

Your ref
Our ref
Ask for Wendy Johnson
email wendy.johnson@lichfielddc.gov.uk

**District Council House, Frog Lane
Lichfield WS13 6YU**

Switchboard +44 (0) 1543 308000
Fax +44 (0) 1543 309899
Direct Line +44 (0) 1543 308065
Minicom only +44 (0) 1543 308078

1 December 2016

Dear Sir/Madam

SPECIAL ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE

A meeting of the above mentioned Committee has been arranged to take place on **MONDAY 12 DECEMBER 2016 at 6.00 PM** in the **COMMITTEE ROOM**, District Council House, Lichfield, to consider the following business.

Yours faithfully

Neil Turner BSc (Hons) MSc
Director of Transformation & Resources

To: Members of Economic Growth, Environment and Development (Overview and Scrutiny) Committee

Councillors Cox (Chairman), Mrs Baker (Vice Chairman), Bamborough, Mrs Boyle, Mrs Eagland, Mrs Evans, Miss Hassall, Marshall, Mills, Mosson, Smedley and Mrs Stanhope MBE



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AGENDA

1. Apologies for absence
2. Declarations of Interest
3. Adoption of Community Infrastructure Levy Regulation 123 List (copy attached)
4. Local Plan update – Allocations document (copy attached)

Adoption of Community Infrastructure Levy Regulation 123 List

Cllr Pritchard

Date: 12th December 2016

Agenda Item: 3

Contact Officer: Ashley Baldwin/Maxine Turley

Tel Number: 01543 308206

Email: maxine.turley@lichfielddc.gov.uk

Key Decision? YES

Local Ward All

Members



**ECONOMIC GROWTH,
ENVIRONMENT &
DEVELOPMENT
OVERVIEW & SCRUTINY
COMMITTEE**

1. Executive Summary

- 1.1 The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6th April 2010 through the Community Infrastructure Levy Regulations 2010.
- 1.2 Lichfield District Council's Community Infrastructure Levy Charging Schedule, Regulation 123 list, Instalment Policy, In Kind Policy and Exemptions, Relief and Exceptional Circumstances Policy were all approved by Full Council on 19th April 2016. There is a commitment in the Regulation 123 list to update this on a regular basis and to ensure that the contents are clear to all readers and users of the list.
- 1.3 Following approval by Cabinet in October 2016, a revised and updated Regulation 123 list attached at **APPENDIX A** was subject to public consultation with the proposed amendments shown in red. The comments received have been reviewed with recommendations and amendments to the document now proposed. A summary of comments and recommendations form **APPENDIX B** with the revised version of the Regulation 123 list incorporating the recommendations provided at **APPENDIX C**.

2. Recommendations

- 2.1 That this Committee endorses the recommendations listed in **APPENDIX B** which relate to the Regulation 123 list.
- 2.2 That this Committee recommends the revised Regulation 123 list (**APPENDIX C**) is approved by Cabinet.

3. Background

- 3.1 The Community Infrastructure Levy (CIL) is a charge levied on certain new buildings and extensions to buildings according to their floor area. In this way money is raised from development to help the Council contribute towards the infrastructure required to ensure the District grows sustainably.
- 3.2 Following a lengthy development process in line with the CIL Regulations (2010) and substantial public consultation, the District Council's [Charging Schedule](#) was examined in January 2016 and approved by Full Council on 19th April 2016 along with the Regulation 123 list, Instalment Policy, In Kind Policy and Exemptions, Relief and Exceptional Circumstances Policy. Approval was also given to commence charging CIL on 13th June 2016.

- 3.3 CIL income from new development (after allowing for Parish Council shares and administration) can be spent on anything that constitutes "infrastructure" as defined by Regulation 216 of the 2008 Planning Act and the CIL Regulations 2010 (as amended). As part of the administration of CIL, Regulation 123 of the Community Infrastructure Levy Regulations 2010 (as amended) sets out the requirement for the CIL Charging Authority to publish a list of the infrastructure which may in whole or in part be funded through the CIL. This list prevents double funding, as items on this list cannot be funded through S106 agreements. It is, therefore, important that the CIL 123 List does not limit the Council's ability to negotiate a S106 obligation where directly related and specific infrastructure needs are identified for a development scheme.
- 3.4 Planning Guidance states that *'authorities may amend the Regulation 123 list without revising their charging schedule, subject to appropriate consultation. However, where a change to the Regulation 123 list would have a very significant impact on the viability evidence that supported the examination of the charging schedule, this should be made as part of a review of the charging schedule'*.
- 3.5 As noted in the currently adopted Regulation 123 list introductory text, the list will be updated on a regular basis taking into account the Council's Infrastructure Delivery Plan (IDP) and any changes to the CIL Regulations. The IDP has been updated and the opportunity has also been taken to where necessary provide clarity in relation to queries raised by stakeholders since publication of the original Regulation 123 list in April 2016. Following approval by Cabinet in October 2016, the revised Regulation 123 list attached at **APPENDIX A** was subject to public consultation for a period of 4 weeks between 12 October and 10 November 2016. The amendments to the original being shown in red.
- 3.6 The Consultation resulted in 8 external representations. The comments received were mainly regarding the 'transport' and 'biodiversity and environment' sections with comments also received regarding health and education. The main points identified can be summarised as follows:
- A need for clarity in regard to the relationship between S106 contributions and the Community Infrastructure Levy for the projects on the Regulation 123 list.
 - Clarification regarding the nature of projects identified on the list.
 - Project delivery specifically relating to the CIL Charging Schedule and the ability of CIL to fund the projects on the Regulation 123 list.
- In response to the representations a number of changes to the document are being proposed. A summary of these representations can be viewed in **APPENDIX B**.
- 3.7 It is intended that this iteration of the Regulation 123 list as shown at **APPENDIX C**, on adoption will supersede the previous version adopted on 19th April 2016.

Alternative Options	1. The District Council could continue with the current Regulation 123 list as approved by Full Council on 19 th April 2016 however without the proposed revisions to the Regulation 123 list there would be a lack of clarity between the uses of CIL and S106 obligations and could reduce the Council's capacity to secure S106 obligations which mitigate the impact of development.
Consultation	1. Consultation has taken place internally and with Staffordshire County Council regarding the content of the Regulation 123 list and the revisions to the Regulation list were presented to the Economic Growth, Environment and Development (Overview and Scrutiny Committee) at its 15 th September 2016 meeting. Following Cabinet approval 4 weeks of public consultation was subsequently undertaken on the draft revised list
Financial	1. The District Council is required to publish a list of the infrastructure

Implications	<p>(Regulation 123 list) which may in whole or in part be funded through the CIL. Items on the Regulation 123 list cannot be funded through S106 agreements however by providing clarity this will enable S106 obligations to be levied where necessary to meet Habitats Regulations (where required) and to make a development acceptable in planning terms.</p> <p>2. Revision of the Reg. 123 list itself has been undertaken within existing service budgets.</p>
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Contribution to the Delivery of the Strategic Plan	<p>1. The Local Plan Strategy (2015) and its associated infrastructure requirements as set out in the Infrastructure Delivery Plan are relevant to the Council's ambitions regarding the economy, communities and places as identified in the Strategic Plan 2016-2020 for Lichfield District.</p>
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Equality, Diversity and Human Rights Implications	<p>1. There are no Human Rights Issues.</p>
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Crime & Safety Issues	<p>1. There are no crime and safety issues.</p>
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	Risk Description	How We Manage It	Severity of Risk (RYG)
A	If we do not have a clear and up to date Regulation 123 list the need for S106 contributions could be challenged.	Ensure that an up to date Regulation 123 exists to ensure the distinction between CIL and S106 is clear and therefore supports the sustainable development of the area.	Yellow
B	If we do not have a clear and up to date Regulation 123 list the distinction between what is funded through CIL and S106 would be unclear and the authority may be at risk from double counting.	Ensure that an up to date Regulation 123 exists to ensure the distinction between CIL and S106 is clear and therefore supports the sustainable development of the area.	Yellow
C	The Government is currently conducting a review of CIL as to whether it is meeting its intended objectives of providing a faster, fairer, more certain and transparent means of funding infrastructure through developer contributions.	As and when the Government make any changes to CIL, the Council may have to review its administration of the charge and any other relevant supporting policies in respect of the same	Yellow
D	The cost of meeting Lichfield District's infrastructure needs exceeds the amount of money available from CIL and decisions will therefore need to be made on which items of infrastructure are funded.	No single funding mechanism will be sufficient to deliver all the necessary infrastructure to support new development within the District. A packaged approach to funding will be required. The District Council has developed Governance arrangements for the allocation of CIL income which were approved at Full Council in July 2016.	Yellow

<p>Background documents</p> <p>Community Infrastructure Levy Regulations 2010 http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents</p> <p>CIL Examination Report https://lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Planning-obligations/Downloads/Community-Infrastructure-Lvy-CIL/Lichfield-CIL-final-examiners-report.pdf</p>
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Relevant web links

<https://lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Planning-obligations/Community-Infrastructure-Levy-CIL.aspx>



Lichfield District Council
Community Infrastructure Levy
Regulation 123 List

Effective from **Day/Month/2016**

What is the Community Infrastructure Levy?

The Community Infrastructure Levy (CIL) is a charge on development, calculated on a £ per square metre (sq.m) basis of development. CIL is intended to be used to help fund infrastructure to support the development of an area rather than making an individual planning application acceptable in planning terms, which is the purpose of Section 106 Agreements. CIL does not fully replace Section 106 Agreements. For more information you can also:

- Visit the Council's CIL web pages: www.lichfielddc.gov.uk/CIL
- Read the CIL Planning Policy Guidance (PPG): <http://planningguidance.communities.gov.uk/blog/guidance/community-infrastructure-levy/>
- Email: CIL@lichfielddc.gov.uk
- Call Lichfield's Planning enquiry line: 01543 308174
- Visit the [Planning Portal](#).
- Lichfield District Council's Planning Obligations Supplementary Planning Document

What is this document?

CIL income from new development can be spent on anything that constitutes "infrastructure" as defined by Regulation 216 of the 2008 Planning Act and the CIL Regulations 2010 (as amended). This includes but is not limited to: roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces. Regulation 123 of the CIL Regulations 2010 (as amended) sets out the need for local authorities to produce a list of "relevant infrastructure" which will be funded in whole or part by the CIL.

The Community Infrastructure Regulations 2010 (as amended) restricts the use of planning obligations secured through S106 agreements for infrastructure that will be funded in whole or in part by the Community Infrastructure Levy. This is to ensure there is no duplication between CIL and planning obligations in funding the same infrastructure projects. In addition, a development should not have to contribute twice towards the same piece of highways infrastructure through works carried out under Section 278 of the Highways Act 1980, and monies or land provided through CIL. The CIL Regulations 2010 (as amended) prescribe that a condition must not be imposed on the grant of planning permission to require a highway agreement for the funding or provision of infrastructure that is included on the Regulation 123 list, nor must a planning condition be used that prevents or restricts the carrying out of development (sometimes referred to as a 'Grampian condition') until a highway agreement has been entered into which is also included on the Regulation 123 list of infrastructure.

The relationship between CIL and planning obligations is explained in the Planning Practice Guidance¹ where it notes that it is possible that site specific mitigation may still be necessary subject to certain limits, namely:

¹ Paragraphs 93 to 107; Reference ID:25-093-20140612 to Reference ID: 25-107-20140612

- The application of the statutory test with respect to planning obligations (Regulation 122);
- Ensuring no overlap between CIL and planning obligations as noted above; and
- Imposing a limit on pooled contributions from planning obligations towards infrastructure that may be funded by the levy.

The list below sets out those infrastructure projects that Lichfield District Council currently intends may be wholly or partly funded by CIL, together with clarification notes and S106 requirements. The order in the table does not imply any order of preference for spend, it just signifies projects that will be considered by the council in its decision as to what might receive CIL funding. This list will be updated on a regular basis, taking into account the Council's Infrastructure Delivery Plan (IDP) and any changes to the CIL regulations.

Transport	
Infrastructure to be funded in whole or in part by CIL	Notes
<p>Completion of the Lichfield Southern Bypass via provision of new underbridge section.</p>	<ul style="list-style-type: none"> • Section from east of new bridge structure to London Road to be delivered by developer as part of site access road layout. • New underbridge section will be funded by existing s106 and possible Local Growth Fund. • Section to west of new bridge to be delivered by gift of on land from currently owned by developers.
<p>Improvements to the Strategic Highway Network as identified by the Highways Agency at:</p> <ul style="list-style-type: none"> • Muckley Corner • Swinfen • Further junction improvements and safer access to A38 (Hillards Cross and Fradley South) 	<p>CIL funds may be used to form part of package for Local Enterprise Partnership (LEP) bids.</p>
<p>Transport improvement scheme from the integrated Transport Strategy for Lichfield:</p> <p>Lichfield City Centre Transport Package including:</p> <ul style="list-style-type: none"> • Bus network improvements • Cycle and walking routes within the City • Electric Charging Points • Delivery of local traffic routing scheme • Designated Coach Parking area • Real Time Passenger Information, including signage to car parks <p>East Lichfield Local Transport Package (including Fradley) including:</p>	

- HGV routing and parking arrangements in Fradley

Burntwood Transport Package including:

- Cannock Road – public realm enhancements and access modifications
- Improved walking and cycling links from southern to northern Burntwood
- Bus access and service improvements linking to Cannock and Lichfield
- Burntwood Bus interchange

District wide measures including

- A5 (T) and A38 (T)
- Route signage Lichfield to Tamworth

Education	
Infrastructure to be funded in whole or in part by CIL	Notes
<p>Primary Education</p> <p>Primary School provision to deliver the Local Plan Strategy will be generated through S106 agreements apart from the following projects that may benefit from CIL funds:</p> <ul style="list-style-type: none"> • A 105 place expansion of Hob Hill Primary School, Rugeley to increase the school from 210 to 315 places • A 77 place expansion of All Saint's Alrewas Primary School to increase the school from 238 places to 315 places 	<p>S106 agreements will be required to secure the provision of primary education facilities to mitigate the need generated by site specific developments, and growth within the Strategic Development Allocations (SDAs) identified in the Lichfield District Local Plan as:</p> <ul style="list-style-type: none"> • South of Lichfield • Deans Slade Farm • Cricket Lane • East of Lichfield (Streethay) • Fradley • East of Burntwood Bypass • East of Rugeley • North of Tamworth (BDL)
<p>Secondary Education</p> <p>Delivery of Five Forms of Entry of additional secondary education facilities through:</p> <ul style="list-style-type: none"> • Expansion to Nether Stowe School • Expansion to The Friary School • Expansion to King Edward VI School 	<p>S106 agreements will be required to secure the provision of secondary education facilities (other than those to be funded through CIL) to mitigate the need generated by site specific developments.</p>

Open Spaces, Sporting and Recreational Facilities

Infrastructure to be funded in whole or in part by CIL

Notes

Open Space

Improvements to open space provision, including play provision for key sites, in line with the Open Space Assessment.

S106 agreements will be required to secure the on-site provision and maintenance of recreation and open space needs generated by growth within the Strategic Development Allocations (SDAs) and the North of Tamworth Broad Development Location identified in the Lichfield District Local Plan as:

- South of Lichfield
- Deans Slade Farm
- Cricket Lane
- East of Lichfield (Streethay)
- Fradley
- East of Burntwood Bypass
- East of Rugeley
- North of Tamworth Broad Development Location

Indoor Sports

CIL funds may be spent on improving indoor sports provision to serve Lichfield City and its hinterland as set out in the Swimming Pool and Sports Hall Feasibility Study 2013.

No specific elements for indoor sports provision have been identified for new S106 funding.

Playing Pitches

CIL funds may be spent on improving playing pitch provision in line with the deficiencies identified in the Playing Pitch, Tennis and Bowls Strategy.

S106 agreements will be required to secure the on-site provision and maintenance of playing pitch provision for the following SDAs and the North of Tamworth Broad Development Location identified in the Lichfield District Local Plan as:

- South of Lichfield
- Deans Slade Farm
- Cricket Lane
- East of Lichfield (Streethay)
- Fradley
- East of Burntwood Bypass
- East of Rugeley
- North of Tamworth Broad Development Location

Environment and Biodiversity

Infrastructure to be funded in whole or in part by CIL

Notes

Environment and Biodiversity

CIL funds may be spent on improving the public realm, landscapes and habitats; and improving access to green space, to include:

- Chasewater Country Park improvements.
- Central Rivers Initiative projects.
- ~~Heathland management programme.~~
- Improvements to the canal network to improve Green Infrastructure Links.
- Local Nature Reserves.
- Woodland and hedgerow projects.

Except on sites identified as biodiversity offsetting recipient sites.

Infrastructure works relating to the restoration of the Lichfield and Hatherton Canal will potentially benefit from CIL funds, *apart from works required in relation to any on-site provision by the developers connected to the three SDAs in the vicinity of the canal: South of Lichfield, Deans Slade Farm, Cricket Lane.*

S106 agreements will be required to fund biodiversity offsetting measures where appropriate and as outlined in Local Plan Strategy 2008-2029 Policy NR3 and expanded upon within the Biodiversity and Development SPD.

