscaping. The western boundary of this area would be drawn between the south-western corner of the playing fields and the entrance to Birch Coppice Business Park (BCBP) to the south. This area could be excluded from the Meaningful Gap Assessment area without encroaching within the minimum 0.86km Meaningful Gap width, between the bounds of Polesworth & Dordon and Tamworth 	Noted. Disagree that public opinion should be reflected and/or used as an assessment criterion unless it is supported by clear evidence of planning judgement. There is also no specific distance that is or should be used to "define" the Meaningful Gap, and the reference to a 'minimum 0.86km Meaningful Gap width' is not considered relevant or applicable as an assessment criteria. The geographical proximity of development between settlements is nevertheless an appropriate issue to highlight in the assessment. The issue is to try and define the Meaningful Gap, not simply to consider how this area can accommodate development. Development needs will be addressed through the Site Allocations Plan and Core Strategy review process not through the Meaningful Gap assessment report. It is considered that the Meaningful Gap report can help contribute towards and inform the Site Allocation Plan process. It nevertheless addresses an interim period/issue of how to apply the requirements Policy NW19 while the development of the Site Allocations Plan is underway and does not need to be consulted on in tandem.	
MG14		A Dodson	YES	<p>The proposed designation will avoid the coalescence of the settlements and loss of settlement identity.</p> <p>Area 10 – Landscape</p> <p>I agree that residential of a minor nature may be possible in Freasley but this should be limited to infill between existing properties and not on the margins</p>	Noted.	
MG15		C Greatorex	Coleshill Town Council	YES	Believe this to be an acceptable proposal and fully support it	Noted
MG16		R Young	Grendon Parish Council		Need to retain semi-rural area. Prevent more traffic on A5 which is already busy. Stops spread of Tamworth into North Warwickshire and possible inclusion into Staffordshire. HS2 implications need to be considered	Noted

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT
MG17	R Bilcliff	UKIP Tamworth	NO	The Meaningful Gap in your assessment document states it is a gap which should protect current settlement identity. However, with Tamworth Borough Councils current planned and previous developments of house building up to their boundaries and your borders, and your proposal to exclude area's 5 & 7 from the meaningful gap assessment stating under Recommendations: that both these area's should NOT be included into the 'Meaningful Gap' Any house building onto our boundaries in both these area's would fail to achieve the 'Meaningful Gap' to ensure settlement separation and identity. I therefore urge you to include the said areas into your 'Meaningful Gap'. Alternatively, enter into talks with TBC to see if TBC will review their proposal's and that they too adopt a 'Meaningful Gap' within their borders and share the ownership and constraints of installing this 'Meaningful Gap' as laid down within the NPPF	Noted. The concerns regarding the potential impact of development in Area 7 are noted, in particular the concern over geographical proximity of existing development between Stonydelph, Green Lane, Birchmoor and Polesworth/Dordonand it is proposed that the Meaningful Gap Report be amended to include part of Area 7 as Meaningful Gap. Area 5 is not affected or impacted upon by the same level of existing development or geographical proximity of development and it is proposed it should be maintained as outside the Meaningful Gap.
MG18		Hartshill Parish Council	YES	It is important that each community retains its individual identity. Heritage is essential for future generations. Flood areas should remain as such to prevent flooding in residential properties. Landscapes of the area, green open spaces and historical buildings and land must remain for future generations	Noted
MG19	J R Thomason		YES		Noted
MG20	C Sharp		YES	Important for each community to retain its identity. Heritage is essential for future generations. Flood areas should remain as such to prevent flooding in residential properties. Landscapes of the area, green open spaces and historical buildings and land must remain for future generations	Noted
MG21	D Ormerod		YES		Noted
MG22	J Randle		YES	Support this as it refers to the gap between the M42 and Dordon to provide a rural buffer zone but not on the scale suggested. All the employment is being provided along the A5 corridor especially at Birch Coppice so use some of the gap for housing developments to reduce travel requirements on an already overloaded network. What sense is there in grid locking our villages by building disproportionate amounts of housing which will overload the already bursting infrastructure	Noted. The issue being addressed is to try and define the Meaningful Gap, not simply to consider how this area can accommodate development. Development needs will be addressed through the Site Allocations Plan and Core Strategy review process not through the Meaningful gap assessment report. No further change proposed.
MG23	M Henley	Polesworth Society	YES	We believe it is important that Polesworth and Dordon maintain their individual identities and don't get swallowed by the Tamworth 'conurbation' in the same way the likes of Amington and Wilnecote have been. Polesworth in particular has a rich historical identity that should be protected	Noted
MG24	R Torkildsen	English Heritage		The evidence gathered on the relationship of the 'gap' to heritage assets and the historic landscape is noted and I have no reason to disagree with the reports assessment, its conclusions (relating to the impact on the significance of affected heritage assets) and the proposed extent of the 'gap'. It should be noted that national policy and legislation requires a consideration of, and great weight to, the conservation of any affected heritage asset's setting. As such care should be taken to ensure the impact on the setting of those assets beyond the parcels, where relevant, are also considered.	Noted

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support Comments	NWBC COMMENT	
MG25	1	C Eggington	Lichfield District Council	<p>Lichfield District Council would like to be clear at the outset that it has no objections to the principle of preparing evidence which will inform the next stage of North Warwickshire's Local Plan. However, Lichfield District Council is concerned that North Warwickshire is applying this as policy now ie with effect from the date of approval by the Local Development Framework Sub – Committee (21st January 2015) when this has not yet been tested through any Examination in Public of the Allocations DPD, and indeed prior to any consultation on even the principle of the approach. It is appreciated that this particular evidence is about defining what constitutes a 'meaningful gap' between Tamworth and Polesworth and Dordon in order to retain the separate character of the communities. However, by default, this also starts to define where development might or might not be appropriate, potentially setting limitations on how much development North Warwickshire may be willing to take to help address Tamworth's needs.</p> <p>Lichfield District Council emphasises that this evidence must not be used to inform or set a ceiling figure for housing growth to address Tamworth's needs. This would imply that the 'rest' should be allocated by default to Lichfield District which has not yet begun any process of appraisal in this respect, having only very recently (February 17th) adopted its Local Plan Strategy and which – at the time of writing – is in the Legal Challenge period</p>	<p>Noted. Assessment will be fed into Site Allocations Plan consultation but the land affected already lies outside identified development boundaries, within the open countryside and is constrained by Adopted Core Strategy policy NW19. The assessment helps clarify and inform the area affected by the Policy and does not determine the outcome of the Site Allocations Plan consultation or impact on, or constrain discussions on levels of housing requirements, whether within North Warwickshire Borough or as part of any joint Duty to Co-operate discussions with adjoining authorities.</p>
MG25	2	C Eggington	Lichfield District Council	<p>As this piece of evidence clearly has strategic implications in relation to Tamworth's needs, Lichfield District Council would have expected to have been aware, through the regular Duty to Co-operate meetings, that this piece of work was being undertaken and to have discussed this accordingly. The Council has no recollection of any such discussion having taken place, and has only become aware of this work and its implications through this formal consultation process. This is regrettable as this approach does appear to sit counter to the spirit of the Duty to Co-operate.</p> <p>Indeed, para. 3.3 of the Meaningful Gap assessment refers to the Duty to Co-operate: however there is no mention of ongoing discussions nor the MoU. Instead, reference is made to a joint evidence base (the 'Tamworth Future Development and Infrastructure Study' 2009), the conclusions of which were not supported by North Warwickshire Borough Council although no further explanation is offered as to why in the Meaningful Gap report. This 2009 study now needs to be considered in the light of the changed policy context, the changing needs of the area and to form part of a review of the evidence base as a whole with all partners co-operating constructively, actively and on an ongoing basis.</p>	<p>Noted. Lichfield will be aware that North Warwickshire Borough Council did not agree with or sign up to the conclusions highlighted within the 2009 Tamworth Infrastructure study. This study has now been taken over by events and the ongoing GBSLEP study currently underway is expected to review both housing growth and the opportunities and options for addressing that need within the GBSLEP area.</p>
MG25	3	C Eggington	Lichfield District Council	<p>Lichfield District Council therefore looks forward to progressing open and transparent discussions accordingly. In terms of the methodology and the conclusions of the assessment on a site by site basis, Lichfield District Council does not offer any comment at this point but reserves the right to comment further as part of future Duty to Co-operate discussions relating to Tamworth's needs.</p>	<p>Noted.</p>

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT	
MG26	1	R Crowe	Barton Willmore (on behalf of Taylor Wimpey)	YES	In order to sensibly interpret the Council's consideration of the gap between Tamworth and villages within North Warwickshire, we consider that it is appropriate for the Council to provide a spatial dimension to the designation. Whilst the gap covers a particularly large area of land, the general premise is similar in nature to green wedges or areas of separation, which are commonly seen in Authorities across the country. In terms of the specific parcels of land, we are primarily concerned with the assessment of 'Area 7 - Land south of B5000, immediately adjoining Tamworth Boundary, west of the M42 and bordered by the service station and Industrial estate, Relay Park to the south.'	Noted. The assessment aims to clarify the areas that could reasonably be termed or considered as "meaningful gap", a form of strategic gap in planning terms. This means that not all the land within this area between Tamworth and Polesworth/Dordon, will perform or act as a gap to the same extent. The area identified and retained as Meaningful Gap will nevertheless contribute to maintaining the separation of the settlements. The areas outside the gap designation will still be classed as open countryside. Following consideration of the representations part of Area 7 is to be retained as Meaningful Gap, performing more crucially as a gap in terms of distance between the settlements.
MG26	2	R Crowe	Barton Willmore (on behalf of Taylor Wimpey)		In terms of the areas of assessment, we respond as follows: <ul style="list-style-type: none"> • Landscape – We consider it appropriate that the presence of the M42 and the associated landscaping is referenced within the landscape consideration of this parcel. We concur that the nature of adjacent land uses and the relationship to this site mean that it can be appropriately described as 'urban fringe'. The strongly defined boundaries of the site and the visual and physical relationship with the Stonydelph/Tamworth area are key considerations for assessing this area; • Heritage – We acknowledge that there are no significant heritage constraints or designations affecting this area; • Infrastructure – We note that the route of HS2 is anticipated to constrain the southern edge of this area. It is appreciated that the difference between the northern and southern parts of the area in terms of HS2 are highlighted in the Council's assessment; • Properties – In terms of the area, it is acknowledged that the sports ground and related facilities are located within the site. It is expected that any development of the wider area would retain and support enhancement to the existing sports provision. It is correct that the close relationship to the urban area of Tamworth is acknowledged within the assessment at this point; and 	See Note above. It is unclear as to the need to add extra detail and description around the M42. The M42 is referred to in the section on Area 7 and it is considered unnecessary to go into further detail describing the limited landscaping and planting that exists within the M42 land take, embankments and maintenance areas. This general support to the original exclusion of Area 7 is noted a. However, on further consideration and in reflection of other representations received, the proximity of development in Tamworth at Stonydelph, with existing development along Green Lane at Westfields, Birchmoor, and the narrowness of the gap between development at the junction of Chiltern Rd with Tamworth Rd/B5000 to development in Polesworth at the Lynch and Kiln Way estates, (which is already affected by some sporadic development at Tamworth Rd, the Hermitage on Hermitage Lane), support the suggestion that the northern part of Area 7 is the most critical in terms of where future development could result in the coalescence of the two settlements. It is therefore proposed that part of Area 7 should be included within the Meaningful Gap as a direct change/amendment to the original proposals following the consultation.
MG26	2	R Crowe	Barton Willmore (on behalf of Taylor Wimpey)	contd	<ul style="list-style-type: none"> • Environmental Constraints – We acknowledge that there are no natural, environment or ecological designations affecting the site. In terms of the agricultural land, it is acknowledged that part of the area is classified as Grade 2 agricultural land; however, this is not unique to this parcel with relatively large areas of Grade 2 and even Grade 1 agricultural land located in the wider area. In summary, we support the Council's conclusions in relation to this Site and the acknowledgement that it does not form part of the 'meaningful gap' area. 	Agreement with initial report assessment comments are noted. However, on further consideration and in reflection of other representations received, the proximity of development in Tamworth at Stonydelph, with existing development along Green Lane at Westfields, Birchmoor, and the narrowness of the gap between development at the junction of Chiltern Rd with Tamworth Rd/B5000 to development in Polesworth at the Lynch and Kiln Way estates, (which is already affected by some sporadic development at Tamworth Rd, the Hermitage on Hermitage Lane), support the suggestion that the northern part of Area 7 is the most critical in terms of where future development could result in the coalescence of the two settlements. It is therefore proposed that part of Area 7 should be included within the Meaningful Gap as a direct change/amendment to the original proposals following the consultation.

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT	
MG27	1	R Barnes	NO	Planning Prospects (on behalf of St Modwen)	<p>A local (North Warwickshire) employment land requirement for the Plan period of 60ha is identified by the Core Strategy, about half of which (29ha) remains to be allocated. SMD indicate that the majority of proposed allocations do not pass the tests of suitability, availability and achievability, leading to a shortfall of at least 18ha. Tamworth Borough Councils (TBC) emerging local Plan confirms that a significant shortfall (14ha) needs to be accommodated elsewhere. SMD believe this figure should be higher (at least 32ha). The emerging Tamworth Local Plan also demonstrates that meeting local need for housing will require additional land outside TBC's boundaries. There is also a significant employment land requirement at the regional and sub-regional level which is far greater than current supply. A mechanism will need to be found to distribute this unmet need to locations elsewhere, including North Warwickshire</p>	<p>The purpose of the report is to put meat on the bone and clarify what constitutes the "meaningful gap", not seek to address or deliver any development needs or requirements. The Report is not intended to assess all the evidence that will be part of the Site Allocations Plan process or try and address the results of the emerging Tamworth Local Plan.</p>
MG27	2	R Barnes		Planning Prospects (on behalf of St Modwen)	<p>As such, the development requirements for North Warwickshire are significant, both in terms of local need, and accommodating a share of need from the wider sub-region. The Green Belt constraints within North Warwickshire are such that the opportunities to provide land to meet this need are already limited. The imposition of any further constraints – for example through defining and controlling a "Meaningful Gap" – should therefore be limited as far as possible.</p>	<p>See Note above. The assessment aims to clarify the areas that could reasonably be termed or considered as "meaningful gap", a form of strategic gap in planning terms, as required by the Adopted Core Strategy policy NW19, not to address the development requirements for North Warwickshire. The Local Plan and Site Allocations Plan will provide primarily for the local requirements. Any additional requirements arising from needs outside the Borough will be dealt with through the Duty to Co-Operate between authorities. If the site proposed is to deliver regional or national needs then evidence and justification to support this case will be necessary, including an assessment of all other sites that may be available and that would be better placed to address that need than this site within a strategic, meaningful gap, resulting in, potentially, the co-alescence of the settlements, Tamworth and Dordon.</p>
MG27	3	R Barnes		Planning Prospects (on behalf of St Modwen)	<p>The Adopted NW19 Policy is more relaxed than the earlier draft. Deleting the earlier policy presumption against anything other than minor development in the gap between Polesworth and Dordon and Tamworth. The Inspector's report is clear that the Core Strategy does nothing to meet the significant employment need which exists beyond that arising locally. The Inspector also necessarily steered the Core Strategy towards a position capable of securing the availability of land to meet expanded development needs. This included relaxing the approach towards development in the area west of Polesworth and Dordon in the manner discussed above, and acknowledging the prospect of changes to the Green Belt. The Inspector's consideration of the area around Polesworth and Dordon included the requirement that any development in this area, "must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them." The Inspector stated "I have seen no analysis of the landscape or any other evidence to support the presumption against anything other than minor development, I do not consider that a blanket presumption is justified and it is removed by MM67. This is necessary because the evidence does not support it (indeed, it would appear to conflict with the SA) and to provide flexibility."</p>	<p>See Note above. The Local Plan and Site Allocations Plan will provide primarily for the local requirements. Any additional requirements arising from needs outside the Borough will be dealt with through the Duty to Co-Operate between authorities. The meaningful gap assessment does not deal with strategic development site needs, growth or address the need for Green Belt review. This will be addressed through a Core Strategy review and/or Site Allocation Plan process. A blanket presumption is not being applied as part of the areas assessed will be defined as falling outside the "meaningful gap" area and, by inference, if developed would not impact on the meaningful gap and the separation of the settlements. They are not, nevertheless, being specifically proposed for development and applicants will have to justify any proposals based on an analysis of the wider than local need, including the reasons for why those sites proposed perform and are best located in sustainability terms when compared to all other land available within the region.</p>

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT
MG27	4	R Barnes	Planning Prospects (on behalf of St Modwen)	The Inspector noted (paragraph 21) that this would enable options to be explored through the Site Allocations DPD, taking landscape considerations and the need to maintain a gap into account. It is clear that North Warwickshire will have to identify land in the countryside to meet its own development needs. The demand for such land will be amplified when the requirements of neighbouring authorities and sub-regional and wider needs are taken into account. SMD site is not within the Green Belt, and offers the opportunity to accommodate development requirements without the need to intrude onto Green Belt land.	See Note above. Difficult to understand how the significant development of land within a Strategic Gap between two settlements can be construed as not impacting on the "meaningful gap". Also note that no Green Belt land lies within the meaningful gap and none of the St Modwen development site lies in the Green Belt, so reference is superfluous. No necessity proposed anywhere within North Warwickshire or Tamworth Local Plans for further industrial development in the Green Belt or for re-designation (removal of Green Belt designation) of land from Green Belt to allocated development land.
MG27	5	R Barnes	Planning Prospects (on behalf of St Modwen)	SMD considers that the SMD proposal does not as a matter of fact encroach into the gap between Polesworth and Dordon and Tamworth. The site is to the south of the A5, and as such does not include any land north of Watling Street through Birchmoor, across Tamworth Road and to the railway line, which will remain (as at present) very largely open and, on any reasonable interpretation, continue to represent a "meaningful gap" between the North Warwickshire settlements and Tamworth. The site is, broadly, in the southern area identified for the direction of growth. Significant areas of open space will remain around it to the south and east, and it will be distinct from the other employment areas in this part of the Borough, separated from them by open space. The identity of Polesworth and Dordon will be retained. In short, the development of the SMD site is consistent with the provisions of NW19.	Disagree. The inspectors report does not indicate that significant strategic development should be targeted to this area, simply that options be explored. The Site Allocations Plan is currently addressing the housing and employment needs for the Borough. The Areas lying south of the A5 are still considered to contribute to the function of a Meaningful Gap. The land to the south of the A5 is considered particularly critical and sensitive as it adjoins a major gateway into the Borough, along the A5 from M42 Junction 10. The land to the south is open and runs up to a major developed area at Birch Coppice Business Park, clearly an integral part of Dordon and contributing to the functioning of the settlement. There is clearly therefore the need to assess the impact of development in this area and the potential for significant development resulting in the coalescence of the settlements. The presence of small elements of residential development along the side of the A5 to the south also add to the sensitivity and potential cumulative impact that further development along this corridor/gateway would have and highlights the need to clarify the terms of policy NW19 and the "meaningful gap".

