

## Hammerwich neighbourhood plan

### Summary of regulation 16 representations

Person or Organisation	Section/Paragraph/Policy	Summary
Inland Waterways Association, Lichfield Branch – Philip Sharpe	Paragraph 3.10; The Vision; 8.10; Policy T3; Map 6; Appendix 1,4),iii)	The Inland Waterways Association, Lichfield Branch is pleased to fully support the many references in the Neighbourhood Plan to the various benefits of the continuing work to restore the Lichfield Canal, and the importance of protecting its route through the Local Plan. IWA also welcomes the inclusion of the canal towpath as a priority project for CIL funding.
Buildings by Bespoke Limited – Catherine O’Tool (Pegasus Group)	Section 3; Section 7 Policies H1 and H2; Section 8 Policies T1 and T2; Section 9 Key views and Policy LEnv2; Section 12 Paragraph 12.4	The Pegasus Group, on behalf of Buildings by Bespoke Limited, have provided representations made for the Neighbourhood Plan and in relation to the site referred to as ‘Land adjacent 117 Norton Lane’. Support is given to the plan period mirroring the 2018-2040 Local Plan Review. Attention is drawn to Map 2 and paragraph 136, which refers to the Green Belt and that amendments to boundaries may be made through non-strategic policies. In terms of housing allocations, Buildings by Bespoke Limited notes that the Neighbourhood Plan does not propose any new housing allocations. Part of paragraph 3.16 is not supported, as this does not allow any housing development along the northern boundary where existing residential development adjoins Burntwood, as this is outside of the settlement boundary for Hammerwich village. Buildings by Bespoke Limited state that this is an entirely suitable location for residential development, which has links to public transport, and other local services and facilities accessible by foot in the Burntwood area, and so would like to see this area reflected in the plan. Policies T1 and T2 should be in accordance with the parking standards set by Lichfield District Council. Policy LEnv 2 is generally supported.
Canal and River Trust – Hazel Smith	Objectives and Vision; Cycling & Walking; Parks & Public Spaces; Local Heritage Assets	The Canal and River Trust would like some small amendments to be made to the Neighbourhood Plan in respect of the local waterways. In paragraph 6.2, they suggest to include recreational uses such as the towpaths within the list of local facilities and amenities, resulting in Objective 1 becoming applicable, or to also amend the wording of Objective 6 to include ‘to support and maintain local recreational projects and facilities’. The Canal and River Trust recommend that Policy T3 should incorporate the aim of creating circular walks to promote health and wellbeing within the local population, as existing towpaths have the potential to provide circular routes. The wording of Policy T3 should also be amended to include enhancements to ensure a 10% net

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		<p>gain to nature conservation, and suggest the wording ‘...without harm to other recreational uses or wildlife, and to ensure 10% net gain to nature conservation’. The Canal and River Trust welcome the continuing work to develop and strengthen the green corridor as mentioned in paragraph 9.8, and has suggested to reference the canals as wildlife habits contributing to the wildlife network in the supporting paragraphs. A suggestion has been made that within the Local Heritage Assets chapter, it may be more helpful to designate a conservation area for the Anglesey Branch of the Wyrley &amp; Essington Canal Extension, rather than as an addition to the Local List as referred in paragraph 9.15. There is also an issue raised with the footbridge at Ogley Junction, which is believe to be already part of a Grade 11 listed building, and so would not require further mention in the Local List, if this is the bridge as understood by the Trust.</p>
<p>Harworth Group Plc – Katherine Else (Claremont Planning)</p>	<p>Paragraphs 3,2; 3,11; 3.13; 3.14; Vision; Policy CF1; Policy H1; Policy T2; Policy T3; Policy VB1</p>	<p>Claremont Planning on behalf of Harworth Group Plc have provided the following comments for the Hammerwich Neighbourhood Plan. In Section 3, paragraph 3.2, the Local Plan Review should not be considered as being in an advanced stage, as it has further stages to go through, and currently has deficiencies such as not identifying Burntwood as a location for strategic allocation, which would impact Hammerwich’s Neighbourhood Plan. In paragraph 3.11, it states that the Local Plan Strategy nor the Local Plan Review propose any large-scale development within the parish, which is objected to, as large scale development should be identified within Hammerwich due to its proximity to Burntwood and sustainability credentials afforded to this location. The Neighbourhood Plan would provide the community the opportunity to realise development in a sustainable way. Harworth Group promote the site off Hospital Road, and have provided a Vision document for potential proposals. In paragraph 3.13, references are made to the Local Plan Review proposing no further land is taken out of the Green Belt. However, representations by Harworth Group were made requesting that further releases should be made, and that the site at Hospital Road should be removed to assist in meeting housing needs. In paragraph 3.14, Harworth Group are objecting the approach that each settlement with the district would only need to supply a very small number of new homes to meet the housing requirement for the district. The current Neighbourhood Plan fails to acknowledge the role Hammerwich and the Burntwood area can assist with the requirement and also the unmet need from the Greater Birmingham Housing Market area. It is necessary for a higher proportion of new housing allocations to be accommodated in Hammerwich, and for the plan to review the housing numbers proposed at the settlement. Policy CF1 is supported, and it is suggested that the parish should further seek support proposals for residential development to increase patronage and</p>

