

Berkswell Draft Neighbourhood Development Plan – Consultation Responses – 18th June to 31st July 2018

Table 2 Consultation Bodies 050918 FINAL

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
Natural England 1.0			All	Comment	<p>Thank you for your consultation regarding the Berkswell Draft Neighbourhood Plan dated 15th June 2018.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals.</p> <p>We have reviewed the attached plan however Natural England does not have any specific comments on this draft neighbourhood plan.</p>	Noted.	No change.

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					If the Neighbourhood Plan changes and there is the potential for environmental impacts, Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening exercises may need to be undertaken.		
LNW Network Rail 2.0			All	Comment	As you are aware Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure	Noted. These are largely detailed matters which would be addressed by SMBC through the development management process as and when development proposals come forward over the plan period.	No change.

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					<p>Order); in addition you are required to consult the Office of Rail and Road (ORR).</p> <p>(1) Within Transport Assessments there is a review of local needs regarding public transport; this usually focuses on buses. However, Transport Assessments should also take into account their impact upon footfall at railway stations.</p> <p>Developers are encouraged to consider including within Transport Assessments trip generation data at Railway Stations. Location of proposals, accessibility and density of developments should be considered in relation to railway stations. Where proposals are likely to increase footfall at railway stations developer contributions should be considered (either via CIL, S106 or unilateral</p>		

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					<p>undertaking) to provide full funding for enhancements at stations as a result of increased numbers of customers.</p> <p>(2) Development proposals should be accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossing(s) with mitigation implemented as required. Network Rail would encourage the council to adopt specific policy wording to ensure that</p> <ul style="list-style-type: none"> a) The impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and b) suitable mitigation incorporated within the development proposals and fully funded by the developer(s). TS/TAs 		

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					<p>should be undertaken in conjunction with the local highways authority with advice from Network Rail.</p> <p>(3) Developments in the neighbourhood area should be notified to Network Rail to ensure that:</p> <p>(a) Access points / rights of way belonging to Network Rail are not impacted by developments within the area.</p> <p>(b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.</p> <ul style="list-style-type: none"> • Drainage works / water features • Encroachment of land or air-space • Excavation works • Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues 		

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					<ul style="list-style-type: none"> • Lighting impacting upon train drivers ability to perceive signals • Landscaping that could impact upon overhead lines or Network Rail boundary treatments • Any piling works • Any scaffolding works • Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949) • Any use of crane or plant • Any fencing works • Any demolition works • Any hard standing areas <p>For any proposal adjacent to the railway, Network Rail would request that a</p>		

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					<p>developer constructs (at their own expense) a suitable steel palisade trespass proof fence of at least 1.8m in height.</p> <p>All initial proposals and plans should be flagged up to the Network Rail Town Planning Team London North Western Route at the following address:</p>		
The Coal Authority 3.0			All	comment	<p>Thank you for the notification of the 15 June 2018 consulting The Coal Authority on the above NDP.</p> <p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction,</p>	Noted.	No change.

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					<p>where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware the Neighbourhood Plan area lies within the current defined deep coalfield. However the Neighbourhood Plan area does not contain any surface coal resources or recorded risks from past coal mining activity at shallow depth. Therefore The Coal Authority has no specific comments to make on the Neighbourhood Plan.</p> <p>In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to provide The Coal Authority with any future drafts or updates to the emerging Neighbourhood Plan. This letter can be used as evidence for the legal and procedural consultation requirements.</p>		

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					<p>The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.</p> <p>Yours faithfully</p> <p>Development Team Leader</p>		
National Grid 4.0			All	Comment	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus. National Grid has identified the following high voltage overhead powerlines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • YYA Route - 275kV from Berkswell substation in Solihull to Coventry substation in West Midlands 	<p>Noted.</p> <p>These are largely detailed matters which would be addressed by SMBC through the development management process as and when development proposals come forward over the plan period.</p>	No change.