Meaningful Gap Consultation Responses June 2015

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MG27	6	R Barnes	Planning Prospects (on behalf of St Modwen)	Had the Core Strategy Inspector considered it necessary for this area to remain free from development he could have specified this. Equally, if he had seen the need for an extensive protective corridor to be defined between Tamworth and Polesworth and Dordon he could have required one. He took neither course of action, and instead preferred a pragmatic, more flexible and less restrictive approach. The MGA seeks to raise a barrier to the development of the SMD site. SMD consider that Inspector's intention was to provide a far more relaxed approach than sought in earlier drafts. The MGA also expands its remit beyond consideration of a "meaningful gap" by covering an extended corridor well beyond the area between Polesworth and Dordon and Tamworth. A corridor based approach is not anticipated by the Core Strategy. The "meaningful gap" should be restricted to land within the gap, i.e. principally Areas 1, 2, 6, 7 and 8.	The site clearly lies within the Gap between Tamworth, J10 of the M42 and Dordon, particularly the significant built up area of Birch Coppice Business Park, part of Dordon, not a separated isolated settlement or development. To suggest that Areas 9 and 10 could effectively be wholly developed or at least significantly developed without affecting the Gap between the settlements of Tamworth and Dordon is considered unrealistic. Tamworth's built development and physical presence continues south of J10 of the M42 and the A5 down to Overwoods Road. Most of the land west of the M42 and south of J10 has received planning consent or is subject to current planning applications. The land east of the M42, south of J10 and the A5 is currently significantly open apart from the small hamlet of Freasley, consisting of isolated groups of houses, often set in landscaped grounds/gardens. This maintains a significant open aspect which is only broken by the physical built form of Birch Coppice Business Park, to the north and south of the Spoil Tip along its western boundary. The development of this gap would result in a continuous built form stretching from central Tamworth through Wilnecote, Dosthill and Hockley, across the M42 and in a broad arch through Freasley to Birch Coppice, part of Dordon, with no visible gap in between. It is considered this would not maintain a meaningful gap or avoid the co-alescence of Dordon and Tamworth, and also involve the swallowing up of the small, rural settlement of Freasley into the larger urban built form of Tamworth.
MG27	7	R Barnes	Planning Prospects (on behalf of St Modwen)	It is concerning that the MGA conflates the relevant policy objectives – which speak to identity and a meaningful gap relative to specific settlements – with other issues. This is flagged at paragraph 2.4 of the paper which refers to landscape quality and amenity as factors in defining the meaningful gap. This is not appropriate. The gap is essentially a geographical consideration relative to the places named in the policy, and land cannot be brought into or out of it due to quality or amenity. It is then not clear why or how the Landscape Sensitivity Assessment (LSA) undertaken as part of the North Warwickshire Landscape Character Assessment can be used to inform the MGA. LSA says nothing about the sensitivity of the majority of the MGA area including the SMD site. It is also not clear why the method relies on buried infrastructure constraints, i.e. the high pressure gas pipeline. Similarly, it is not clear why the presence of heritage assets should be brought into the MGA. Again, this is a separate point to that of what any gap should be.	Noted. Partly disagree. The Assessment looked at a number of issues and evidence base assessments impacting on and affecting the Meaningful Gap. It is agreed that distance and geographical location is an important issue and it is considered that area 9 still performs well in providing an open gap in geographical terms as well as a visible distance break between the settlements of Tamworth (edge at Centurion Park) and Dordon, (edge at Birch Coppice Business Park and residential development along the A5). All the land south of the A5 at Birch Coppice and Hall End Business Park has received planning consent and is currently under development. There will therefore be no open gap between Dordon and the entrance to Birch Coppice. The only undeveloped, open gap remaining between Dordon and Tamworth, south of the A5, will therefore be Areas 9 and 10, hence their inclusion within the area to be defined as Meaningful Gap. Geographical proximity of development and narrowness of the gap will be addressed in the studv.

Meaningful Gap Consultation Responses June 2015

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MG27	8	R Barnes	Planning Prospects (on behalf of St Modwen)	<p>These issues then serve to undermine the approach applied in the tables. Most of the matters considered here, including landscape sensitivity, heritage, aspects of infrastructure, and environmental constraints, do not consider at all what is necessary to achieve a "meaningful gap". In any other study of this type, the assessment should consist of a) quantitative assessments based on physical and visual separation, and b) qualitative assessment as to at what point (and in what form) the presence of development would not deliver a "meaningful gap" to receptors within and moving through the area. The sensitivity based assessment applied has no relevance to assessment of separation / identity, and their presence is wholly misguided. They may represent constraints on development, but that is a separate point to the interpretation of policy NW19 and how its objectives will be met.</p>	<p>Agree only insofar as greater emphasis should be given to the geographical location of Areas 9 and 10 and the distance between the settlements that remains. Further development approved south of Dordon and east of Tamworth will reduce this remaining area even further, highlighting even more the need to maintain areas 9 and 10 as part of the meaningful gap to maintain the separation between the two settlements.</p>
MG27	9	R Barnes	Planning Prospects (on behalf of St Modwen)	<p>The traffic light system lacks rigour without an accompanying matrix to show in a systematic, precise and transparent manner how the various ratings are arrived at. It would appear, from the recommendation text for Area 9, that the decision as to this area being required within a "Meaningful Gap" is significantly influenced by these sensitivity considerations. SMD consider that Area 9 is not perceived on the ground as being part of a continual open area. Notwithstanding this, the judgement as to how Area 9 relates to Areas beyond its boundary should form no part of the assessment as to whether some development within this area would reduce the separation between Tamworth and Dordon / Polesworth to the extent that it is no longer meaningful. As such, the MGA addresses inappropriate considerations in an unsystematic manner that lacks the appropriate degree of thoroughness. It does not speak to the objectives of policy NW19</p>	<p>Disagree. The assessment and planning judgements involved a traffic light system to provide a simple straightforward method of indicating how the judgements and their outcomes were made. Planning will involve the consideration of numerous aspects and issues as "material planning considerations", that individually may not outweigh the pressure for development but collectively provide sufficient justification to control or constrain unrestricted, speculative development proposals. Disagree with objectors view of Area 9 and its relationship with other areas. The assessment notes the open aspect of area 9 and its clear physical boundaries and also highlights this similarity with adjoining areas to the north and south (note - minor text correction required, change 'Area 7' to 'Area 8' on Recommendation for Area 9 in assessment). The open and mainly undeveloped character of the area north and south of the A5 at a major gateway into the Borough is considered critical to the functioning of these areas as "meaningful gap", to fully justify their inclusion in the Assessment and highlight how the impact of significant development in these area would have a significant adverse impact on the aims and objectives of Policy NW19 in seeking to maintain a meaningful gap and respect the separate identities of Tamworth and Dordon.</p>

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MG27	10	R Barnes Planning Prospects (on behalf of St Modwen)	<p>It is not considered that landscape sensitivity represents a constraint to development over parts of the area. Similarly, heritage does not represent a particular constraint to development here that is sensitively designed and delivered. Area 9 covers a large area of land, and there is sufficient space to bring forward development there whilst leaving a significant buffer to avoid impacts on heritage assets. The SMD shows that whilst the high pressure gas pipeline is a constraint, it by no means prevents development in Area 9. In fact the effect of the pipeline and its buffer, plus the tipped area (and indeed the A5), is to create a clear separation between the SMD site and the settlements of Polesworth and Dordon, further helping to ensure that their identity is maintained. The outcome of the MGA is to recommend (paragraph 10.1) the definition of an extended corridor which would, "constitute an additional presumption against development, over and above the strict controls normally available to local authorities for development in the countryside." This is inconsistent with the policy direction arrived at through the Core Strategy process, is inconsistent with the positive and enabling approach underpinning the NPPF, and has been arrived at following an approach flawed in principle and method</p>	<p>Noted. See notes regarding assessment criteria and material considerations above. The assessment notes the open aspect of area 9, its clear physical boundaries and also highlights this similarity with adjoining areas to the north and south. The open and mainly undeveloped character of the area north and south of the A5 at a major gateway into the Borough is considered a "landscape sensitivity" that is critical to the functioning of these areas as "meaningful gap", to fully justify their inclusion in the assessment and highlight how the impact of significant development in these areas would have a significant adverse impact on the aims and objectives of Policy NW19 in seeking to maintain a meaningful gap and respect the separate identities of Tamworth and Dordon. To rely solely on the narrow width of the High Pressure Gas Pipeline and the spoil tip, which is set back considerably from the edge of the A5 (275m approx) as providing the 'meaningful gap' requirements of policy NW19 is considered insufficient/inadequate. Development along the southern edge of the A5 in Area 9 would result in a near continuous belt of development from Wilnecote and Centurion Park, Tamworth, to Dordon at Birch Coppice up to Gypsy Lane, resulting in the coalescence of the two settlements. Further clarification will, nevertheless, be provided in the amended Report to clearly indicate that the assessment and Report will constitute an explanation of policy, not a policy in itself. As policy advice towards clarifying the Council's application and approach to the Adopted Core Strategy Policy NW19 it forms part of the "material considerations" to be made in determining any planning application likely to be affected/impacted by the adopted Planning Policy.</p>
MG27	11	R Barnes Planning Prospects (on behalf of St Modwen)	<p>The significant pressure for development arising from local and sub-regional needs, and the recognition that this might necessitate the review of Green Belt boundaries. Together, these considerations mitigate against the imposition of unduly restrictive designations outside the Green Belt. Through the examination of the Core Strategy there was a shift in emphasis leading to the adoption of policy NW19 dealing with land between Tamworth and Polesworth and Dordon</p> <p>which is more relaxed and flexible than that which appeared in the emerging plan. The Core Strategy Inspector steered the Core Strategy towards a position capable of securing the availability of land to meet expanded development needs, and this included relaxing the approach towards development in the area west of Polesworth and Dordon. The SMD site does not encroach into the gap between Tamworth and Polesworth and Dordon. The MGA appears to anticipate a quasi Green Belt approach to an extended corridor of land far larger than can reasonably be considered necessary or relevant in relation to the application of policy NW19</p>	<p>The impact or requirement for addressing sub -regional or regional needs will need to be made through the appropriate channels via the Site Allocations Plan process, review of the Core Strategy and through the Duty to Co-Operate. The Report addresses the need to clarify Policy NW19 and the meaningful gap area, not future development needs or the need to review Green Belt. Areas 9 and 10 are not designated Green Belt and the assessment does not seek to apply Green Belt status to these areas as noted in the Board Report. The Council would argue that development of all or significant part of Area 9 and 10 would clearly and physically encroach the gap between Tamworth and Dordon and would result in a continuous band of development stretching from the centre of Tamworth through Wilnecote and Hockley, south of the A5 to Birch Coppice Business Park and residential development at Dordon, subsuming the hamlet of Freasley along the way.</p>

Meaningful Gap Consultation Responses June 2015

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MG27	12 R Barnes	Planning Prospects (on behalf of St Modwen)		The MGA conflates the relevant policy objectives with issues such as landscape sensitivity, buried infrastructure and heritage which are entirely separate from the consideration of land required to maintain a "meaningful gap" between Tamworth, Polesworth and Dordon. The analysis is undermined accordingly at a most fundamental level as it simply does not test the objectives of the "gap" as set out at paragraph 2.3 of the document. The MGA analysis has not been undertaken in a rigorous, systematic, transparent and precise manner, and is again undermined accordingly. The MGA approach to the area including the SMD site is unnecessarily downbeat, placing too much emphasis on perceived heritage and infrastructure constraints which the SMD proposal demonstrates can overcome. For these reasons it is considered that the MGA is inappropriate in principle, in its extent, and in its methodology. It is not considered appropriate to seek to designate land in this way outside the proper procedures for a Local Plan designation which in this instance should be done through a jointly prepared DPD.	Disagree. The land in question clearly functions as a gap, operating to separate the two settlements of Tamworth and Dordon, where both settlements built form extends south of the A5 and where recent planning consents bracket the site/land in question. It is not considered that the approach is downbeat or places too much emphasis on heritage or infrastructure constraints. Planning judgement will involve the consideration of numerous aspects, criteria and issues as "material planning considerations", that individually may not outweigh the pressure for development but collectively provide sufficient justification to control or constrain unrestricted, speculative development proposals. The meaningful gap assessment addresses the need to clarify Policy NW19 and the meaningful gap area. It does not deal with strategic development site needs, which will be addressed through a Core Strategy review and/or Site Allocation Plan (SAP) process, but will be fed into the SAP process.
MG28	P Kreuser	CT Planning (on behalf of Walton Homes)	NO	Objection is made on behalf of Walton Homes Ltd to the Meaningful Gap Assessment and particularly the inclusion of land to the west of the M42 falling within the Assessment Area as identified in Appendix 1 of the Document. Walton Homes have submitted a planning application on this land. This development could provide some 88 dwellings and could go some way to providing for the housing needs of Tamworth. Such a development would be located in a highly sustainable and appropriate location; adjacent to the largest settlement in the area with its consequent provision of facilities and services. The site enjoys a better relationship with the Urban Area than it does with the Open Countryside. It is submitted that the M42 represents a logical boundary to any Meaningful Gap in this location. The wider rural and open nature of the landscape of North Warwickshire and most relevant for incorporation into a Meaningful Gap lies to the south of the M42 rather than within the narrow and contained residual land left between the M42 and the Tamworth Boundary. It appears not to have been the subject of any detailed appraisal. The results of the detailed appraisal at Section 8 of the Assessment Document relate only to land east of the M42, around Freasley Village. It is submitted therefore that no sound landscape, heritage, infrastructure or other environmental constraints have been identified on land to the west of the M42 that renders this area worthy of inclusion in any Meaningful Gap.	Noted. The site is subject to a current planning application and also adjoins a site with planning consent immediately to the north off Centurion Business park. The site is part of the original area for assessment and in view of the current application, the proximity of adjoining development, the M42 and the planning consent to the north, the distance from the land to Dordon and Birch Coppice and that the site will be significantly impacted by HS2 route it was considered that it did not perform as well as other areas as part of the Strategic Gap. An area of field will remain open countryside between the site and the M42. This area will remain open countryside. The site is not significantly linked visually and has limited relationship with areas 10 and 9 to the east of the M42. It is not currently included within the areas designated as Meaningful Gap. This will be clarified in an amended Report. As noted above, there is less visual and physical/geographical links with the land designated as Meaningful Gap to the east and the land does not perform well as strategic gap.
MG29	I Lings	Woodland Trust		A Gap Assessment should be used to shape the patterns of settlements and the potential boundaries for areas in a Core Strategy and Site Allocation in a Local Plan. The Woodland Trust believes that proximity and access to woodland is a key issue linking the environment with health and other social and economic issues that can be addressed by green infrastructure provision in urban design. Trees are only acknowledged with two Areas (7 & 10), therefore the proximity of woodland to a proposed development is not being acknowledged effectively. We would be pleased for Space for People and the WAST to be used to inform your Meaningful Gap Assessment so as to help shape future development whilst also protecting and enhancing access to woodland and help create green space linkages	Noted. Proximity and access to woodland is not considered to be a pre-requisite requirement for determining whether land performs as a Strategic Gap. The landscape value/quality and impact to which woodland contributes, may be a factor but is only one of a number of considerations. Similarly access to woodland as green open space is not considered essential as to whether land performs well as strategic gap, although it will be of wider social/health benefits.