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		<p>maintain the viability of businesses. Objection is raised to the wording of Policy H1, as it limits development to small-scale infill schemes, and specifically promotes housing for older people, whereas the Local Plan Strategy indicates development should deliver a balanced housing market. Objection is made to Policy T2, as the standards set are too onerous and do no accord with the requirements set out in the Sustainable Design SPD, and so should be amended to reflect this. Support is given to Policy T3, and Harworth Group identify new cycling and walking route which would meet the objectives of this policy at the site off Hospital Road. Objection is raised to Policy VB1 and the extent of the village boundary as illustrated in Map 4. The settlement boundary is too tightly drawn which will result in an adverse effect on the future viability and sustainability of the village without moderate levels of housing growth. In the Vision section, Harworth Group object to the wording that refers to any development in the Green Belt will have to be small-scale, and request this be deleted, as it does not reflect the NPPF or Local Plan, as development in the Green Belt does exist and do not have to be small-scale.</p>
<p>Lichfield &amp; Hatherton Canals Restoration Trust</p>	<p>Vision; Paragraph 8.10; Appendix 1</p>	<p>Luke Walker on behalf of Lichfield &amp; Hatherton Canals Restoration Trust is pleased that the Neighbourhood Plan mentions the progress of the restoration of the Lichfield Canal in the By-2040 Vision for the parish, and welcomes that the Neighbourhood Plan supports the policy statements in the Local Plan that regard the protection of the projected through route for the Lichfield Canal, and the use of the word ‘crucial’ in Paragraph 8.10 of the Neighbourhood Plan. They also welcome the inclusion in the list of projects for funding in Appendix 1- Priority Projects in the Parish, the funding of the sections of the towpath of the Lichfield Canal within the parish.</p>
<p>Mrs Mears and KM Jackson &amp; Son – Chonetell Buchanan (First City Ltd)</p>	<p>Paragraphs 2.1 to 3.16; Policy H1</p>	<p>Mrs Mears and KM Jackson &amp; Son have provided the following representations. The settlement boundary as per Map 4 and part of policy VB1 is very tight around the existing built development, providing very little opportunity for additional residential development. To meet the housing needs in paragraph 2.9 and types of housing identified in figures 3 and 5, the plan should allow the allocation of the land south of the Triangle ward (land south of Highfields Road) for new development. The Local Plan Review preferred options consultation stage identified 400 dwellings required in Burntwood during the review plan period. Due to the boundary issues of Hammerwich Parish and the inclusion of Triangle Ward which forms part of Burntwood this figure cannot be accommodated within the existing development boundary or on existing allocated sites from the current adopted Local Plan, and so there is an immediate need for an allocation of land to be identified.</p>