Section 106 agreements will be required **where appropriate** to secure infrastructure works relating to the restoration of the Lichfield and Hatherton Canal for the three SDAs in the vicinity of the canal: South of Lichfield, Deans Slade Farm, Cricket Lane.

<p>Cannock Chase Special Area of Conservation</p> <p>CIL funds may be spent on measures for preventing harm to the Cannock Chase Special Area of Conservation (CCSAC) agreed by the Cannock Chase SAC partnership <i>i.e. the Strategic Access Management and Monitoring Measures (SAMMM) apart from works required in relation to interpretation panels and waymarking as identified in the SAMMM.</i></p>	<p>S106 agreements will be required for the Strategic Development Allocations (SDAs) to secure the provision of <i>bespoke</i> mitigation measures in relation to the Cannock Chase Special Area of Conservation <i>other than the mitigation contained within the SAMMM.</i></p> <p><i>To satisfy Habitats Regulations and prevent harm to the Cannock Chase SAC, contributions via S106 agreements/unilateral undertakings will be required towards works required in relation to interpretation panels and waymarking as identified in the SAMMM by all new net dwellings which are not liable to, or exempt from CIL charges within the 0-8km Zone of Influence.</i></p>
<p>River Mease Special Area of Conservation</p> <p>CIL funds may be spent on measures for mitigating the impact of development upon the River Mease Special Area of Conservation (RMSAC) measures.</p>	

Other Infrastructure	
Infrastructure to be funded in whole or in part by CIL	Notes
<p>Flood Mitigation General measures may benefit from CIL funds.</p>	Site specific SUDS will be secured through planning conditions or S106 agreements.
<p>Health facilities CIL funds may be used where evidence is provided that there is no local capacity and expansion of services is required to support growth across the district.</p>	S106 agreements will be required for the Strategic Development Allocations (SDAs) to secure the provision of health care as identified in the Local Plan Strategy concept statements.
<p>Social and community facilities will benefit from the local slice of CIL funds (15-25%) raised within their area. These funds can be distributed by Parish Councils and any neighbourhood planning forums that emerge, in line with evidence of local need.</p>	S106 agreements will be required for the Strategic Development Allocations (SDAs) to secure the provision of community centres/hubs as identified in the Local Plan concept statements.
<p>Low Carbon Initiatives / Carbon Investment Fund CIL funds may be used to support the delivery of Local Plan policy SC1 which states: The District Council is developing a Carbon Community Fund (CCF) which will support the achievement of carbon targets through financial contributions.</p>	

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Regulation 123 Draft Charging Schedule Consultation Summary Table

Organisation	Comment Summary	Action
Highways England	In relation to transport provisions impacting on the strategic road network that it largely replicates those matters cited in the Infrastructure Delivery Plan (IDP) 2015. Our previous letter to the Council, dated 1st September 2016 has made clear that the content of the IDP is not substantiated by any available transport evidence; it is largely reliant on traffic modelling data which is out of date and which does not reflect the level or distribution of development growth now envisaged by the adopted local plan. We consider that a more robust assessment of strategic traffic impacts is required to inform the suitability and use of CIL to fund district wide transport infrastructure needs. This would enable a more considered position in relation to the existing infrastructure requirements and accordingly, the Community Infrastructure Levy – Regulation 123 List. We are concerned that the existing list of items on the Regulation 123 List is fairly generic in terms of the location and scope of improvements which may be necessary on the SRN. Their inclusion, in this format, may preclude the use of traditional mechanisms, to secure site specific infrastructure and bring a risk of double counting.	Duly noted. Liaison is underway with HE regarding the IDP. Follow up telephone call and confirmation email received that the HE are happy with the content of the R123 list. Highways England acknowledge, the nature and cost of strategic road network schemes are not known at the present time. Recommendation No change
	We also note that the 'Highways Agency' is referenced in page 3 of the document. For the avoidance of any confusion, Highways England has (since April 2015) become the strategic highways company with responsibility maintaining the safety and efficiency of the SRN in England.	Duly noted Recommendation Amended text.
Staffordshire County Council	Transport: <ul style="list-style-type: none"> In relation to the Lichfield Transport Package: bullet point 4 for clarity reword as '<i>Delivery of a traffic directional signage scheme</i>'. 	Duly noted. Recommendation Amend to clarify nature of the project
	<ul style="list-style-type: none"> As only some elements of the District Integrated Transport Strategy perhaps include in the noted section '<i>Delivery of other schemes/projects within the District Integrated Transport Strategy not listed will continue to</i> 	Duly noted. Recommendation

Commented [JC1]: Do we need to add in some additional text to say why given the original comments HE are now content with the wording of the Reg. 123 list. Also should we add in statement that if following future discussions and work changes to the IDP need to be made then this may mean related changes to the Reg. 123 list having to be made.

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	<i>be delivered via S106 and/or Planning Condition where appropriate’.</i>	Amend notes section to distinguish projects funded via CIL and S106.
	<ul style="list-style-type: none"> Agree to the change in the notes section relating to the land required for the completion of the bypass. 	Duly noted.
	<p>Education: The changes seem appropriate. For clarification our interpretation of the R123 list is that the Secondary school projects listed delivers the required pupil places for the growth in housing in Lichfield City and its immediate environs. Housing development elsewhere in the District that does not feed into the city centre secondary schools will where necessary contribute via S106 to projects at other schools to provide places to mitigate their developments’ impact. Please could you confirm that this with the proposed changes provide for this.</p>	<p>Duly noted.</p> <p>Recommendation Notes section is amended to ensure clarification of the split between CIL and S106 projects.</p>
	<p>Flood Mitigation Measures Considered this is too general and could hinder the delivery of site specific projects. Propose the notes section is amended to <i>‘Site specific SUDS and offsite flood mitigation measures where they are required directly as a result of the development will be secured through planning conditions or S106 agreements’.</i></p>	<p>Duly noted.</p> <p>Recommendation Notes section is amended to ensure clarification of delivery mechanisms.</p>
	<p>Environment and Biodiversity Changes acceptable</p>	Duly noted.
Framptons on behalf of ‘the Deanslade Park Consortium’.	<p>Transport The Consortium raised the inappropriate nature of the phrase ‘gift of land from developers’ in the adopted version of the CIL documentation at a pre-application meeting in June 2016. Therefore its removal is a welcome clarification. However the change of text fails to adequately address the point which the Consortium were trying to articulate. The Consortium, as stated at both sittings of the LDC Local Plan Examination in Public, are willing to discuss the area of land in question and in accordance with the LDC ‘Payment in Kind Policy’ would be willing to negotiate transfer of this land in lieu of other payments. Therefore the Consortium’s position is that the third bullet should</p>	<p>Duly noted.</p> <p>The District Council has an adopted Payment in Kind Policy, however it is at the Council’s discretion whether the authority enters into an agreement for a land payment to discharge part or all of a levy liability. Inclusion of this within the R123 list would pre-empt future discussions.</p>

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	<p>make reference to the Council's adopted Payment in Kind Policy at this point so that it is clear that the land is not a gift, but can be offset against other contributions as part of the planning application process.</p>	<p>Recommendation No change</p>
	<p>Education: The Deanslade Park Consortium throughout the Local Plan Examination in Public and during pre-application discussions with the Local Education Authority (SCC) have discussed the developer contributions necessary for Secondary education. The response has been consistently that no contributions via S106 will be necessary and the SDAs will be excluded from further S106 agreements. It implies that SDAs within the catchment of the 3 named secondary schools will be exempt, but this is open to interpretation. It is therefore requested that the precise position be clarified in the documentation for the avoidance of doubt and to give certainty to all parties.</p>	<p>Duly noted.</p> <p>Recommendation Notes section is amended to ensure clarification of the split between CIL and S106 projects and Lichfield City and the remainder of the District.</p>
	<p>Environment and Biodiversity This section of the CIL documentation would be made sound if it included a clause for the SDAs to be considered as offsetting sites for biodiversity if they are making a suitable provision as part of any application. In the case of Deanslade Park the proposals include a hill top Country Park of circa 16 ha area as well as other Green Infrastructure within the site. It is submitted this provision, subject to appropriate management and maintenance constitute appropriate opportunities for biodiversity offsetting. Therefore the CIL documentation should include a bullet point for provision of this type associated to the Local Plan SDAs. Whilst discussions with officers at Pre-application stage have implied any site can deliver offsetting it is considered beneficial for reasons of deliverability and clarity for the bullet points at page 8 to include 'onsite biodiversity offsetting at allocated SDAs'.</p>	<p>Delivering biodiversity compensation in a measurable way is essential to demonstrating that a net-gain to biodiversity value is likely to be achieved by a development. Where measurable compensation is delivered beyond the boundaries (red and blue lines) of an application it is termed 'biodiversity offsetting'. Therefore a development site cannot 'biodiversity offset' its own impact on site. The impact would have to be compensated offsite. Should any site whether an SDA or other, wish to provide a site to host biodiversity offsetting to compensate for</p>

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		<p>development elsewhere within the District this is at the discretion of the respective land owners and a private matter. Representations can be made to the District Council regarding its Biodiversity Offsetting Opportunity Maps and its emerging Biodiversity Offsetting Strategy.</p> <p>Recommendation No change</p>
	<p>Lichfield and Hatherton Canal The Deanslade Park Consortium has consistently stated throughout the LDC Local Plan Examination; Public Exhibition June 2015; and through formal Pre-application discussions that they will resist making contributions that fail to meet the CIL Regulation 122 tests. No compelling evidence has been tabled by the Local Planning Authority or those promoting the Canal to demonstrate the Canal is essential infrastructure. The Canal new build project put very simply is not required to make any of the three South Lichfield SDAs acceptable in planning terms. Specifically in the case of Deanslade Farm land for the route of the future canal has been safeguarded to the north of the housing allocation which is outside of the application but will remain unaffected by the proposals. In these circumstances the requirement fails the test of CIL Regulation 122 and should be omitted from the CIL documentation as it is unlawful.</p>	<p>The levy is intended to provide infrastructure to support the development of an area, rather than making individual planning applications acceptable in planning terms. As a result, some site specific impact mitigation may still be necessary in order for a development to be granted planning permission. Some of these needs may be provided for through the levy but others may not, particularly if they are very local in their impact. Therefore, the Government considers there is still a legitimate role for development specific planning obligations to enable a local planning authority to be confident that the specific consequences of a particular</p>

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		<p>development can be mitigated. (Planning Practice Guidance Paragraph: 094 Reference ID: 25-094-20140612)</p> <p>As such the Lichfield Canal can be included on the R123 list and requires 'on site provision'. As stated in the representation, the canal lies to the north of the housing allocation and outside the application.</p> <p>Recommendation No change</p>
	<p>Cannock Chase Special Area of Conservation The Deanslade Park Consortium recognises the special qualities of Cannock Chase and understands the sensitivity of the site and the need to protect it so that it can remain as a functional destination and facility into the future. However as far back as 2014 in the LDC Local Plan Examination in Public the Consortium raised the issue of on-site open space (such as the 16 ha Country Park at Deanslade Farm) providing an alternative destination which would reduce the perceived pressure from visitor numbers to Cannock Chase as residents of Deanslade Park and Lichfield generally would be able to use the 16 ha Country Park being provided for recreation. The Consortium is not trying to create a destination such as Cannock Chase but feels strongly that the over provision of open space at Deanslade Farm should be recognised as a facility or community asset that will provide a long term opportunity for recreation and countryside access. Such a position was debated with the Local Inspector in 2014 as seen the following extracts below from the Consortiums response to</p>	<p>Research commissioned by the Cannock Chase SAC Partnership concluded that an adverse effect on the integrity of the SAC would arise from residential development within 15km of this European Site in the absence of mitigation. The Cannock Chase SAC Partnership has developed and is implementing a developer contributions scheme to fund a package of access management measures¹ to offset the impact of new housing identified within the Local Plan policies of the planning authorities within the 0-15km Zone of Influence (ZOI). These Strategic Access Management and Monitoring Measures (SAMMM) provide</p>

¹ Strategic Access Management and Monitoring Measures (SAMMM)

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	<p>the Inspector’s questions: <i>“3.21 Question 8. Cannock Chase Special Area of Conservation. Has it been established that 15km zone of influence soundly based? Is policy NR7 too onerous?”</i> <i>3.22 The consortium has no specific comments to raise concerning the 15km zone as this is for the Council and its partners to justify. The one observation the consortium would like to raise is that the policy should be sufficiently flexible to recognise opportunities for sites to provide on-site mitigation for alternative natural green space if the particular site is appropriate. In the case of Deanslade Farm the formation of the Country Park offers an opportunity for such a facility and the policy should facilitate this being investigated”.</i></p> <p>It is submitted that Page 9 of the LDA CIL consultation should allow for the opportunity for SDAs to offset the impact of the additional population they house on the Cannock Chase Special Area of Conservation where significant over provisions of open space which will be publically accessible will offer alternative destinations which will reduce the burden on the Chase for local amenity and recreation.</p>	<p>mitigation to rule out adverse effects on the integrity of the SAC. Based on the analysis of the visitor survey data and the cost of a proportionate suite of access management measures (SAMMM) the Partnership agreed to collect developer contributions from the 0-8km ZOI to deliver the £1.97 million required in order to mitigate for the impact of new housing within the whole 0-15km zone. It is at the discretion of each authority within the 0-8km ZOI how to deliver their individual total mitigation monies required to the SAC Partnership. As such, contributions are only sought from planned residential development within the 0-8km zone.</p> <p>In Lichfield these contributions are taken from the CIL pot for all new net residential development within the 0-8km zone at the rate per dwelling set within the ‘Cannock Chase SAC - Guidance to Mitigate the Impact of New Residential Development’.</p> <p>The CIL rates set have been subject to examination and are non negotiable. The District Council does however have both ‘in kind’ and ‘exceptional circumstances relief’ policies.</p> <p>Recommendation No change</p>
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Walsall Council	Walsall Council supports the changes and has no further comment.	Duly noted
HSE	No representation to make at this stage.	Duly noted
Inland Waterways Association	<p>Environment and Biodiversity</p> <p>Support the R123 list subject to amendment of 'Lichfield and Hatherton Canal' to just 'Lichfield Canal'.</p>	<p>Duly noted</p> <p>Recommendation</p> <p>Amend reference to Lichfield and Hatherton Canal to 'Lichfield Canal'.</p>
Lichfield Civic Society	<p>General observations</p> <p>Although the document states at the outset that the intention of the CIL List is to "avoid duplication with S.106 contributions, etc.", the details relating to many of the items of infrastructure present both CIL and S.106 as sources for funding. This seems to be neither helpful nor "avoiding duplication".</p>	<p>The CIL Charging Authority must publish a list of the infrastructure which may in whole or in part be funded through the CIL. This list prevents double funding, as items on this list cannot be funded through S106 agreements. It is, therefore, important that the R123 List does not limit the Council's ability to negotiate a S106 obligation where directly related and specific infrastructure needs are identified for a development scheme.</p> <p>Recommendation</p> <p>No change</p>
	The List is extensive (and expensive) and is only likely to be funded in part by developers, particularly when the total requirements for contribution to the CIL fund for any site are aggregated. This, in turn, raises the question as to whether a development should proceed, or be granted planning permission,	The CIL Regulations 2010 (as amended) restrict the use of S106. Contributions (S106) may only be pooled from up to five separate

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	<p>without the necessary basic infrastructure and associated funding in place.</p>	<p>planning obligations for a specific item of infrastructure as such the delivery of large projects is restricted.</p> <p>Regulation 122 of the CIL Regulations provide the parameters for when planning obligations can be used, ie the obligation is necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.</p>
	<p>The funding situation for essential infrastructure seems to be ineffective in securing adequate funding partly because of: - 1. The way the legislation is structured, 2. The nominal amount of CIL that the SDA sites will contribute and 3. Weaknesses or anomalies in policies adopted by the Council that relieve developers of costs. This results in the costs falling upon the public purse or essential infrastructure not being provided. With these weaknesses developers, may well find it easy to avoid or limit their overall contribution to addressing the needs. Two examples where policies and funding is inadequate are the Southern Bypass and health facilities as mentioned below.</p>	<p>The CIL rates set have been subject to viability testing and examination. Please see these items addressed under Transport and Health below.</p>
	<p>Transport Regarding the detailed items in the List, Lichfield Southern Bypass has three sources of funding quoted (i.e. future developers, existing S106 monies and "possible Local Growth Fund"). This is but one vital item of infrastructure in the District where uncertainty exists as to funding, although the same point could be made on many other items on the List. On the Lichfield Southern Bypass, the IDP is unclear, or of doubtful content, where it states that the South</p>	<p>The council has long recognised that it has never been the intention, nor is it possible, that CIL will fund all the demands for infrastructure provision. Instead, the purpose of CIL is to contribute towards funding</p>

