

Fradley Neighbourhood Plan

Summary of Regulation 16 Representations

Person or Organisation	Section/Paragraph/Policy	Summary
Network Rail	Whole Plan	<p>Developments within the neighbourhood plan area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and fully funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail. Contributions will be sought where proposals impact on level crossings to mitigate the impacts of those developments. Wherever possible level crossings will be closed, and either replaced with a footbridge or by a diversionary route with mitigation measures fully funded by developers.</p> <p>Within and close to the Fradley Neighbourhood Area are the following LCs:</p> <ul style="list-style-type: none"> • Leaveleys • Whitemoor • Roddige Lane • Fradley • Wilsons • Fine Lane • Waterworks • Brookhay • Corks Farm No.2 • Hollands <p>Sustainable drainage proposals should take into account the impacts upon adjacent railway infrastructure, i.e. proposals must not import a risk of flooding, pollution, soil slippage onto the existing operational railway. Sustainable drainage systems within the Local Plan area should be</p>

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		<p>directed away from the railway and should not use soakaways within 30m of the railway boundary. Attenuation ponds/basins on sites adjacent to or near to the railway boundary should only be included in proposals with the agreement of Network Rail and should not be included in proposals that are adjacent to a railway cutting.</p> <p>Developments in the neighbourhood area should be notified to Network Rail to ensure that:</p> <ul style="list-style-type: none"> (a) Access points / rights of way belonging to Network Rail are not impacted by developments within the area. (b) That any proposal does not impact upon the railway infrastructure / Network Rail
National Grid	Whole Plan	<p>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-pressure gas pipeline as falling within the neighbourhood area:</p> <ul style="list-style-type: none"> • FM04 – Blaby to Alrewas <p>From the information provided the underground pipeline does not interact with any of the proposed development sites.</p>
Inland Waterways Association (Lichfield Branch)	Whole Plan	<p>The Trent & Mersey Canal and Coventry canals are historic waterways and valuable amenity and recreational corridors providing leisure boating, walking, angling, cycling and nature conservation benefits to the neighbourhood. The Trent & Mersey Canal is designated a Conservation Area throughout for its special architectural and historic interest. Parts of both canals around Fradley Junction are within the Fradley Junction Conservation Area.</p> <p>Paragraph 2.5: Trent & Mersey and Coventry Canals</p> <ul style="list-style-type: none"> • The two canals “meet” rather than “merge” at Fradley Junction. • The public house is the Swan not the White Swan. • The sentence about James Brindley is misleading: whilst he was appointed to build the Coventry Canal in 1768 he died in 1772 and its extension to Fradley was not completed until 1789; the date of 1777 is the completion date for the whole of the Trent & Mersey Canal but the section through Fradley was opened in 1770. We suggest replacing the

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		<p>sentence by: “James Brindley was the surveyor and engineer for the Trent & Mersey Canal which was opened through Fradley in 1770. The junction dates from 1789 when the Coventry Canal was completed.”</p> <p>In addition:</p> <p>Paragraph 1.13: Whilst the reference to Policy IP2: Lichfield Canal is welcome this has only indirect relevance to Fradley.</p> <p>Paragraph 4.2: The references to Mid Suffolk are clearly a serious mistake.</p>
	Section 8 Movement	<p>The Trent & Mersey Canal and Coventry canals are historic waterways and valuable amenity and recreational corridors providing leisure boating, walking, angling, cycling and nature conservation benefits to the neighbourhood.</p> <p>8 Movement routes</p> <p>The towpaths of the Coventry and Trent & Mersey canals provide existing routes for walking and cycling and should be referred to in the supporting text for Policy FRANP11, and also shown on Figure 1 Movement Routes, the Policies Map and Inset Map. Improvements to the towpath surfaces to cater for their increased use and maintenance requirements resulting from the expanding population of Fradley should be funded by the new housing developments. Access to canal towpaths is listed as a possible action in Table 10.1 as a non-land use issue but both access and improvements/maintenance are legitimate planning issues that should be addressed through conditions on development or CIL or S106 mechanisms.</p> <p>Note also that the legend to 11 Policies Map is missing the Movement Routes symbol.</p>
Severn Trent	Whole Document	We expect surface water to be managed in line with the Government’s Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal

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		<p>with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably.</p>
Lichfield District Council	Whole Plan	<p>Generally welcome the draft neighbourhood plan which is clearly the result of a significant amount of work.</p> <p>Section 4: Suggest paragraph 4.4 is redrafted to make clear that planning applications will be determined in accordance with the adopted Local Plan unless material considerations suggest otherwise.</p> <p>Policy FRANP1: Concern with criteria C of the policy which provides criteria which must be met if development beyond the settlement boundary is to be considered. There is some concern that this section of the policy could provide support for development which is not consistent with the adopted Local Plan. Criteria D also provides support for the re-use of brownfield sites, particularly those outside of the village settlement boundary. Again there is some concern that this could lead to support for proposals which otherwise would conflict with the policy adopted in the Local Plan. As such it is recommended that the policy be reworded and that criteria D be removed from the policy.</p> <p>Section 6: The second and third sentences of paragraph 6.10 need re-wording as it confuses the requirements of legislation with national planning policy and development within a conservation area cannot affect its setting.</p> <p>Policy FRANP6: While references to the range of heritage assets within the plan area is now included in paragraphs 2.31-2.33 and paragraph 6.2 states that one of the adverse impacts of inappropriate development can include the loss of significance to heritage assets, including impacts on setting, this is not followed through into the policies. Policy FRANP6 only requires development proposals to ‘demonstrate that they have appropriately addressed any impact either on the setting of designated heritage assets or on the assets themselves’</p>

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		<p>Given that this replaces the bullet point in the previous version which stated that development proposals shall ‘retain historic buildings that contribute to the distinctive character and historic and architectural interest of the village.’</p>
Staffordshire County Council	Whole document	<p>The Plan should refer more to the quality of the natural environment and its importance for local wildlife. New development should aim to provide habitat links and new habitat features such as native hedges, meadows, ponds and woodlands. This would provide some accessible natural greenspace. The Plan could consider how some of these existing spaces might be enhanced.</p> <p>The Neighbourhood Plan has identified the potential for cultural heritage to contribute to the local environment and the potential for their significance to be harmed by inappropriate or poorly designed development. Whilst the archaeological resource of the Neighbourhood Plan area is highlighted under the section headed ‘Heritage’ (page 14-15) the potential for harm is not further explored within Chapter 6 Character and Environment.</p> <p>Policy FRANP8: Minimising the Landscape Impact of Development is supported.</p> <p>We welcome the information within the plan and would encourage that recognition is given to improve accessibility on the walking and cycling networks throughout the Parish.</p> <p>The desire to increase the levels of physical activity is also welcomed and the public rights of way network should be integral to any schemes that are developed to promote this. The Plan should also encourage developers to enhance the existing path network where possible in line with Staffordshire County Council’s Rights of Way Improvement Plan.</p> <p>Policy FRANP10 refers to provision for off-road lorry parking and access to basic facilities for drivers linked to new distribution and warehousing. We are aware that</p> <p>HGV parking is an issue and is being considered by the freight group. Policy FRANP10 may go some way to assist however it is suggested that the policy could be strengthened by an additional requirement on new B8 development to prepare and implement a HGV management plan for</p>

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		<p>their site. This could include matters such as pre-defined delivery times/slots; control of parking on site e.g. how long HGVs can park for; communications with drivers etc.</p> <p>In terms of the cumulative impact of trips from new development in Fradley the approach proposed in the Plan is supported for any further development to that which has already been considered.</p> <p>Policy FRANP14 is supported. We are in the process of compiling locality analysis of specialist housing for older people for each District, which may be of some assistance in the future with this policy.</p> <p>It is noted that the Plan contains no policy around high speed internet connectivity but lists Broadband as a non-land use issue to be addressed. We have seen a number of examples of policy around internet connectivity, which has been refined over time taking on experience from other plans.</p>
Fradley West Consortium (RPS)	Whole document	<p>RPS is instructed by the Fradley West Consortium (FWC) to submit representations to the Fradley Neighbourhood Plan. Representations are made in the context of FWC’s interest in land at Fradley Junction.</p> <p>Where a neighbourhood plan is emerging ahead of an up-to-date Framework and PPG compliant Local Plan, the Parish Council should ensure that due regard is given to the direction that the emerging Local Plan is taking. It is currently uncertain what spatial direction the Council will take to meet its full needs as will be set out in the Local Plan Review. The plan should allow for sufficient flexibility as advised by the PPG so that it is able to respond to market conditions.</p> <p>Paragraph 1.1: The plan proposes to cover the period 2017-2029. The end date is in conformity with the Local Plan Strategy however the start date differs. It would be clearer for these to be consistent.</p> <p>Paragraph 1.11: Paragraph states that Fradley’s housing requirement equates to 1250. It must be recognised that the housing requirement is a minimum figure.</p>