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					<ul style="list-style-type: none"> <li data-bbox="1014 352 1386 488">YYE Route - 275kV from Berkswell substation in Solihull to ZF134B Tower in Solihull <p data-bbox="1014 531 1386 738">From the consultation information provided, the above overheads powerlines does not interact with any of the proposed development sites.</p> <p data-bbox="1014 782 1386 1382"><i>Gas Distribution – Low / Medium Pressure</i> Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@cadentgas.com</p>		

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Tyler Parkes for Chief Constable of West Midlands Police 4.1			All	Comment	<p>See 8 page letter dated 11th July 2018. Shown in Appendix 1</p> <p>Appendix 1 _ Tyler Parkes for West Midlands Police</p> <p>Our ref: 8980 KDBH NP HW 11th July 2018</p> <p>Dear Sir/Madam Berkswell Regulation 14 Draft Neighbourhood Plan 2018 – 2033 Consultation: Formal Representations on behalf of Chief Constable of West Midlands Police.</p> <p>We act for the Chief Constable of West Midlands Police (CCWMP) and are instructed to make representations on local development documents in respect of securing policy reference in such documents to matters including: ☑ Recognising the community need for securing safe</p>	Noted.	No change.

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					<p>environments with crime reduction made a priority;</p> <p>☑ Requiring developers to demonstrate how proposals address community safety and crime prevention in Design & Access Statements, or other relevant planning application documents;</p> <p>☑ Ensuring the timely and effective engagement of the police and other emergency services to ensure effective delivery of infrastructure projects required as a result of development growth with the recognition that the police are a social infrastructure delivery agency;</p> <p>☑ In appropriate cases, seeking financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of development proposals and growth; and</p>		

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					<p>☑ Ensuring the timely and effective engagement of the police and other emergency services in the planning processes in relation to matters likely to affect crime and fear of crime.</p> <p>The CCWMP has a statutory duty to secure the maintenance of an efficient and effective police force for its area and Solihull Metropolitan Borough Council (MBC) is statutorily required to consider crime and disorder and community safety in the exercise of its duties with the aim of achieving a reduction in crime. Neighbourhood Plans, once 'made', become part of the Council's development 2/8 plan and these documents should therefore consider crime and disorder with polices aimed at reducing crime and the fear of crime, in</p>		

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					<p>line with national and Local Plan policies.</p> <p>The CCWMP is grateful for the opportunity to comment on the Berkswell Regulation 14 Draft Neighbourhood Plan (NP). Comments are set out below:</p>		
4.2				Comment	<p>Planning Policy Background</p> <p>1. The National Planning Policy Framework (NPPF), March 2012, paragraph 156 sets out the strategic priorities for local planning authorities, including, 'the provision of health, security, community and cultural infrastructure...' Security is therefore a national strategic planning objective for local authorities.</p> <p>2. Paragraph 58 in subsection 7, Requiring Good Design states, '<i>Local and neighbourhood plans should comprehensive policies and set out the quality of development that will be expected for the</i></p>	<p>Noted.</p> <p>The Basic Conditions Statement sets out how the NDP meets the required basic conditions, including having regard to national planning policies and general conformity with strategic planning policies as set out in the local plan. NDPs should avoid duplication of</p>	No change.

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					<p><i>area... Planning policies should aim to ensure that developments:...create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion...'</i></p> <p>3. This message is reemphasised in paragraph 69 in subsection 8, Promoting Healthy Communities, which states, <i>'The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities...Planning policies and decisions, in turn, should aim to achieve places which promote:...safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and safe develop robust and accessible developments, containing clear and legible pedestrian routes, and high</i></p>	<p>existing national and local policies.</p> <p>However, where there is a need to strengthen the local detail in NDP policies in line with police advice then this will be considered by the PC - see proposed changes set out below in 4.3 - 4.9 below.</p>	

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					<p><i>quality public space, which encourage the active and continual use of public areas.'</i></p> <p>4. Paragraph 17, requires local authorities as one of their 'Core Planning Principles', to <i>'take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.'</i> This would include the requirement for appropriate levels of police infrastructure are provided and maintained to meet the needs of the community.</p> <p>5. The national 'Planning Practice Guidance' (PPG), paragraph 10 (Reference ID: 26-010-20140306) is sub-titled 'Planning should address crime prevention'. It states that <i>'Designing out crime and designing in community safety should be central to the planning and delivery of new</i></p>		