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	<p>Lichfield SDA does not require completion of the Bypass. This may well be the current policy (unfortunately) of LDC and SCC for what was the initial element (the so- called St John's site), but once the developments at Cricket Lane and Deanslade are included, the requirement for prior completion is fundamental. This matter should be addressed in policy terms.</p>	<p>infrastructure in conjunction with other sources of funding. Inclusion on the R123 list allows for the project to receive CIL but also prevents double funding, as items on this list cannot be funded through S106 agreements.</p> <p>Recommendation No change</p>
	<p>Health Facilities In the adopted Local Plan, apart from Fradley, none of the Strategic Development Allocations (SDAs) sites in Burntwood, East of Rugeley, Lichfield or Streethay have any reference to health care provision.</p>	<p>Duly noted</p> <p>Recommendation Amend notes section to '<i>S106 agreements will be required for the Strategic Development Allocations (SDAs) to secure the provision of health care as where identified in the Local Plan Strategy concept statements</i>'.</p>
	<p>Our view is that the need for additional capacity in Lichfield is likely to arise following completion of the SDA's and other allocated or windfall sites in the City and Streethay. The low level of CIL contributions of the SDA sites towards delivery of infrastructure indicates that Lichfield City will in due course be in the same position as Burntwood with a real and belated recognition of the need for additional health provision. Little, if any, monies for health facilities will be available from CIL because of all the other categories of funding needs identified in the IDP and regulation 123 list.</p>	<p>Substantial viability evidence was undertaken to set the rates within the charging schedule and which were subject to public examination.</p> <p>The R123 list is a list of those projects or types of infrastructure that it intends to fund, or may fund, through the levy. The levy delivers additional funding for charging authorities to carry out a wide range of infrastructure projects that support</p>

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		<p>growth and benefit the local community. It cannot be expected to pay for all the infrastructure required, but it is expected to make a significant contribution. (Planning Practice Guidance Paragraph: 095 Reference ID: 25-095-20140612). The District Council are actively working with the Heath Authority with regard to health provision within the District. In addition should it be required. The District Council's has Governance arrangements for CIL where organisations with projects on the R123 list will bid for the release of funds from a centralised pot via a formal application process. The onus will be on applicants to produce strong evidence based arguments, which will include clear delivery plans for proposed projects along with potential and secured match funding information.</p> <p>Recommendation No change</p>
	<p>Other comments have been put forward made regarding Fradley health provision in the Local Plan and IDP which have no bearing on the R123 list consultation. These comments will be addressed via the relevant channel.</p>	
<p>Historic England</p>	<p>The amendments to the extant Regulation 123 list are noted and are</p>	<p>Duly noted. Amending the revised</p>

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	<p>welcomed in relation to the Environment and Biodiversity section. Historic England recommends that the current text be revised to read 'CIL funds may be spent on improving the public realm, historic environment, landscapes...' for completeness since some of the projects contained in the list will impact on heritage assets whether designated or non-designated.</p> <p>As previously recommended, you may wish to consider including text to set out that development specific planning obligations and S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets.</p>	<p>text to include the 'historic environment' as a generic subject matter would however rule out site specific S106 agreements which are bespoke to a situation.</p> <p>Recommendation No change</p>
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**Lichfield District Council
Community Infrastructure Levy
Regulation 123 List**

Effective from **Day/Month/2016**

What is the Community Infrastructure Levy?

The Community Infrastructure Levy (CIL) is a charge on development, calculated on a £ per square metre (sq.m) basis of development. CIL is intended to be used to help fund infrastructure to support the development of an area rather than making an individual planning application acceptable in planning terms, which is the purpose of Section 106 Agreements. CIL does not fully replace Section 106 Agreements. For more information you can also:

- Visit the Council's CIL web pages: www.lichfielddc.gov.uk/CIL
- Read the CIL Planning Policy Guidance (PPG): <http://planningguidance.communities.gov.uk/blog/guidance/community-infrastructure-levy/>
- Email: CIL@lichfielddc.gov.uk
- Call Lichfield's Planning enquiry line: 01543 308174
- Visit the [Planning Portal](#).
- Lichfield District Council's Planning Obligations Supplementary Planning Document

What is this document?

CIL income from new development can be spent on anything that constitutes "infrastructure" as defined by Regulation 216 of the 2008 Planning Act and the CIL Regulations 2010 (as amended). This includes but is not limited to: roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces. Regulation 123 of the CIL Regulations 2010 (as amended) sets out the need for local authorities to produce a list of "relevant infrastructure" which will be funded in whole or part by the CIL.

The Community Infrastructure Regulations 2010 (as amended) restricts the use of planning obligations secured through S106 agreements for infrastructure that will be funded in whole or in part by the Community Infrastructure Levy. This is to ensure there is no duplication between CIL and planning obligations in funding the same infrastructure projects. In addition, a development should not have to contribute twice towards the same piece of highways infrastructure through works carried out under Section 278 of the Highways Act 1980, and monies or land provided through CIL. The CIL Regulations 2010 (as amended) prescribe that a condition must not be imposed on the grant of planning permission to require a highway agreement for the funding or provision of infrastructure that is included on the Regulation 123 list, nor must a planning condition be used that prevents or restricts the carrying out of development (sometimes referred to as a 'Grampian condition') until a highway agreement has been entered into which is also included on the Regulation 123 list of infrastructure.

The relationship between CIL and planning obligations is explained in the Planning Practice Guidance¹ where it notes that it is possible that site specific mitigation may still be necessary subject to certain limits, namely:

¹ Paragraphs 93 to 107; Reference ID:25-093-20140612 to Reference ID: 25-107-20140612

- The application of the statutory test with respect to planning obligations (Regulation 122);
- Ensuring no overlap between CIL and planning obligations as noted above; and
- Imposing a limit on pooled contributions from planning obligations towards infrastructure that may be funded by the levy.

The list below sets out those infrastructure projects that Lichfield District Council currently intends may be wholly or partly funded by CIL, together with clarification notes and S106 requirements. The order in the table does not imply any order of preference for spend, it just signifies projects that will be considered by the council in its decision as to what might receive CIL funding. This list will be updated on a regular basis, taking into account the Council's Infrastructure Delivery Plan (IDP) and any changes to the CIL regulations.

Transport	
Infrastructure to be funded in whole or in part by CIL	Notes
Completion of the Lichfield Southern Bypass via provision of new underbridge section.	<ul style="list-style-type: none"> • Section from east of new bridge structure to London Road to be delivered by developer as part of site access road layout. • New underbridge section will be funded by existing s106 and possible Local Growth Fund. • Section to west of new bridge to be delivered on land currently owned by developers.
<p>Improvements to the Strategic Highway Network as identified by the Highways England at:</p> <ul style="list-style-type: none"> • Muckley Corner • Swinfen • Further junction improvements and safer access to A38 (Hilliards Cross and Fradley South) 	CIL funds may be used to form part of package for Local Enterprise Partnership (LEP) bids.
<p>Transport improvement scheme from the integrated Transport Strategy for Lichfield:</p> <p>Lichfield City Centre Transport Package including:</p> <ul style="list-style-type: none"> • Bus network improvements • Cycle and walking routes within the City • Electric Charging Points • Delivery of a traffic directional signage scheme. • Designated Coach Parking area • Real Time Passenger Information, including signage to car parks <p>East Lichfield Local Transport Package (including Fradley) including:</p>	Delivery of other schemes/projects within the District Integrated Transport Strategy not listed will continue to be delivered via S106 and/or Planning Condition where appropriate'.

- HGV routing and parking arrangements in Fradley

Burntwood Transport Package including:

- Cannock Road – public realm enhancements and access modifications
- Improved walking and cycling links from southern to northern Burntwood
- Bus access and service improvements linking to Cannock and Lichfield
- Burntwood Bus interchange

District wide measures including

- A5 (T) and A38 (T)
- Route signage Lichfield to Tamworth

Education	
Infrastructure to be funded in whole or in part by CIL	Notes
<p>Primary Education</p> <p>Primary School provision to deliver the Local Plan Strategy will be generated through S106 agreements apart from the following projects that may benefit from CIL funds:</p> <ul style="list-style-type: none"> • A 105 place expansion of Hob Hill Primary School, Rugeley to increase the school from 210 to 315 places • A 77 place expansion of All Saint's Alrewas Primary School to increase the school from 238 places to 315 places 	<p>S106 agreements will be required to secure the provision of primary education facilities to mitigate the need generated by site specific developments, and growth within the Strategic Development Allocations (SDAs) identified in the Lichfield District Local Plan as:</p> <ul style="list-style-type: none"> • South of Lichfield • Deans Slade Farm • Cricket Lane • East of Lichfield (Streethay) • Fradley • East of Burntwood Bypass • East of Rugeley • North of Tamworth (BDL)
<p>Secondary Education</p> <p>Delivery of Five Forms of Entry of additional secondary education facilities through:</p> <ul style="list-style-type: none"> • Expansion to Nether Stowe School • Expansion to The Friary School • Expansion to King Edward VI School 	<p>CIL provides for the required secondary pupil places for the growth in housing in Lichfield City and its immediate environs. Housing development elsewhere in the District which does not feed into the three Lichfield City secondary schools will where necessary contribute via S106 to projects at other schools to provide places to mitigate their developments' impact.</p>

Open Spaces, Sporting and Recreational Facilities

Infrastructure to be funded in whole or in part by CIL

Notes

Open Space

Improvements to open space provision, including play provision for key sites, in line with the Open Space Assessment.

S106 agreements will be required to secure the on-site provision and maintenance of recreation and open space needs generated by growth within the Strategic Development Allocations (SDAs) and the North of Tamworth Broad Development Location identified in the Lichfield District Local Plan as:

- South of Lichfield
- Deans Slade Farm
- Cricket Lane
- East of Lichfield (Streethay)
- Fradley
- East of Burntwood Bypass
- East of Rugeley
- North of Tamworth Broad Development Location

Indoor Sports

CIL funds may be spent on improving indoor sports provision to serve Lichfield City and its hinterland as set out in the Swimming Pool and Sports Hall Feasibility Study 2013.

No specific elements for indoor sports provision have been identified for new S106 funding.

Playing Pitches

CIL funds may be spent on improving playing pitch provision in line with the deficiencies identified in the Playing Pitch, Tennis and Bowls Strategy.

S106 agreements will be required to secure the on-site provision and maintenance of playing pitch provision for the following SDAs and the North of Tamworth Broad Development Location identified in the Lichfield District Local Plan as:

- South of Lichfield
- Deans Slade Farm
- Cricket Lane
- East of Lichfield (Streethay)
- Fradley
- East of Burntwood Bypass
- East of Rugeley
- North of Tamworth Broad Development Location

Environment and Biodiversity

Infrastructure to be funded in whole or in part by CIL

Notes

Environment and Biodiversity

CIL funds may be spent on improving the public realm, landscapes and habitats; and improving access to green space, to include:

- Chasewater Country Park improvements.
- Central Rivers Initiative projects.
- Improvements to the canal network to improve Green Infrastructure Links.
- Local Nature Reserves.
- Woodland and hedgerow projects.

Except on sites identified as biodiversity offsetting recipient sites.

Infrastructure works relating to the restoration of the Lichfield Canal will potentially benefit from CIL funds, *apart from works required in relation to any on-site provision by the developers connected to the three SDAs in the vicinity of the canal: South of Lichfield, Deans Slade Farm, Cricket Lane.*

S106 agreements will be required to fund biodiversity offsetting measures where appropriate and as outlined in Local Plan Strategy 2008-2029 Policy NR3 and expanded upon within the Biodiversity and Development SPD.

Section 106 agreements will be required where appropriate to secure infrastructure works relating to the restoration of the Lichfield Canal for the three SDAs in the vicinity of the canal: South of Lichfield, Deans Slade Farm, Cricket Lane.

Cannock Chase Special Area of Conservation

CIL funds may be spent on measures for preventing harm to the Cannock Chase Special Area of Conservation (CCSAC) agreed by the Cannock Chase SAC partnership i.e. the Strategic Access Management and Monitoring Measures (SAMMM) *apart from works required in relation to interpretation panels and waymarking as identified in the SAMMM.*

S106 agreements will be required for the Strategic Development Allocations (SDAs) to secure the provision of bespoke mitigation measures in relation to the Cannock Chase Special Area of Conservation other than the mitigation contained within the SAMMM.

To satisfy Habitats Regulations and prevent harm to the Cannock Chase SAC, contributions via S106 agreements/unilateral undertakings will be required towards works required in relation to interpretation panels and waymarking as identified in the SAMMM by all new net dwellings which are not liable to, or exempt from CIL charges within the 0-8km Zone of Influence.

Other Infrastructure	
Infrastructure to be funded in whole or in part by CIL	Notes
<p>Flood Mitigation General measures may benefit from CIL funds.</p>	<p>Site specific SUDS and offsite flood mitigation measures where they are required directly as a result of the development will be secured through planning conditions or S106 agreements.</p>
<p>Health facilities CIL funds may be used where evidence is provided that there is no local capacity and expansion of services is required to support growth across the district.</p>	<p>S106 agreements will be required for the Strategic Development Allocations (SDAs) to secure the provision of health care as identified in the Local Plan Strategy concept statements.</p>
<p>Social and community facilities will benefit from the local slice of CIL funds (15-25%) raised within their area. These funds can be distributed by Parish Councils and any neighbourhood planning forums that emerge, in line with evidence of local need.</p>	<p>S106 agreements will be required for the Strategic Development Allocations (SDAs) to secure the provision of community centres/hubs as identified in the Local Plan concept statements.</p>
<p>Low Carbon Initiatives / Carbon Investment Fund CIL funds may be used to support the delivery of Local Plan policy SC1 which states: The District Council is developing a Carbon Community Fund (CCF) which will support the achievement of carbon targets through financial contributions.</p>	

Local Plan update – Allocations Document

Cabinet Member: Councillor I. Pritchard

Date: 12th December 2016

Agenda Item: 4

Contact Officer: Craig Jordan/ Ashley Baldwin

Tel Number: 01543 308202/ 308147

Email: craig.jordan@lichfielddc.gov.uk/
ashley.baldwin@lichfielddc.gov.uk

Key Decision? NO

Local Ward
Members



**Economic Growth,
Environment and
Development (Overview
and Scrutiny)
Committee**

1. Executive Summary

- 1.1 Consultation on the future content of the Council's Local Plan Part 2 Allocations document closed on the 10th of October 2016. In total 98 responses were received which have been analysed as part of developing the Local Plan Allocations document.
- 1.2 A draft of the document has now been prepared for consideration prior to approval for the purposes of publication consultation.

2. Recommendations

- 2.1 The Economic Growth, Environment and Development Overview and Scrutiny Committee note the consultation responses received and responses made to comments (APPENDIX A).
- 2.2 That the Economic Growth, Environment and Development Overview and Scrutiny Committee recommends to Cabinet that the draft Local Plan Allocations document be approved for the purposes of undertaking public consultation on the Publication version of the Local Plan Allocations document (APPENDIX B).
- 2.3 That the Economic Growth, Environment and Development Overview and Scrutiny Committee recommend that Cabinet approve the proposed consultation methods for seeking views and comments on the draft Local Plan Allocations document.

3. Background

Overview

- 3.1 The purpose of this report is to update Members on the progress in preparing the Lichfield District Local Plan Allocations document. The Allocations document is intended to include:
 - Proposed employment and housing allocations.
 - Policy on Lichfield City Centre including demarcating primary and secondary retail frontages.
 - Policy on Burntwood Town Centre.
 - Policy on accommodating the needs of Gypsy, Traveller and Travelling Show people.
 - A review of previously saved policies emanating from the previous Lichfield District Local Plan June 1998.

In addition to the above this report considers:

- Proposed consultation methods for the Publication consultation stage on the Local Plan Allocations document.
- Responses to the comments received as part of the Regulation 18 consultation

3.2 Members will recall that the Council consulted on a Regulation 18 (APPENDIX C) from August 2016 – October 2016. This consultation set out the proposed scope and nature of the Local Plan Allocations document.

3.3 In total 98 responses were received by the Council, there are not considered to be any showstoppers identified by the responses. Officers have assessed each comment made as part of preparing the Local Plan Allocations (APPENDIX A). In summary the key issues raised during the consultation were:

- A number of comments indicated that it would be preferable to deal with the Birmingham housing numbers and review Lichfield District's own housing numbers now. In addition the level of employment land requirements were also recommended to be updated.
- Suggested Core Policies 1 and 6 were challenged in particular. This was primarily associated with the perceived need to review the Local Plan Strategy (2015) to deal with Birmingham's housing needs. However other responses indicated that strategic changes to Core Policy 1 could create investment uncertainty, particularly in the retail sector.
- In relation to settlement policies such as Whit 4 (Whittington) it was suggested these should be amended to take account of unmet housing needs arising from Birmingham.
- Policy NR3 was challenged in terms of its perceived conflict with the NPPF.
- Policy CP4 was cited as being an issue because of the lack of infrastructure that has come forward aligned to what was set out in the Infrastructure Delivery Plan associated to the Local Plan Strategy (2015).
- Saved Policy NA.1 relating to the AONB was put forward for retention by the Cannock Chase AONB.
- Policy SC1 was highlighted as being in conflict with National guidelines due to the withdrawal of the Code of Sustainable Homes.
- In relation to Burntwood Town Centre, a general point of allowing a level of flexibility of uses on specific land identified in the town centre was made.
- The Council's housing trajectory identified within the Local Plan Strategy (2015) was challenged.
- A total of 76 representations proposed sites for development, however the bulk of these sites have already been received by the Council through the Strategic Housing Land Availability Assessment (SHLAA). Any new information was considered by officers.