Meaningful Gap Consultation Responses June 2015

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MG30	T Pritchard		YES	<p>• I applaud this move. Here in Freasley we are squeezed on nearly all sides by commercial development as it is. The recommendations to include the land identified to the South and North of us (Areas 9 & 10) within the meaningful gap represents our last chance to avoid losing our identity as an ancient hamlet. Our side of the A5 has been nibbled away at by Tamworth in their push over many years right up to their County boundary. With St Modwen's recent proposals as well, it sometimes feels like North Warwickshire have no more land left here to sacrifice for them before Tamworth joins up with Hall End and Wilnecote wraps around Freasley and Wood End, leaving just the M42 and HS2 in between!</p> <p>All the individual settlements around Tamworth have already been lost. Bullying their way into Warwickshire as well must not be allowed. Your proposals are not denying Tamworth some opportunity to gain from development you feel could be allowed. These assessments are well argued and balanced in their conclusions. You have made them without detriment to the maintenance of a proper separation between the settlements while still respecting their separate identities.</p> <p>We welcome the suggestion that minor development of a residential nature may be possible within and on the margins of Freasley, without significantly impacting on any meaningful gap. We feel that this can only help ensure the hamlet's viability as an independent but connected community.</p> <p>I hope you succeed in getting your proposals and recommendations for the meaningful gap accepted in full under the Adopted Core Strategy Provisions. They are hugely important for us all. Congratulations on an excellent piece of work.</p>	<p>Noted. Support welcomed. Freasley's circumstances are that it is considered to be a hamlet sitting in/set within the open countryside gap between Tamworth (Hockley) and Dordon (Birch Coppice). It is intended that this area will be classed as part of the meaningful gap and appropriate constraints on 'major' new development applied.</p>
MG31	1 M Bassett	Freeths (on behalf of Hallam Land Management)	NO	<p>This consultation response is prepared on behalf of Hallam Land Management Ltd (HLM Ltd) who are promoting land for development, the Site of which includes land within Areas 3 and 4. There is no justification for a specific Meaningful Gap Policy. The adoption of the Meaningful Gap Assessment as policy compromises the emerging Site Allocations process and undermines the emerging Local Plan. It is therefore recommended that the Policy is withdrawn. Notwithstanding this principle objection and without prejudice, the methodology of the Assessment is significantly flawed. Substantial and overriding weight is given to landscape considerations without the required evidence in the form of a full landscape assessment to make any such judgement. Consequently the landscape and overall conclusions of the Assessment are also flawed and it is recommended that Areas 3 and 4 are removed from the proposed Meaningful Gap</p>	<p>Noted. Disagree on the need for a specific policy. Current and future development pressure indicates the need for greater clarity on the term and the area affected by Policy NW19. The policy advice and Report will help the council address this pressure and the outcome can be fed into any future Site Allocations and/or Development Management plan and in no way undermines this emerging Plan. In the interim period the policy advice helps the Borough defend against speculative development proposals aimed at utilising the inherent delay in the development plan system, the lack of clarity in the Core strategy policy and avoiding a more critical analysis and assessment of their development proposals that may undermine the Borough Council's development strategy, the aims and objectives of the Core Strategy Policy NW19, resulting and enabling in significant, major development growth in an area of strategic gap that results, longer term, in the coalescence of the settlements and loss of their identity.</p>

Meaningful Gap Consultation Responses June 2015

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MG31	2	M Bassett	Freeths (on behalf of Hallam Land Management)	NO	<p>Policy NW19 was subject to modification by the Inspector and is worded so that development must respect the identities of the adjacent settlements; not that an exercise should be first undertaken to evaluate what may harm identities of settlements in advance of considering the housing requirements of the Borough. The Inspector clearly thought it was inappropriate to impose a blanket restriction on development in the potential gap area and advocates an evidence based holistic approach through the Site Allocations DPD process, whereby the full range of relevant issues and criteria, including Sustainability Appraisals (which do not appear to have been undertaken), can be considered. Contrary to this, the Meaningful Gap Assessment seeks to designate a protected area, an equal designation of which does not appear within the NPPF, in advance of consideration of wider issues relating to housing site allocations. Accordingly it is considered that the Meaningful Gap Assessment is premature and prejudices the forthcoming Site Allocation DPD process, against which any Meaningful Gap should be informed. It is therefore recommended that the Meaningful Gap Policy is withdrawn</p>	<p>Noted. It is agreed that the Policy requires development to respect the separate identities of Polesworth, Dordon and Tamworth. It also states development must maintain a meaningful gap between them. In the absence of any clarity over what such a term and gap constitutes the Council would be held at fault for not reviewing and clarifying the policy, resulting in speculative developments being submitted with the sole aim of using the period between adoption of the Core Strategy, delivery of the Site Allocations Plan and Policy development to achieve development levels and growth that in no way would reflect or respect the need to maintain a gap and separation of the settlements. The interpretation or determination of what constitutes a gap should not be left solely to the outcome of a planning application. The Council's report applies a level of flexibility in that not all areas will be included within the Meaningful Gap. This provides the potential for longer term growth outside of the strategic gap area, which can be fed into the Site Allocation plan process as required and where evidence points to the need for development to come forward.</p>
	3	M Bassett	Freeths (on behalf of Hallam Land Management)	NO	<p>The purpose of any Meaningful Gap in the context of Policy NW19 is to ensure new development respects the identities of specific settlements. However, the assessment contained within the report appears to attribute significant and in relation to particular identified Areas, overriding weight to landscape considerations. Para 9.5 is contrary to the final conclusions (ie: that Areas 3 and 4 are included in the meaningful gap), and notwithstanding that the judgement on landscape sensitivity is not supported, this results in a confused report where the parameters of any assessment are not clear. The Assessment places unjustified weight on landscape considerations and admits that Areas 3 and 4 do not have significant merit in contributing to the Meaningful Gap. The conclusions of the report are informed by Section 8 which provides a sensitivity analysis based on a range of issues which fail to reflect the purpose of the Meaningful Gap within the core strategy. Amongst other matters, landscape, heritage and environmental constraints are very briefly identified and attributed a traffic light sensitivity score. Rather than if the identified Areas contribute to a Meaningful Gap, the results of this landscape sensitivity assessment alone appear the basis of designating part of the gap. Consequently it is considered that the methodology and overall conclusions are significantly flawed.</p>	<p>Disagree, no particular or additional weight is given to landscape considerations over an above any other considerations. It is simply part of the assessments made. The open and mainly undeveloped character of the area north and south of the A5 at a major gateway into the Borough is considered a "landscape sensitivity" that is critical to the functioning of these areas as "meaningful gap", to fully justify their inclusion in the Assessment and highlight how the impact of significant development in these area would have a significant adverse impact on the aims and objectives of Policy NW19 in seeking to maintain a meaningful gap and respect the separate identities of Tamworth and Dordon. It is nevertheless noted that the report should be clarified and emphasis also given to the geographical considerations, proximity of development and settlements to each other. This may address the issue and concerns raised over assumed priority being given to landscape considerations and quality. This further clarification in respect of gap sensitivity and the impact of existing development within the gap area that may re-inforce the need to provide higher priority/profile protection to some areas where any development threatens the maintenance of gap between settlements and would result in settlement coalescence. As a result it is proposed that Area 4 should be excluded from the Gap but part of Area 7 be brought within it.</p>

Meaningful Gap Consultation Responses June 2015

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MG31	4	M Bassett	Freeths (on behalf of Hallam Land Management)	NO	It is understood that the Meaningful Gap Assessment was undertaken without an invitation to Tamworth Borough Council to discuss evidence to inform the exercise. The Meaningful Gap clearly involves strategic cross boundary issues on the basis that the Core Strategy identifies that NWBC will provide a minimum of 500 homes to meet Tamworth's needs.	Disagree, the aim of the report was to clarify the terms of Policy NW19 of the Adopted Core Strategy in terms of identifying a strategic gap, not to invite an adjoining authority to consult on how best to address their development needs within that gap and/or enter into a bidding opportunity with consultants and developers for sites to accommodate that need. The Duty to Co-operate will address any accommodation of needs or development requirements made with Tamworth Borough Council through the Site Allocations Plan process, not through the Meaningful Gap report. The delivery of any additional houses, which has yet to be agreed, is not an appropriate element for inclusion in the meaningful gap report. The Borough has development land opportunities elsewhere outside the Meaningful Gap, that could accommodate any future development needs agreed and it would benefit the retention and future protection of the area identified as Meaningful Gap.
MG31	5	M Bassett	Freeths (on behalf of Hallam Land Management)	NO	HLM Ltd has commissioned FPCR to undertake a Landscape Appraisal of the Meaningful Gap Study Area. Having regard for FPCR's assessment it is not justified to include Areas 3 and 4 within the Meaningful Gap on landscape ground	Noted. As part of the revised Report it is considered and agreed that Area 4 does not perform as part of the strategic gap as well as other areas within the area of assessment and will be excluded from within the Meaningful Gap.
MG31	6	M Bassett	Freeths (on behalf of Hallam Land Management)	NO	Paragraph 3.3 explains that Tamworth's emerging Local Plan requires a minimum of 2000 homes will need to be built outside its borough boundaries to meet its housing needs. The Meaningful Gap Assessment advises that some of the development pressure may be reduced by the redevelopment of the Golf Course site. This is inaccurate and misleading. Paragraph 6.1 refers to Appendix 8 which relates to an extract from the North Warwickshire Landscape Character Assessment. However, Appendix 8 is not included in the published version of the Meaningful Gap Assessment on NWBC's website	Disagree. Unsure as to why a statement of fact is inaccurate and misleading i.e. that an application within Tamworth's boundaries may reduce pressure to develop outside, particularly if increased densities and levels are achieved. No further amendments required. Appendix 8 related to the FCPR Landscape assessment which is available on the Council's website and will be added again to the amended report. No new information involved. Summary of the relevant elements of the Landscape assessment were included in the Report.
MG31	7	M Bassett	Freeths (on behalf of Hallam Land Management)	NO	The M42 provides a physical and definitive boundary to any proposed gap policy and having this as the western boundary of the gap would deliver the requirements of Policy NW19 in ensuring development does not impinge on the identity of Polesworth and Dordon, keeping them separate from Tamworth and any additional development to the west of the M42. Area 4 is located directly adjacent to the former Golf Course which is both allocated for development in the emerging Tamworth Local Plan and subject to a planning application for up to 1100 dwellings, with associated infrastructure. Given our firm view that Area 3 should be excluded from the Meaningful Gap, it is clear that Area 4 would also have no justification for being included in the gap. This land is highly likely to have development abutting to the west and rather than being part of a gap should be seen as an opportunity to significantly contribute to meeting housing need without compromising the purpose of Policy NW19.	The presence of the M42 is noted but cannot form the sole reason for determining the boundaries of a strategic gap. The motorway is a national piece of infrastructure and is located within the Gap, not determining the extent or boundary of that gap. The delivery of significant infrastructure such as HS2/M42/M6 Toll has not in the past resulted in development automatically being enabled up to its edge. This is a false presumption. The gap exists either side of the motorway and can be maintained as such if required, felt necessary as strategic gap.

Meaningful Gap Consultation Responses June 2015

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MG31	8 M Bassett	Freeths (on behalf of Hallam Land Management)	NO	Area 7 within the Study is excluded from the Meaningful Gap, yet potentially appears to have a greater impact on coalescence of settlements than Areas 3 and 4. Birchmoor is located on the eastern side of the M42 but is by far the closest settlement to the motorway on this side, with Polesworth and Dordon enjoying far greater separation. The development of Area 7 would result in the main built up area becoming uncomfortably close to Birchmoor and to avoid such an impact, as a minimum the southern half of the site should be included within the Meaningful Gap. The report advises that HS2 limits the extent of developable land for Area 7. In practice it is likely that only the northern half of this site will be suitable for development and when you account that a planting buffer will be required on the eastern perimeter of this site, the area of developable land becomes further constrained.	Noted. The delivery of significant infrastructure such as HS2/M42/M6 Toll has not in the past resulted in development automatically being enabled up to its edge. This is a false presumption. The gap exists either side of the motorway and can be maintained as such if required, felt necessary. The potential impact on Area 7 is nevertheless noted and it is proposed that part of this area should be included within the Meaningful Gap. The presence of limited development off Tamworth Road and Hermitage Lane, reduces the available gap area along the B5000, which makes the potential impact of development pressure in this area critical. The loss of Area 3 to the north would make this impact worse and there is clearly the need to maintain this area as open gap to provide a distinct gap between Tamworth, the M42, and Polesworth to the east. Loss of this gap/area, particularly to the south would practically coalesce the two settlements and result in the aims of the policy failing. It is agreed that greater emphasis and account should be taken of the geographical proximity of development. As a result further amendments will be necessary to the Meaningful Gap report, involving including part of Area 7 within the Meaningful Gap. Areas 4 and 5 will also be excluded from the Gap, reflecting their less critical impact on and contribution to the Meaningful Gap in geographical terms.
MG31	9 M Bassett	Freeths (on behalf of Hallam Land Management)	NO	Area 5 is the only other section of the Study area that is excluded from the gap. Whilst it is agreed that Area 5 would provide no function as a gap and is rightly excluded, the development of this site would be significantly constrained by noise from the Karting Circuit, should this use remain. The potential constraints of Areas 5 and 7 further demonstrate that the Meaningful Gap is overly large and unduly restrictive on development opportunities outside of the Site Allocations DPD process	Noted. Part of Area 7 to the north is to be included within the Gap but it is agreed and accepted that Area 4 to the north of Area 5 should also be excluded from the Gap. This would provide the future flexibility (and avoidance of a "blanket" restriction) for development the Policy aims to provide while reducing the extent of the gap area seen as critical.
MG31	10 M Bassett	Freeths (on behalf of Hallam Land Management)	NO	In summary it is strongly recommended that Areas 3 and 4 are excluded from the Meaningful Gap. Areas 3 and 4 perform no function in protecting a gap between Polesworth and Dordon and Tamworth, as acknowledged in the Meaningful Gap Assessment and which is far stronger defined by the physical barrier of the M42. To include Areas 3 and 4 on landscape grounds is inappropriate in terms of the intention of Policy NW19 and furthermore it is demonstrated by FPCR that such a judgement has been arrived without sufficient evidence or justification and is not warranted in landscape sensitivity terms.	Partly agree, partly disagree. Area 3 is to be maintained as Gap, Area 4 is to be excluded from the Gap. The Gap is not determined solely on landscape sensitivity terms, but area is still significantly open and major development in these areas will have significant visual and landscape impact. It is difficult to understand how the enabling of major development within this area will have anything other than a significant and detrimental impact visually and in landscape terms. It is also difficult to see how enabling significant housing growth in these areas would address, achieve and support the Policy NW19 to maintain a meaningful gap and respect the separate identities of Tamworth and Polesworth.
MG32	M Fogarty	WCC		This is a matter for the Borough Council to determine and the County Council has no comments on this consultation	Noted
MG33	M White	Godfrey Paton	YES	Agree in principle that a separation between settlements should be maintained, to prevent small towns and villages combining to make large settlements	Noted
MG34	R Young	Dordon Parish Council	YES	Dordon Parish Council would like to confirm their support for the " Meaningful Gap "and the principle of protecting the rural nature of the Borough in line with NW1.We consider this is the view of the vast majority of Parishioners and ask that you take this into consideration.Please confirm receipt of this e-mail	Noted

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT
MG35	J Melvin	Natural England		We note the intention to include part of Alvecote Pools as part of the "meaningful gap" between Poleworth/Dorton and Tamworth however this does not appear to fall within the scope of the consultations that Natural England would routinely comment on. The lack of specific comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated sites or landscapes. It is for the local authority to determine whether or not this application is consistent with national or local policies on biodiversity and landscape and other bodies and individuals may be able to help the Local Planning Authority (LPA) to fully take account of the environmental value of this site in the decision making process, LPAs should seek the views of their own ecologists when determining the environmental impacts of this development. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.	Noted. No further amendments necessary.
MG36	T Collins	Fisher German	NO	The concept of a meaningful gap is established by policy NW19 of the Core Strategy, which the Core Strategy Inspector amended from the more restrictive policy which was originally proposed by North Warwickshire Council. Whereas the Council sought for the land west of Polesworth and Dordon to remain undeveloped. The Inspector advises that options for considering the potential for development in this area should be explored in the Site Allocations DPD, but the wording of the adopted policy is clear that development may take place to the west of Polesworth and Dordon, subject to respecting the separate identities of these settlements from Tamworth. The adopted Core Strategy nor the Inspector's report state that a delineated meaningful gap should be designated and identified on a proposals map; rather the intention of the Inspector's wording is for development proposals to be considered in the context of maintaining a gap between the settlements. In this context, it is contended that a meaningful gap should not be subject to a specific designation, but rather it should be a concept for consideration in the determination of planning applications.	Noted. The Site Allocations Plan is currently being revised and in the interim period between the adoption of the Core Strategy and the finalising and adoption of a revised Site Allocations Plan it is important to establish and clarify the Policy NW19 and the area affected by Meaningful Gap status to address ongoing pressure for development within the gap between Tamworth and Polesworth/Dordon. Without this clarity there is a significant risk that the development industry will determine what is "Meaningful Gap" by application not through the Local Plan process, to the detriment and loss of the gap and potential co-alescence of the settlements. Without guidance to direct where significant development should not be accommodated there is the potential for different applications arriving at different decisions until the Site Allocations Plan has progressed further through the adoption process or a Core Strategy review is undertaken. In the interim the Assessment and Report will support policy NW19 and provide further guidance/clarification.
MG36				Reference is made in section 6 of the MGA to landscape constraints, and in particular a Landscape Character Assessment (LCA) of the Borough published in 2010 by FPCR. It is noted that the relevant extracts of this LCA, whilst referred to in the MGA, have not been published alongside the consultation document. Having reviewed the LCA, it followed a clear methodology to characterise the landscape of North Warwickshire and divide it into a number of broad character areas, which were in turn assessed for their landscape character sensitivity, visual sensitivity and landscape value. The area considered within the MGA falls within the Anker Valley and the Tamworth Fringe Uplands character areas, with both Areas 1 and 2 falling within Anker Valley. In providing a management strategy for the Anker Valley Character Area, the LCA advises that development should reinforce the existing settlement pattern, and that settlement expansion should include appropriate landscape planting to integrate the settlement edge within the landscape. In providing the more detailed assessments of the area the LCA considered 8 areas around Polesworth and Dordon, but these do not cover the majority of the area considered in the MGA.	Appendix 8 related to the FCPR Landscape assessment which is already available on the Council's website and will be added again to the amended report. No new information is involved. Summary of the relevant elements of the Landscape assessment were included in the Report. Note that the Landscape Character Assessment is not a planning policy or Site Allocations document. If sites and development were to be allocated within the strategic gap area between Tamworth and Polesworth & Dordon then the LCA strategy and recommendations should be appropriate and applied. However, sites are not proposed within this area and the report aims to address the pressure for its loss and redevelopment through clarifying those areas considered important to establish as part of the "Meaningful Gap". This does also allow some flexibility in identifying those areas not performing as significantly as strategic gap.