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		<p>To meet the housing needs and types as identified in Paragraph 2.9 and Figures 3 and 5, an allocation of the land south of the Triangle ward (land south of Highfields Road) would accommodate new housing development and would permit the area to grow sustainably, whilst maintaining the shape and size of Hammerwich village and avoiding piecemeal infill development.</p>
<p>National Grid – Avison Young</p>	<p>Whole plan</p>	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan Area.</p>
<p>Redrow Homes – Ian Deverall (Turley)</p>	<p>Paragraph 1.3; Vision; Section 3; Policy T2; Section 12</p>	<p>Redrow suggest that their representations should be read alongside their wider comments which have been submitted separately to this consultation. The representations provided for this consultation are made in context of the land south of Highfields Road, which Redrow are promoting for residential development, and lies within the Hammerwich parish and immediately adjoins the built-up area of Burntwood. Redrow contend that LDC’s evidence base has demonstrated that the site is sustainable and deliverable, and Redrow put forward that it is appropriate for release from the Green Belt for residential development. Although Redrow acknowledge that the Neighbourhood Plan cannot allocate the site as it would not be consistent with the Local Plan, nor a detailed amendment to the Green Belt, the wording of Paragraph 1.3 should be revised to reflect the position with the draft site allocation. Redrow have suggested the paragraph should read ‘there was some delay in preparing this Neighbourhood Plan, as LDC proposed a residential allocation to the south of Highfields Road in the Draft/Publication version of the LPA document (Regulation 19) in May 2017; Site Ref. B14 with an “approximate dwelling yield” of 250 dwellings. The LPA evidence base concluded that the site was both deliverable and sustainable but the proposed allocation was subsequently omitted through the “Focussed Changes” in 2018 because LDC’s analysis of housing land supply in 2017 indicated that sufficient land had been identified to meet the LPS housing requirement to 2029 without the need for all the proposed Green Belt releases. Progress on the Neighbourhood Plan could then re-start...’ This is to provide an accurate record of why the site was proposed and then withdrawn for allocation. The Neighbourhood Plan should avoid referring to the site as not being in accordance with the Vision and Objectives, as it could be allocated following the Local Plan Review process. Redrow Homes suggest that it is premature and misleading for the Neighbourhood Plan to claim conformity with the emerging Local Plan Review given the current status of the LPR, and so the</p>

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		Neighbourhood Plan should be drafted in accordance with the adopted Local Plan Strategy (2008-2029). In the Vision, the reference to 2040 should be replaced with 2029. In Section 3, amendments should be made to refer to the adopted LP rather than the LPR, particularly in reference to Paragraphs 3.2, 3.11, 3.13, 3.14 and 3.15. All references to consistency and conformity with the LPR should be deleted from the Neighbourhood Plan. As the LPR will be submitted for examination by December 2021 (as per Policy LPR: Local Plan Review from the Local Plan Allocations documents), the Neighbourhood Plan should include a policy with Section 12 which commits to a review of the Neighbourhood Plan following the adoption of the LPR to assess its conformity, which will be even more important if the plan continues to remain aligned to the LPR Plan Period up to 2040. Policy T2 seeks to achieve parking standards which go beyond those adopted in LDC's Sustainable Design SPD, and that suitable evidence has not been provided to justify parking standards different to those set out within the Sustainable Design SPD, and similar to LDC's comments on the policy believe that Policy T2 should be removed to meet Basic Condition 8(2) (e).
Severn Trent Water	Whole plan	Severn Trent Water do not have any comments to make for the Neighbourhood Plan, but have provided general guidelines in regard to their Position Statement, Sewage Strategy, Surface water and sewer flooding, Water Quality, Water Supply, and Water Efficiency.
Walton Homes – JVH Planning	Housing chapter	JVH Planning Consultants on behalf of Walton Homes Ltd have provided comments on the Housing chapter of the Neighbourhood Plan. Walton Homes Ltd note that the plan identifies the needs of the residents in terms of housing, such as space for working from home and the lack of housing suitable for an aging population, but does not identify any potential strategic sites to address these needs, and have suggested that the site at the East of Hammerwich Road and west of Stockhay Lane should be considered as a strategic site for future development.
Lichfield District Council	Whole plan; Paragraph 1.3; Section 3; Section 7; Section 8; Section 9; Section 10	Lichfield District Council welcome the Neighbourhood plan which as drafted is well presented and is the result of significant work. Comments have already been made by the council throughout the plan making process, a number of which have been taken into account. The council have provided a number of comments for the current representation. LDC have suggested that Paragraph 1.3 be removed, as the final plan does not need to reference delays in the plan process. LDC are currently reviewing its Local Plan (formally known as the Local Plan Review, now known as the Local Plan 2040), and is yet to commence its Regulation 19 consultation and so at this stage only limited weight can be given to its contents and policies. The Local Plan 2040 has