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					<p><i>development.</i> It emphasises that it is important that crime reduction-based planning measures are based upon a clear understanding of the local situation and consideration needs to be given to how planning policies relate to wider policies on crime reduction, crime prevention and sustainable communities.</p> <p>6. Paragraph 003 (Reference ID: 41-003-20140306) explains that to help deliver their vision communities that have a 'made' neighbourhood plan or Order will benefit from 25% of the revenues from the Community Infrastructure Levy (CIL) arising from the development that takes place in 3/8 their area. The use of neighbourhood funds should match priorities expressed by local communities, including priorities set out formally in neighbourhood plans.</p>		

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					<p>7. Paragraph 045 (Reference ID: 41-045-20140306) suggests that the neighbourhood plan body may wish to consider what infrastructure needs to be provided in their neighbourhood area alongside development such as homes, shops or offices. It emphasises that <i>'...infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way...'</i> The PPG states that <i>'...Qualifying bodies should engage infrastructure providers...in this process...'</i></p> <p>Paragraph 46 (Reference ID: 41- 046-20140306) goes onto explain that, <i>'...A qualifying body should set out in their draft neighbourhood plan the prioritised infrastructure required to address the demands of the development identified in the plan...'</i></p>		

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					<p>8. Paragraph 71 of the PPG (Reference ID: 25-071-20140612) explains that the levy can be used to fund a wide range of infrastructure, <i>'...including police stations and other community safety facilities...'</i> This flexibility gives local areas the opportunity to choose what infrastructure they need to deliver their Plan.</p> <p>9. Paragraph 78 of the PPG (Reference ID: 25-078-20140612) emphasises that the neighbourhood portion of the levy can be spent on a wider range of things than the rest of the levy, provided that it meets the requirement to 'support the development of the area'. The wider definition means that the neighbourhood portion can be spent on, for example: the provision, improvement, replacement, operation or</p>		

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					<p>maintenance of infrastructure; or anything else that is concerned with addressing the demands that development places on an area.</p> <p>10. When an Inspector examines a Neighbourhood Plan it will be tested to establish whether or not it meets the 'basic conditions'. These include that it should: have regard to national policies and advice contained in guidance issued by the Secretary of State; contribute to the achievement of sustainable development; and be in general conformity with the strategic policies contained in the development plan for the area of the authority.</p> <p>11. At a local level, Solihull Local Plan, adopted December 2013, Policy P15 'Securing Design Quality' states that '<i>All development proposals will be</i></p>		

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					<p><i>expected to achieve good quality, inclusive and sustainable design, which meets the following key principles...vii. Creates attractive, safe, active, legible and uncluttered streets and public spaces which are accessible, easily maintained and encourage walking and cycling and reduce crime and the fear of crime....'</i> The Policy goes on to require that <i>'...Applicants should adhere to the urban design principles set out in established current design guidance, including... Secured by Design principles...'</i></p> <p>At paragraph 13.3.3 4/8 of the Local Plan, it states that the Council, <i>'...are working with statutory delivery agencies to have the most up-to-date information on infrastructure requirements and to strive for multiple benefits from development where possible...'</i> including working, <i>'...with the West</i></p>		

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					<p><i>Midlands Police to deliver safe developments and communities.'</i></p> <p>12. The emerging Solihull Local Plan Review, draft published for consultation December 2016, Policy P15 continues to require consideration of crime and safety in design, it states proposals will be expected to <i>'...Create attractive, safe, active, legible and uncluttered streets and public spaces which are accessible, inter-connected and easily maintained, and encourages walking and cycling and reduces crime and the fear of crime through the adoption of Secured by Design principles in all developments...'</i></p> <p>13. At both a national and local planning policy level, there is therefore a recognised planning need for development to design-in</p>		