Ref No	Name	Organisation	Support Comments	NWBC COMMENT
MG36			<p>In particular, as the LCA formed part of the evidence base in support of the Core Strategy, and was considered by the Inspector as part of his examination, his statement in paragraph 21 of the report (referred to above) that the evidence does not support a blanket presumption against development in this area means that further assessment of the landscape is required before such a policy approach could be supported.</p> <p>In order to provide a robust justification for any meaningful gap, it is clear that a detailed landscape character assessment should be undertaken for the whole of the area under consideration. This should take a similar approach to the Borough-wide LCA, whereupon a methodology is followed to divide the area according to rational and considered characteristics, and each sub-area can then be assessed in detail for its potential role in ensuring the provision of a meaningful gap. Such an assessment should then form part of the evidence base to inform the Site Allocations DPD (discussed below), to ensure that all policy requirements can be considered in the round, including the need to deliver housing, and that both the policies and their supporting evidence can be properly tested at examination. Without following this approach, it is considered that the MGA in its current form goes clearly against the intentions of the Core Strategy Inspector as set out above, who did not intend for a meaningful gap to be defined in a way which circumvents the need for proper examination</p>	<p>Noted. The County Council is currently reviewing its Landscape Character Guidelines and these may help to inform the report and assessment. However, the designation of the Meaningful Gap is not made solely on landscape grounds. The key determinant is whether the land performs well, as a strategic gap, maintaining an open area that prevents the coalescence of the settlements and helps maintain their identity. The Meaningful Gap Report will be amended to reflect greater weight being given to geographical proximity of existing development and the potential impact of future development on these areas.</p>
MG36			<p>It is noted that Area 1 of the MGA is the only one which follows any of the sub-areas given detailed consideration in the LCA; namely Area C. The LCA was prepared for different a purpose to that required for the MGA, it does not automatically follow that the LCA's assessment areas are suitable for use in the MGA. If a proper landscape character assessment of the whole of the proposed meaningful gap were undertaken, as outlined above, it should follow a clear methodology for defining the sub-areas to be considered, resulting in logical parcels of land for detailed assessment.</p>	<p>Noted. See comments above. The LCA provided background support for the meaningful gap assessment but was not critical in determining the meaningful gap. A range of criteria were assessed. It is noted elsewhere that landscape character alone is not sufficient to warrant meaningful gap status but the need to maintain the separate identity of the settlements is crucial.</p>

Ref No	Name	Organisation	Support Comments	NWBC COMMENT
MG36			<p>The land east of Pooley Lane, has been included within Area 2 of the MGA. This land sits to the east of the ridgeline formed by Pooley Lane itself, sloping down towards Polesworth. The land falls away towards the Coventry Canal and River Anker, and it is considered that the ridgeline and road forms a natural existing boundary within the wider landscape. The land adjacent to the south of this site, which occupies a very similar position within the wider landscape and follows the same topography, is now built out as a housing development known as The Lynch. The surrounding topography means that this existing development has been assimilated into the wider landscape. This is reflected in the MGA's consideration of Area 2. This recognises that there are differences within the sub-areas considered by the MGA, and that certain areas may be considered suitable for development, demonstrating the need for a fuller assessment of the proposed meaningful gap to provide a proper evidence base to inform the Site Allocations DPD. However this assessment is not carried forward to the conclusions, where paragraph 9.3 of the MGA refers to the potential for only "very limited development" which may be able to be accommodated on small infill plots. In this regard, the MGA's conclusions do not support its own assessment, which in any event is considered flawed. The wording of policy NW19 states clearly that development to the west of Polesworth and Dordon is permissible where it respects the separate identities of these settlements from Tamworth. As such, any assessment of the meaningful gap should seek to identify areas where development could successfully be incorporated into the wider landscape. Furthermore, regard should be given to the potential mitigating effects of good quality landscaping schemes, and the improvements they can make to a wider area.</p>	<p>Disagree, the development on any significant scale within Area 2 would have an adverse impact on the gap between the settlements. The area east of Pooley Lane is considered to have far greater relationship with adjoining land west of Pooley Lane than it has with the main built form of Polesworth and would appear to stand alone within the gap, outside of the settlement. This may set a precedent for similar development within the gap that would impact on the settlements identity and encourage the coalescence of the settlements of Tamworth and Polesworth, contrary to Policy NW19 and irrespective of the quality of any landscaping schemes that may be devised.</p>
MG36			<p>If it is considered appropriate and necessary for the meaningful gap to be defined, this should be undertaken as part of the Site Allocations DPD. This would enable the need for the delineation of such a gap, and its extent, to be weighed against the need for the provision of housing. In light of the NPPF's requirement for local planning authorities to meet their full, objectively assessed needs, it is therefore highly likely that the number of dwellings to be allocated in the emerging Site Allocations DPD will need to increase from that set out in the Core Strategy, and that additional sites will need to be identified to meet these needs.</p> <p>In this context, the early introduction of a defined meaningful gap in advance of the Site Allocations DPD would artificially constrain the potential availability of land to meet North Warwickshire's needs, which is contrary to both the NPPF and to the Core Strategy Inspector's intentions when modifying policy NW19.</p>	<p>Noted. Disagree with comment re NPPF/Inspector. The Inspector's report does not prevent the planning authority from taking other actions and processes forward to address a specific planning issue. The clarification of what constitutes a Meaningful Gap is not considered contrary to either NPPF or Core Strategy Inspector's intentions and gives a clear framework for decision making. The Site Allocations Plan process will address the issue of development needs within and outside the Borough not the meaningful gap report. The Meaningful Gap assessment addresses the interim requirement of clarifying the adopted Policy NW19, not the housing requirements or other development needs of the Borough. The need to clarify Policy NW19 in the face of growing development pressure means the action is required in the interim to avoid delay, prior to the Site Allocations Plan moving to its next stage of consultation. This study will be fed into the Site Allocations and Development Management Policy documents as part of the policy review process.</p>

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT	
MG36				<p>The proposed policy approach for the meaningful gap, as set out in paragraph 10.1 of the MGA, stands in stark contrast as it states explicitly that the meaningful gap would operate as an “additional presumption against development”. It is not believed that this was the Inspector’s intention for how policy NW19 should operate, and it should certainly not be implemented as such without going through the formal process of examination as part of the Site Allocations DPD.</p>	<p>Disagree. The wording and terms of Policy NW19 cannot be construed as anything else but an additional constraint, that constraint being the need to maintain a meaningful gap and the separate identities of the settlements it lies between. This consultation is part of the planning process to determine the Meaningful Gap. This study will be fed into the Site Allocations/Development Management policy documents as required but forms an important element of policy advice now for decision making in the interim period to address ongoing development pressures.</p>	
MG36				<p>In summary, the Meaningful Gap Assessment is considered premature, as it is clear that the Core Strategy Inspector intended for such a gap to be considered as part of the Site Allocations DPD. The blanket presumption against development to the west of Polesworth and Dordon was not considered justified, and yet through the publication of the MGA as a stand-alone piece of work it would appear that the local planning authority is seeking to reapply their previous approach and circumvent the need for formal examination of a key policy. It is not believed that the Core Strategy Inspector intended there to be a specific gap defined between the settlements, and the application of such a designation to act as a presumption against development would be clearly contrary to the requirements of the NPPF.</p> <p>Notwithstanding the above, in respect of the detail of the MGA itself, it has not been based on a comprehensive assessment of the landscape character, and there is no clear methodology for either the identification of the 10 sub-areas considered in the assessment or the detailed assessments themselves. Furthermore, although the MGA makes limited reference to the ability of certain areas to accommodate development, there is no specific allowance for any development sites to come forward within the assessed area. As such, it is not considered that the MGA provides a sufficiently detailed analysis of the landscape to enable the application of a meaningful gap designation, which in any event would represent the implementation of a preferred policy approach rather than the protection of an area of intrinsic landscape value which is not subject to any other landscape classifications at a national or local level. Such an approach does not meet the requirements of the NPPF in respect of requiring a proportionate evidence base, and is not positively prepared to accord with the principles of delivering sustainable development or to meet North Warwickshire’s objectively assessed housing needs.</p>	<p>Disagree, there is no blanket presumption being applied, simply clarity of purpose and definition of area. This supports a clear framework for appropriate decision making. The Site Allocations Plan will address the long term development needs of the Borough, not the Meaningful Gap Report. But current and ongoing development pressures mean there is an urgent need to address the risk of adverse impact on the strategic gap between Tamworth, Polesworth and Dordon now for which delay would only result in the loss of significant elements of the gap and potential impact on and loss of separate identity of the settlements adjoining and within that gap. This is considered clear and proportionate.</p>	
MG37	1	A Roberts	Tamworth Borough Council	NO	<p>Tamworth Borough Council (TBC) have a number of concerns about this consultation exercise relating to the unclear purpose and assessment of the ‘meaningful gap’, whether a designation is proportionate or necessary in advance of allocating sites for development, the Duty to Cooperate and how the document will be used in determining planning applications. The Council is concerned that this will lead to uncertainty and confusion for Tamworth residents about the long term plans for development around Tamworth.</p>	<p>Noted. Disagree on the need for a specific policy or lack of clear purpose. Current and future development pressure indicates the need for greater clarity on the term and the area affected by Policy NW19. The Report will help the council address this pressure and the outcome can be fed into the Site Allocation Plan process. Tamworth Borough will be fully consulted on and involved in that planning process and consultation. The Duty to Cooperate is unaffected by the need to clarify the existing adopted Core Strategy Policy NW19 through the current meaningful gap assessment and report, on which document Tamworth BC were consulted.</p>

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support Comments	NWBC COMMENT	
MG37	2	A Roberts	Tamworth Borough Council	<p>Contradictory positions in different parts of the report leave the assessment unclear about the purpose of the meaningful gap. Section 2 sets out the intention that the gap should not be a countryside or landscape designation or green belt and confirms no exceptional circumstances were established at the core strategy examination last year to designate new green belt. It goes on to presume the Inspector's term of 'meaningful gap' refers to an approach to gaps and green wedges from deleted national guidance. In Section 3 however, core strategy policy NW19 is quoted and although the policy requires development to maintain a meaningful gap between settlements, it does not state that the council would or should designate a specific protected area in advance and was endorsed by the Inspector. In Section 8, the criteria for assessment (Landscape, Heritage, Infrastructure, Properties, Environmental Constraints) do not appear to be concerned with the separate identities of settlements or preventing their coalescence. Great weight is given to cursory landscape comments for instance that do not reflect on that purpose. In the concluding paragraph 10.1, although referring to the purpose of policy NW19, the assessment recommends designation of a very large area of land to be kept open, where development is restricted. Again, it is not clear that this is necessary to fulfil the purpose accepted by the Inspector for the core strategy examination.</p>	<p>Noted. The performance of the areas as strategic gaps is important but can be supported and complemented by landscape, setting, topography and physical, environmental or infrastructure/service constraints. The intention of the term "Meaningful Gap" is clear from the Policy, reasoned justification and the Inspectors report, that is to maintain a gap i.e. a strategic gap, between the settlements and to take into account landscape considerations as part of that assessment. The report and consultation enables that consideration to be taken and amendments to be made if necessary. The outcome will form a material consideration for planning purposes and decision making and will be fed into the Site Allocations Plan and Development Management Plan process.</p>
MG37	3	A Roberts	Tamworth Borough Council	<p>Perhaps inevitably given the confusion about the purpose of the assessment, it is unclear whether it is fit for purpose. As already mentioned, none of the criteria in Section 8 relate to the purpose of the gap stated in the core strategy. There is also no rationale for the division of land parcels in the gap or assessment and no consideration of whether constraints within each parcel apply to the whole area or just part of it. Paragraph 6.3 suggests that the landscape character of the overall assessment area is not broadly sensitive but this character becomes a key consideration in the recommendation to include various areas in the proposed gap. Paragraph 6.1 refers to a landscape character assessment Appendix 8 which is not included with the report published for consultation. A landscape character assessment should be prepared as part of the evidence base for the Site Allocations DPD and it should be used in conjunction with the rest of the evidence base to make a proportionate and evidence based driven assessment of all potential land use allocations in this area.</p>	<p>Noted. The divisions of land into parcels or Areas reflects physical boundaries and topographical features on the ground. These areas are also coherent parcels/'wholes' in their own right, with significant boundary features (Motorway, built form of settlement etc..) determining the limits of the areas. The Appendix referred to related to a summary of the Landscape Character Assessment for North Warwickshire, a copy which was available to view on the website along with the Site Allocations Plan DPD.</p>

Meaningful Gap Consultation Responses June 2015

Ref No	Name	Organisation	Support	Comments	NWBC COMMENT
MG37	4	A Roberts	Tamworth Borough Council	<p>The assessment does not effectively justify why a designation is required in order to have a meaningful gap between Polesworth/Dordon and Tamworth or why it should be of a scale that precludes the majority of land between them. Other options would be to make sufficient allocations to meet the level of development expected in North Warwickshire or to provide guidance on the application of the principle in core strategy policy NW19 to planning applications. The proposed designation would not be green belt but the assessment sets out in paragraph 2.5 that it would be something similar. As exceptional circumstances have not been demonstrated there is no justification for the designation under the NPPF. If the intention is to create a landscape policy, then this should be criteria-based, not a blanket restriction. There is no explanation for the size of assessment areas in section 8. They are insufficient to define a designation boundary as they are not sufficiently subdivided according to physical features on the ground. A more detailed assessment would be required to justify a definitive line on a map to allocate more and less appropriate areas for development. The assessment does not appear to have been informed by a Sustainability Appraisal, which would look at a broader range of sustainability criteria than those in this assessment. The national Planning Practice Guidance makes it clear that appraisal should be carried out at the same time as evidence gathering and engagement. There is a risk that the outcomes of this consultation could prejudice the ability of NWBC to take into account the findings of the appraisal required as part of the preparation of the Site Allocations DPD</p>	<p>Noted. The assessment helps clarify and define the term Meaningful Gap for the purposes of Policy NW19 in the Adopted Core Strategy. A blanket restriction is not proposed on the gap between Tamworth and Polesworth/Dordon and those areas not considered to perform sufficiently as strategic gap are being excluded from the "Meaningful Gap". Due to current development pressure there is, however, the need to define the areas within which significant development would be seen to impact detrimentally on the separation of the settlements and the maintenance of a strategic gap between the settlements. The outcome of the Assessment will be fed into the Site Allocation process. The Sustainability Appraisal will be updated to reflect any changes as part of the Site Allocations Plan process. Disagree with objectors interpretation of para 2.5 of the Report and assessment. The para refers to the potential for overlap between Green Belt (GB) and meaningful gap being assumed but makes it clear that meaningful gap is not GB and is not seeking to replace GB so no exceptional circumstances apply or are necessary. Additional text clarity will be provided to ensure no confusion arises. No further changes proposed.</p>
MG37	5	A Roberts	Tamworth Borough Council	<p>TBC were not invited to discuss this evidence in advance of this consultation. The TBC Duty to Cooperate statement makes it clear that this relates to a strategic cross boundary issue: meeting Tamworth's development needs and the options for future growth of Tamworth as a settlement. Therefore, we suggest that this piece of evidence should be discussed further in a meeting between officers. TBC have repeatedly proposed to undertake joint evidence base preparation to deal with the unmet need to be delivered in North Warwickshire and Lichfield.</p>	<p>Noted. Issue has been discussed as part of Duty to Co-operate work but is primarily aimed at addressing a current Core Strategy policy issue and requirement not addressing a Tamworth development need.</p>

Ref No	Name	Organisation	Support Comments	NWBC COMMENT
MG37	6	A Roberts Tamworth Borough Council	<p>Two points of inaccuracy are also relevant in paragraph 3.3 of the assessment. Regarding the 2000 homes to be delivered outside Tamworth: in calculating this shortfall all deliverable/developable sites in Tamworth were taken into account, including the Golf Course. Development of that site will not reduce the amount of housing to be delivered in North Warwickshire. Secondly, it is stated that NWBC do not accept the Tamworth Future Development and Infrastructure Study 2009, commissioned by themselves with TBC and Lichfield District Council. At the time of completion of this piece of work officers from the three authorities 'signed it off' but we are not aware of any Council decision to 'not accept' the Study from North Warwickshire or what specific issues with the Study are. Furthermore, despite offers from TBC to review and update this work or a similar piece jointly, no more recent evidence of the comparative suitability or achievability of the options for Tamworth's growth across authority boundaries exists. It is not clear how this consultation will feed into the Site Allocations DPD, or how it will be used in the site selection process. Furthermore paragraph 15 of the Inspector's report states "The Council has proposed a main modification which commits it to continue working collaboratively with its neighbours and to an early review of the Plan should it be demonstrated that any unmet need should be accommodated in the Borough." This work has not been carried out in a collaborative manner.</p>	<p>Noted. Assessment report is not looking specifically at how to address any housing requirement for Tamworth's needs. This is addressed through the Core Strategy and the Site Allocations Plan process. This assessment clarifies and concerns Core Strategy Policy NW19. The issue is noted but do not agree that this is a cross-border issue. This study is as a consequence of the Core Strategy and explaining what constitutes the Meaningful Gap. In terms of any need to address any future shortfall in Tamworth's development requirements this will be addressed through the Duty to Cooperate, the Site Allocations Plan process and any future Core Strategy review, in which Tamworth will be involved and appropriately consulted at the correct time and under the proper procedure.</p>
MG37	7	A Roberts Tamworth Borough Council	<p>The report to the Sub-Committee recommended: c) To apply the meaningful gap area identified as policy and to start using it for planning purposes from the date of this committee... It is not clear what status the 'policy document' has, and how it will be used when determining planning applications. The 2012 Local Plan Regulations governing SPDs make it clear that this 'policy document' has not been prepared in conformity with them, nor does the 'policy document' conform to the remit of an SPD as set out in the regulations. Furthermore the recently adopted LDS lists the meaningful gap as only 'policy advice'. It should not be left to a document which has no formal status in North Warwickshire's adopted or emerging development plan to set a strategy or identify preferred sites within this area. Such decisions should be made through the preparation of a development plan document, in North Warwickshire's case: a review of the Local Plan or through the emerging Site Allocations Local Plan</p>	<p>Noted. The assessment study document will be used as a Material Consideration in any decisions taken on planning applications within the Meaningful Gap. The policy advice will be fed into the emerging Site Allocations Plan, having already undergone a level of public consultation. Further clarification will, nevertheless, be provided in the amended Report to clearly indicate that the assessment and Report will constitute an explanation of policy, not a policy in itself. As policy advice towards clarifying the Council's application and approach to the Adopted Core Strategy Policy NW19 it forms part of the "material considerations" to be made in determining any planning application likely to be affected/impacted by the adopted Planning Policy.</p>

1. Meaningful Gap Assessment

Introduction

- 1.1 The Borough Council believes that the designation of a gap between Tamworth and Polesworth/Dordon is essential to help shape the future settlement pattern and protect current settlement identity, so that new employment land and new homes can be accommodated, between 2011 and 2029, but in ways which will avoid the coalescence of the settlements and loss of settlement identity.
- 1.2 The principle of a meaningful gap has been established through the Council's Core Strategy, which has recently been adopted (October 2014). The Inspector accepted the need for maintaining a gap between Tamworth and Polesworth/Dordon, requiring the maintenance of a "meaningful gap" between the settlements in Policy NW19. This document draws upon existing policy and other background information for evaluating the requirement and justification for what constitutes a "meaningful gap" policy in the Council's Core Strategy, for consultation and inclusion in the Site Allocations Plan.
- 1.3 The aims of the paper are to:
1. Define what is meant by the term "meaningful gap"; and
 2. Provide background information about their planning benefits.
- 1.4 This is done by;
- providing a framework for the identification of the "meaningful gap" areas.
 - providing justification for the "meaningful gap" policy in the Core Strategy.
- 1.5 This assessment identifies potential boundaries for the "Meaningful Gap" areas for the Core Strategy and for inclusion in the Site Allocations Development Plan.