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		<p>Paragraph 1.13: There is no reference to the Local Plan Review which has now commenced. Therefore an additional paragraph should be added to explain this.</p> <p>Paragraph 1.14: Given that LDC is progressing a Local Plan Review it is essential that the neighbourhood plan includes a policy which provides a clear approach to monitoring and review.</p> <p>Policy FRANP1: It is important that the policy is sufficiently flexible to ensure development needs are appropriately delivered within the neighbourhood plan area. Support the inclusion of criteria relating to demonstrable need for development and support for re-use of brownfield land outside of the settlement boundaries.</p> <p>Policy FRANP7: FWC strongly object to the proposed designation of ‘Fradley Wood’ as a Local Green Space. Object to the designation on a number of grounds having regard to the criteria set out in paragraph 77 of the NPPF and NPPG requirements. It is requested that ‘Fradley Wood’ be omitted from the list of proposed Local Green Spaces within the policy.</p>
Historic England	Whole document	<p>Previous substantive Regulation 14 comments remain entirely relevant, that is: <i>“Historic England is supportive of the Vision and objectives set out in the Plan and particularly the emphasis in FRANP6 upon the importance of adopting locally distinctive design for new development and of respecting and responding to defined Character Areas. We consider that the Plan takes a suitably proportionate approach to the historic environment of the Parish”.</i> Beyond those observations we have no further comments to make.</p>
Sport England	Policy FRANP3	<p>Sport England supports the positive approach to planning new/expanded sports facilities as contained with Policy Franp3. However, planning policies should be based on robust and up to date assessments for new provision in line with NPPF paragraph 73. The Playing Pitch, Tennis and Bowls Strategy 2012 for Lichfield District Council is now over 5 years old. Representations have</p>

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		<p>been made to the District Council about the need to update its evidence base as part of the Lichfield Local Plan Review Scoping, issues and options consultation.</p> <p>The supporting text for the policy highlights the Playing Pitch, Tennis and Bowls Strategy 2012 requirements for Fradley which are also expressed within the Local Plan, but then the policy itself supports additional football pitches and the provision of a 3G pitch which are not supported by the strategy or informed by an up to date evidence base. It is therefore considered that the policy has not had regard to national planning policy and it is not in general conformity with Local Plan policy Frad2.</p> <p>It is recommended that the policy is amended to state that additional sports facilities identified in the Playing Pitch, Tennis and Bowls Strategy 2012 (and any subsequent updates) will strongly be supported.</p>
Gladman Developments Ltd	Whole document	<p>It is not within the remit of a Neighbourhood Plan to determine planning applications, and as such where reference is made in the plan to ‘permitting’ or ‘refusing’ development, suggest that the wording is amended to read ‘supported’ or ‘not supported’.</p> <p>Vision: Concerned with the wording of the vision. The use of the word ‘preserved’ does not set out a positive approach, suggest replacing with ‘conserved and enhanced’.</p> <p>Policy FRANP1: Do not consider the use of settlement boundaries as an effective response to future development proposals if they preclude the delivery of otherwise sustainable development. NPPF is clear that sustainable development should go ahead without delay. Use of settlement limits to arbitrarily restrict development coming forward is not in accord with the positive approach to growth required.</p> <p>Policy FRANP6: Policy should not be overly prescriptive. Therefore suggest more flexibility is provided within the policy wording.</p>