3.4 Tamworth Borough Council has requested that the District Council consider accommodating a proportion of 825 dwellings which cannot be accommodated within the Borough of Tamworth. This would be in addition to the 500 dwellings that is already identified within the Local Plan Strategy (2015) and relates to additional need arising out of the Tamworth Local Plan when formally examined last year. It is considered that at this stage it is not appropriate to accept any of the 825 dwellings as this is deemed out of scope. The District Council consider this be part of the wider GBHMA unmet housing numbers which should be considered holistically and strategically as part of a future review of the Lichfield District Local Plan.

3.5 Tamworth Borough Council has also requested that Lichfield District Council consider accommodating their 1 Gypsy, Traveller and Travelling show people pitch requirement. It is considered that before the District Council agree to look at this issue under the duty to cooperate, Tamworth Borough Council needs to undertake a full and proper assessment of Gypsy and Traveller pitches in its administrative

area. A review of Tamworth Borough Councils evidence base highlights a lack of proper assessment in this respect.

- 3.6 As part of the same Duty to Cooperate discussions Tamworth Borough Council has identified employment land requirements which cannot be accommodated in its area. The Borough Council has asked that Lichfield District and North Warwickshire assist in meeting this need. The Local Plan Allocations indicates that 6.5 ha can be accommodated within Lichfield District.
- 3.7 Overall, the consultation is considered to have been very effective. A number of key issues have been raised, some of these issues are addressed within the Local Plan Allocations document, whereas other issues will be addressed through the Full Plan review which will be undertaken upon adoption of the Local Plan Allocations.

Employment allocations

- 3.8 Economic growth is a core part of the Council's agenda. To assist with this it is imperative that the District has a diverse portfolio of land for employment development/occupation. In line with the Local Plan Strategy (2015) a review of the District's current stock has been undertaken. This review has identified a current portfolio of 96.58 hectares (including sites completed between 2008 and 2016) to be maintained. This demonstrates there is sufficient land within the existing employment land portfolio to meet the 79.1 hectare requirement set out within the Local Plan Strategy (2015) with some flexibility. This flexibility enables the Allocations document to address the 6.5 hectare requirement arising from Tamworth Borough. In addition the Local Plan Strategy (2015) requires the allocation of a further 10 hectares of employment land to be identified. The assessment of potential employment sites has identified that this requirement is best accommodated in Fradley to the south of the existing employment land (APPENDIX B).
- 3.9 The NPPF requires Local Planning Authorities to only protect those employment areas that are performing effectively and to consider the re-allocation of employment land where this is justified for other suitable uses. The Council's Employment Land Review (2012 and 2014) indicates that a number of employment areas are poorly performing. The Local Plan Allocations identifies the site boundaries of those employment areas that are considered to be performing effectively, where this is not the case no boundaries are drawn. This opens up the opportunity for other non-employment uses to come forward on a poorly performing employment area. However it should be noted a changing from employment to housing will be market driven.

Housing allocations

- 3.10 The Local Plan Strategy (2015) commits Lichfield District Council to deliver a minimum of 10,030 dwellings within the plan period (2008 – 2029). The Local Plan Strategy identified Strategic Development Allocations and a Broad Development Location which amounted to 5, 584 dwellings.
- 3.11 The Local Plan Strategy (2015) identifies a set of housing requirements for the various settlements within the District. An assessment has been undertaken which identifies the progress which has been made towards meeting the housing requirements within the Local Plan Strategy, with each settlement within the settlement hierarchy being considered in detail. The assessment notes that a majority of settlements still require further sites to be identified to meet the strategic housing requirements as set out within the Local Plan Strategy (2015). The table below identifies those settlements that have met their requirement and those where there is a shortfall. It should be noted that the overall requirement column is taken directly from Table 8.1 of the Local Plan Strategy and provides slightly in excess of the 10,030 homes required by the Local Plan. The assessment demonstrates there is a shortfall of approximately 1800 dwellings. A key purpose of the Local Plan Allocations is to bridge this shortfall.

Table 1: Settlement requirements

Settlement	Completions 2008-2016 (GROSS)	Currently Committed Supply	Allocated Sites (including those with planning permission and under construction) ¹	TOTAL	Overall requirement (table 8.1 Local Plan Strategy)	Remaining Dwellings
Lichfield City	567	456	2100	3123	3912	-789
Burntwood	236	113	345	694	1350	-656
East of Rugeley	543	79	450	1072	1130	-58
North of Tamworth	0	165	835	1000	1000	0
Fradley	16	5	1250	1271	1259	12
Armitage with Handsacre	79	205	0	284	220	64
Alrewas	30	30	0	60	180	-120
Fazeley	124	112	0	236	350	-114
Shenstone	45	3	50	98	150	-52
Whittington	16	3	0	19	110	-91
Other Rural	281	250	0	531	500	31
TOTAL	1937	1419	5030	8386	10161	-1771

GROSS DEMOLITIONS IN PLAN PERIOD (2008-2016)	56
TOTAL DWELLINGS REMAINING	-1827

3.12 An assessment of potential sites has been undertaken in line with the Local Plan Strategy (2015). When considering sites, those that were deemed out of scale with the proposed growth for a settlement, or of such a scale they would result in strategic 'greenfield' release have not been considered. The site of the now decommissioned Rugeley Power Station has been considered given that this is a Brownfield site. The sites proposed within the Local Plan Allocations (APPENDIX B) to meet the remaining 10,030 requirement, are considered to be those best aligned with the Local Plan Strategy (2015). Rugeley Power Station is proposed for allocation for a minimum of 800 dwellings. A draft concept statement has been developed and this amongst other things would seek to protect the valued Borrowpit area from residential development. Table 2 sets out the impacts on each of the settlements as a result of proposed allocations.

¹ Where completions have occurred on Strategic Development Allocations these are included within the completions column, additionally where Strategic Development Allocations have been permitted for a different figure than is set out within the Local Plan Strategy this is taken account of in the total.

3.13 Proposed allocations include sites with unimplemented planning permissions. The view with these sites is that they have planning merit, given they have been through a formal determination process. An allocation ensures their suitability if at a later date during the plan period the permission was to lapse.

Table 2: Settlement outputs

Settlement in Hierarchy (not including North of Tamworth or East of Rugeley)	Total dwellings (including completions, committed supply, SDAs and proposed Allocations)	LPS requirement (including Upper end of LPS range)	Difference
Lichfield City	3840	3912	-72
Burntwood	1365	1350	+15
Fradley	1421	1250	+171
Alrewas	180	180	0
Armitage with Handsacre	288	220	+68
Fazeley, Mile Oak & Bonehill	345	350	-5
Shenstone	148	150	-2
Whittington	108	110	-2
Other Rural	551	500	+51
North of Tamworth	1165	1000	+165
East of Rugeley (including Rugeley Power Station)	1422 (including 800-1200 (350 net increase from proposed Rugeley power Station allocation))	1130	+292
TOTAL	10,833	10,152	+681

3.14 While some settlements are still slightly under their proposed numbers it is considered the proposed allocations are the most suitable sites and the numbers for each settlement are broadly in line with the Local Plan Strategy (2015).

3.15 The Local Plan Allocations does not identify sites below 5 dwellings. However there is an assumption that around 50 – 55 dwellings per annum will come forward based on previous delivery rates. With this assumption, and the above allocations the Council will have around a 10% buffer which is considered an acceptable.

3.16 Outside of this assessment, there are three large appeals that the Council are awaiting a decision on. These are Watery Lane, Lyleavale, and Dark Lane Alrewas. These decisions could have implications on the numbers contained in Table 2 above. However, waiting for decisions is not considered an appropriate approach given the length of time they have already sat with Secretary of State.

- 3.17 The Local Plan Strategy identifies a requirement for 14 permanent pitches and 5 transit pitches. In total 7 permanent pitches have been delivered during the Plan period. This leaves a requirement of 7 permanent pitches and 5 transit pitches to be identified within the Local Plan Allocations.
- 3.18 The SHLAA and 'Call for Sites' does not contain any site submissions for the above purposes. The Regulation 18 consultation resulted in no site submissions being made to the Council. Officers have sought to identify the potential of sites that are broadly in line with Local Plan Strategy policy H3 but were submitted for alternative uses. In addition sites on the public register and previous planning applications for pitches have been assessed.
- 3.19 The assessment has identified a 1 pitch allocation (APPENDIX B). While over 20 potential sites were assessed the conclusions were that these sites were either unsuitable in planning policy terms or were lacking in deliverability. It is proposed therefore that the 1 pitch allocation be confirmed and that policy criteria are used to determine the suitability of proposals if and when they come forward in due course.

Retail and Office assessment – impacts for Lichfield City Centre and Burntwood Town Centre

- 3.20 Consultants WYG and White Land Strategies were commissioned to undertake an updated assessment looking at the retail and office floorspace requirements for Lichfield City Centre and Burntwood Town Centre. The figures within the Local Plan Strategy (2015) were established pre West Midlands Regional Spatial Strategy i.e. pre-recession and were based on the results from a shopper survey dating back to 2004. In accordance with paragraph 158 of the NPPF, it is important for local authorities to ensure that Local Plans are based on an adequate and up-to-date evidence base. A sense check of figures is helpful to carefully plan for the two centres' needs.
- 3.21 The results of the assessment indicate that a revised need be planned for, the figures are set out below.
- 3.22 The figures set out in table 3 do not take account of the turnover of the existing retail commitments within the District, most significantly the permitted Friarsgate scheme. However rather than specify precise Class A1 floorspace needs within a policy it is proposed that the 'latest' evidence base be referred to within the policy. This enables evidence to be updated in the future without the need for a Plan review

Table 3: Floorspace requirement without taking account of commitments (i.e. without Friarsgate or any other permitted floorspace)

Year	Convenience Floorspace Capacity (sq.m)			Comparison Floorspace Capacity (sq.m)		
	Lichfield District	Lichfield City Centre	Burntwood town centre	Lichfield District	Lichfield City Centre	Burntwood town centre
2021	-3,400 -- 2,200	400 – 600	1,700 – 2,600	2,400 – 3,900	1,700 – 2,800	200-400
2029	-2,100 -- 1,400	700 – 1,000	2,000 – 3,000	6,300 – 10,500	4,600 – 7,600	600-1,000

- 3.23 Without taking account of the committed comparison floorspace, the requirement for additional comparison floorspace across the District as a whole would be for between 2,400 sq.m and 3,900 sq.m (net) of additional comparison floorspace at 2021 and between 6,300 and 10,500 sq.m additional

comparison floorspace at 2029. In terms of convenience floorspace requirements, there is no identified requirement for additional floorspace across the District as a whole at either 2021 or 2029.

3.24 The Friarsgate floorspace (in combination with other commitments) more than accounts for the identified floorspace requirement over the plan period. The Table below sets out the floorspace requirements when taking account of the commitments.

Table 4: Floorspace requirement taking account of commitments

Year	Convenience Floorspace Capacity (sq.m)			Comparison Floorspace Capacity (sq.m)		
	Lichfield District	Lichfield City Centre	Burntwood town centre	Lichfield District	Lichfield City Centre	Burntwood town centre
2021	-4,900 -- 3,200	-400 - -300	1,300 – 1,900	-11,200 -- 6,700	-6,700 -- 4,000	-800 - -500
2029	-3,600 -- 2,400	-100 - 0	1,500 – 2,400	-4,400 -- 2,600	-1,800 -- 1,100	-500 - -300

3.25 However the evidence also indicates that the positive economic impacts of Friarsgate may have the wider benefit of drawing shoppers back into the District and in particular the city centre, and therefore increase the level of market share attracted by existing facilities (due to the attraction of Friarsgate).

3.26 WYG has therefore undertaken a second scenario for both the District and the city centre, which assumes that the market share will increase from 2021 onwards, and therefore the level of available expenditure will increase, thus raising the potential floorspace requirement for additional comparison floorspace within the District and the city centre will also increase.

3.27 The figures set out below are based on an assumption that the existing market shares for the District and the city centre will increase by 15% in each case.

Table 5: Projected floorspace requirement for Lichfield District and the City Centre post Friarsgate, taking account of commitments and assuming an increased market share

Year	Comparison floorspace sq.m (net)	
	Lichfield District	Lichfield city Centre
2021	1,700 – 2,800	-300 – -200
2029	3,400 – 5,700	3,100 – 5,100

3.28 With regard to bulky goods retail, the assessment does not split the floorspace requirements to bulky or non-bulky floorspace but it does express a floorspace range dependent on the nature of the operator (i.e. a lower sales density for bulky retailers and a higher sales density for non-bulky retailers). WYG's recommendation is that any requirement for additional Class A1 floorspace should be directed to the defined centres of Lichfield and Burntwood in the first instance, in order to compete with the provision at Ventura Retail Park in Tamworth in particular. Whether this floorspace is bulky or non-bulky will be dependent on the market and the size of any available development sites in the future. There is also a qualitative requirement for additional floorspace within Burntwood to increase the attractiveness of the centre and draw shoppers (and expenditure) back.

3.29 The WYG work has implications for the city and town centre boundaries of Lichfield and Burntwood respectively and primary/ secondary retail areas. Revised boundaries have duly been developed

(APPENDIX B). In relation to Lichfield it will be noted that Friarsgate is proposed to be allocated to meet the majority of comparison floorspace needs.

Review of 1998 Saved Policies

3.30 In total there are currently 54 saved policies carried over from the 1998 Local Plan. The Council have committed to a review of these saved policies. Table 6 sets the policies that are proposed for deletion and those that have been reviewed and which are proposed to form part of the Local Plan Allocations document.

Table 6: Saved Policy review

Policy No.	Policy	Delete or Redraft or new policy
E2	Forest of Mercia	Delete
C2	Character of Conservation Areas	Redraft
C7	Buildings out of Scale or Character	Delete
C9	Protected Open Spaces	Delete
Emp.2	Existing Industrial Areas	New policy
Emp.5	Major Developed Sites in the Green Belt	Delete
Emp.11	Wyrley and Essington Canal	Redraft
T6	Rail Transport	Delete
S2	Neighbourhood Shopping Centres	Delete
L7A (Relevant to Lichfield City Area)	Buffer Depot, Streethay	New policy
L9 (Relevant to Lichfield City Area)	Extension to Boley Park Industrial Estate	New policy
L10 (Relevant to Lichfield City Area)	Britannia Way	New policy
L12 (Relevant to Lichfield City Area)	Office Development – Sandford Street	Delete
L13(Relevant to Lichfield City Area)	City Centre Redevelopment	New policy
L15 (Relevant to Lichfield City Area)	Primary Retail Area	New policy
L16 (Relevant to Lichfield City Area)	Secondary Retail Area	New policy
L17 (Relevant to Lichfield City Area)	Bird Street	Delete
L18 (Relevant to Lichfield City Area)	Dam Street	Delete
L19(Relevant to Lichfield City Area)	Business Area	Delete
L21 (Relevant to Lichfield City Area)	New Roads	Delete
L22 (Relevant to Lichfield City Area)	Road Line Safeguarding	Redraft
L23 (Relevant to Lichfield	Road and Junction	Redraft

Policy No.	Policy	Delete or Redraft or new policy
City Area)	Improvements	
L24 (Relevant to Lichfield City Area)	Traffic Management	Delete
L26 (Relevant to Lichfield City Area)	Rear Servicing	Delete
L27 (Relevant to Lichfield City Area)	Pedestrian Access to the City Centre	New policy
L31 (Relevant to Lichfield City Area)	Lichfield Rail Stations	Delete
L35 (Relevant to Lichfield City Area)	Recreation Zones	Delete
L36 (Relevant to Lichfield City Area)	Recreation Zones	Delete
L37 (Relevant to Lichfield City Area)	Lichfield Linear Park	Delete
L42 (Relevant to Lichfield City Area)	Environmental & Housing Improvement	Delete
L46 (Relevant to Lichfield City Area)	Shop fronts	Redraft
L47 (Relevant to Lichfield City Area)	Cathedral Close	Delete
L49 (Relevant to Lichfield City Area)	Framework Open Space	Delete
L50 (Relevant to Lichfield City Area)	Landscape Improvements in Framework Open Space	Delete
B1 (Applicable to Burntwood only)	Existing Residential Areas	Delete
B5 (Applicable to Burntwood only)	New Shopping Development	Delete
B6 (Applicable to Burntwood only)	Indoor Leisure	Delete
B9 (Applicable to Burntwood only)	Redevelopment & Town Square	Delete
B13 (Applicable to Burntwood only)	Redevelopment and Expansion of Neighbourhood Centres	Delete
B15 (Applicable to Burntwood only)	Road and Junction Improvements	Delete
B21 (Applicable to Burntwood only)	Chasetown Industrial Estate	New policy
B22 (Applicable to Burntwood only)	Recreation Zones	Delete
B24 (Applicable to Burntwood only)	Chasewater Area and Country Park	Delete
NA1 (Applicable to Northern Area only)	Cannock Chase – Area of Outstanding Natural Beauty	Redraft
NA12 (Applicable to Northern Area only)	Lea Hall Colliery	Delete
NA13 (Applicable to	Rugeley Power Station	Delete

Policy No.	Policy	Delete or Redraft or new policy
Northern Area only)		
NA20 (Applicable to Northern Area only)	Public Open Space, Longdon	Delete
EA1 (Applicable to Eastern Area only)	Fradley Airfield Industrial Proposals	New policy
EA 13 (Applicable to Eastern Area only)	Hotel at Fradley	New policy
EA14 (Applicable to Eastern Area only)	The Tame and Trent Valley	Delete
EA16 (Applicable to Eastern Area only)	The National Forest	Redraft
SA3 (Applicable to the southern area only)	Laurel House, Lichfield Road, Fazeley	Delete
SA6 (Applicable to the southern area only)	Little Aston Park	Delete
SA7 (Applicable to the southern area only)	Canal Facilities at Fazeley	Delete

3.31 Those policies that are proposed for deletion are considered to be either ineffective/no longer relevant or in conflict with the wider policy framework. Those that are being taken forward are being updated to ensure compliance with the wider policy framework.