2. Gap Designations

- 2.1 Gaps are spatial planning tools designed to shape the pattern of settlements, they are not countryside protection or landscape designations. They command wide public support and have been used with success in previous strategic plans to influence the settlement pattern. Nationally the most significant application of policy to maintain settlement separation and avoid coalescence is Green Belt Policy. Gaps can have other positive aspects: in retaining open land adjacent to urban areas which can be used for new/enhanced recreation and other green infrastructure purposes.
- 2.2 Previous National Guidance (in PPS's and PPG's) on gaps and green wedges has subsequently been revoked but the rationale for a meaningful gap has

therefore been established over many years as a principle in planning and there are some overlaps with Green Belt policy and purposes.

- 2.3 This guidance introduced the idea that new development should not *significantly* diminish the extent of a gap, thus allowing for small-scale changes but maintaining a core area for protection to prevent coalescence of settlements and maintain their identity. The Core Strategy Inspectors term of “meaningful gap” in Policy NW19 is intended to apply this approach. A gap should also be a contiguous, uninterrupted, integral whole to be a ‘meaningful gap’ and not broken or split/partially subdivided by significant development. The potential impact of geographical proximity to existing development and the impact that new development may have on the narrowest most critical parts of the meaningful gap and the areas they lie in will also be considered/assessed.
- 2.4 Landscape quality/amenity can also contribute towards determining which areas of meaningful gap are most sensitive and should preferably contribute towards supplying the specific area that constitutes the meaningful gap.
- 2.5 The meaningful gap is bounded to the extreme south by Green Belt. The potential for overlap between the application of a meaningful gap and Green Belt designation needs to be avoided. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open but the fundamental aim of the Meaningful Gap is to prevent the coalescence of development from the settlements of Polesworth, Dordon and Tamworth to respect their identities. The Inspector in the Core Strategy Inquiry did not consider extending the Green Belt to cover the open area between Tamworth and Polesworth/Dordon. The NPPF notes that new areas of Green Belt should only be established in exceptional circumstances. The Borough Council did not consider any changes to the Green Belt and until such a time that a full assessment can be made this is not considered applicable or necessary at this time. The Meaningful Gap assessment is not intended to replace or overlap with Green Belt.

3. Current Policy

- 3.1 The adopted Core Strategy Adoption Policy NW19 refers to the provision of a “Meaningful Gap” between Polesworth/Dordon and Tamworth, to maintain the separation between the settlements and respect their separate identities.

NW19 Polesworth & Dordon

The broad location of growth will be to the south and east of the settlements subject to there being no unacceptable environmental impacts from surface mining and that viable and practicable coal reserves are safeguarded.

*Any development to the west of Polesworth & Dordon must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a **Meaningful Gap** between them.*

- 3.2 This policy links to the positive management and enhancement of the environment of the urban fringe covered by such designation. It reflects the Spatial Vision for the Borough relating to the Borough's rural character; "*The rural character of North Warwickshire will be retained and reinforced to ensure that when entering the Borough it is distinctive from the surrounding urban areas.*"
- 3.3 There are, however, a number of other pressures impacting on this area in policy terms as follows;
- The emerging Tamworth Local Plan indicates a significant level of growth in both housing and employment that may not be able to be accommodated solely within its current boundaries. Policy **SP1**, The Spatial Strategy for Tamworth, indicates that a minimum of 2000 homes and 14 ha of employment land will need to be found outside of the borough to meet their needs. Some of the development pressure may be met through redevelopment of the Golf Course site but this will not be sufficient to address the full need sought.
 - Under the Duty to Co-operate, North Warwickshire has a legal duty to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination. This inevitably brings additional pressure in how this duty can be complied, how any agreed potential development accommodation from Tamworth should be delivered and how to maintain the Meaningful Gap required in Policy NW19.
 - The Tamworth Future Development and Infrastructure Study 2009, which was jointly commissioned with North Warwickshire BC and Lichfield DC, identified potential sites immediately adjoining Tamworth's boundary. The Study indicated that these sites, forming option D in the study, performed reasonably well over a range of sustainability indicators although significant off-site highway works may be necessary. The study indicates a net potential of 1367 units in site E immediately adjoining the Tamworth Boundary and 2738 units immediately west of Polesworth/Dordon, site D. It should be noted that North Warwickshire Borough Council did not support the final findings, which predate the NPPF and the Duty to Co-operate.
 - The submission of a number of significant planning applications within the area covered by the Meaningful Gap, and the need to assess the impact of these development proposals in terms of Policy NW19. It should be noted that of the current planning applications submitted within the Meaningful Gap area between Tamworth and Polesworth/Dordon one site, west of the M42, has recently received planning consent. This is noted in the report below.

4. Description of Area under assessment

- 4.1 The Area for assessment covers a distinctive area of land currently separating Tamworth from the settlements of Polesworth, Dordon, Birchmoor and Freasley. The latter two small hamlets lie within the area or gap, which also contains the M42 motorway subdividing the gap into east and west elements and further cut by the A5 and B5000 transport corridors/roads.
- 4.2 The area stretches from the current Green Belt boundary to the south of Tamworth, where the current Freight Branch line to Birch Coppice Business Park and Birmingham Intermodal Freight Terminal (BIFT) runs and then up to the West Coast Main Line, which forms a clear northern boundary/limit to the Gap. It is bordered to the east by the former Birch Coppice Spoil Tip (now landscaped/planted), Polesworth and Dordon settlements up to Pooley Park/Alvecote Pools SSSI, and to the west by Tamworth built development from Centurion Park on the A5/M42 Junction 10 up to the Tamworth Golf Course, Alvecote Marina. The area also incorporates the hamlets of Freasley and Birchmoor. This area is shown in **Appendix 1**.

5. Infrastructure Constraints within Area of assessment

- 5.1 The area is subdivided by some significant transport and utility service infrastructure assets and constraints, including the following;
- 1) M42 which runs north to south through the area, centrally in the top half and along the western boundary at the southern half of the area.
 - 2) A5 and Junction 10 of the M42, running east to west in the southern third of the area, the major gateway into the Borough from the west.
 - 3) B5000, main northern route to Tamworth from Polesworth/Dordon, in the northern third of the area, a main gateway into the Borough
 - 4) High Pressure Gas Pipeline. This is underground and therefore not visible but applies a significant constraint to potential development, with a significant buffer zone approximately 80m **either side** of the pipeline, applied by the HSE (known as the Inner Zone or "IZ"), to maintain/protect access to service/maintain the pipeline. This travels south to north through the centre of the eastern half of the site approximately parallel with the M42 route. The Middle and Outer Zones will not restrict development unless this is fairly high density residential or other development with a high level of public use and access. **See Map Appendix 2**
 - 5) HS2 "Y" Route. At this stage the route is still only proposed, awaiting a formal announcement by the Secretary of State as well as Parliamentary Approval. The route closely follows the M42 travelling from the south west to north east corners of the area, with the greatest potential impact on the area from Junction 10 to Pooley Park, impacting on some of the more sensitive landscapes within this area. **See Map Appendix 2**
- 5.2 The presence of and potential for impact on the gap by the significant infrastructure constraints must be considered. The potential impact (or lack of

impact) from these infrastructure constraints on the 10 areas is shown in **Map Appendix 4**

6. Landscape Constraints

- 6.1 The North Warwickshire Landscape Character Assessment (LCA) has undertaken a Landscape Sensitivity assessment of land immediately adjoining the settlement boundaries of the main settlements in North Warwickshire. The relevant areas included in that assessment and affecting the meaningful gap are included in Appendix 8, which is an extract from the LCA. In summary this indicates the land immediately adjoining the western boundary of Dordon/Polesworth (between the A5 and B5000 corridors) as moderate sensitivity and the land further to the north west boundary of Polesworth, between the settlement and Pooley Lane (along the canal/river valley corridor) as of higher sensitivity in landscape terms.
- 6.2 The Warwickshire County Council Landscape Guidelines (published first in 1990) identify the area as falling within the “Arden Landscape”. The guidelines offer guidance to landowners, farmers, planners, developers, road engineers, foresters, ecologists and landscape architects on how development and modern land management practices can best be integrated into the landscape. They define areas of strong landscape character and areas where a concerted effort is required to enhance areas of degradation to help conserve the diversity and beauty of Warwickshire’s Landscapes.
- 6.3 The Landscape Assessment and Guidelines are being reviewed and currently indicate the area covered by the gap to constitute ‘Open Field Landscapes’ and part of the “Industrial Arden”. This is described as a variable, rather fragmented urban fringe landscape characterised by mining settlements, spoil heaps and pockets of both pastoral and arable farmland. This is a landscape often dominated by the proximity of urban and industrial land, including housing estates, commercial development, factories, former mines and quarries. Roads, railways, canals and pylons are also common features.
- 6.4 Although farmland makes up a significant proportion of the landscape, much may have, poorly managed, intermittent hedgerows or significant enlarged fields, where hedgerow removal to enable more efficient arable cropping has occurred. Areas of farmland are typically surrounded on two or more sides by urban development, which may not be well defined. The assessment also notes that “the undulating nature of the landform often allows views from one mining settlement to another, reinforcing the settled community character of the landscape. The description above of the Industrial Arden and Open Field Landscape clearly reflects the character of the area under consideration as a “Meaningful Gap”.

7. Landscape and Heritage sensitivity

- 7.1 In order to start identifying the most appropriate area to designate as a “Meaningful Gap” it would be appropriate to identify those areas sensitive in

landscape terms in addition to contributing to maintaining the gap between the settlements.

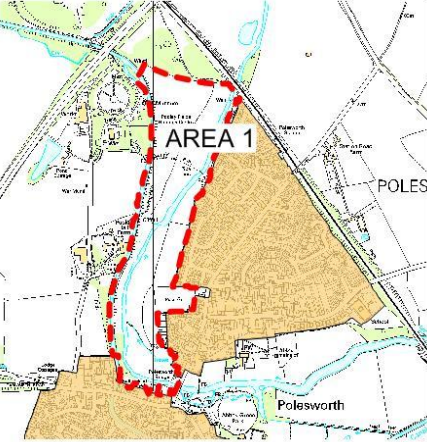






- 7.2 The area has been broken down into 10 discrete areas. Each is divided/separated from each other by significant Transport infrastructure (M42/A5 etc) or landscape and settlement features (canal, woodlands, spoil tip, small settlements eg Birchmoor/Freasley or existing commercial or residential development). These areas are identified on Map **Appendix 3** and Photomontage of the areas in **Appendix 6**.
- 7.3 In addition, the presence of Heritage assets is noted, such as Scheduled Ancient Monuments, Listed buildings or other non-statutory buildings or sites noted as of local value in either the Borough's Historic Environment Assessment or Warwickshire County Council's historic (where known/available) records. The Borough Council's Landscape Character Assessment (LCA) and the County's Arden Landscape Guidelines have been used to help identify the most sensitive landscape areas and are noted in the following assessments where relevant/appropriate.

8 Geographical Proximity and Narrowness of the Gap

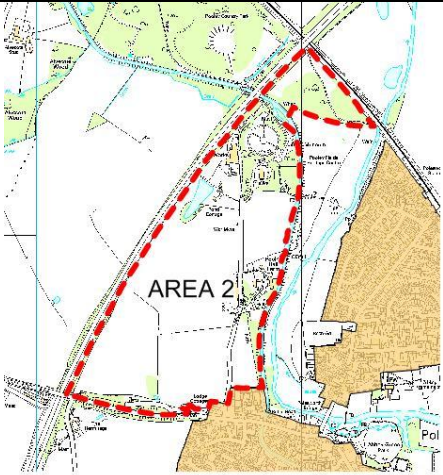


- 8.1 The geographical proximity to existing development and physical narrowness of the gap is also an issue that needs to be considered and addressed. At significant locations within the Gap there are certain areas where the presence of existing development, the narrowness of the remaining gap(s) of open, undeveloped land, the potential impact of future development proposals and/or local plan allocations on these gaps, all have an impact on and affect the potential future maintenance of a "meaningful gap" and the separation of the settlements.
- 8.2 Where this also corresponds with significant gateways/entrances to the Borough along significant transport corridors, the need to protect such areas from significant development is re-inforced both by Policy NW19 and the need to deliver the Core Strategy Spatial Vision of retaining and re-inforcing the rural character of North Warwickshire distinctive from the surrounding urban areas.





9. Assessment Tables and Recommendations

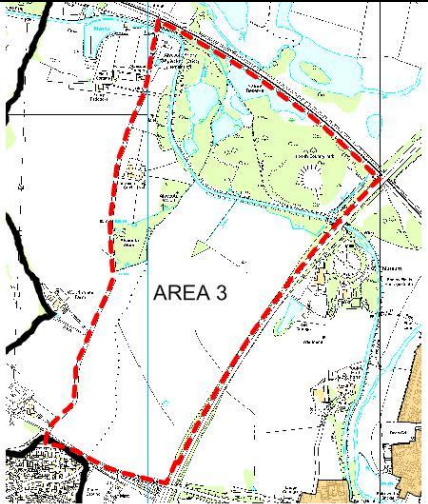






9.1 The following tables list the assessment of sensitivity, identifies any known constraints and the presence of property/development within the areas assessed as relevant and appropriate. The findings/impacts are displayed using a Traffic Light Sensitivity assessment, Red = High Sensitivity/High Impact, Amber= Moderate Sensitivity/Impact , Green = Low Sensitivity/Impact.

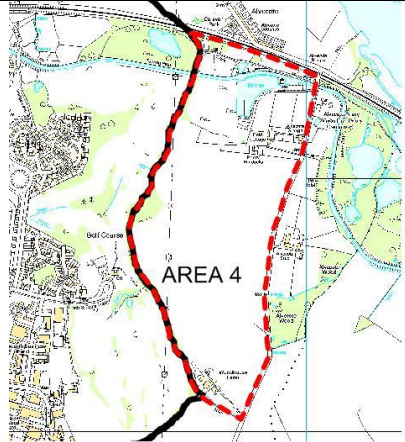
 <p>Area 1) Land immediately west of Polesworth along the river/canal corridor See Appendix 5.</p>	<ul style="list-style-type: none"> • Landscape: Noted as Area C in the LCA, identified as of high sensitivity in landscape terms. An open river flood plain and canal corridor, with steep, treed escarpment to the west, leading to open farm land and a former colliery site now significantly landscaped and planted. 	
	<ul style="list-style-type: none"> • Heritage: This corridor adjoins a number of heritage assets including Pooley Hall (Grade 2*), Polesworth Bridge (Grade 2), the former North Warwickshire Colliery at Pooley, now Pooley Park and Heritage Centre, includes part of the Coventry Canal and associated structures. 	
	<ul style="list-style-type: none"> • Infrastructure: North West corner of site affected by HS2 route and presence of HP gas pipeline. 	
	<ul style="list-style-type: none"> • Properties: No significant properties in the area. Closely adjoins built area of Polesworth to south and east. 	
	<ul style="list-style-type: none"> • Environmental Constraints: Area affected significantly by Flood Zones 2 and 3 along Anker River. Agricultural land classification 3. 	
	<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap : The area immediately adjoins the settlement of Polesworth. The southern element of this area covers the narrow river gap over the floodplain, which is unlikely to be under significant pressure from development but has some incremental pressure along its edge, outside of the 	

	floodplain areas. This forms a natural gap in the built up area with limited function as a strategic gap	
Recommendation – Include as part of the “Meaningful Gap” due to higher sensitivity to development impact and loss and effect of environmental and heritage constraints.		

 <p>Area 2) Land west of Polesworth, between the Coventry Canal, Pooley Lane and M42 See Appendix 5.</p>	<ul style="list-style-type: none"> • Landscape: Area of large open fields with some remnant hedgerows to the west. Visible along Pooley Lane, the highest part of this area, with views towards Tamworth/Golf Course boundary and Polesworth to the south and east. Land drops from Pooley Lane down to the M42 which lies partially within a cutting at this point, opening out as it travels north past Pooley Park, over the canal and River Anker. To the east the area slopes sharply down to the canal and river, with significant mature tree/hedgerow field boundaries. Development would have significant visual impact on views and outlook to and from Polesworth. The southernmost field area, immediately adjoining the recent development at the Lynch off Pooley Lane, is partially screened by tree and scrub growth on the steep slope above the canal at this point. This may help minimise development impact potential on this part of the area but development would still be visible from Polesworth (See photos). This heavily treed slope/escarpment rising from the river valley and canal forms a significant visual landscape border and barrier to the west of Polesworth that would be sensitive to development particularly along the ridge line. 	
	<ul style="list-style-type: none"> • Heritage: The area also includes some significant heritage assets including Pooley Hall Listed Grade 2*, the miners war memorial from Pooley Colliery, the Pooley Park former colliery site, heritage centre and former wharves at Pooley Park and the Coventry Canal. 	

	<ul style="list-style-type: none"> • Infrastructure: The high pressure gas pipeline cuts through the centre of the site and adjoins the route of the M42 and the proposed route of HS2, restricting the potential for development without impacting on one or other of these significant infrastructure assets. 	
	<ul style="list-style-type: none"> • Properties: There are industrial units adjoining the Park, based in and converted from the old former mining buildings. The area includes the Heritage Centre at Pooley Park to the north east and adjoins some limited, sporadic residential developments to the south along the B5000 and off Pooley Lane. 	
	<ul style="list-style-type: none"> • Environmental Constraints: Pooley Park to the north is partly a SSSI in favourable condition. Agricultural land classification 3. 	
	<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap : Forms a significant gap between Polesworth and the M42 that has already been impacted along its southern boundary by some small scale, sporadic ribbon development along B5000 Tamworth Road. This area is sensitive to development which could impact significantly on the maintenance of a “meaningful gap” between Polesworth and the M42. It is considered it operates as strategic gap. 	
<p>Recommendation – Include as part of the “Meaningful Gap” due to higher sensitivity to development impact, importance as a strategic gap along a gateway into North Warwickshire and effect of potential infrastructure constraints.</p>		

 <p>Area 3) Land west of M42 at Polesworth and Robeys Lane. See Appendix 5 photos Nos 1 to 20.</p>	<ul style="list-style-type: none"> • Landscape: Area of open rolling arable fields with some remnant hedgerows, ponds and isolated tree copses, which levels out to the north and east. Significant views across to north and north east. Land rises to south. This area also includes Alvecote wood, recently awarded the best small woodland in England in the Royal Forestry Society Best of England awards 2014. Pooley Country Park, landscaped former colliery lies to the north 	
	<ul style="list-style-type: none"> • Heritage: Pooley Country Park (landscaped former colliery), the Coventry Canal and Alvecote Priory, which is a Scheduled Ancient Monument and listed grade 2, all lie within the northern part of the area. 	
	<ul style="list-style-type: none"> • Infrastructure: Site not significantly impacted by any proposed or existing infrastructure constraints. 	
	<ul style="list-style-type: none"> • Properties: Area contains a commercial stable and farm buildings. 	
	<ul style="list-style-type: none"> • Environmental Constraints: Alvecote Wood is a designated local wildlife site and ancient woodland. Pooley Country Park includes a significant area of SSSI designation. Agricultural land classification 3a and 3b. 	
	<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap: Forms a significant open gap between Tamworth and the M42. This area is sensitive to development which could impact on the maintenance of a “meaningful gap” between Polesworth and the M42. It is considered it operates as strategic gap, particularly in relation to its southern boundary and the land to the south (Area 7). It acts as a significant gateway into the Borough from Tamworth. The expansion of the area to the north also provides a clear gap between Tamworth and the M42 which, although sensitive to development is not as critical as its southern border/element, hence an amber score. 	
<p>Recommendation – Include as part of the “Meaningful Gap” due to its contribution as strategic gap, open aspect, higher sensitivity of landscape to development and environmental impact.</p>		



Area 4) Land immediately adjoining Tamworth's north eastern boundary, alongside the Golf Course potential development site, west of Robey's Lane, north of Priory Park Kart Circuit but south of West Coast Main Line (WCML).