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					<p>crime prevention measures and design-out crime, as well as the need to plan for appropriate levels of infrastructure, such as street lighting and CCTV, which would be eligible for CIL funding.</p> <p>Policies and Proposals in the Draft Berkswell NP Draft Vision (page 11) 14. The CCWMP welcomes the aim set out in the Draft Vision that Berkswell Parish should remain a 'safe' place. In order to achieve this aim, and to support the aims of national and local planning policy in respect of safety and security, the CCWMP recommends introducing additional policy wording as detailed below.</p>		
4.3			Vision and Objectives	Comment	<p>Draft and Objectives (pages 11 -12) 15. The CCWMP recommends introduction of an additional</p>	<p>Accepted. Insert additional text as suggested</p>	<p>Amend Plan. Insert additional point under housing objectives:</p>

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					bullet point under sub-heading 'Housing Objectives' as follows: Designs and layouts should create and maintain safe neighbourhoods by including measures to reduce crime and the fear of crime.	into housing objectives.	" Designs and layouts should create and maintain safe neighbourhoods by including measures to reduce crime and the fear of crime."
4.4			Vision and Objectives	Comment	16. The CCWMP welcomes the references under sub-heading 'Accessibility and Infrastructure Objectives' to the need to promote improved and safe accessibility with improved traffic flows and adequate off-road parking. However, the CCWMP considers it is important that the need for additional community safety facilities arising from the scale of development proposed in the Draft Solihull Local Plan Review be specifically referenced within bullet point	Accepted. Insert additional text as suggested into accessibility and infrastructure objectives.	Amend Plan. Amend Accessibility and Infrastructure Objectives point 10 to: " To encourage the development of infrastructure for facilitating safe and secure environments, health, wellbeing, leisure and the community for <u>all</u> residents."

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					<p>10 by the inclusion of the following amendment (changes shown in 'bold'):</p> <p>☐ To encourage the development of infrastructure for facilitating safe and secure environments, health, wellbeing, leisure and the community for all residents.</p>		
4.5			B1	Comment	<p>Draft Policy B1: New Housing - General Principles (pages 15 -17)</p> <p>17. The CCWMP requests that Draft Policy B1: New Housing – General Principles addresses the need to ensure new development considers the need to design out-crime and to design-in safety features, in consultation with West Midlands Police.</p> <p>Well-designed places can help to reduce the circumstances and opportunity for crime and increase public confidence and security also reducing the fear</p>	<p>Accepted.</p> <p>Insert additional wording as suggested.</p>	<p>Amend Plan.</p> <p>Insert additional criterion into Policy B1 under 2. Layouts and Accessibility:</p> <p>" Development schemes should create and maintain safe neighbourhoods by including measures to reduce crime and the fear of crime, and to strengthen the sense of local community. Such measures should incorporate the principles of 'Secured by Design' and be agreed in consultation with the West Midlands Police."</p>

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					<p>of crime. Sustainable communities can be maintained by effective design solutions which integrate well maintained public spaces, community facilities, residential developments, shops and parks into the surrounding development. We therefore recommend introduction of a new bullet point as follows:</p> <p>Development schemes should create and maintain safe neighbourhoods by including measures to reduce crime and the fear of crime incorporating the principles of 'Secured by Design' and in consultation with the West Midlands Police.</p>		
4.6			B3	Comment	<p>Draft Policy B3: Protecting Local Landscape and Built Character (pages 30 -31)</p> <p>18. Heritage crime, such as the theft of lead flashing, cast-iron</p>	<p>Partially accepted.</p> <p>Advice was sought from the local authority</p>	<p>Amend Plan.</p> <p>Insert additional point (5) into Policy B3 under sub heading Heritage Assets:</p>

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					<p>down pipes and other historic artifacts, is a significant problem, particularly in Conservation Areas and for Listed Buildings. In an effort to reduce the incidence of recurrent heritage crime, the CCWMP request that 'Draft Policy B3: Protecting Local Landscape and Built Character' or the supporting text, be amended to include reference to the willingness of the Neighbourhood Forum to favourably consider the use of alternative materials, where appropriate, when repairing Listed Buildings to reduce the risk of repeat theft and damage.</p> <p>19. Whilst planning permission is unlikely to be required for replacement materials, Listed Building consent is usually necessary for proposals affecting a Listed building, particularly if an alternative replacement material is</p>	<p>conservation officer.</p> <p>It was advised that the replacement of material stolen from historic assets should start from the position that like-for-like replacement is the normal expected standard with appropriate security measures.</p> <p>If alternative materials are proposed following theft of or from a heritage asset, proposals should be accompanied by a detailed and thorough explanation of the rationale for the change and the anticipated impact</p>	<p>" Material(s) stolen from historic assets should be replaced like-for-like and supported by appropriate security measures.</p> <p>If alternative materials are proposed following theft of or from a heritage asset, proposals should be accompanied by a detailed and thorough explanation of the rationale for the change and the anticipated impact on the significance of the heritage asset together with an explanation of why like-for-like materials with appropriate security measures will not be the appropriate course of action."</p>