Sustainability Appraisal - Scoping Report

3.32 Consultation was undertaken in the Scoping Report from August – September 2016. Responses received along with how we have addressed these are set out in APPENDIX D.

Consultation proposals

3.33 The Council has an adopted Statement of Community Involvement (SCI) which sets out the process for engagement at different stages of Plan making. Consultation on the Local Plan Allocations will represent the Publication stage which requires us to undertake the following as a minimum:

- 6 weeks of consultation.
- Publish the document on the Councils website.
- Publish at the Council's principal office.
- Make available in alternative formats if requested.
- Issue a press release.
- Engage with stakeholders using a range of methods set out within the SCI Appendix A.

3.34 In addition to the above, it is proposed that the following methods be utilised:

- One drop in event held at each of the settlement set out in table 2.
- Meetings with Duty to Cooperate partners.
- Presentation to strategic partnerships.

Alternative Options	<ol style="list-style-type: none"> 1. The Committee commit to a full review of the Local Plan now and wait for the issue of Birmingham's/Greater Birmingham Housing Market Area shortfall to be addressed. 2. The Committee determines that the proposed sites identified are not appropriate. This has potential policy implications such as the need to identify sites in other settlements that have already met their requirements.
Consultation	<ol style="list-style-type: none"> 1. Consultation will be required on the Local Plan Allocations.
Financial Implications	<ol style="list-style-type: none"> 1. Consultation is required as part of the planning process. It is expected the cost of complying with the recently adopted SCI will give better value than the previous SCI. 2. Officer time will be needed to run the consultation on the Local Plan Allocations. 3. The costs of consultation will be met within approved budgets.
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. Supports the priority of a vibrant and prosperous economy as it assists in the delivery of the planning function of the Council. 2. Supports the priority of a Healthy and Safe communities by ensuring the provision of housing. 3. Supports the priority of Clean, green and welcoming places to live by assisting in allocating land for affordable housing, as well as supporting the delivery of residential and commercial developments.
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. An Equality Impact Assessment will accompany the Local Plan Allocations consultation.
Crime & Safety Issues	<ol style="list-style-type: none"> 1. None.

	Risk Description	How We Manage It	Severity of Risk (RYG)
A	An approach to the Local Plan is not agreed and there is a lack of clarity associated with how Lichfield District Council continue with meeting its commitments to delivering Site Allocations	Proceed to agree approach to taking forward the Local plan	Yellow
B	Alternative sites are recommended that may not be policy compliant	An evidence based assessment of alternative sites to ascertain issues with policy compliance	Yellow
C	The three appeal decision referenced at paragraph 3.16 are released which impacts on the numbers identified within the Allocations document	Officers present an update to Members taking stock of the appeal decisions.	Yellow

Background documents:
 Local Pan Strategy 2015
 Statement of Community Involvement
 Local Development Scheme

Relevant web links:

Local Pan Strategy 2015 - <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Local-Plan-Strategy.aspx>

Statement of Community Involvement - <https://lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Local-Plan-documents/Statement-of-Community-Involvement-SCI.aspx>

Local Development Scheme - <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Local-Plan-documents/Local-Development-Scheme-LDS.aspx>

Lichfield District Council Local Plan Allocations

Representation to the Open Consultation – Regulation 18

(Consultation closed 10th October 2016)

All representations are available for view via the Planning Policy Consultation Portal which is accessible via the following link:

http://lichfielddc-consult.limehouse.co.uk/portal/planning/local_plan_allocations/lpa_open_consultation/lpa_open_consultation

In order to view representations please follow the instructions below:

1. Using the link above access the Planning Policy Consultation Portal for the 'Local Plan Allocations Open Consultation – Regulation 18 Consultation'. Then click the 'view closed consultation' icon.



2. On the following page please click 'View Comments' which will display all comments to the consultation. All comments are displayed with the consultee name the top with the representation reference (starting LPAOC) at the end of each comment. Additionally all comments can be downloaded in full using the 'attachments' at the end of each representation.

Representation Ref.	Consultee/ Agent	Council Response
LPAOC43	Maria Sheridan – Delta Planning on behalf of Prologis	A full Employment Land Review will be undertaken as part of the subsequent Plan Review. Employment numbers within the Plan are considered minimum. Comments on employment submission and settlement boundary are noted and are assessed as part of developing the Local Plan Allocations for employment land allocations, employment area boundaries and identifying the settlement boundary.
LPAOC44	Stacey Green – Barton Willmore on behalf of the Church Commissioners	Comments in relation to Burntwood 4 are noted. The urban capacity study indicates that there is a need to look at additional sites around Burntwood to meet the requirements

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Representation Ref.	Consultee/ Agent	Council Response
		<p>of the Local Plan Strategy. It is not considered necessary to update the policy to enable this.</p> <p>The submission does not provide any hard evidence that the SDAs/ BDL will not come forward. That said the submissions will be considered through the Allocations process.</p> <p>Comments associated with SHLAA appraisal will be addressed as part of the SHLAA 16/ 17 update, and will be considered as part of the Allocations process.</p> <p>Comments on the settlement boundary are noted.</p>
LPAOC45	Richard Brown – CBRE on behalf of IM Properties	<p>Comments on the Core Policy 6 are considered to present no new issues that have not already been explored at the Examination and Inquiries.</p> <p>Comments associated with delivery rates are noted and the Council proactively works with developers and landowners to bring forward sites. In addition delivery is assessed annually through the Council’s monitoring. At the time of writing the Council have maintained a 5 year land supply. The Local Plan Allocations will assist in bringing forward smaller sites. Comments regarding other landowners indicating that they will not bring forward the numbers of housing associated with their sites are considered unsubstantiated.</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>undertaking evidence review now to assist with a full plan review.</p> <p>The land promoted by the submission is considered of such a large scale given that in the Councils view is not connected to any settlements and is greenfield. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations. The accompanying Masterplan will be considered as part of any review of the Plan which results in 'significant' growth within the District.</p>
LPAOC 48	Matthew Williams – Savills on behalf of the Estate of Neal Francis Thomas	<p>Comments associated with site submission will be addressed as part of the SHLAA 16/ 17 update. The land promoted by the submission is considered of such a large scale given that it is connected to Shenstone. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than through the Allocations.</p> <p>Comments associated with the Shenstone NP are noted but are considered a matter for the neighbourhood plan process and are beyond the scope of the Local Plan Allocations process. It should be noted that the Shenstone Neighbourhood Plan was subject of a successful referendum on the 17th November 2016 having been independently examined.</p>
LPAOC49	Neil Cox – Pegasus Group on behalf of Miller Homes	<p>Comments associated with housing trajectory are noted. The Local Plan Allocations document will set out an updated housing trajectory.</p> <p>Comments associated with Birmingham's housing needs are noted. An agreement has not been reached with the GBHMA</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the 5 year land supply are noted, at the time of writing the Council has a 5 year land supply with a buffer which has been calculated using the method as recommended by the Local Plan Inspector within his final report on the Local Plan Strategy.</p> <p>Site extension at Streethay will be considered as part of the Allocations.</p>
LPAOC51	James Chadwick – Staffordshire County Council	Comments associated with the BDL are noted. The Council acknowledge that the monitor manage approach proposed (and at the time of writing is subject to a planning application) creates a level of uncertainty. However the evidence to date does not categorically indicate that development cannot come forward in this area. In addition, the Council are committed to a full plan review, if further evidence were presented to the Council this can be addressed through the review process.
LPAOC52	Antony Muller – Natural England	Noted.
LPAOC53	Neil Cox – Pegasus Group on behalf of Persimmon Homes and St Modwen Development Ltd.	<p>Comments associated with housing trajectory are noted. The Local Plan Allocations document will set out an updated housing trajectory</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the 5 year land supply are noted, at the time of writing the Council has a 5 year land supply with a buffer which has been calculated using the method as recommended by the Local Plan Inspector within his final report on the Local Plan Strategy.</p> <p>Comments associated with Policy NR3 are noted, however it is the Council's view that the policy is positively worded and had been subject to Examination.</p> <p>Comments associated with the CIL are considered outside the scope for the Local Plan Allocations document.</p> <p>Positive progress towards bringing forward St. Johns and Cricket Lane SDA are noted.</p> <p>Comments associated with Lichfield City's Neighbourhood plan are noted but are considered outside the scope of the Local Plan Allocations document.</p>
LPAOC54	Tom Beavin – JVH Planning on behalf of Mr Bhagi	<p>Comments associated with Birmingham's housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Settlement boundary comments are noted.</p> <p>The land promoted by the submission is considered of such a large scale given that it is connected to Little Aston. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC55	Tom Beavin – JVH Planning on behalf of Shipley Estates and the Baxter Estate	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Settlement boundary comments are noted.</p> <p>Site submissions will be considered as part of the Allocations process.</p>

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Representation Ref.	Consultee/ Agent	Council Response
LPAO56	Tom Beavin – JVH Planning on behalf of Mr Leason	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Settlement boundary comments are noted.</p> <p>The land promoted by the submission is considered of such a large scale given that it is connected to Armitage. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC57	Tom Beavin – JVH Planning on behalf of Mrs M Wiseman	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>Settlement boundary comments are noted.</p> <p>Site submissions will be considered as part of the Allocations process.</p>
LPAOC58	James Beynon - Quod on behalf of Evans Property Group	<p>Submission is essentially promoting employment/ economic land submission. This is noted and the proposals are assessed as part of developing the Local Plan Allocations for employment and identifying the settlement boundary. The site submissions will be assessed and included within the 2016/17 update of the ELAA.</p>
LPAOC59	Tom Beavin – JVH Planning on behalf of Mr Neachell	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Settlement boundary comments are noted.</p> <p>Site submissions will be considered as part of the Allocations process.</p>

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Representation Ref.	Consultee/ Agent	Council Response
LPAOC10	Phil Sharpe – Inland Waterways Association – Lichfield Branch	Comments are noted and will be considered as part of the saved policy review. However it is considered that safeguarding of the canal line is already addressed in detail within the Local Plan Strategy.
LPAOC29	Gill Brown – Nigel Gough Associates – The Booth Trustees	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Site submission is noted, however there is limited information submitted. The land promoted by the submission is considered of such a large scale given that it is connected to Whittington. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p> <p>Comments associated with the Green Belt are noted. The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p>
LPAOC32	Stephen Stoney – Wardell Armstrong on behalf of Leavesley Group	The land promoted by the submission is considered of such a large scale given that it is connected to Fradley. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.

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Representation Ref.	Consultee/ Agent	Council Response
LPAOC36	James Hollyman – Harris Lamb on behalf of Davy Developments	Site submission will be considered as part of the Allocations process.
LPAOC38	Damien Middleton – HDD on behalf of Development Securities (Lichfield) Ltd	<p>Comments associated with the impact of changing floorspace needs within Lichfield centre are noted. It should be stressed that this exercise seeks to support the provisions within the Local Plan strategy.</p> <p>Comments associated with out of centre retail are noted.</p>
LPAOC37	Helen Smith – Maria Bailey Planning on behalf of Mr and Mrs Hill	<p>The land promoted by the submission is considered out of line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p> <p>Comments associated with the Green Belt are noted. The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p>
LPAOC40	Michael Davies – Savills on behalf of The Crown Estate	Response is a submission which has been put forward through the SHLAA in the past. This will be considered as part of the Allocations process.
LPAOC39	Alice Fitton – Turley on behalf of Bovis Homes	Reference to development to support Tamworth housing needs is considered to be addressed by the Local Plan Strategy which identifies the North of Tamworth BDL. While the Council are committed to continuing with Duty to Cooperate discussions, at this stage the Allocations is not seeking to identify further housing provision for Tamworth to meet the additional unmet need identified within the Tamworth Borough Local Plan.

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Representation Ref.	Consultee/ Agent	Council Response
		<p>The land promoted by the submission is considered out of line with the Local Plan Strategy given that it is connected to Wigginton. It would be best considered as part of any Plan review rather than the Allocations.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Comments associated with the boundary of Wigginton will be assessed as part of identifying the boundaries.</p>
LPAOC41	David Pickford – Pegasus Group on behalf of Drayton Manor Park	<p>Comments associated with the Green Belt are noted. The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology. Saved Policy EMP .5 of the 1998 Plan does support Drayton Manor Park. However this policy is considered to be in conflict with the NPPF. Consideration of removing Drayton Manor Park from the Green Belt is considered a strategic change to the Local Plan Strategy and as such is considered out of scope for the Local Plan Allocations.</p>
LPAOC42	Neil Cox – Pegasus Group on behalf of Bloor Homes	<p>Comments associated with safeguarding land are noted. However it is the view of the Council that this can be better addressed through the review rather than the Allocations process. However the Council will address the need to review the Green Belt around St. Matthews and will consider how this relates more broadly through the Allocations process.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>Comments associated with housing trajectory are noted. The Local Plan Allocations document will set out an updated housing trajectory</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the 5 year land supply are noted, at the time of writing the Council has a 5 year land supply with a buffer which has been calculated using the method as recommended by the Local Plan Inspector within his final report on the Local Plan Strategy.</p> <p>Comments associated with Policy NR3 are noted, however it is the Council’s view that the policy is positively worded and had been subject to Examination.</p> <p>Comments associated with the CIL are considered outside the scope for the Local Plan Allocations document.</p> <p>Comments associated with the BDL are noted. The Council acknowledge that the monitor manage approach proposed (and at the time of writing is subject to a planning application) creates a level of uncertainty. However the evidence to date does not categorically indicate that development cannot come forward in this area. In addition, the Council are</p>

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		<p>committed to a full plan review, if further evidence were presented to the Council this can be addressed through the review process.</p> <p>Comments associated with the East of Rugeley SDA do not align with the latest information the Council have with the promoter of this site.</p> <p>Site submission will be considered as part of Allocations process.</p>
LPAOC35	Jim Malkin – JMI Planning on behalf of Little Aston Golf Club	<p>The land promoted by the submission is considered out of line with the Local Plan Strategy given that it is connected to Little Aston. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC59	Tom Beavin – JVH Planning on behalf of Mr M Neachell	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Settlement boundary comments are noted.</p> <p>Site submissions will be considered as part of the Allocations process.</p>

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LPAOC60	Tom Beavin – JVH Planning on behalf of Hodgetts Ltd.	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>The land promoted by the submission is considered out of line with the Local Plan Strategy given that it is connected to Elford. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC62	David Onions – Pegasus Group on behalf of Wilson Bowden Developments	<p>Comments associated with housing trajectory are noted. The Local Plan Allocations document will set out an updated housing trajectory</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p>

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		<p>Comments associated with the 5 year land supply are noted, at the time of writing the Council has a 5 year land supply with a buffer which has been calculated using the method as recommended by the Local Plan Inspector within his final report on the Local Plan Strategy.</p> <p>Comments associated with Policy NR3 are noted, however it is the Council's view that the policy is positively worded and had been subject to Examination.</p> <p>Comments associated with the CIL are considered outside the scope for the Local Plan Allocations document.</p> <p>Comments associated with the BDL are noted. The Council acknowledge that the monitor manage approach proposed (and at the time of writing is subject to a planning application) creates a level of uncertainty. However the evidence to date does not categorically indicate that development cannot come forward in this area. In addition, the Council are committed to a full plan review, if further evidence were presented to the Council this can be addressed through the review process.</p> <p>Comments associated with the East of Rugeley SDA do not align with the latest information the Council have with the promoter of this site.</p> <p>The land promoted by the submission is considered of such a large scale given that it is connected to Fradley. As such it is not in line with the Local Plan Strategy. It would be best</p>

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		<p>considered as part of any Plan review rather than the Allocations.</p>
LPAOC61	Tom Beavin – JVH Planning on behalf of D Cliffe & J Fielding	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>The land promoted by the submission is considered of such a large scale given that it is connected to Kings Bromley. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC63	Tom Beavin – JVH Planning on behalf of Mr Bliss and Messrs Argyll	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p>

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		<p>The land promoted by the submission is considered of such a large scale given that it is connected to Hopwas. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC64	Tom Beavin – JVH Planning on behalf of Mr Gough	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Settlement boundary comments are noted.</p> <p>The land promoted by the submission is considered of such a large scale given that it is connected to Hill Ridware. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC65	Tom Beavin – JVH Planning on behalf of GJL Property Developers (Lichfield)	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p>