See Appendix 5 photos Nos 1 to 20.

<ul style="list-style-type: none"> • Landscape: Top two thirds of the site is highly visible rolling open countryside, with few field boundaries. Views to north and east are extensive and the land rises to the centre of the site/fields before dropping down to Alvecote marina. Development on this area would be highly visible and constitute a significant visual impact on the open countryside in this area. There is currently a fairly strong treed/hedgerow boundary along the western Golf Course border of this area, which helps screen and minimise the visual impact of potential development areas on the golf course. 	
<ul style="list-style-type: none"> • Heritage: Includes Alvecote Marina on the Coventry Canal, former coal wharves and dock. Adjoins Alvecote Priory Remains, Scheduled monument and listed grade 2 to north east. 	
<ul style="list-style-type: none"> • Infrastructure: Site not significantly impacted by any proposed or existing infrastructure constraints 	
<ul style="list-style-type: none"> • Properties: The area includes Woodhouse Farm and commercial units to the south and Alvecote Marina and Pub to the north, alongside a number of residential properties within large grounds. 	
<ul style="list-style-type: none"> • Environmental Constraints: Site not significantly impacted by any environmental constraints or designations. Agricultural land classification 2 and 3b. Site includes some areas of very good quality agricultural land. 	
<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap: The area immediately borders Tamworth Borough, currently the former Golf Course which is subject to a planning application for mixed residential, employment and open space/services. It is not, however, considered to operate significantly as strategic gap between Polesworth and Tamworth and has limited development within it except at the margins of its northern and southern boundaries. Significant gap still remains east of Robey's Lane outside this area to operate as 'meaningful gap'. 	

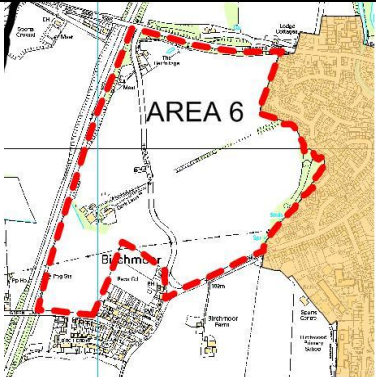






Recommendation – Exclude as part of the “Meaningful Gap” as it does not operate significantly as ‘strategic gap’. Treat as open countryside. Note presence of very good quality agricultural land.



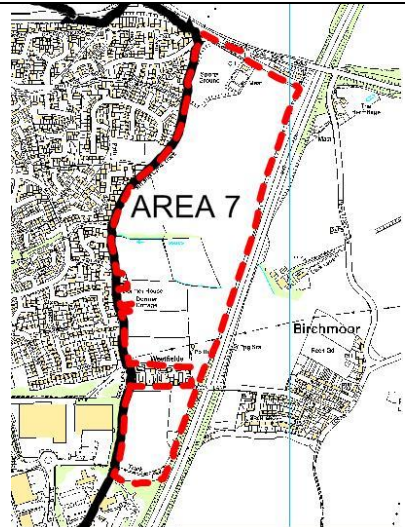
Area 5) Land immediately adjoining Tamworth's eastern boundary, north of B5000, south of Woodhouse Farm of approximately 19.5ha. See Appendix 5 photos Nos 1 to 20.





<p>Landscape: This area contains the Tamworth Priory Park Karting circuit and open arable pasture, screened with mature hedge banks and treed boundaries along the southern, south eastern and western edges. The site area lies close to existing residential and commercial development in Tamworth to the south and west respectively. The site drops to the north east and adjoins Tamworth Golf Course with mature tree screened boundaries.</p>	
<ul style="list-style-type: none"> • Heritage: There are no significant heritage constraints or designations affecting this area. 	
<ul style="list-style-type: none"> • Infrastructure: Site not significantly impacted by any proposed or existing infrastructure constraints. The site could potentially be accessed from the adjoining golf course redevelopment site or access onto the B5000 or via Robey's Lane. 	
<ul style="list-style-type: none"> • Properties: This area contains the Tamworth Priory Park Karting circuit. The site adjoins Tamworth Golf Course, which is currently under investigation as a potential development area for Tamworth's needs. 	
<ul style="list-style-type: none"> • Environmental Constraints: There are no significant environmental constraints or designations affecting this area. Agricultural land classification of grade 2, very good quality agricultural land, but currently partly in leisure/recreation use (former Priory Park circuit). 	
<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap: The area immediately borders Tamworth Borough, currently the former Golf Course which is subject to a planning application for mixed residential, employment and open space/services. It is not, considered to operate significantly as strategic gap between Polesworth and Tamworth and has limited development within it, constituting a farm and commercial go kart track. Significant gap still remains east of Robey's Lane outside this area to operate as 'meaningful gap'. Its relationship and proximity is primarily with Tamworth's built up area and is not considered to operate/contribute as a rural Gateway into North Warwickshire to the same degree that the land east of Robey's 	

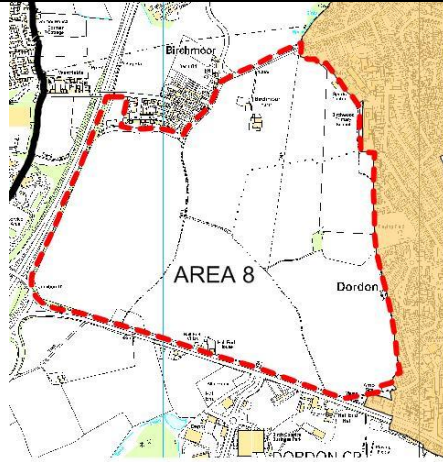
	Lane and Chiltern Road operates as.	
Recommendation – Do not include as part of the “Meaningful Gap” but note presence of very good quality agricultural land.		

 <p>Area 6) Land between Birchmoor to the south, B5000 to north, Polesworth to east and M42 to west along Hermitage Road. See Appendix 5 photos No's 25 to 32</p>	<ul style="list-style-type: none"> • Landscape: Rolling open arable fields with some mature tree'd hedgerows around farms on the site of former colliery and tram way to Polesworth and canal basin. The presence of these industrial heritage assets reflects the former land uses. The topography drops from Birchmoor then rises as it approaches the B5000 before dropping sharply to the highway. This results in significant views to the north east, east and north, with more restricted views to the west across the M42 and towards the margins of Tamworth. Development on the higher areas of this site would have a significant visual impact both on the site itself and on views into the site area. 	
	<ul style="list-style-type: none"> • Heritage: Presence of former colliery site and tramway reflects local industrial heritage. No designated assets. 	
	<ul style="list-style-type: none"> • Infrastructure: The high pressure gas pipeline cuts through the centre of the site and adjoins the route of Hermitage Road. HS2 “Y” route also cuts through the north-west third of the site, alongside the M42. This limits the potential for development without impacting on one or other of these significant infrastructure assets. 	
	<ul style="list-style-type: none"> • Properties: Site of former colliery now a farm and small commercial units. Area adjoins Birchmoor hamlet/settlement to south, which served the former colliery. 	
	<ul style="list-style-type: none"> • Environmental Constraints: Site not significantly impacted by any environmental constraints or designations. Agricultural land classification 3. 	
	<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap: Forms a significant gap between Polesworth and the M42 that has already been partially impacted along its northern boundary by some small scale, development at the Old Dairy, Hermitage Lane 	

	<p>adjoining the B5000 Tamworth Road. The area lies in close proximity to Polesworth to the east and has a significant area of built settlement at Birchmoor along its south western boundary. The presence of Birchmoor reduces the size of the gap between Tamworth and Polesworth. This area is sensitive to development which could impact significantly on the maintenance of a “meaningful gap” between Polesworth and the M42. It is considered it operates as an important strategic gap.</p>	
<p>Recommendation – Include as part of the “Meaningful Gap” due to landscape sensitivity to development impact and importance as a strategic gap. Note also impact of potential infrastructure constraints (HS2 and HP Gas pipeline).</p>		

 <p>The map shows a site labeled 'AREA 7' outlined in red. It is situated between the M42 motorway to the east and a residential area to the west. Birchmoor is labeled to the south of the site. The map shows various roads, fields, and built-up areas.</p>	<ul style="list-style-type: none"> • Landscape: The land is primarily flat, arable pastureland, split into a number of fields with small hedgerows and fences delineating them and more substantial, mature hedges and tree'd boundaries around the whole site, particularly to the west which also includes a pedestrian/cycle access route providing access into the adjoining residential areas in Stonydelph. There are some views out of the site towards the north and east across the M42, but views into the site are limited and restricted by the screening from existing boundary hedge and trees, the presence of some development within the site and the existing commercial and residential developments to the south and west. This is an “urban fringe” area, constrained physically by development (M42, Relay Park Industrial estate, Westfields housing) and with strong clearly defined physical boundaries. Its visual and physical relationship is primarily with Stonydelph/Tamworth. 	<p>☑</p>
	<ul style="list-style-type: none"> • Heritage: There are no significant heritage constraints or designations affecting this area. 	<p>☑</p>


<p>Area 7) Land south of B5000, immediately adjoining Tamworth Boundary, west of the M42 and bordered by the service station and Industrial estate, Relay Park to the south. See Appendix 5 photos Nos 21 to 24.</p>	<ul style="list-style-type: none"> • Infrastructure: The main constraint is likely to be the potential impact of the HS2"Y" route, which cuts the south eastern corner of the site and housing at Westfields after cutting through the commercial estate and service station area. At Westfields the route crosses over the M42 leaving the majority of the northern two thirds (29ha) of the site less impacted by HS2. 	
	<ul style="list-style-type: none"> • Properties: The area including the sports ground and facilities on Tamworth Road, a small area of housing west of Birchmoor (Westfields) and the M42 overbridge and is approximately 35ha in area. The area immediately adjoins the main built up settlement area of Stonydelph, Tamworth to the west. Retention or replacement of sports facilities/playing fields likely to be required. 	
	<ul style="list-style-type: none"> • Environmental Constraints: There are no natural, environment or ecological designations affecting the site. Agricultural land classification a mix of 2, 3a and 3b. Site includes some areas of very good quality agricultural land. 	
	<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap: Forms a significant gap between Tamworth and the M42 that has already been partially impacted along its northern boundary by some small scale, development at the Polesworth football ground adjoining the B5000 Tamworth Road and along the former Tamworth Road. The northern area is considered to operate/contribute as a rural Gateway into North Warwickshire. The area lies in close proximity to Tamworth to the west and has a significant area of built settlement at Green Lane, Birchmoor along its southern boundary. The presence of development at Green Lane, Birchmoor reduces the size of the gap between Tamworth and Polesworth. This area is sensitive to development which could impact significantly on the maintenance of a "meaningful gap" between Polesworth and the M42. It is considered it operates as an important strategic gap. 	
<p>Recommendation – Include as part of the "Meaningful Gap" in view of its importance as a strategic gap. Note presence of very good quality agricultural land and recreational facilities to north. Note also impact of potential infrastructure constraints (HS2) on southern part of area.</p>		

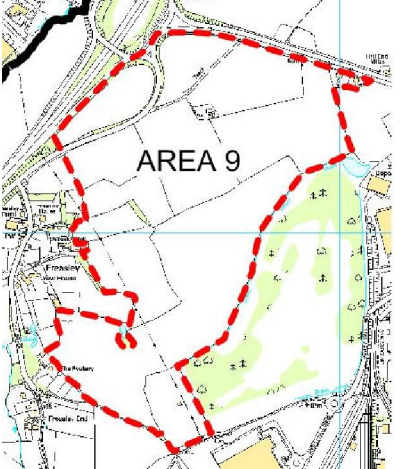








Area 8) Land south of Birchmoor Road and Green Lane, North of A5, bordered by the M42 to the west and Dordon to the east. See Appendix 5 photos Nos 33 to 65.

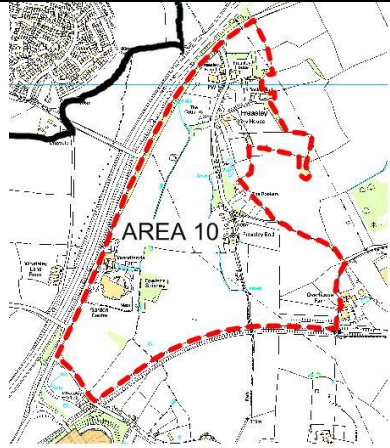
- Landscape:** Large open arable fields, typical industrial style agriculture, rising gently to the north and Birchmoor, with most hedgerows removed and some limited remnant tree copses. Some planting and tree screening along the south western and south eastern boundaries where the site adjoins the M42 and the former ambulance station. Little landscape value. Indicated as of moderate sensitivity in the LCA. The open nature of the site and hard boundary edge to the east with Dordon and the Secondary school providing the backdrop means development on this site would be highly visible, particularly from the A5 and Dordon. This area forms the most obvious potential for maintaining a “Meaningful Gap” between the settlements of Tamworth and Dordon with the clear boundaries provided by the M42 to the west and Dordon built edge to the east. Development along the eastern edge may also provide the opportunity for softening the urban edge through appropriate landscaping.
- Heritage;** There may be some heritage assets along the route of the A5, the roman Watling Street, on the site of the former Hall End Hall and the Industrial heritage linked to a former Tramway within the site related to Birch Coppice Colliery.
- Infrastructure;** The high pressure gas pipeline cuts centrally through this site, which reduces the potential for development.
- Properties:** There are a limited number of residential properties north of the A5 at Hall End Villas. Area 8 also adjoins or contains part of the small settlement of Birchmoor. To maintain the separation of Birchmoor and avoid encroachment from Tamworth it is considered appropriate to include all the land around the settlement. This area also currently provides sport and recreation assets/fields linked to the primary and secondary Schools immediately adjoining the main Dordon settlement built up area to the east. An opportunity exists for enhancing this provision, which could include some associated development and landscaping to soften the harder, urban edge of the settlement in landscape terms.
- Environmental Constraints:** There are no natural environment or ecological designations affecting the site. Agricultural land classification 3.









	<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap: Forms a significant gap between Polesworth and the M42. Although of significant size the area is of very open aspect forming a significant whole. To the north the presence of the built development at Green Lane, Birchmoor, significantly reduces the area of remaining gap between Tamworth and Polesworth/Dordon making this area sensitive to development and critical for maintenance as a strategic gap. The presence and proximity of Polesworth/Dordon to the east forms a significant built edge/form to the area and the southern boundary provides and contributes to the major open and rural gateway into North Warwickshire. This southern boundary area has some limited sporadic development along it and any significant development in this area is considered to have a detrimental impact on the ability to maintain the separation of the settlements at this point. This area is considered to be sensitive from development and operate as strategic gap. 	
<p>Recommendation – Include as part of the “Meaningful Gap” due to development impact on open landscape and importance as a strategic gap. Note also significant impact of infrastructure constraints (HP Gas pipeline). There is a clear character link between this area and the open areas 6 and 9 to the north and south, forming an uninterrupted, continuous open area, forming an integral whole meaningful gap.</p>		

	<ul style="list-style-type: none"> • Landscape: Similar to area 8 this is primarily open arable land with much of the original field boundaries and hedgerows removed. The land is flat and open, visible from the A5 and partially from the west (along Trinity Road). Towards the south the older more historic field boundaries still exist, around Freasley, and reflect the Arden Landscape more prevalent to the south, including smaller fields with wooded and hedged boundaries and small remnant woodlands and copses. The Spoil Tip to the east forms a significant landscape and development barrier/boundary and the allotments to the north east are identified as a Site Allocations development opportunity. 	
	<ul style="list-style-type: none"> • Heritage: Similar to Area 8 there may be unknown heritage remains/assets relating to the roman road, Watling Street, along the northern boundary. Western boundary also close to/adjoining Freasley Hall and associated structures, and Yew House, listed Grade 2 and Common Land along ‘The Green’.. 	