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					<p>proposed. It would therefore be appropriate for either an additional sentence to be included within the policy itself, or for the supporting text to make reference to the need to consider crime and safety issues in these circumstances.</p> <p>20. Where replacement works are proposed to Listed Buildings, it is recommended that the particular circumstances of a heritage environment, 6/8</p> <p>site context, and merits be considered on a case by case basis. In particular to: assess whether repeat crime (such as theft of materials from a building) is highly likely; assess the potential damage to an historic asset that may result from repeated theft of existing and any like-for-like replacement materials such as</p>	<p>on the significance of the heritage asset together with an explanation of why like-for-like materials with appropriate security measures will not be the appropriate course of action.</p> <p>Insert additional wording following conservation officer's advice.</p>	

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					<p>from historic churches; and, consider the significance of that particular element of the building (to be re-instated in the event of theft) in terms of its contribution to the value of that particular heritage asset. For example the lead roof on one building may not be as important to the historic asset as another due to its size, aspect or prominence on the building.</p> <p>21. There will be cases where the use of alternative materials is the most appropriate way of avoiding such crime. For instance if the site is open, has no defensible boundaries, is not subject to natural surveillance, poorly lit, and the design of the building offers offenders a number of potential routes up to the roof to target metal fixtures and fittings. This makes it difficult to install suitable measures to prevent access to the roof.</p>		

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					<p>Any defensive anti-climb measure, such as metal spikes, would potentially not be in keeping with the historic or architectural status of the site and would certainly not be aesthetically pleasing.</p> <p>22. The use of replacement material (along with the installation of signage around the site indicating the material has been replaced by a 'no theft value' option) that proves valueless to any potential thief may be the most suitable measure, or an important part of a range of measures, to deter crime.</p> <p>23. The principle of this approach is accepted by English Heritage (the 3rd para in Section 3 of the document English Heritage Guidance Note: Theft of Metal from Church Buildings' (2011)) states:</p>		

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					<p>“Every case is assessed on its merits, but we appreciate that there will be instances in which a change of material will be appropriate, especially when the area of roof is not visible from ground level. After a theft, the first priority must be to provide emergency cover whilst the permanent replacement is arranged. In some situations, a durable replacement such as terne-coated stainless steel, tiles or slates, rather than lead, might be the most prudent way to repair the building”.</p> <p>24. By way of local example, at Knowle Parish Church, four metal theft offences were recorded in the 16 months prior to the stolen guttering metal being replaced by glass reinforced plastic (GRP) in ‘ October 2012. There have been no incidents of theft or damage against the building since. Metal replacement</p>		

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					<p>options, such as lead, cast iron and aluminium would all be attractive to thieves and as a result could draw offenders to the site.</p> <p>25. The CCWMP recommends introduction of the following wording: 7/8</p> <p>☒ 'In appropriate circumstances, favourable consideration will be given to the use of approved 'alternative' materials to replace building materials and artefacts stolen from buildings of historic importance to reduce crime and the fear of crime'.</p>		
4.7			All	Comment	26. The local Police Senior Leadership Team and Neighbourhood Policing Unit will have detailed knowledge about site specific issues in	Accepted. Insert additional supporting text before Policy B1:	Amend Plan. Insert additional text after para 5.14:

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					<p>respect of crime and safety and any needs arising from the proposed development growth in specific locations – such as the proposed 800 dwelling development provisionally identified by the emerging Solihull local plan Review at Barratt's Farm.</p> <p>27. Additionally, the centrally-based Design Out Crime Team (DOCT) have extensive knowledge of security measures and 'Designing Out Crime'. The CCWMP requests that, as appropriate, the Senior Leadership Team, Local Policing Unit and CPDAs are engaged in policy implementation and delivery once the Berkswell NP is 'made'.</p> <p>28. Given the recognised importance of prioritising safety and security within national, local and emerging planning policies, the CCWMP</p>		<p>"At Regulation 14 consultation stage West Midlands Police submitted detailed comments relating to the need for the NDP to consider design and planning to improve community safety and reduce opportunities for crime. These suggestions have been taken on board both in the objectives and additional text in Policies B1 and B3. The Parish Council is committed to working in partnership with the Police to promote safe and secure environments and communities to deliver the NDP's objectives."</p>

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					considers it important that the Berkswell NP should include reference to the intention to work in partnership with the Police to promote safe and secure environments and communities to deliver the Plan's objectives in the policy supporting text.		
4.8			Appendix 5	Comment	<p>Appendix 5 – Improving Local Infrastructure (pages 61 – 64)</p> <p>29. The growth in development anticipated across the Berkswell NP area and in the adjacent Balsall Common Parish Council area up to 2033 will inevitably place pressure on existing physical, community, social and green infrastructure.</p> <p>Therefore, as recognised in the NP, measures need to be in place to ensure that new growth is supported by appropriate and timely infrastructure provision so</p>	<p>Accepted.</p> <p>Insert additional text to Appendix 5 as suggested.</p> <p>It should be noted that the WM Police closed their community office within Balsall Common centre within Berkswell parish within the last 12 months.</p>	<p>Amend NDP.</p> <p>Insert after Appendix 5 a new section / Appendix headed:</p> <p>“Suggestions made for the spending CIL by stakeholders excluding residents”</p> <p>West Midlands Police advised in their Regulation 14 consultation response that the growth in development anticipated across the Berkswell NP area and in the adjacent Balsall Parish Council area up to 2033 will inevitably place pressure on existing</p>

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					<p>that vibrant and sustainable communities can be created and maintained. This will also create opportunities to provide infrastructure solutions to ease and remedy existing issues.</p> <p>30. The scale of development will, of course, impact the maintenance of appropriate levels of community safety facilities. The CCWMP is disappointed that the need for CIL investment to bridge the 'funding gap' necessary to maintain and improve Police infrastructure for existing and future new communities, has not been highlighted in the summary table of suggestions made by residents.</p> <p>31. The CCWMP therefore requests that the Appendix 5 includes reference to the need for CIL investment towards the maintenance of an effective Police</p>		<p>physical, community, social and green infrastructure.</p> <p>Therefore there is a need to support new and existing development by timely infrastructure provision, such as Police infrastructure necessary to maintain and improve safety and security, so that vibrant and sustainable communities can be created and maintained."</p>

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					<p>8/8 presence and for provision of crime reduction facilities, such as CCTV or street lighting, as an example on page 61. It is recommended that the following bullet point be added under part 'A' between points 'c' and 'd' as follows: <input checked="" type="checkbox"/> to support new and existing development by timely infrastructure provision, such as Police infrastructure necessary to maintain and improve safety and security, so that vibrant and sustainable communities can be created and maintained.</p>		
4.9			All	Comment	32. The CCWMP request that the Neighbourhood Forum work together with the West Midlands Police to ensure that necessary security improvement facilities are included within the list of local community facilities and infrastructure as a candidate for CIL funding.	Noted. The Parish Council welcomes the offer to work with the West Midlands Police in the future to improve community safety.	No change.

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					<p>Conclusion</p> <p>33. The CCWMP urge the Neighbourhood Forum to recognise the importance of considering crime prevention in all appropriate policies and proposals within the NP. They advocate the introduction of policy wording which will promote the development of safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Amendments are sought to Draft Policies which will ensure consistency with national and local overarching planning policies and ensure that the NP meets the basic conditions.</p> <p>34. The CCWMP requests that the Neighbourhood Forum involve them in the plan making and implementation process on an on-going basis</p>		