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		<p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Settlement boundary comments are noted.</p> <p>Site submissions will be considered as part of the Allocations process.</p>
LPAOC30	Simon Cook – Burntwood Action Group	<p>Response challenges the Supplementary Green belt report 2013. It should be noted that this report has already been examined and taken into account as part of the Examination process. The Local Plan Strategy confirms that the St Matthews development will be removed from the Green Belt through the Local Plan Allocations document, which will also confirm the precise boundaries of such a removal. This is supported by the Green Belt review evidence which has been subject to examination. Such changes to the Green Belt boundary will be undertaken in line with guidance within the NPPF.</p> <p>The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Comments in relation to the Town Centre boundaries are noted and there is a recognition that there is a need to be flexible with development in this locations.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>Recommendations regarding identifying land for certain uses are noted, however to make allocations there needs to be a level of certainty that the site will come forward. Mount Rd for example is assessed as part of the urban capacity assessment and it is unlikely the whole site will come forward for residential development within the plan period</p>
LPAOC67	Neil Cox – Pegasus Group on behalf of Richborough Estates	<p>Comments associated with housing trajectory are noted. The Local Plan Allocations document will set out an updated housing trajectory</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the 5 year land supply are noted, at the time of writing the Council has a 5 year land supply with a buffer which has been calculated using the method as recommended by the Local Plan Inspector within his final report on the Local Plan Strategy.</p> <p>Comments associated with Policy NR3 are noted, however it is the Council’s view that the policy is positively worded and had been subject to Examination.</p> <p>Comments associated with the CIL are considered outside the scope for the Local Plan Allocations document.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>Comments associated with the BDL are noted. The Council acknowledge that the monitor manage approach proposed (and at the time of writing is subject to a planning application) creates a level of uncertainty. However the evidence to date does not categorically indicate that development cannot come forward in this area. In addition, the Council are committed to a full plan review, if further evidence were presented to the Council this can be addressed through the review process.</p> <p>Comments associated with the East of Rugeley SDA do not align with the latest information the Council have with the promoter of this site.</p> <p>Site submission will be considered as part of Allocations process.</p>
LPAOC68	Neil Cox – Pegasus Group on behalf of Clearwater Properties	<p>The Local Plan Allocations will assess the future role and function of Mount Road Industrial Estate.</p> <p>Comments associated with housing trajectory are noted. The Local Plan Allocations document will set out an updated housing trajectory</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the 5 year land supply are noted, at the time of writing the Council has a 5 year land supply with a buffer which has been calculated using the method as recommended by the Local Plan Inspector within his final report on the Local Plan Strategy.</p> <p>Site submission will be considered as part of Allocations process.</p>
LPAOC69	Alice Fitton – Turley on behalf of Legal and General UK Property Fund	<p>Comments on saved policies are noted. Where the Council considers the need for a saved policy, and this need does not conflict with other policies such as the NPPF they will be taken forward in the Allocations.</p> <p>The employment allocations will be considered as part of the Allocations process.</p>
LPAOC70	Tom Beavin – JVH Planning on behalf of Walton Homes	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>The land promotions by the submission is considered of such a large scale given that it is connected to Armitage. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC71	Tina Pearsall – Cerda planning on behalf of CALA Homes	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC72	Chontell Buchanan – First City Limited on behalf of KB Jackson & Son and Mrs Mears	<p>Site submission will be considered as part of the Allocations process.</p> <p>Comments associated with Mount Road Industrial estate are noted. The ability of the industrial estate to come forward from a residential perspective is assessed through the urban capacity assessment which informs the Allocations process.</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the Green Belt are noted. The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Settlement boundary comments are noted. There is not a settlement boundary for Burntwood given its location inset within the Green Belt.</p>
LPAOC73	Sinead Meally – Brooke Smith Planning on behalf of PDSA	<p>The land promoted by the submission is considered of such a large scale given that it is connected to Stonnall. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC74	Sinead Meally – Brooke Smith Planning on behalf of Flatagent Ltd.	<p>Site submission will be considered as part of the Allocations process. Implications of this will be taken account for as part defining the settlement boundaries.</p> <p>Reference to development to support Tamworth housing needs is considered to be addressed by the Local Plan strategy which identifies the BDL. While the Council are committed to continuing with Duty to Cooperate discussions, at this stage the Allocations is not seeking to identify further housing provision for Tamworth.</p>

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LPAOC75	Tom Beavin – JVH Planning on behalf of the Aucott Group	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with the BDL are noted. However the submission does not provide any evidence for the Council to utilise.</p> <p>Settlement boundary comments are noted.</p> <p>Site submissions will be considered as part of the Allocations process.</p>
LPAOC76	Louise Whinnett – Pegasus Group on behalf of Acres Architecture Ltd	<p>The Local Plan Allocations seeks to be aligned with the Local Plan Strategy. Therefore recommendations associated with the settlement hierarchy and sustainability of settlements within the District are noted, however the emphasis on the Allocations is to align with the Strategy.</p> <p>Comments associated with the Shenstone Neighbourhood Plan are considered to be matters for the Neighbourhood Plan process to address. These comments cannot be addressed through the Local Plan Allocations process and are beyond the scope of the Local Plan Allocations process. It should be noted that the Shenstone Neighbourhood Plan was subject of a successful referendum on the 17th November 2016 having been independently examined.</p>

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		<p>Comments associated with the Green Belt are noted. The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC77	Maria Sheridan – Delta Planning on behalf of New Street LLP	The former Norgren site proposal is noted and will be considered as part of the Allocations. It is also recognised the intention to redevelop this site as a mixed use scheme. It is noted that the former Norgren site is considered a suitable location by the Consultee for bulky good.
LPAOC88	John Thompson – Lichfield Civic Society	In terms of the ‘Plan review’ post the adoption of the Local Plan Allocations the Council will undertake further engagement on this with communities. Comments associated with the Green Belt are noted. The Council would highlight that a Green Belt review accompanied the Local Plan

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		<p>Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>In relation to office development, the findings of the centres study will determine the scale of growth, but it considered more appropriate and in line with National policy to direct this to the strategic centres.</p> <p>Comments associated with infrastructure are noted and the Infrastructure Delivery Plan will continue to be reviewed and updated.</p>
LPAOC89	Mark Dauncey – Pegasus Group on behalf of Smith Brothers Farm Ltd	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with Policy NR3 are noted, however it is the Council’s view that the policy is positively worded and had been subject to Examination.</p> <p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>

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LPAOC90	Tom Collins – Fisher German LLP on behalf of Messrs R and RW Bartlett	<p>The land promoted by the submission is considered of such a large scale given that it is connected to Shenstone. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p> <p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with safeguarding land are noted. However it is the view of the Council that this can be better addressed through the review rather than the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC91	Dawn Jordan – CT Planning on behalf of FB Developments Premier Ltd, Mr J Minchall, Mr G bannister and M Lapworth Developments Ltd	<p>The land promoted by the submission is considered of such a large scale given that it is connected to Armitage. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC92	Dawn Jordan – CT Planning on behalf of Elford Homes	<p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>

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LPAOC89	Mark Dauncey – Pegasus Group on behalf of Smith Brothers Farm Ltd	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with Policy NR3 are noted, however it is the Council’s view that the policy is positively worded and had been subject to Examination.</p> <p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC94	Dawn Jordan – CT Planning on behalf of Mr & Mrs D Astill	<p>The land promoted by the submission is considered of such a large scale given that it is connected to Fradley. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC95	Dawn Jordan – CT Planning on behalf of Mr D Burton	<p>Reference to cartographical errors are noted. It should be noted that the ‘Made’ Little Aston Neighbourhood Plan recommends that the District Council consider amending the Green belt boundary in this location to remove Tufton Cottage from the Green Belt. The Little Aston Neighbourhood Plan also extends the Little Aston Park density area (Policy LAP1) to include Tufton Cottage. Consideration of these recommendations will be undertaken as part of the Local Plan Allocations process.</p>

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LPAOC96	Justin Milward – Woodland Trust	<p>The protection of trees is important and the Council have an adopted Trees Landscaping and Development SPD and within the Local Plan Strategy (2015)</p> <p>Data associated with Trees is noted and will be considered as part of Allocations process.</p>
LPAOC50	Dawn Jordan – CT Planning on behalf of Orchard Properties	<p>The land promoted by the submission is considered of such a large scale given that it is connected to Colton. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC98	Clare Eggington – Cannock Chase District Council	<p>It is agreed that Duty to Cooperate matters are of the utmost importance and Lichfield District Council welcomes the proactive approach taken by Cannock District Council in this regard. In relation to Rugeley Power Station the Council are committed to working jointly with Cannock District Council in ensuring that a suitable reuse for the site is identified.</p> <p>The commitment within the Local Plan strategy to meet 500 dwellings associated with Cannock District needs will be met.</p> <p>Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>It is agreed that the Cannock Chase AONB is important and this is acknowledged within the Local Plan Strategy.</p>

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LPAOC97	Dawn Jordan – CT Planning on behalf of South Staffordshire Water	<p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC99	Dawn Jordan – CT Planning on behalf of South Staffordshire Water	<p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC32	Stephen Stoney – Wardell Armstrong on behalf of Leavesley Group	<p>The land promoted by the submission is considered of such a large scale given that it is connected to Fradley. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC100	Dawn Jordan – CT Planning on behalf of Mr P Smith	<p>The land promoted by the submission is considered of such a large scale given that it is connected to Armitage. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations. Evidence supporting the Local Plan Allocations document suggests the housing requirements for Armitage with Handsacre have been met.</p>
LPAOC101	Dawn Jordan – CT Planning on behalf of Trustees of St John’s Hospital	<p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC12	Avant Homes	<p>Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In</p>

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		<p>addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with reserving land are noted. However it is the view of the Council that this can be better addressed through the review rather than the Allocations process.</p> <p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC13	Peter Young – Hints with Canwell Parish Council	Noted, comments will be considered as part of drawing the settlement boundaries.
LPAOC2	Gareth Hyde – Whittington Neighbourhood Group	Noted, infrastructure is an issue for all areas, and the Local Plan Strategy contains policies on infrastructure needs.
LPAOC3	Paul Gilmour	Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.
LPAOC4	Abby Brough – Stafford Borough Council	Noted.
LPAOC5	Mike Smith – Walsall Metropolitan Borough Council	Noted comments on Lichfield City Neighbourhood Plan however these are outside of the scope of the Allocations.
LPAOC10	Philip Sharpe – The Inland Waterways Association	Comments are noted and will be considered as part of the saved policy review. However it is considered that

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		safeguarding of the canal line is already addressed in detail within the Local Plan Strategy.
LPAOC11	David Bostock – Borrowcop and District Residents’ Association (BADRA)	Comments are associated with the allocated SDA’s and existing business park.
LPAOC15	James Fox – HS2 Limited	Noted.
LPAOC17	Rob Duncan – Rob Duncan Planning Consultancy on behalf of Mr. J Bradshaw	The land promoted by the submission is considered of such a large scale given that it is connected to Burntwood. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.
LPAOC16	Liz Boden – Pegasus Group on behalf of C-Zero Limited	<p>It is considered the Local Plan Strategy does not restrict self-build. In terms of reviewing the need for private housing it is considered best to undertake this as part of a review given the Local Plan Strategy was adopted in 2015.</p> <p>In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted</p>
LPAOC22	Letty Askew – Highways England	Noted
LPAOC14	Kenneth Leadbeater	Response challenges the Supplementary Green belt report 2013. It should be noted that this report has already been examined and taken into account as part of the Examination process. The Local Plan Strategy confirms that the St Matthews development will be removed from the Green Belt through the Local Plan Allocations document, which will also

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		<p>confirm the precise boundaries of such a removal. This is supported by the Green Belt review evidence which has been subject to examination. Such changes to the Green Belt boundary will be undertaken in line with guidance within the NPPF.</p> <p>The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Comments in relation to the Town Centre boundaries are noted and there is a recognition that there is a need to be flexible with development in this locations.</p> <p>Recommendations regarding identifying land for certain uses are noted, however to make allocations there needs to be a level of certainty that the site will come forward. Mount Rd for example is assessed as part of the urban capacity assessment and it is unlikely the whole site will come forward for residential development within the plan period</p>
LPAOC18	Peter Button	<p>Response challenges the Supplementary Green belt report 2013. It should be noted that this report has already been examined and taken into account as part of the Examination process. The Local Plan Strategy confirms that the St Matthews development will be removed from the Green Belt through the Local Plan Allocations document, which will also confirm the precise boundaries of such a removal. This is supported by the Green Belt review evidence which has been subject to examination. Such changes to the Green Belt</p>

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		<p>boundary will be undertaken in line with guidance within the NPPF.</p> <p>The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Comments in relation to the Town Centre boundaries are noted and there is a recognition that there is a need to be flexible with development in this locations.</p> <p>Recommendations regarding identifying land for certain uses are noted, however to make allocations there needs to be a level of certainty that the site will come forward. Mount Rd for example is assessed as part of the urban capacity assessment and it is unlikely the whole site will come forward for residential development within the plan period</p>
LPAOC31	Vic Chamberlain	<p>Response challenges the Supplementary Green belt report 2013. It should be noted that this report has already been examined and taken into account as part of the Examination process. The Local Plan Strategy confirms that the St Matthews development will be removed from the Green Belt through the Local Plan Allocations document, which also will confirm the precise boundaries of such a removal. This is supported by the Green Belt review evidence which has been subject to examination. Such changes to the Green Belt boundary will be undertaken in line with guidance within the NPPF.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Comments in relation to the Town Centre boundaries are noted and there is a recognition that there is a need to be flexible with development in this locations.</p> <p>Recommendations regarding identifying land for certain uses are noted, however to make allocations there needs to be a level of certainty that the site will come forward. Mount Rd for example is assessed as part of the urban capacity assessment and it is unlikely the whole site will come forward for residential development within the plan period</p>
LPAOC31	Vic Chamberlain – Burntwood Action Group	<p>Response challenges the Supplementary Green belt report 2013. It should be noted that this report has already been examined and taken into account as part of the Examination process. The Local Plan Strategy confirms that the St Matthews development will be removed from the Green Belt through the Local Plan Allocations document, which will also confirm the precise boundaries of such a removal. This is supported by the Green Belt review evidence which has been subject to examination. Such changes to the Green Belt boundary will be undertaken in line with guidance within the NPPF.</p> <p>The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Comments in relation to the Town Centre boundaries are noted and there is a recognition that there is a need to be flexible with development in this locations.</p> <p>Recommendations regarding identifying land for certain uses are noted, however to make allocations there needs to be a level of certainty that the site will come forward. Mount Rd for example is assessed as part of the urban capacity assessment and it is unlikely the whole site will come forward for residential development within the plan period</p>
LPAOC19	Dr. Klaus Armstrong-Braun – Envirowatch.EU	Noted.
LPAOC20	Chris Timothy – CT Planning on behalf of Cork Farms	<p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC21	Chris Timothy – CT Planning on behalf of Mr JF Duncan	<p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC23	Richard House – Gladman Development Limited	Reference to development to support Tamworth housing needs is considered to be addressed by the Local Plan strategy which identifies the BDL. While the Council are committed to continuing with Duty to Cooperate discussions, at this stage the Allocations is not seeking to identify further housing provision for Tamworth.

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Representation Ref.	Consultee/ Agent	Council Response
		<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>The submission does not provide any hard evidence that the SDAs/ BDL will not come forward.</p> <p>Settlement boundary comments are noted.</p>
LPAOC24	Janet Taylor	<p>The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Comments in relation to the Town Centre boundaries are noted and there is a recognition that there is a need to be flexible with development in this locations.</p> <p>In relation to allocating land as a Conservation Area, this is considered out of scope for the Allocations and there is no evidence to justify this.</p>
LPAOC29	Nigel Gough – Nigel Gough Associates – The Booth Trustees	<p>The land promoted by the submission is considered of such a large scale given that it is connected to Fradley. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p>
LPAOC25	Luke Walker – Lichfield & Hatherton Canals Restoration Trust	Noted
LPAOC26	Robin Hawley – South Lichfield Residents Group	<p>In relation to comments regarding lack of design guidance it is considered the Local Plan Strategy contains sufficient detail to guide development. However the Local Plan Allocations will highlight key issues to consider when bringing forward individual sites. However the SDA’s already have a concept framework which establishes how development should come forward.</p> <p>The Infrastructure Delivery Plan will be updated as part of the Allocations. This will be done in line with guidance from professional infrastructure providers.</p> <p>In relation to comments associated with the employment allocation attached to the SDA, this is not considered appropriate or necessary to review as part of the Allocations.</p>
LPAOC27	James MacDonald	<p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>

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Representation Ref.	Consultee/ Agent	Council Response
LPAOC28	Sushil Birdi – Tamworth Borough Council	<p>Reference to development to support Tamworth housing needs is considered to be addressed by the Local Plan strategy which identifies the BDL. While the Council are committed to continuing with Duty to Cooperate discussions, at this stage the Local Plan Allocations is not seeking to identify further housing provision for Tamworth i.e. the 825 dwellings referenced in the submission is considered out of scope at this stage. In relation to this 825 Lichfield District Council consider this be part of the wider GBHMA housing numbers which should be considered holistically and strategically. The District Council is committed to doing this through a full review of the Local Plan.</p> <p>In relation to comments associated with Tamworth inability to accommodate employment provision, it is considered that this can be met through the portfolio and additional sites that are being identified by Lichfield District Council.</p> <p>In relation to Tamworth’s request to transfer their one pitch requirement, it is considered that Tamworth need to undertake a full and proper assessment of Gypsy and Traveller pitches. A review of Tamworth’s evidence base highlights a lack of proper assessment in this area.</p> <p>Comments associated with the BDL are noted. The Council acknowledge that the monitor manage approach proposed (and at the time of writing is subject to a planning application) creates a level of uncertainty. However the evidence to date does not categorically indicate that development cannot come forward in this area. In addition, the Council are committed to a full plan review, if further evidence were</p>

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Representation Ref.	Consultee/ Agent	Council Response
		presented to the Council this can be addressed through the review process.
LPAOC78	James Beynon (Quod) – Evans Property Group	The land promoted by the submission is considered of such a large scale given that it is connected to Fradley. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.
Cover letter to other representations which are already dealt with in this table. Cover letter repeated content of other representations.	Tom Beavin – JVH Planning	Representation summarises JVH Planning's other representation which are already dealt with in this table.