<p>Area 9) Land south of the A5, with the M42 and Junction 10 to the west, the Spoil tip to the east and up to Freasley hamlet in the south. See Appendix 5 photos Nos 33 to 65.</p>	<ul style="list-style-type: none"> • Infrastructure: This area is cut centrally by the high pressure gas pipeline, which limits significantly the potential for development to the east and west. There may be some opportunity to “round off” the current employment allocation at/on the allotments to the west of Birch Coppice access and immediately north of the Spoil Tip/ south of Nos 15 to 18, Hall End Cottages, Watling Street, as long as this does not extend into or impact upon the Inner Buffer Zone area of the high pressure gas pipeline. 	
	<ul style="list-style-type: none"> • Properties: There are few buildings within the site apart from a number of residential properties immediately south of the A5 at Hall End Cottages, adjoining the allotments to the east. 	
	<ul style="list-style-type: none"> • Environmental Constraints: There are no natural, environment or ecological designations affecting the site. Agricultural land classification 3. 	
	<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap: Forms a significant gap between Dordon and the M42. Although of significant size the area is of very open aspect forming a significant whole. The presence and proximity of development at Centurion Park Tamworth to the west (including planning consent right up to the M42) and at Birch Coppice to the east frames this area. There is also significant further employment allocation on the land immediately adjoining Birch Coppice to the rear of sporadic residential development on the north eastern boundary of this area, along the A5, which further reduces the remaining strategic gap between the M42 and Birch Coppice. The Area contributes to the major open and rural gateway into North Warwickshire from the west along the A5 with its significant open aspect and character framed to the south by the spoil tip and small hamlet of Freasley, both set back from the A5. Significant development on the remaining undeveloped area of this corridor/gateway would effectively merge the settlements of Tamworth and Dordon from Wilnecote to Birch Coppice. This area is considered to be sensitive from development and operates as strategic gap. 	
<p>Recommendation – Include as part of the “Meaningful Gap” due to development impact on open landscape and importance as a strategic gap. Note also significant impact of infrastructure constraints (HP Gas pipeline). Some limited potential for development alongside the adjoining, allocated Allotments site west of Birch Coppice.</p>		



Area 10) The settlement of Freasley , including land immediately adjoining and to the south of the settlement. See Appendix 5 and Photomontage Appendix 7.

<ul style="list-style-type: none"> • Landscape: This area forms an attractive access corridor through the hamlet of Freasley, with mature trees and hedgerows along the roads, field boundaries and copses around the settlement reflecting the historic Arden landscape, surrounded by more industrial agriculture in the form of more modern, open arable fields stretching up to the A5 and alongside the spoil tip. The area is fairly flat and well screened from Trinity Road to the west. This forms a small remnant of Arden Landscape, which would be extremely sensitive to the impact of major development. Minor development of a residential nature may be possible within and on the margins of Freasley, without significantly impacting on any meaningful gap. 	
<ul style="list-style-type: none"> • Heritage: There are numerous heritage assets,(Listed Buildings) in Freasley, including Yew House, Sycamore Cottage, Freasley Hall and associated structures from the late 1600's to mid 1700's, which contribute to the character of this area. The remaining properties are predominantly late 19C or 20C era. The settlement also includes an area of Commons Land along The Green. 	
<ul style="list-style-type: none"> • Infrastructure: The high pressure gas pipeline cuts through the eastern half of the site. Trinity Road, the M42 (and proposed HS2 route to the west of the M42) and the Freight Branch line to Birch Coppice to the south form strong transport infrastructure boundaries, which along with the Spoil Tip separate this area from the surrounding landscape, including residential development to the west (Tamworth) and commercial development to the east (Birch Coppice and BIFT). 	
<ul style="list-style-type: none"> • Properties: Apart from the hamlet itself there is a large garden centre located on the south west corner of this area where the land rises towards the south west and Trinity Road. A farm which includes some commercial uses lies to the south east of the area, alongside Birch Coppice. 	
<ul style="list-style-type: none"> • Environmental Constraints: There are no significant environmental constraints or designations affecting this area. Agricultural land classification 3. 	
<ul style="list-style-type: none"> • Geographical proximity/Narrowness of Gap: Forms a gap between Dordon, at Birch Coppice and the M42. The area is mainly of open aspect but with some development impact already existing from the Planters Garden Centre to the west and the hamlet of Freasley in the north of the area. The presence and proximity of 	

	<p>development to the west of the M42 at Hockley (with the HS2 route proposals and residential planning applications affecting the land), the hamlet of Freasley within the northern part of the site and the presence of Birch Coppice, business park and container terminal to the east frames this area. Significant development on the remaining undeveloped part of this area would contribute towards the merger of the settlements of Tamworth and Dordon with a southern arm of built development stretching from Hockley to Birch Coppice, Dordon. It has a significant relationship with the open Area 9 to the north. This area is considered to be sensitive from development and operate as a strategic gap albeit this is not considered as critical as Areas 9 and 8 to the north, hence the “amber” classification.</p>	
<p>Recommendation – Include as part of the “Meaningful Gap” due to landscape and heritage sensitivity from development impact. Note also impact of infrastructure constraints (HP Gas pipeline).</p>		

10. Conclusion

- 10.1 In terms of landscape sensitivity the areas that are considered most sensitive to the potential impact of development are Areas 1, 2, 3, 6 and 10. However, although Areas 8 and 9 are considered less sensitive in landscape terms they are considered to operate more significantly as strategic gap on the major Gateway into the Borough from the west, are more sensitive to the impact of development in view of their open aspect and constitute the main “Meaningful Gap” area between Tamworth, the M42 and the built areas of Dordon and Birch Coppice, along with Areas 2 and 6, which follow the broad, eastern corridor of the M42. Area 2 and 3 are also considered to perform/operate significantly as strategic gap either side of the M42 on a similar gateway into the Borough.
- 10.2 These are also the areas most affected by infrastructure constraints with both HS2 “Y” Route and the High Pressure Gas Line and its associated Buffer Zone present. This would appear to support the identification of this south west/north east corridor or gap as the main area of meaningful gap referred to in the Core Strategy Policy. Areas 8 and 6 also adjoin or contain part of the small settlement of Birchmoor. In view of the proximity of development at Tamworth and Polesworth to Birchmoor, the narrowness of the gap either side of Birchmoor and the M42 along Green Lane and it is considered appropriate to include all the land around that settlement in Areas 6, 7 and 8 within the meaningful gap to maintain the identity and separation of Birchmoor and avoid encroachment from Tamworth, particularly as this settlement may be significantly impacted by the route of HS2 in the future. This area also contributes significantly to a contiguous, integral area that would constitute a ‘meaningful gap’.
- 10.3 The narrowness of the gap remaining between Tamworth and Polesworth along the B5000 is also an issue. This area is sensitive to development and provides a similar rural gateway role into Polesworth and North Warwickshire as the A5 does in the south into Dordon. The presence of some limited sporadic development along the northern boundaries of Area 7 and 6 and the southern boundary of Area 2, already impacts somewhat on this area of strategic gap and it is considered essential to try and maintain that gap that remains to avoid further co-alescence of the settlements, particularly in view of the proximity of the gap to development at Stonydelph, Tamworth and Kiln Way, Polesworth, It is therefore considered important to include Area 7 within the meaningful gap to help maintain this open corridor into the Borough and avoid loss of separation between Tamworth and Polesworth.
- 10.4 The areas contributing least to the principle of a ‘Meaningful Gap’ are considered to be Areas 3, 4, 5 and 10. Of these only Area 10 is east of the M42 but is still considered sensitive in landscape terms (remnant Arden Historic Landscape), containing Common land and adjoining the Green Belt to the south. This area is also affected by the High Pressure gas main and has a number of heritage assets within the settlement of Freasley, which

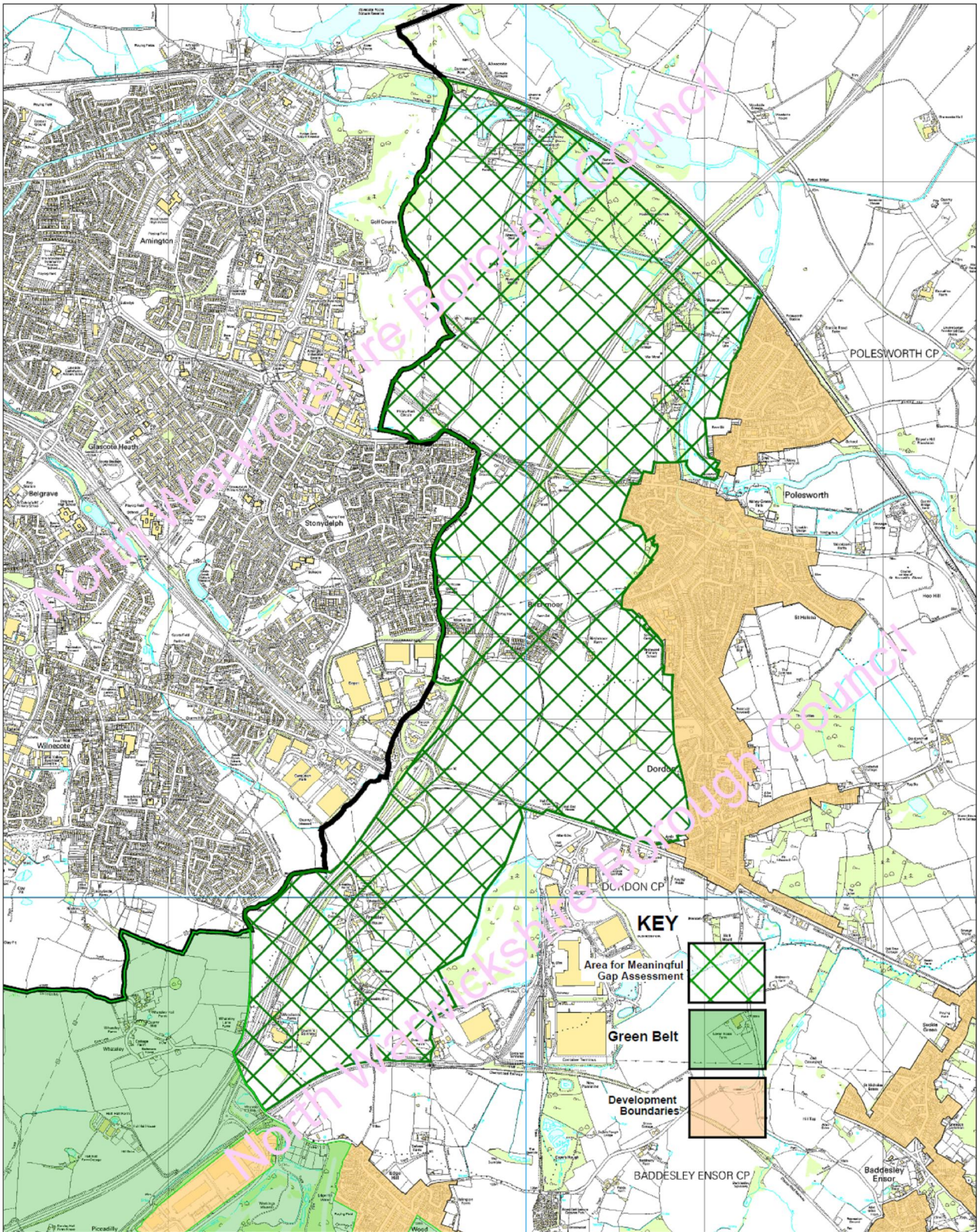
would be adversely impacted by any significant levels of development. This area should therefore be considered as contributing to the “Meaningful Gap”.

- 10.5 Area 3 is considered to currently operate less significantly as Meaningful Gap more as simply “open countryside” with significant landscape sensitivity. If development from the west starts to encroach towards Robeys Lane this sensitivity will increase and the areas importance as part of the Meaningful Gap, particularly between Tamworth and the M42, will grow. It is therefore still considered to operate as a strategic gap particularly between Tamworth and the M42 and forms part of an open corridor either side of the M42 between Tamworth and Polesworth that connects to the corridor to the south in areas 6, 7 and 8. Therefore, in advance of any development proposals to the west and mindful of the potential impact from HS2 it is considered appropriate to include these Areas within the Meaningful Gap.
- 10.6 The areas therefore most likely to fall outside the remit of the Meaningful Gap term are Areas 4 and 5, immediately adjoining Tamworth Borough boundary. Current proposals for development on the Golf Course and land adjoining Area 5 would result in built development on three sides of Area 5. Their visual and physical relationships are considered closer to built development in Tamworth and the physical separation of Area 4 from the rest of the open areas above reduces its relationship with and contribution to the meaningful gap . These areas are recommended to be excluded from falling within the terms or ‘designation’ of a Meaningful Gap in Policy NW19.

11. Proposed Policy Approach

- 11.1 The Meaningful Gap report supports Policy NW19. This explains how the Borough Council will interpret the words “meaningful gap” within that policy. The main principles would be to retain the mainly undeveloped aspect of the areas designated, avoiding/restricting significant development within the “Meaningful Gap” to help maintain the separate identity of the settlements affected as sought by Core Strategy Policy NW19. Those areas not affected by Meaningful Gap designation would be governed by the remaining Core Strategy/Local Plan policies and the NPPF dealing with sustainable development in the open countryside.

Area for Assessment of Meaningful Gap



North Warwickshire
Site Allocations Plan
Pre-Submission Stage 2014

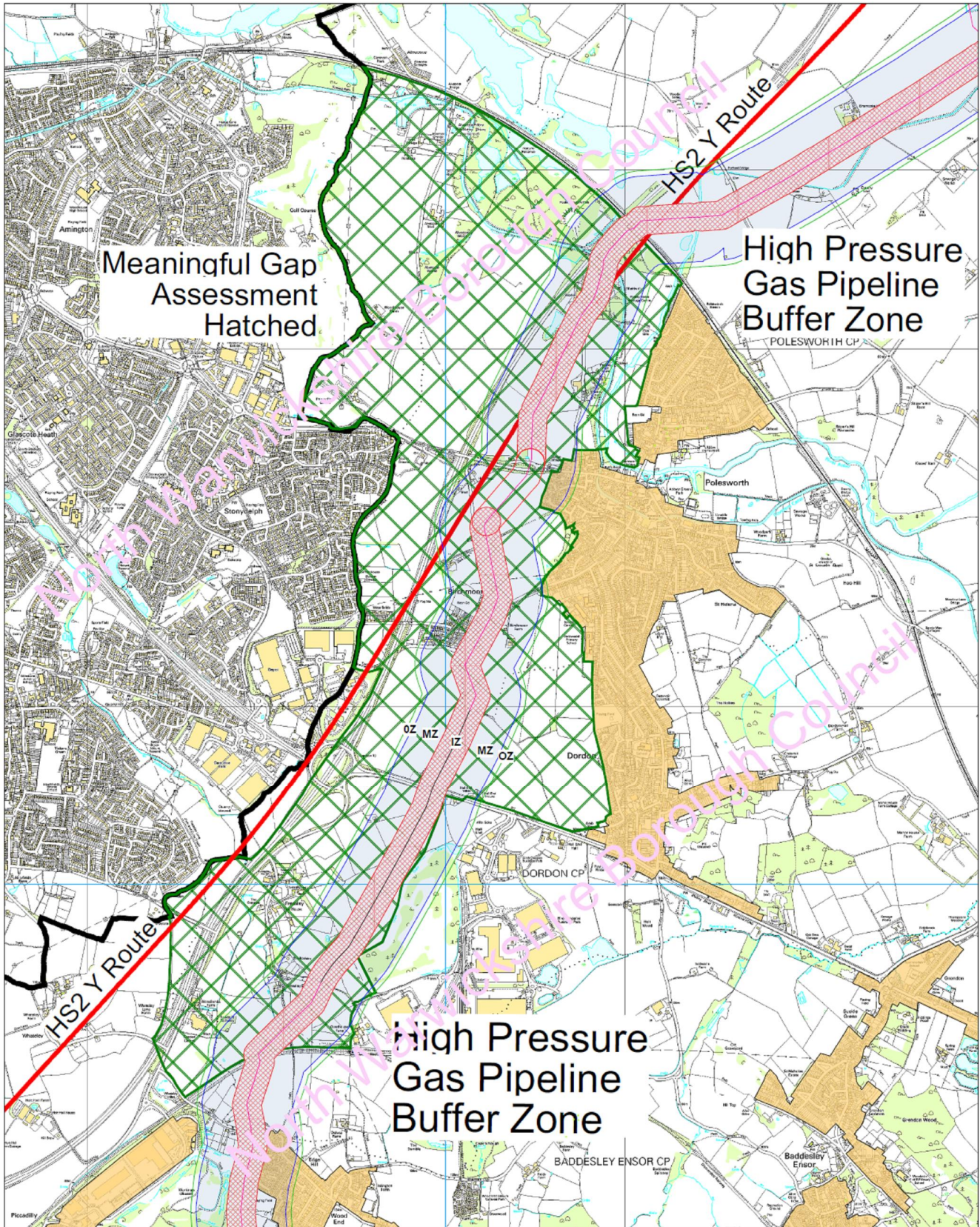
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North Warwickshire
Borough Council



Impact of Gas Pipeline Buffer and HS2 Y Route on Meaningful Gap



North Warwickshire
Site Allocations Plan
Pre-Submission Stage 2014

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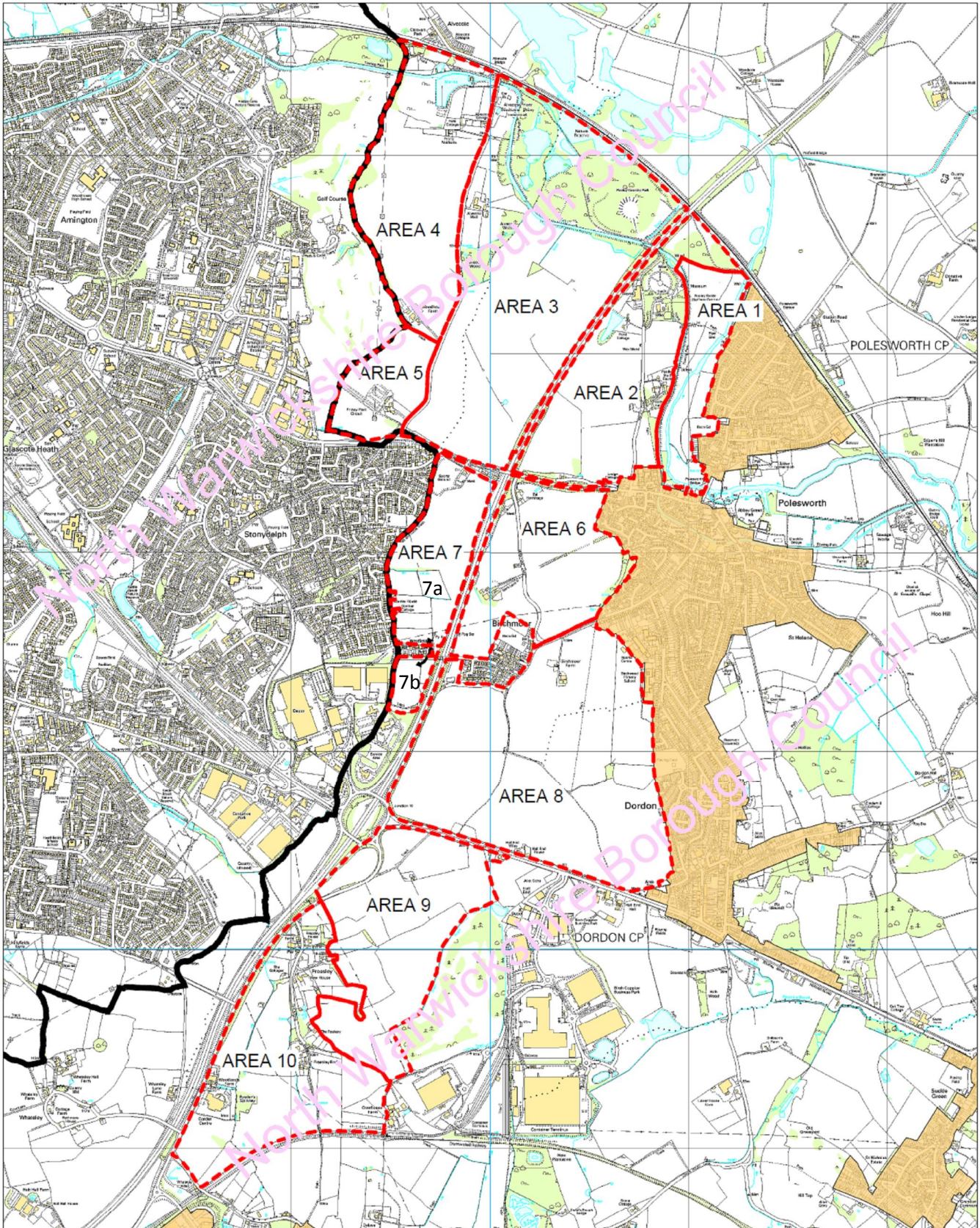