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		<p>Policy FRANP7: Whilst there is some evidence contained within the supporting text to policy 7, do not consider the evidence robust or sufficient enough to support the designation of all the identified sites as Local Green Spaces. Suggest revisiting this policy to provide robust and justified evidence to support the inclusion of any proposed designations.</p> <p>Policy FRANP8: The policy regarding landscape is broad, lacks sufficient clarity and appropriate precision within the wording. In its current form policy 8 does not provide a practical framework from which decisions can be made. Gladman believe that this policy needs to be redrafted in order to guarantee sufficient clarity within the wording that ensures the policy conforms with the guidance and requirements set through national policy.</p>
Wilson Bowden Developments (Pegasus Group)	Whole document	<p>Wilson Bowden Development (WBD) has a controlling interest in land at Hay End Lane and has made previous submission regarding the site to the neighbourhood plan and local plan.</p> <p>Support the vision for Fradley and the neighbourhood plan objectives, particularly those relating to the provision of an appropriate mix of community, leisure and retail facilities that are accessible to the village.</p> <p>Clarification should be given within the neighbourhood plan over the housing figures. It is noted that the plan envisages that further development will come forward over the neighbourhood plan period, and that the aspiration for this development to be brought forward on sites that can address the community infrastructure needs identified within the plan is supported.</p> <p>Policy FRANP1: It is the case that requiring proposals to be in accordance with Local Plan policy NR1 will effectively exclude further housing development beyond the settlement boundary, meaning housing needs may not be met and that other aspirations may not be fulfilled. There is changing Local and National policy context and the neighbourhood plan should include acknowledgement of this.</p>

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		<p>Policy FRANP2 is supported.</p> <p>Policy FRANP3: The policy sets out support for the provision of specific sporting facilities. Draw attention to the clients proposed development which includes an indicative master plan which includes provision of a potential sport and recreation hub.</p> <p>Policy FRANP4 is supported.</p> <p>Policy FRANP5: Policy supports new and/or improved play and youth facilities subject to a number of criteria. Draw attention to the clients proposed development which includes an indicative master plan which includes provision of a play and youth facilities.</p> <p>Policy FRANP6, FRANP7, FRANP8, FRANP11 and FRANP12 are supported.</p> <p>Policy FRANP13: Parking standards are set out with Lichfield District Council’s Sustainable Design SOD and therefore the inclusion of the policy is unnecessary.</p> <p>Policy FRANP14 is supported.</p>
Environment Agency	Whole document	Previously responded to an earlier version of the Neighbourhood Plan in January 2018, where we provided detail comments. Having now reviewed the ‘Submissions’ document and are disappointed that previous comments relating to sustainable drainage systems (SuDS) and the potential impacts of climate change have not been addressed in this version of the plan.
Evans Property Group (Quod)		Evans continue to support the pro-active approach adopted by the Parish Council. However the Parish has not modified the draft plan to align with previous representations. Figure 4.1 should be updated to correctly identify the boundaries of planning permissions. Policy FRANP14 is not

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		consistent with the adopted Lichfield Core Strategy or based on an up-to-date assessment of housing need and should not be included as a consequence.
Coal Authority	Whole document	The Coal Authority has no specific comments to make.
J.T. Leavesley Ltd (Wardell Armstrong)	Whole document	<p>Representation made on behalf of land at Hay End Lane, Fradley which is currently the subject of planning application (ref 18/00078/OUTMEI).</p> <p>The neighbourhood plan is set out to be in conformity with the Local Plan 2015, moving forward this is becoming increasingly objective as the District Council has formally commenced a review of its Local Plan.</p> <p>Section 1 of the plan re-iterates Local Plan policy relevant to Fradley and provides no positive means of delivering community benefits over and above those of the existing, now aged, Plan. It is therefore silent in development terms and it is highly questionable whether it is positively prepared.</p> <p>Support the vision to the extent that it purports to encourage sustainable growth but this is countered in that the plan makes no allocation of development in excess of that of an aged Local Plan that is subject of an accelerated review.</p> <p>Policy FRANP1: Policy fails to adequately take opportunity offered by the current planning application that the neighbourhood plan should consider. The draft neighbourhood plan is lacking in identification of the means whereby development and infrastructure can be delivered. To achieve this a revision to Policy FRANP1 to allow for development proposals that constitute sustainable development which allow for important development and infrastructure to be achieved. The neighbourhood plan is silent on self-build housing a further case where the plan is not in conformity with national policy but can easily be rectified by a supportive policy.</p> <p>Policy FRANP6:</p>