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					<p>to establish potential infrastructure pressure points and future infrastructure needs as more detailed information on development proposals and the scale of growth are finalised. The CCWMP is keen that the Berkswell NP recognises the need for CIL revenue to be directed towards maintaining and improving community safety, in line with national and local planning policy objectives.</p> <p>The CCWMP and his representatives would be pleased to meet with you to discuss the matters raised in this letter of representation. We should be grateful if you would acknowledge receipt of this letter of representation.</p> <p>Yours faithfully,</p>		

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Balsall Parish Council 5.1			All	Comment	<p>See appendix 9</p> <p>General Comments</p> <p>Balsall Parish Council welcomes the opportunity to comment on the Berkswell NDP draft.</p> <p>The plan area conjoins the Balsall Parish Neighbourhood Plan area. The settlement of Balsall Common straddles the boundary of the two parishes and provides facilities for both parish populations.</p> <p>In recognition of this fact, Balsall Parish Council supports the bringing together of the settlement of Balsall Common under one parish and one Neighbourhood Development Plan by moving the present boundary. This together with the need to view planning development policies for the village of Balsall Common as a whole has meant that the</p>	<p>Noted.</p> <p>Proposals for parish boundary changes have been considered through the Community Governance Review by SMBC. The Governance Committee voted 8 to nil to for no change to the parish boundaries on 21/08/18. That followed an 80% "vote" by residents in a 54% turnout for no change in the Balsall Common area of Berkswell.</p> <p>The NDP boundary for Berkswell was established through designation by SMBC and the</p>	No change.

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					Balsall NDP evidence gathering has included the Berkswell parish part of Balsall Common. The robustness of the plan making process requires this analysis of settlement need.	review of the parish boundaries would not necessarily lead to changes to the NDP boundary unless through a new application for designation as a neighbourhood area.	
5.2			All	Comment	Planning Policy comments The Berkswell NDP has extensive reliance upon or repeats existing NPPF or SMBC policy in the draft policies the Plan presents.	Not accepted. The Policies have been prepared through careful and detailed public consultation with local residents, stakeholders and SMBC. The submission plan has taken on board a number of suggestions for changes from consultees which strengthen and add	No change.

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						<p>further detail to Policies.</p> <p>Overall the content of the NDP is supported by SMBC, and ultimately the Examiner will determine whether further amendments are required in order to meet the Basic Conditions.</p>	
5.3			All	Comment	<p>Whilst the Plan provides considerable coverage of rural area and conservation area protection, supported by green spaces and biodiversity assessments, it is disappointing to see that housing and community infrastructure needs of the rural parish are not as comprehensively addressed though planning policies.</p>	<p>Not accepted.</p> <p>The NDP includes detailed supporting information from community consultations about community infrastructure requirements and a policy (B2) to guide rural housing.</p>	No change.

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					<p>It would be helpful to understand the needs and usage derived from an evidence base of the whole Berkswell population of the facilities currently provided by the settlement of Balsall Common. This would assist the Balsall NDP formulation of policies for commercial/retail, infrastructure and community facilities and the allocation of CIL resources.</p> <p>There is no comprehensive assessment of existing community infrastructure provision in Berkswell parish to provide context for defining how funds made available to Berkswell Parish Council through Community Infrastructure Levy (CIL) will make contributions towards appropriate community infrastructure for the plan area.</p>	<p>If further information is required in terms of useage of community facilities in Balsall Common then the Balsall Parish NDP provides an appropriate opportunity for such consultation.</p> <p>Policies and proposals in Berkswell NDP can only address Berkswell parish - the designated neighbourhood area.</p> <p>Berkswell Parish council is committed to working with Balsall Parish Council to ensure any developer</p>	

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						contributions including CIL are spent according to community need.	
5.4			Appendix 5	Comment	<p>continued page 2</p> <p>Appendix 5 does not make it clear whether the community infrastructure suggestions relate to the needs of Berkswell parish more widely or where Berkswell parish forms part of Balsall Common and includes the strategic housing sites.</p> <p>There is an intimated suggestion from the NDP Steering Committee, that CIL derived in Balsall Common could be used to contribute to Berkswell village traffic calming and a Berkswell/Balsall Common cycle link.</p> <p>Other suggestions for CIL benefit for existing and new</p>	<p>Noted.</p> <p>Berkswell Parish Council is committed to work with Balsall Parish Council to determine local needs and priorities for community infrastructure provision that most benefits residents of both parishes.</p>	No change.