North Warwickshire
Borough Council



Ordnance
Survey
Licensed System Supplier

Individual Assessment areas within Meaningful Gap



North Warwickshire
Site Allocations Development Plan Document
Issues and Options

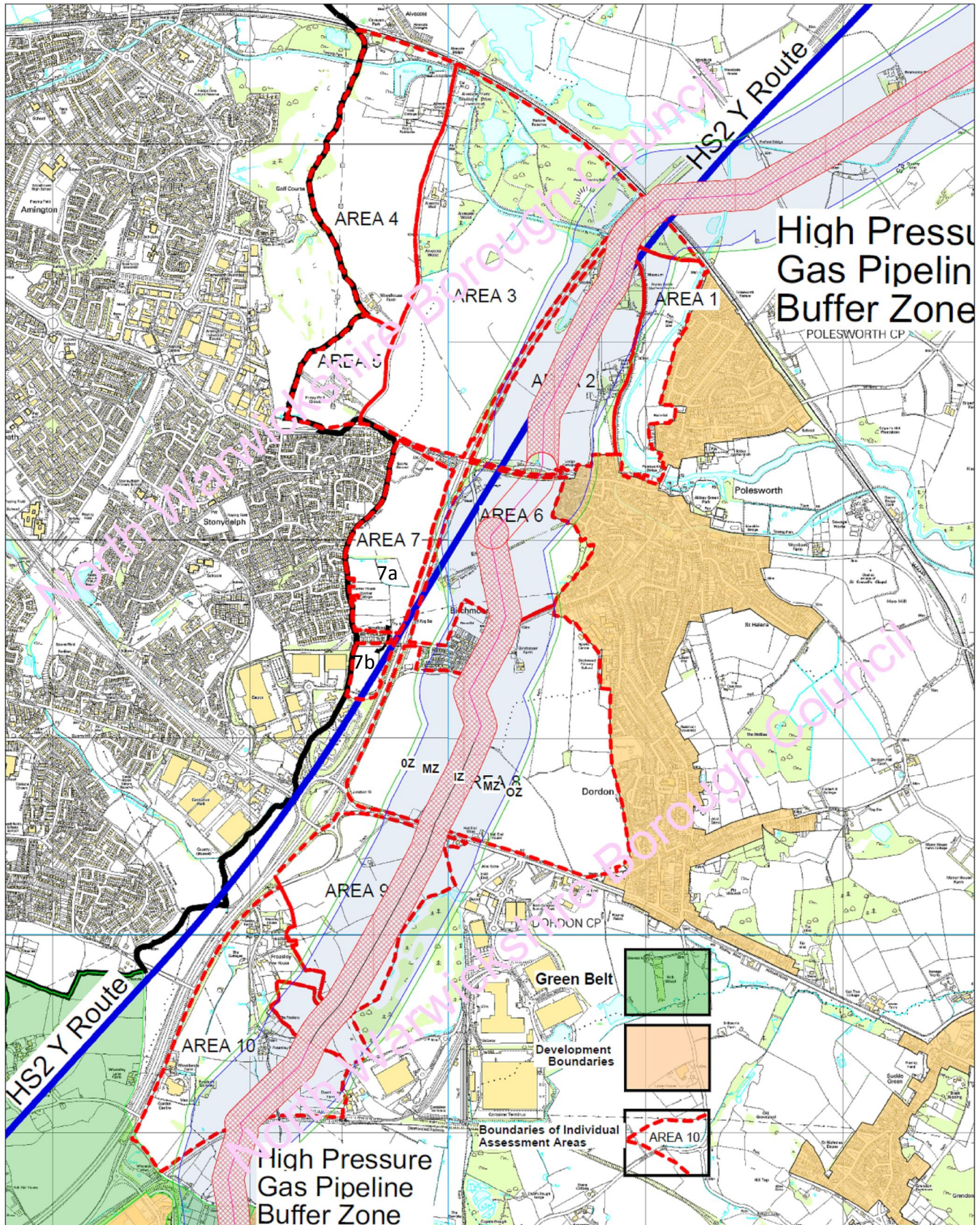
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North Warwickshire
Borough Council



Assessment Areas, Green Belt, HS2 Route, HP Gas Pipeline & Buffer Zone within Meaningful Gap



North Warwickshire
Site Allocations Plan
Draft Pre-submission Stage 2014

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North Warwickshire
Borough Council



Agenda Item No 6

Planning and Development Board

15 June 2015

**Report of the
Head of Development Control**

Corporate Plan Targets 2014/15

1 Summary

- 1.1 This report describes the action taken on a number of targets as set out in the 2014/15 Corporate Plan.

Recommendation to the Board

That the Board notes the report and be invited to make any observations

2 Background

- 2.1 There are on-going targets set out in the current Corporate Plan which require monitoring at the end of March 2015. The most convenient approach to do so is through this annual report on how each has been progressing.
- 2.2 Members will be aware of the substantial change in the planning environment in which they are now determining applications. The report below draws attention to the fact that this is beginning to impact on the ability to fully achieve the Council's priorities and objectives.

3 Development Management

- 3.1 The first such target is to "manage new development proposals such that they deliver the priorities of the Council's Corporate Plan and its Sustainable Community Strategy". Members will know that the approach here is to show that the service can manage new development proposals such that they are placed in the best possible position to benefit from a grant of planning permission, rather than just being refused. This is very much therefore the service adding value to submitted development proposals such that they are better able to achieve the Council's priorities and objectives. This can be achieved in a number of ways – engagement in pre-application discussion; pre-application consultation, resolving technical details with other agencies through negotiation and discussion, seeking amendments to plans and through the use of conditions and Section 106 Agreements. Members are familiar with all of these activities. That being said, Members should always remember that decisions to refuse planning permission should always

continue to be taken where there is clear and strong evidence to support them, either where there is significant and demonstrable harm, or because they clearly do not accord with the Development Plan.

- 3.2 Members will know that during the year they themselves had several presentations given to them on future proposals by developers keen to establish pre-application responses – eg St Modwens’s, Bloor Homes, Euro Car Parts and Harworth Estates. There have also been a number of local pre-application consultations and exhibitions such that local communities can become involved in pre-application discussion – eg. the Grendon solar farm; St Modwens at Freasley and for housing sites in Corley and Fillongley. Members have also influenced development proposals through the use of conditions and the terms of Section 106 Agreements. The Design Champions too are active in requesting changes –eg. at Spon Lane, Grendon; the hotel development at Heart of England and housing developments in Atherstone.
- 3.3 The Council is bringing more employment opportunities to the Borough through the grant of permissions at the Aldi headquarters building in Atherstone and on the Birch Coppice Estate – eg Euro Car Parts. The Planning Board itself is active in securing a wider range of jobs through the use of conditions agreed with developers such that there is a greater range of opportunity on new sites. At a smaller scale the Board has promoted alternative uses within some units on established industrial estates in order to retain them in occupancy and to broaden the employment base – eg. training and sporting facilities.
- 3.4 The Council has seen a marked upturn in housing proposals during the year and housing supply is expected to steadily increase throughout forthcoming years as our Core Strategy is now adopted. Importantly there is still affordable housing being approved, but opportunities are becoming increasingly limited as this is now confined either to the Council’s own land, or to the larger development sites, given the recent new Government guidance on such provision on smaller sites. Regrettably this has led to a significant reduction in contributions arising from those sites and thus the ability of the Council to deliver affordable provision in the Borough’s villages and smaller settlements.
- 3.5 The Council’s Health and Well-Being objectives are being met directly through the encouragement of leisure facilities such as the grant of permissions for the re-use of vacant industrial units; through the provision of cycle and pedestrian routes for journeys to work via Section 106 contributions and direct improvements to the Council’s own green spaces. The submission of much larger housing applications recently, enhances the Council’s role in managing that development to provide for co-ordinated open space provision with links to surrounding areas – eg. the Bloor development at Atherstone.
- 3.6 The Council has a priority to protect and improve the Borough’s heritage and countryside. This is being achieved through ensuring new developments are in keeping with their surroundings; that design is of a high quality and that proposals are heritage led wherever possible. Refusals of planning permission where there are clear adverse impacts have always been made.

3.7 In conclusion, Members will know that this year the Board has begun to experience significant change in how it should manage new development proposals. This is due to the NPPF and secondly to the continuing changes to the planning regulations introducing far more flexibility and change, reducing the need to involve the Council at all in decisions on new developments. These changes are beginning to alter the way that officers are making recommendations and indeed how the Board is then considering applications. These are introducing a tension between the Council's priorities and those particularly set out the NPPF. Even with the adoption of the Core Strategy, the Board will continue to have regard of the NPPF in its decision making as that is now Government planning policy. However wherever possible officers will continue to offer advice and guidance such that new development proposals are managed so as best to meet these new demands whilst balancing them against the Council's priorities. Perhaps the best example of this recently, has been in the approach to the development proposals in Austrey. Whilst it was fortunate in that several applications were submitted within a similar period, the Board was able to manage that process in a comprehensive and pro-active way rather than just reacting to the individual cases.

4 Protecting the Green Belt

4.1 This target is to ensure that only appropriate development is permitted in the Green Belt. This underlies the current Local Plan and is carried forward into the adopted Core Strategy. But it too is being weakened by the NPPF with its different interpretations of what is "appropriate" development and particularly to the weight to be given to the Green Belt when there is a housing shortfall. Members will have seen during the year a number of applications where planning application reports set out the Green Belt arguments in some detail as a consequence of the NPPF changes. These reports make explicit the weight to be given to various factors and to how a recommendation has been made when it comes to determining the balance between them. This will continue to be the practice, and Members should also be aware that they too should be explicitly considering these weights and the final balance. The Government through recent Ministerial Statements has showed its intent to underscore the significance of Green Belt protection in planning decisions, but the weight to be given to a development will still have to be weighed against the NPPF.

5 Design Champions

5.1 The two Members elected to assist in promoting good design have been regularly involved in a number of cases usually at their own request. Changes made often go un-mentioned or they are un-noticed. But it is the detail of the design that can make a development good rather than average, and the changes often just involve minor alterations to fenestration, having arched heads rather than straight; having a variety of porches and canopies outside doors, and the introduction of chimneys to some houses. On a larger scale then involvement in the development of a draft Master Plan for the Bloor

Homes proposals is a consequence of the Champions involvement in establishing clear principles.

6 Transport Links

6.1 Section 106 Agreements are regularly used to promote bespoke transport arrangements so as to enable access to new employment opportunities. However there has been little opportunity during the past year do follow this through. Members are probably aware that enhanced bus services through Birch Coppice and as a consequence of the MIRA redevelopment scheme are now under active consideration.

7 Report Implications

7.1 Financial and Value for Money Implications

7.1.1 These actions are all taking place within existing budgets and through developer contributions

7.2 Equalities and Human Rights Implications

7.2.1 The decisions on planning applications and an assessment of the weights to be given to competing policies are made explicit in Board reports such that these decisions are taken in a transparent, reasonable and proportionate manner so as to be less likely to be legal challenge.

7.3 Environmental Implications

7.3.1 The authority works proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

7.4 Links to Council Priorities

7.4.1 These actions all help to deliver Council priorities relating to the environment, economic development and access to facilities

The Contact Officer for this report is Jeff Brown (719310).

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

Agenda Item No 7

Planning and Development Board

15 June 2015

Report of the Chief Executive and the Deputy Chief Executive

Progress Report on Achievement of Corporate Plan and Performance Indicator Targets April - March 2015

1 Summary

- 1.1 This report informs Members of the progress with the achievement of the Corporate Plan and Performance Indicator targets relevant to the Planning and Development Board for April to March 2015.

Recommendation to the Board

That Members consider the performance achieved and highlight any areas for further investigation.

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

3 Background

- 3.1 This report shows the end of year position with the achievement of the Corporate Plan and Performance Indicator targets for 2014/15. This is the fourth report showing the progress achieved during this year.

4 Progress achieved during 2014/15

- 4.1 Attached at Appendices A and B are reports outlining the progress achieved for all the Corporate Plan targets and the agreed local performance indicators during April to March 2014/15 for the Planning and Development Board.
- 4.2 Members will recall the use of a traffic light indicator for the monitoring of the performance achieved.

Red – target not achieved (shown as a red triangle)

Green – target achieved (shown as a green star)

5 Performance Indicators

- 5.1 The current performance indicators have been reviewed by each division and Management Team for monitoring for the 2014/15 year.

6 Overall Performance

- 6.1 The Corporate Plan performance report shows that 100% of the Corporate Plan targets and 33% of the performance indicator targets are currently on schedule to be achieved. Individual comments from the relevant division have been included where appropriate. The table below shows the following status in terms of the traffic light indicator status:

Corporate Plan

Status	Number	Percentage
Green	5	100%
Red	0	0%
Total	5	100%

Performance Indicators

Status	Number	Percentage
Green	1	33%
Red	2	67%
Total	3	100%

7 Summary

- 7.1 Members may wish to identify any areas that require further consideration where targets are not currently being achieved.

8 Report Implications

8.1 Safer Communities Implications

8.1.1 Major applications are considered by the Police Architectural Liaison Officer who is looking to ensure that Secure by Design principles are applied for new developments.

8.2 Legal and Human Rights Implications

8.2.1 The national indicators were specified by the Secretary of State for Communities and Local Government. They were replaced by a single list of data returns to Central Government from April 2011.

8.3 Environment and Sustainability Implications

8.3.1 Improvements in the performance and quality of services will contribute to improving the quality of life within the community. The action to improve employment opportunities for local residents at Birch Coppice is contributing towards the Raising aspirations, educational attainment and skills priority of the North Warwickshire Sustainable Community Strategy 2009 – 2026.

8.4 Risk Management Implications

8.4.1 Effective performance monitoring will enable the Council to minimise associated risks with the failure to achieve targets and deliver services at the required performance level.

8.5 Equality Implications

8.5.1 The action to improve employment opportunities for local residents at Birch Coppice is contributing to equality objectives and is a positive impact in terms of the protected characteristics for age through the young people employment programme.

8.6 Links to Council's Priorities

8.6.1 There are a number of targets and performance indicators included relating to bringing more jobs to North Warwickshire, protecting and improving our environment and defending and improving our countryside and rural heritage.











The Contact Officer for this report is Robert Beggs (719238).

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
National Indicators for Local Authorities and Local Authority Partnerships	Department for Communities and Local Government	Statutory Guidance	February 2008

NWCP Planning Board 14/15

	Action	Priority	Reporting Officer	Update	Status	Direction
NWCP 012	Manage development so as to deliver the priorities on the Council's Corporate Plan and in the Sustainable Community Strategy and report by March 2015	Countryside and Heritage	Brown, Jeff	To be reported on time in June 2015	 Green	
NWCP 013	Ensure that only appropriate development is permitted in the Green Belt, that development is focused on the agreed settlement hierarchy and protects the best of our existing buildings and report by March 2015	Countryside and Heritage	Brown, Jeff	To be reported on time in June 2015	 Green	
NWCP 014	Use the Design Champions to ensure the best achievable designs are implemented and developed and report by March 2015	Countryside and Heritage	Brown, Jeff	To be reported on time in June 2015	 Green	
NWCP 051	To work with the County Council, Job CentrePlus and other partners to provide training and to administer funding provided by the developers and through other funding sources to maximise opportunities for employment of local people including employment engagement activity, development of work clubs and bespoke training	Local Employment	Maxey, Steve	In July a Birch Coppice Breakfast meeting was held to consider recruitment, retention and transport needs of occupiers. This joint event was held to help inform how the remaining s106 funds would be spent. The event identified travel solutions as a key priority with other activities to follow. A new bus service commenced 13/10/14. This is the 766/767 Nuneaton to Tamworth 7 day a week service. More subsidised travel vouchers have been introduced. GVA (IM Properties site management) are developing a Green Travel website with support from S106 funds. A week of events is being planned for 'Bike to Work' week in June.	 Green	
NWCP 070(1)	Looking to improve transport links to the local employment	Access to Services	Brown, Jeff	To be reported on time in June 2015	 Green	

NWPI Planning Board 14/15

Ref	Description	Section	Priority	Year End Target	Performance	Traffic Light	Direction of Travel	Comments
@NW:NI157a	Processing of planning applications in 13 weeks for major application types	Development Control	Countryside and Heritage	60%	94.11%	 Green		This difference is due to case officers following up detailed consultation responses and seeking amendments in order to create a better outcome
@NW:NI157b	Processing of planning applications in 8 weeks for minor application types	Development Control	Countryside and Heritage	80%	55.37%	 Red		The difference is due to a large number of application involving S106 agreements together with extended negotiations on viability issues. Together with waiting for consultation responses
@NW:NI157c	Processing of planning applications in 8 weeks for other application types	Development Control	Countryside and Heritage	90%	84.26%	 Red		Performance reflects priority given to major applications