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Representation Ref.	Consultee/ Agent	Council Response
LPAOC79	Tim Plagerson – RPS Group on behalf of Fradley West Consortium	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>The land promoted by the submission is considered of such a large scale given that it is connected to Fradley. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>
LPAOC80	Anne Walker – Cannock Chase AONB	<p>Comments on horsiculture are noted, however it is considered that this can be addressed through existing national and Local Plan Strategy policies.</p> <p>Comments associated with protecting the AONB are noted.</p> <p>Saved policy comments are noted, this will be considered as part of the saved policy review.</p>

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Representation Ref.	Consultee/ Agent	Council Response
LPAOC81	Kerry Walker – Pegasus Group on behalf of Mr Daniel Wright	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with Policy NR3 are noted, however it is the Council’s view that the policy is positively worded and had been subject to Examination.</p> <p>Comments associated with the CIL are considered outside the scope for the Local Plan Allocations document.</p> <p>The land promoted by the submission is considered of such a large scale given that it is connected to Longdon. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p>

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Representation Ref.	Consultee/ Agent	Council Response
LPAOC82	Poplars Lichfield – Pegasus Group on behalf of Mr Daniel Wright	<p>Comments associated with Birmingham’s housing needs are noted. An agreement has not been reached with the GBHMA authorities regarding the distribution of unmet need. It is considered good planning to progress with the Allocations document rather than wait. In addition the Council are undertaking evidence review now to assist with a full plan review.</p> <p>Comments associated with Policy NR3 are noted, however it is the Council’s view that the policy is positively worded and had been subject to Examination.</p> <p>Comments associated with the CIL are considered outside the scope for the Local Plan Allocations document.</p> <p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>
LPAOC83	Rob Wells – Savills on behalf of ENGIE	<p>Comments associated with Policy SC1 are noted.</p> <p>Site submission will be considered as part of the Allocations process given that it is a brownfield site. This consideration will be linked to a review of any policies if necessary.</p>

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Representation Ref.	Consultee/ Agent	Council Response
		<p>Comments associated with affordable housing however it is not considered necessary to review the affordable housing policy as a result of starter homes.</p>
LPAOC33	Tom Bathurst – Hawksmoor on behalf of A.J.W. Ryman & K.M. Ryman	<p>Comments associated with the Green Belt are noted. The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>The land promoted by the submission is considered of such of such a large scale in relation to its surroundings and is considered currently disconnected from Lichfield city. As such it is not in line with the Local Plan Strategy. It would be best considered as part of any Plan review rather than the Allocations.</p> <p>Settlement boundary comments are noted.</p>

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Representation Ref.	Consultee/ Agent	Council Response
LPAOC26	Robin Hawley, John Horton, Geoff Crook and David Woods – South Lichfield Residents Group	<p>In relation to comments regarding lack of design guidance it is considered the Local Plan Strategy contains sufficient detail to guide development. However the Local Plan Allocations will highlight key issues to consider when bringing forward individual sites. However the SDA's already have a concept framework which establishes how development should come forward.</p> <p>The Infrastructure Delivery Plan will be updated as part of the Allocations. This will be done in line with guidance from professional infrastructure providers.</p> <p>In relation to comments associated with the employment allocation attached to the SDA, this is not considered appropriate or necessary to review as part of the Allocations.</p>
LPAOC85	Rachael Bibby – Planning Prospects on behalf of Lioncourt Strategic Land	Comments associated with Land North of dark Lane are noted and will be considered as part of the Allocations process.

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Representation Ref.	Consultee/ Agent	Council Response
LPAOC86	Mary Danby – Burntwood Town Council	<p>The Council would highlight that a Green Belt review accompanied the Local Plan Strategy and for the purposes of the Allocations this evidence is being utilised. As part of the full plan review an additional Green Belt review will be undertaken in line with the GBHMA agreed methodology.</p> <p>Comments in relation to the Town Centre boundaries are noted and there is a recognition that there is a need to be flexible with development in this locations.</p> <p>Recommendations regarding identifying land for certain uses are noted, however to make allocations there needs to be a level of certainty that the site will come forward. Mount Rd for example is assessed as part of the urban capacity study and it is unlikely the whole site will come forward for residential development.</p>
LPAOC87	Nick Misselke – Acquireland on behalf of Eden Wood Limited	<p>Site submission will be considered as part of the Allocations process.</p> <p>Settlement boundary comments are noted.</p>

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1 Introduction

Introduction

1.1 The Local Plan Strategy was adopted by resolution of Full Council on 17th February 2015. This document is the Local Plan Allocations which complements the Strategy.

1.2 Both the 'Strategy' and 'Allocations' should be read in conjunction and they are both Development Plan Document produced under the Planning and Compulsory Purchase Act 2004 (as amended) to help shape the way in which the physical, economic, social and environmental characteristics of Lichfield District will change between 2008 and 2029.

1.3 The Local Plan Allocations is the second part of the District's strategic plan and deals with:

- Land allocations associated with meeting the growth requirements set out in the Local Plan Strategy (2015) including:
 - Determining remaining housing land requirements to deliver the overall 10,030 homes to 2029 in line with the adopted spatial strategy, including allocations of sites within the Broad Development Location (BDL) to the north of Tamworth, for housing in rural areas and the 'Key Rural' settlements;
 - Consideration of 'infill' boundaries for Green Belt villages (as set out in Core Policy 1);
 - Sites to meet the identified Gypsy and Traveller requirements;
 - Land allocations to meet the Employment Land requirements, including an additional 10 hectares to ensure flexibility of provision;
 - Lichfield City and Burntwood Town centre retail and office requirements, including the identification of primary and secondary retail areas;
 - A review of any remaining Local Plan (1998) Saved policies;
 - Consider Green Belt boundaries including the integration of the developed area of the former St Matthews hospital into Burntwood and development needs beyond the plan period; and
 - Consider any issues arising through 'Made' and emerging Neighbourhood Plans where communities have sought the support of Lichfield District Council to progress with matters outside the scope of the Neighbourhood Plan. An example of this is review of local Green Belt boundaries.

1.4 A primary purpose of the Local Plan Allocations is to assist in encouraging appropriate development in Lichfield District which will contribute to sustainable and economic growth. The Council will be proactive in working with developers and landowners to bring forward development.

1.5 If you require the document in a different format please contact us so we can help address your needs in the most appropriate way.

Preparation of the Local Plan Allocations

1.6 The main stages in preparing the Local Plan Allocations have included:

- Evidence gathering post adoption of the the Local Plan Strategy

- Regulation 18 Open consultation
- Publication consultation (this stage)

1.7 The Local Plan Allocations seeks to deliver any outstanding matters that we not addressed within the Local Plan Strategy. It can be described as the 'delivery vehicle' for the Strategy. The Strategy is based on robust evidence and was subject to extensive public consultation. The Local Plan Allocations is in line with the Strategy and as such this evidence and consultation supports the preparation of this document. All evidence (including updated evidence prepared to support the Allocations) can be viewed at www.lichfielddc.gov.uk/evidence and all relevant information relating to the Local Plan can be seen at www.lichfielddc.gov.uk/localplan.

1.8 The District Council has undertaken a Sustainability Appraisal (SA) and a Habitat Regulations Assessment (HRA) to evaluate the sustainability of the proposed strategy, policies and proposals.

Conformity with Other Policies and Strategies

1.9 The Allocations has been prepared in accordance with the National Planning Policy Framework (the NPPF) and community plans and strategies

A Commitment to Review

1.10 In order to facilitate much needed development the District Council has proactively prepared this Allocations document. The Council is aware, and is committed to reviewing its Plan in full to address the Greater Birmingham Housing Market Area issues, specifically the shortfall in addressing the housing needs within this area. The Council continues to work proactively with partners to identify the appropriate amount of growth to be accommodated within the boundaries of Lichfield District. In addition, as part of this review the Council will continue work with other Neighbouring Authorities through the Duty to Cooperate, as well as undertake a comprehensive review of its evidence base.

National Planning Policy

1.11 National planning policy is set out in the NPPF (March 2012). This emphasises the role of sustainability in guiding plans and policies, setting out three key dimensions to sustainable development: economic, social and environmental, which this Local Plan seeks to follow:

- **An economic role:** contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- **A social role:** supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **An environmental role:** contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Community Plans & Strategies

1.12 [Our County, Our Vision: A Sustainable Community Strategy for Staffordshire 2008-2023](#) has been prepared by the Staffordshire Strategic Partnership. It is a fifteen year vision to improve the quality of life for all our people, by increasing economic prosperity, improving local services, and developing partnership working. To achieve this vision the following priorities have been identified:

- A vibrant, prosperous and sustainable economy;
- Strong, safe and cohesive communities;
- Improved health and sense of well-being; and
- A protected, enhanced and respected environment.

1.13 The A Plan for Lichfield District has been prepared in discussion with the Lichfield District Strategic Partnership and identifies the following strategic themes, under which long-term outcomes have been identified:

Supporting People

We want our District to be a place where everyone shares in an improved quality of life and community well being.

Shaping Place

We want our District to be a place people love to live, work and visit, with a high quality residential, community and commercial environment.

Supporting Business

We want our District to be a place where businesses and enterprise can flourish, and there is a vibrant local economy.

1.14 The Lichfield District Local Plan (Strategy and Allocations) provides one of the primary means of delivering the spatial elements of both the Sustainable Community Strategy (SCS) and Plan for Lichfield District.

1.15 The Lichfield District Local Plan (Strategy and Allocations) will plan, monitor and manage future growth and change in Lichfield District up to 2029, covering a broad range of spatial issues that contribute towards the creation of sustainable communities, including the provision and management of new development, community infrastructure, environmental and heritage protection and measures to help reduce carbon emissions.

1.16 The Lichfield District Local Plan (Strategy and Allocations), and a number of supporting documents (Table 1.1) provide the framework for managing development, addressing key planning issues and guiding investment across the District.

Table 1.1 Local Plan Documents

Local Development Scheme (LDS)	Local Plan Process
Statement of Community Involvement (SCI)	
Local Plan: Strategy	Local Plan Policy
Local Plan: Allocations	
Neighbourhood Plans	
Supplementary Planning Documents (SPD)	Interpretation & Guidance
Parish & Other Community Led Plans	
Authority Monitoring Report (AMR)	Monitoring & Delivery
Infrastructure Delivery Plan (IDP)	

2 Sustainable Communities

2.1 To be populated by any relevant redrafted saved policies.

3 Infrastructure

- 3.1 To be populated by any relevant redrafted saved policies.

4 Sustainable Transport

4.1 To be populated by any relevant redrafted saved policies.

5 Homes for the Future

- 5.1 To be populated by any relevant redrafted saved policies.

6 Economic Development & Enterprise

Policy EMP1: Employment Areas & Allocations

Within the existing employment areas, as shown on the local plan policies map, the District Council will support proposals for new, or the expansion, conversion or redevelopment of existing employment premises which will contribute to the delivery of 79.1 hectares of employment land (Use classes B1, B2, B8) drawn from the employment portfolio.

Between 2008 and 2029 the following sites, as shown on the local plan policies map, are allocated to contribute toward a requirement for an additional 10 hectares of employment land (Use Classes B1, B2 and B8) beyond that identified within the existing portfolio, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Development proposals outside of the traditional employment use classes (B1, B2 and B8) will usually not be supported unless it can be demonstrated that the proposed use would enhance or compliment the existing employment offer and it is demonstrated that any proposed use falling outside of the B use classes would not detrimentally affect the employment area.

These employment areas and allocations provide sufficient flexibility to accommodate a range of uses and be flexible to meet changing circumstances within the employment land market across the plan period. Sufficient flexibility also allows for the provision of 6.5 hectares of employment land to assist in meeting the employment land needs of Tamworth Borough which have not been met within the Borough boundary.

Site reference	Site Name	Site size (Hectares)
EMP1	Land south of Fradley Park	18.2
EMP2	Land east of A38	5.1
EMP3	Land at Main Street, Alrewas	0.4

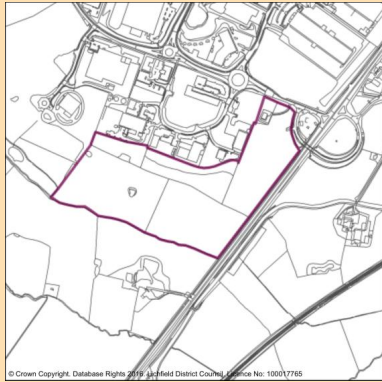
Site EMP1: Land south of Fradley Park

EMP1: Land south of Fradley Park

Site allocated through Policy EMP1

	Site area (Ha)	18.2
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EMP1: Land south of Fradley Park



Employment uses

B1/B2/B8

The site is presently agricultural land which is located directly adjacent to the south of Fradley Park, the major industrial and employment area within the District. To the east the site is bounded by the A38 and to the south by mature vegetation. The site is well located in terms of its proximity to the facilities within the existing employment area and access to the strategic highway network. The northern part of the site was previously allocated for a hotel use to supplement the facilities located within the existing employment area. Such ancillary uses which enhance the employment area may be appropriate within the site.

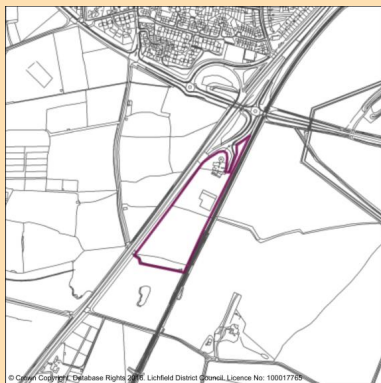
Key development considerations:

- Site should be well integrated with adjacent uses within the Employment Area as illustrated on the Local Plan policies maps.
- A mixture of employment uses and uses related to and supporting the wider employment area will be supported.
- Potential ecological impacts should be considered due to the greenfield nature of the site.
- Appropriate access to the site should be provided.
- Design of the development should take account of the proposed route of HS2 which runs to the south of the site.

Site EMP2: Land east of A38

EMP2: Land East of A38

Site allocated through Policy EMP1



Site area (Ha)

5.1

Employment uses

B1/B2/B8

The site is located to the east of the A39 near to Alrewas and is an existing industrial premises. Planning permission was granted in 2016 to allow for the extension of the site for storage and distribution (B8).

Key development considerations: N/A

Site EMP3: Land at Main Street, Alrewas

EMP3: Land at Main Street, Alrewas

Site allocated through Policy EMP1



Site area (Ha)	0.4
Employment uses	B1/B2/B8

The site is located within Alrewas village close to the A38 which bounds the village to the east. The ELAA 2016 notes that the site had the benefit of planning permission for self storage units (use class B8) which had been implemented and was under construction.

Key development considerations: N/A

7 Healthy & Safe Communities

- 7.1 To be populated by any relevant redrafted saved policies.

8 Natural Resources

8.1 To be populated by any relevant redrafted saved policies.

9 Built & Historic Environment

- 9.1 To be populated by any relevant redrafted saved policies.

10 Lichfield City (incl. Streethay)

Policy LC1: Lichfield City Housing Land Allocations

Along with the Strategic Development Allocations identified within the Local Plan Strategy the following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Site reference	Site Name	Approx. yeild of homes delivered by 2029
L2	East of Lichfield (Streethay) SDA extension	200
L3	Land at Greenhough Road	39
L4	Land at Swan Road, Former Sandford Gate	33 (net loss of 27 dwellings)
L5	Land off Limburg Avenue and Sainte Foy Avenue	194
L6	St Chad's House, Cross Keys	12
L7	Former Day Nursery, Scotch Orchard	27
L8	Former St Michaels Playing Fields, Deans Croft	9
L9	Land off Burton Road (East), Streethay	20
L10	Land off Burton Road (West), Streethay	38
L11	Land south of 75 Shortbutts Lane	5
L12	Land at St Johns Hospital, Birmingham Road	36
L13	Lombard Court, Lombard Street	14
L14	Former Integra Hepworth, Eastern Avenue	99
L15	Land adjacent to Lichfield Library, The Friary	45
L16	Former Windmill Public House, Grange Lane	12
L17	Land to the rear of The Greyhound Public House, Upper St John Street	8
L19	Angel Croft Hotel, Beacon Street	9
L20	Land at The Rosaries, Trent Valley Road	9
L21	Hawthorn House, Hawthorn Close	19
L23	Land off Cherry Orchard	9
L24	Trent Valley Buffer Depot, Burton Road, Streethay	50
L25	Land at 41 Cherry Orchard	10

Site reference	Site Name	Approx. yeild of homes delivered by 2029
L28	Former Beatrice Court, St John Street	40
Total		877

Changes will be made to the village settlement boundary (for Streethay), as shown on the Policies Map, to accommodate the residential allocations (Sites L9 and L10).