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					<p>Balsall Common residents have not been prioritised.</p> <p>The future community infrastructure needs and existing provision of the entire settlement of Balsall Common would need to be taken into account in any recommendations for CIL investment.</p>		
5.5			B1 B2	Comment	<p>Housing Policies B1 and B2.</p> <p>The local housing needs are undemonstrated as there is no local housing needs information. The housing needs of the wider rural plan area are not covered by paragraphs 6.6 — 6.8 sufficiently clearly to create a policy. Nor has the potential or practical provision of affordable housing for Berkswell been identified as coming from areas outside the plan area.</p>	<p>Not accepted.</p> <p>The Policy wording and supporting text has been prepared with the close involvement of officers from SMBC who support the policies.</p> <p>The content of the policies has been prepared following extensive community consultation and engagement</p>	No change.

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					<p>Affordable housing need is exceptionally high as Solihull has one of the most severe problems of affordability in the West Midlands Region. The document titled 'A Housing Market Assessment for Solihull Metropolitan Borough Council — Final Report' was produced in 2010 and estimated that 70% of newly forming households could not afford to buy or rent at market prices. In view of this concern and the likely increasing popularity of the area due to the strategic infrastructure development of HS2, the airport and UK Central, it would seem prudent to address this issue in the NDP.</p>	<p>including consideration of local housing needs in the parish.</p>	
5.6			B3, B4, B5, B6	Comment	<p>Environment Policies B3, B4, B5, B6.</p> <p>The recreation grounds of the field adjacent to the</p>	<p>Noted.</p> <p>The NDP includes detailed information in</p>	No change.

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					Catholic Church, Meeting House Lane and the football ground, Lavender Hall lane, Balsall Common have been included here as Local Green Spaces. It would be beneficial if they also formed part of an assessment from an evidence base as to the value they made to the recreational, sports and community facilities needs of the plan area.	relation to how the proposed Local Green Spaces meet the criteria in the NPPF. This includes results of survey work and community consultation in relation to local recreational value.	
5.7			B7, B8, B9	Support	Accessibility and Infrastructure Policies B7, B8, B9. The identification of Berkswell Station parking as inadequate currently and for serving future needs has been identified and is welcomed.	Noted.	No change.
5.8			B10	Comment	Economy B10. It is not possible to understand from the evidence base or text the dependency	Noted. Policies and proposals in Berkswell NDP can	No change.

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					<p>of the Berkswell plan area on Balsall Common shopping area. The level of provision seen as desirable or required in Berkswell village in meeting local needs is also not described.</p> <p>The results of the business survey revealed a desire for the provision of a business centre/community hub but there is no analysis to indicate that this relates to Balsall Common or the Balsall plan area to assist in satisfying need.</p> <p>Balsall Parish Council</p>	<p>only address Berkswell parish - the designated neighbourhood area.</p> <p>Since the majority of the shopping area lies within Balsall Parish, Berkswell Parish Council considered that the shopping centre should be addressed in the Balsall Parish NDP. This approach was supported by 59% of Berkswell Parish respondents to the Issues and Options consultation with only 29% opposing this approach. Berkswell PC has supplied Balsall PC with the residents input from its survey.</p>	

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Historic Places Advisor Historic England 6.0			All	Support	<p>Thank you for the invitation to comment on the Draft Neighbourhood Plan. Historic England is supportive of both the content of the document and the vision and objectives set out in it. We are very pleased to note that the Plan evidence base is well informed by reference to the Warwickshire Historic Environment Record and includes an historic landscape analysis.</p> <p>The emphasis on the conservation of local distinctiveness through good design and the protection of heritage assets, archaeological remains, local green space and important views, along with landscape character through the retention of the "Meriden Gap" is to be applauded.</p> <p>In conclusion, the plan reads overall as a well written, well-considered and fit for purpose</p>	Noted with thanks.	No change.

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					<p>document. We consider that an exemplary approach is taken to the historic environment of the Parish and that the Plan constitutes a very good example of community led planning.</p> <p>I hope you find these comments and advice helpful.</p>		