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		<p>Policy is flawed in that it does not relate to additional development that will come forward within the current and reviewed Local Plans or the neighbourhood plan as a positive planned document. The omission of any relevant consideration of the substantial strategic expansion of Fradley undermines its function.</p> <p>Policy FRANP14: Needs a different approach based on aspects of developability, deliverability and viability. The plan in its current form is not effective in that the draft policy cannot and will not deliver under the loose pretence of ‘expecting to include some units to demonstrably meet the needs of older people or are capable of adaption to meet such needs’. FRANP14 is supported in that it does in its background reasoning understand that the needs of older people must be met.</p> <p>Request a proper assessment of submitted planning application and how they can be taken forward within a positive and constructive manner within a revised neighbourhood plan which can be consistent with the Parish Councils formal support for the planning application.</p> <p>Generally support the overall objectives of producing a neighbourhood plan however the draft is critically flawed in that it fails to offer an opportunity to deliver development in excess of that already allocated.</p>
Legal & General UK Property Fund (Turley)	Whole document	<p>Broadly support the emerging neighbourhood plan. Support paragraph 7.1 of the neighbourhood plan which recognises the importance of Fradley Park. It is encouraging that paragraph 8.1 recognises the importance of positively influencing future patterns of movement around Fradley including the employment area at Fradley park.</p> <p>Policy FRANP10: Requires development proposals for additional distribution/warehouse favcilities to ensure there is sufficient provision for lorry parking and facilities for drivers. Both of L&G’s latest proposals at Fradley Park have included this.</p> <p>Policy FRANP12:</p>

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		<p>L&G would welcome the opportunity to engage with Fradley Parish Council, Staffordshire County Council and Highways England to improve the Hilliards Cross junction.</p>
<p>Grasscroft Homes & Property Ltd (How Planning)</p>	<p>Whole document</p>	<p>Neighbourhood Plan bases the housing need for Fradley on the figures within Core Policy 1 of the Local Plan Strategy. It has been demonstrated by the commencement of a review of the Local Plan that these figures are out of date. This is not addressed within the neighbourhood plan and there is no acknowledgement of future need within the plan. Given that under-delivery is a strong possibility and the housing requirement for Fradley is likely to increase to accommodate neighbouring shortfall the neighbourhood plan will need to be updated in the near future.</p> <p>The neighbourhood plan makes no mention of the unmet need within the GBHMA. Propose the neighbourhood plan commit to full and immediate review once further evidence emerges regarding unmet need within the HMA.</p> <p>The neighbourhood plan does not take account of the possibility of under delivery from the Strategic Development Allocations. The plan should be worded so it is flexible to allow for the future allocation of additional sites and amendments to the settlement boundary.</p>
<p>IM Land (Barton Willmore)</p>	<p>Whole document</p>	<p>IM Land has land interest within the southern area of the neighbourhood plan area. The land is approximately 231 hectares and is being promoted for a residential led development.</p> <p>It appears the draft neighbourhood plan has had regard to national planning policies and guidance in general terms and sets out a positive vision for the future of Fradley.</p> <p>The vision is focused on providing new infrastructure and connectivity. There is an aim to resist coalescence of Fradley with Lichfield and neighbouring villages. Consider that there are no specific landscape designations and the area is not within the Green Belt, specific evidence should be provided as to why an element of coalescence is not acceptable.</p> <p>Policy FRANP1: Should be amended to ensure that any sites allocated within the Local Plan Allocations or Local Plan Review are supported by the neighbourhood plan and therefore avoid any disconnect</p>