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		<p>renamed a number of policies and so references made to the LP 2040 within the Neighbourhood Plan are already superseded. It is suggested that references to the emerging local plan are removed or updated, and the Hammerwich NP may benefit reviewing/updating the plan following the adoption of the Local Plan 2040.</p> <p>References to the Local Plan 2040 content and policies are made in Section 3, and so paragraphs 3.10, 3.11, 3.14 and 3.15 need to be amended to remove or update the references, and LDC have provided revised working for these paragraphs. In Section 3, LDC also comment that in Paragraph 3.8, there is not a Biodiversity Strategy in place, and the previous strategy has expired.</p> <p>References to the Local Plan 2040 also need to be removed from paragraphs 7.2 and 7.3 of Section 7, paragraph 8.10 of Section 8 policy, and paragraphs 9.7, 9.9, 9.11 of Section 9, and any policies referred to within these paragraphs have now been renamed and so required amendments.</p> <p>In Section 7, LDC have referred to amendments to Paragraphs 7.8, 7.9 and Policy VB1, H1, and H2. Paragraph 7.8 has been suggested to be reworded to ‘...within this Neighbourhood Plan (<i>such as H1 below</i>) and adopted local plan policies should be applied.’ In paragraph 7.9, LDC suggest that it is unclear where the evidence and justification is in relation to drainage and flood risk, and that the following sentences should be removed ‘Local knowledge on drainage patterns should be sought in assessing what mitigation measures might be required. The Parish Council can often be a useful “first point of contact” for this’. Amendments are suggested for Policy H1; Policy VB1 could be incorporated into Policy H1, rather than being a separate policy. The second paragraph of the policy reads as being specific to development for older people, and too non-specific in terms of housing types, and should be re-worded for clarity. The first sentence of paragraph 3 of the policy should read ‘affordable housing should be provided in accordance with adopted local policy’. It is unclear to LDC why Policy H2 has been split into two sections. The policy assumes that all developments will be major housing developments, and so it is unclear how small developments can achieve certain criteria. As with paragraph 7.9, there is no evidence of justification for the requirement for local knowledge to be sought on drainage patterns as mention in point 14. There should be an inclusion A reference to development complying with the Rural Development SPD, and criteria specific to traditional barns should be included. A further suggestion to this policy is to include a reference to the National Design guide and Building for a healthy life, as other criteria fundamental to good design are not listed.</p>

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		<p>In Section 8, LDC state that it is unclear where the evidence and justification is for the level of car parking provision is in Policy T2, and the garage measurements are above those required by Staffordshire County Council. The policy should be replaced with the following: “All new housing development should provide car parking spaces in line with the car parking standards set out within the adopted Local Plan and Supplementary Planning Documents as a minimum”, and LDC also suggest provision for cycle storage should be referred to.</p> <p>In Section 9 the following amendments have been suggested by LDC. For Policy LEnv1, ‘providing that the openness of the space is not harmed’ should be removed as it is similar to the terminology used for Green Belt tests within national guidance, and ‘and that there are no negative impacts to biodiversity / no net loss to biodiversity or impacts to protected / priority species and habitats’ should be inserted. Paragraph 9.7 should be linked to the Nature Recovery Network Mapping as part of the Local Plan Evidence Base. The last sentence of paragraph 9.9 should be altered to read ‘Instead, those seeking to apply for planning permission should refer to the relevant adopted local plan policies’. The phrase Local Heritage Assets is suggested to be reworded to ‘Heritage Assets’. In paragraph 9.14, it needs to be clear that the buildings have been added to the council’s Local List and are already considered as non-designated heritage assets. In paragraphs 9.15-16, LDC suggest that identification is another way of identifying non-designated heritage assets, so it should be made clear if this is the intentions, and having an entry on the HER is not one of the criteria that the council use to assess if a building could be added to the local list. For Policy LEnv3 LDC suggests that this should be titled ‘Heritage Assets’ as the terminology used should accord with the Local Plan which reflect the wording of the NPPF.</p> <p>In Section 10, LDC suggest that further clarification would be helpful to clarify what purposes would be supported as appropriate re-uses of redundant farm buildings.</p>

## Summary of regulation 16 late representations (received after the close of consultation)

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Wendy Taylor	Local environment	<p>There is no mention in the plan of the numerous trees in and around the village which give it much of its character. There are over 100 trees with TPOs as well as several groups of trees that have a similar protection. The value of these to the local landscape is huge as is their importance to local biodiversity and people's well-being. Their contribution to reducing flooding (which is mentioned in the plan as an issue) is ignored as is their role in tackling climate change.</p> <p>I feel this is a serious omission and needs to be rectified.</p>