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		<p>between the neighbourhood plan and future local plan policies, a review mechanism may also be considered.</p> <p>Support Policy FRANP3.</p> <p>Policy FRANP4: Feel that the prescriptive list showing what any community hub is required to include my stifle its ability to come forward. Policy should be structure in a way to advise what facilities are preferable but not explicitly required.</p> <p>Policy FRANP6: Policy should be reworded to ensure it is not overly prescriptive in line with Local Plan Policy BE1.</p> <p>Policy FRANP12: This policy should be qualified to ensure that if and when the junctions mentioned are upgraded then there is no longer a requirement for assessment. Further, the policy should be re- worded to ensure that it is proportionate and only developments which will have generate the significant amount of movements (as set out in Paragraph 32 of the NPPF) and impact on the named junctions are required to submit the required information.</p> <p>Policy FRANP14: This policy is not written clearly currently, and it is unclear if section B refers to only houses which are proposed for use by older people or to all residential developments. If it is meant as the latter, it is considered that the District Council has already set out its preferred housing mix and this should be utilised in the first instance also taking into account Local Plan Strategy Frad4: Fradley Housing.</p>
Canal & River Trust	Whole document	<p>Within the designated Fradley Neighbourhood Plan area there is approximately 2.5miles of the Trent & Mersey Canal, 3.2miles of the Coventry Canal, Fradley Junction where the two canals meet and Fradley Pool Nature Reserve.</p>

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		<p>There is limited reference to the canals within the document and the benefits they can bring to the plan area. Paragraphs 2.31-2.33 make no reference to the rich canal heritage within the Plan area. There are a number of Grade II listed canal bridges and locks along the Trent & Mersey Canal, listed buildings at Fradley Junction and listed milestones along the Coventry Canal.</p> <p>There is no acknowledgement within section 5 of the community facilities that exist at Fradley Junction. It should be ensured that proposals for new community/retail/commercial facilities do not adversely impact on the function and attractiveness of the facilities at Fradley Junction.</p> <p>Policy FRANP6 should be amended to include reference to the canal network and the need for developments to consider the specific design considerations for sites adjacent to the waterway as detailed by Canal & River Trust. In addition, part C(v) of the policy should be amended as follows:</p> <p>‘demonstrate that they have appropriately addressed any impact either on the setting of designated and non-designated heritage assets or on the assets themselves; and’</p> <p>Within the list of areas to be designated as local green space Fradley Wood has a direct frontage to the canal corridor. Whilst it is noted that no development is being promoted on this site it should be acknowledged that it has a boundary with the canal and that the designation will not prevent any necessary works to protect the integrity of the waterway structure, maintenance / management works, such as the cutting of trees/shrubs etc, or to ensure safe navigation of the waterway can be maintained (including emergency access under our statutory powers). In accordance with Paragraphs 120 & 121 of the NPPF.</p> <p>The details / responsibility for the maintenance and management regimes for the local green spaces should also be set out.</p> <p>To ensure developments consider their impact on the canal network it is considered that Policy FRANP8 should be amended to require development proposals on sites adjacent to the canal network and any associated infrastructure, to have regard to its existing setting, character and ecological function. Developments should be expected to respond appropriately to the canal</p>

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		<p>corridor, retaining / enhancing existing landscaping to protect its existing character and enhance its biodiversity value.</p> <p>Paragraph 8.9 refers to the existing canal bridge at Gorse Lane (Bridge No.91, New Bridge) and Policy FRANP12 requires developments to assess/address the impacts on this bridge. Bridge No.91, New Bridge is within the ownership of the Canal & River Trust and therefore any proposals for work to this structure will require our consent. The Trust therefore welcome the requirement for any development, which has the potential to increase traffic flows over this bridge, to include an assessment of the likely impact on the bridge. These assessments need to include details on the existing condition of the bridge, any remedial works necessary and demonstrate that development proposals will not result in the bridge becoming subject to increased volume or weight of traffic.</p> <p>With regards to ‘Gorse Lane Bridge’ and ‘Movement along towpath’ the Canal & River Trust should be identified as a ‘Lead Agency and partner’ as both the bridge and towpaths are within our ownership. It should also be clarified throughout the document that ‘Gorse Lane Bridge’ refers to Bridge No.91, New Bridge on the Coventry Canal.</p>