Policy LC2: Lichfield City Mixed-use Allocations

The following sites, shown on the adopted local plan policies map, are allocated for mixed-use development within the Plan period, subject to the Key Development Considerations set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address. The mix of uses which will be supported is detailed within the table below and the 'Key Development Considerations'.

The Friarsgate mixed used scheme (L27) will be the focus of new retail development in the city centre and accounts for its retail floorspace requirement in the short and medium term. The delivery of Friarsgate is a strategic priority for the Council and is vital to the future vitality of the city centre. Any proposals for retail (or other leisure uses) on edge of centre or out of centre sites should be fully assessed in terms of their impacts on Friarsgate as part of the overall impact assessment.

Table 10.1

Site reference	Site Name	Mix of uses	Approx. Yield of uses
L1	Beaconsfield House, Sandford Street	Residential/Retail	27 dwellings/34m ² retail
L18	Land at Cross Keys (Former What! Store), Cross Keys	Residenital/Retail	35 dwellings/
L22	Former Regal Cinema (former Kwick Save), Tamworth Street	Residential/Retail	38 dwellings/
L26	Friarsgate, Birmingham Road	Retail/Residential	95 dwellings/
L27	Former Norgren site, Eastern Avenue	Bulky goods retail/residential	70 dwellings/
L29	Land at Quonians Lane (Former Auction Centre), Cross Keys	Residential/retail	47 dwellings
Total			312

Policy Lichfield 3: Lichfield Economy

Lichfield City Centre will be promoted as a strategic centre by improving its range of shopping, leisure, business, cultural, education and tourist facilities whilst sustaining and enhancing the significance of its historic environment and heritage assets and their setting. This will be achieved by exploiting redevelopment opportunities identified in the City Centre whilst retaining the special architectural and historical character of the City.

Lichfield City centre will be the focus for new office, leisure and shopping development. The Policies Map (and Map 10.1) defines the extent of the city centre boundary, primary shopping area and primary and secondary frontages.

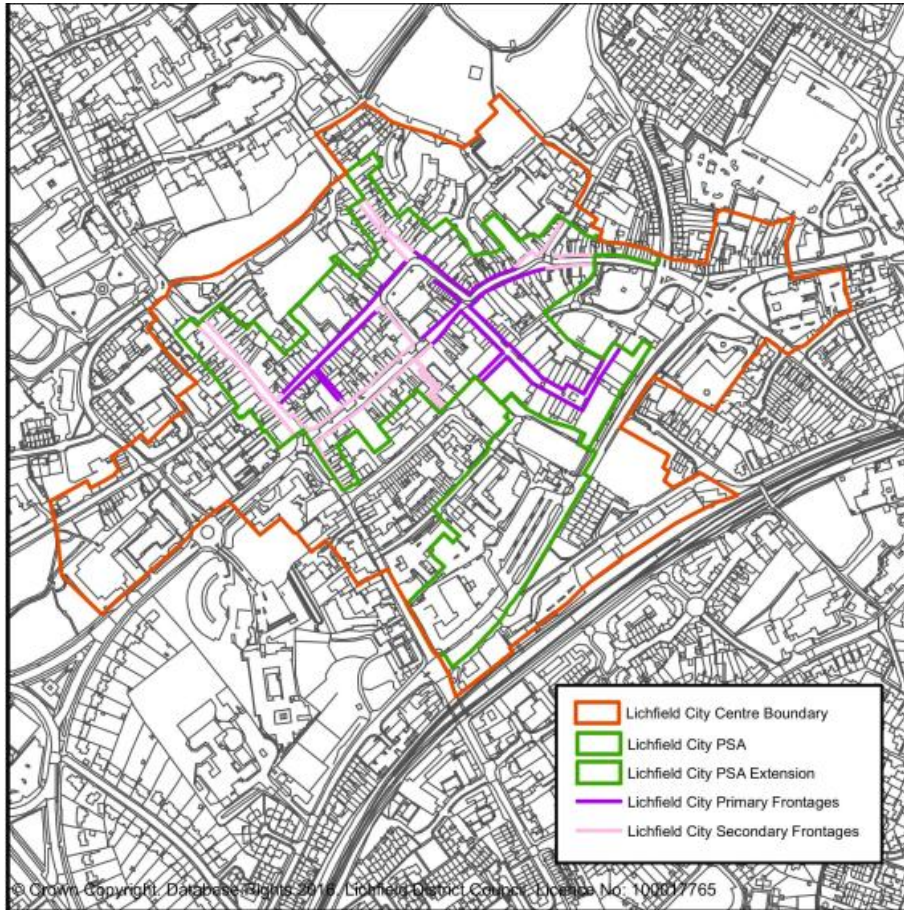
The Primary Shopping Area (PSA) is the retail heart of Lichfield and its protection is key to the vitality and viability of the city centre. As such any proposals (for retail uses) outside of the PSA or the town centre boundary (for all other main town centre uses) will be required to undertake a sequential test and impact assessment in accordance with national guidance and Local Plan Strategy (2015) Policy E1.

Within the primary frontages, any change of use applications from retail to other non-retail uses will be resisted where it would undermine the vitality and viability of the city centre. Other town centre uses, such as cafés, restaurants and offices should be directed towards the secondary frontages.

The provision of new office space will be supported within the City centre boundary in order to meet the evidence based annual floorspace requirement of 1,000 m². 1,400m Managed workspace style office accommodation will be encouraged as part of mixed use schemes and new proposals should have regard to the potential development sites set out in the City Centre Development Strategy. All proposals for new office floorspace should have regard to the need to protect and enhance the City's historic character. A sequential approach to the location of offices will be applied and where there is clear evidence that there are no suitable office sites within the city centre, locations on the edge of the city centre will be considered before locations elsewhere within and accessible to Lichfield City. All sites should benefit from excellent public transport links to Lichfield City and should not prejudice further office development within other town centres, including those outside the district.

In order to meet the requirements from national/ regional office market, the committed Lichfield South Business Park extension site (Site L30) is to be allocated for Grade A office development (up to 12,500 m²).

Map 10.1



Site L1 (Lichfield 1): Beaconsfield House, Sandford Street

L1: Beaconsfield House, Sandford Street

Site allocated through Policy LC2



Site area (Ha)	0.05
Approximate dwelling yield	27
Approximate floorspace (and use)	35m ² (retail)

Beaconsfield house is a former office building within Lichfield City Centre previously identified as a site out of scale and character with the conservation area. Site is located within the City Centre boundary adjacent to a mixture of town centre and other uses.

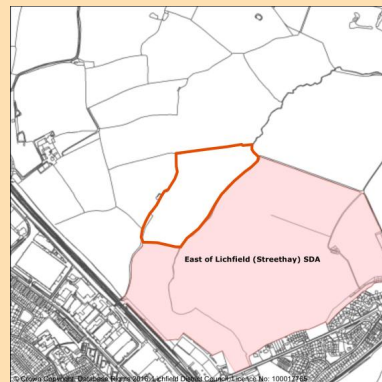
Key development considerations:

- Design and scale of redevelopment must be considered in the context of the buildings location within the conservation area and proximity to heritage assets.
- Opportunity for gateway development on one of the entrances to the city centre.
- Access to site off Sandford Street, development to provide sufficient parking provision for the development (in accordance with the Sustainable Design SPD).
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site L2 (Lichfield 2): East of Lichfield (Streethay) SDA extension

L2: East of Lichfield (Streethay) SDA extension

Site allocated through Policy LC1



Site area (Ha)	9.2
Approximate dwelling yield	200

The site is located to the north of the East of Lichfield (Streethay) SDA as allocated within the Local Plan Strategy which began construction in 2016. Site is presently in agricultural use.

Key development considerations:

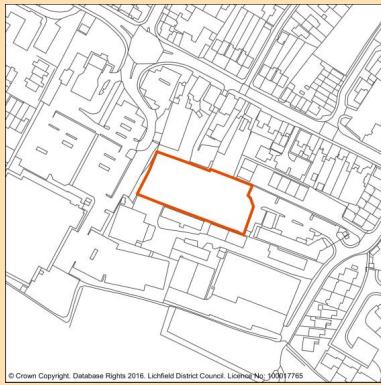
- Development should form an integrated part of the overall development of the SDA.

L2: East of Lichfield (Streethay) SDA extension

- Access to amenities and facilities within the wider SDA and wider area.
- Access to site integrated into road network within the wider SDA.
- Potential ecological impacts should be considered due to the greenfield nature of the site.
- Scheme should be designed to take account of the edge of settlement location and manage the transition from urban to rural.

Site L3 (Lichfield 3): Land at Greenhough Road**L3: Land at Greenhough Road**

Site allocated through Policy LC1



Site area (Ha)	0.3
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Approximate dwelling yield	39
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Currently an unused previously developed site adjacent to an existing employment area. The site is located between an existing supermarket and a small scale modern office development.

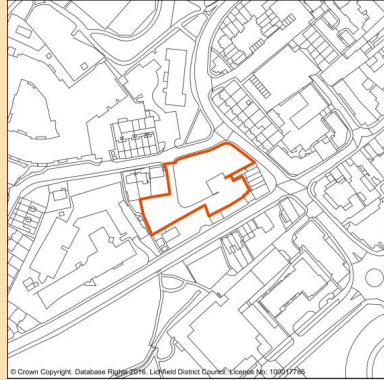
Key development considerations:

- Design and scale of redevelopment must be considered in the context of the buildings location adjacent to the conservation area.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Suitable access to be achieved from Greenhough Road.

Site L4 (Lichfield 4): Land at Swan Road, Former Sandford Gate**L4: Land at Swan Road, Former Sandford Gate**

Site allocated through Policy LC1

L4: Land at Swan Road, Former Sandford Gate



Site area (Ha)	0.3
Approximate dwelling yield	33 (Net -27)

Former sheltered accommodation development which was demolished in 2015. The site is currently vacant brownfield land. Planning permission was granted in 2016 for residential development of 33 dwellings. The previous development accommodated 60 sheltered units which no longer met the appropriate standards for such accommodation in terms of size. The yield for the development is included as a net loss of 27 units.

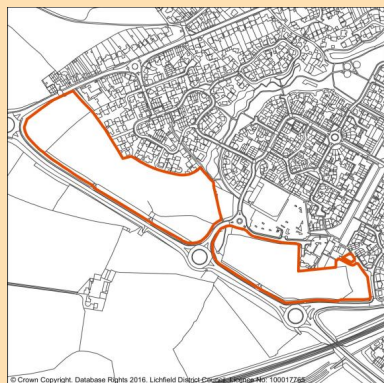
Key development considerations:

- Design and scale of redevelopment must be considered in the context of the buildings location adjacent to the conservation area.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Suitable access to be achieved from Sandford Street.

Site L5 (Lichfield 5): Land off Limburg Avenue and Sainte Foy Avenue

L5: Land off Limburg Avenue and Sainte Foy Avenue

Site allocated through Policy LC1



Site area (Ha)	8.6
Approximate dwelling yield	194

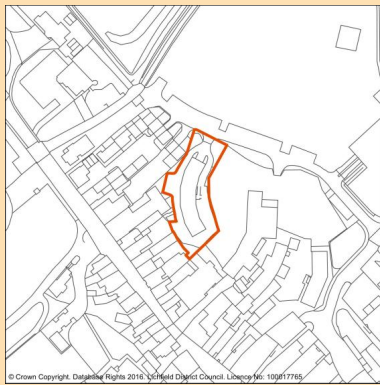
The sit consists of several parcels of land located on the south western edge of Lichfield. The site is bounded by the southern bypass and is immediately adjacent to existing residential development and is currently in agricultural use. Three separate planning permissions have been granted for the site totalling 194 dwellings.

Key development considerations:

- Opportunity for gateway development at one of the key entrances to the city.
- Design of scheme should provide connectivity and integrate into pedestrian and green networks, particularly with the Darwin Park development.
- Potential ecological impacts should be considered due to the greenfield nature of the site.
- Scheme should be designed to take account of the edge of settlement location and manage the transition from urban to rural.

Site L6 (Lichfield 6): St Chad's House, Cross Keys**L6: St Chad's House, Cross Keys**

Site allocated through Policy LC1



Site area (Ha)	0.2
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Approximate dwelling yield	12
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The site is located within Lichfield City centre, directly adjacent to Stowe Pool and consists of an office building along with areas of hard standing and car parking.

Key development considerations:

- Design and scale of development to be considered in the context of the site's location within the conservation area and proximity to heritage assets.
- The SFRA identifies that the site is adjacent to and within areas of high flood risk (Flood Zone 2). Consequently consideration and implementation of suitable measures to manage the potential impacts of flooding and to manage surface water run off.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site L7 (Lichfield 7): Former Day Nursery, Scotch Orchard**L7: Former Day Nursery, Scotch Orchard**

Site allocated through Policy LC1



Site area (Ha)	0.7
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Approximate dwelling yield	27
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The site is a former nursery located within a primarily residential area adjacent to Scotch Orchard Primary School. The site comprises of the vacant nursery building which is located at the centre of the site and mature trees and vegetation within the site boundaries. To the north east the site adjoins an area of open space including a children's play area.

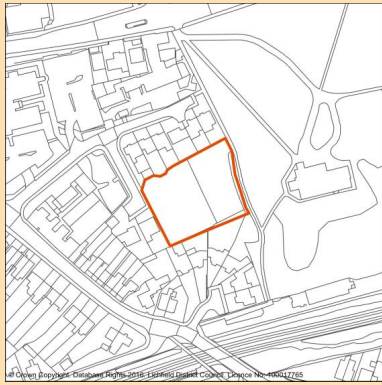
Key development considerations:

- Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site L8 (Lichfield 8): Former St Michaels Playing Fields, Deans Croft

L8: Former St Michaels Playing Fields, Deans Croft

Site allocated through Policy LC1



Site area (Ha)	0.2
Approximate dwelling yield	9

The site is a former playing field associated the nearby St Michaels School which has now been converted to residential accommodation as such the playing fields are no longer in use. The site consists of a grass playing field and a tarmac playing court and is located within a residential area immediately adjacent to the grounds of St Michaels Church.

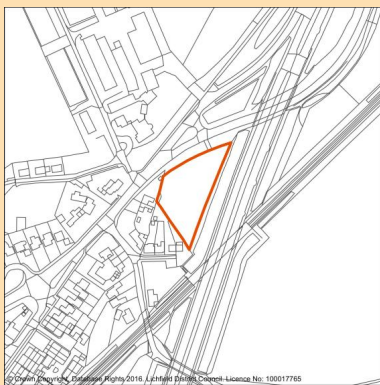
Key development considerations:

- Design and scale of development to be considered in the context of the site's location adjacent to the conservation area and proximity to heritage assets.
- Consideration of replacement play facilities - note that landowner states that 'redundancy rule' means replacement facilities will not be required.

Site L9 (Lichfield 9): Land off Burton Road (East), Streethay

L9: Land off Burton Road (East), Streethay

Site allocated through Policy LC1



Site area (Ha)	0.4
Approximate dwelling yield	20

Greenfield site located on the eastern edge of Streethay which is bounded by the A38 which is elevated above the site.

Key development considerations:

- Design to consider mitigation for noise from A38.
- Potential ecological impacts should be considered due to the greenfield nature of the site.
- Suitable access to be provided.

Site L10 (Lichfield 10): Land off Burton Road (West), Streethay**L10: Land off Burton Road (West), Streethay**

Site allocated through Policy LC1



Site area (Ha)	1.0
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Approximate dwelling yield	38
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The site is located between the existing residential area of Streethay and existing employment area to the east of Lichfield City. Presently the site is an open green field with limited boundary planting or vegetation.

Key development considerations:

- Design to consider mitigation for noise from A38.
- Potential ecological impacts should be considered due to the greenfield nature of the site.
- Suitable access to be provided.

Site L11 (Lichfield 11): Land south of 75 Shortbutts Lane**L11: Land south of 75 Shortbutts Lane**

Site allocated through Policy LC1



Site area (Ha)	0.4
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Approximate dwelling yield	5
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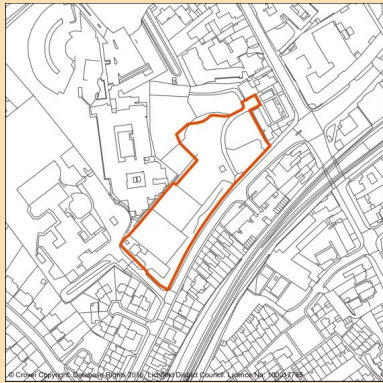
The SHLAA 2016 noted that the site has benefit of planning permission for 6 dwellings which had been implemented and was under construction. The site falls within the South of Lichfield SDA but does not form part of the development for 450 dwellings.

Key development considerations: N/A

Site L12 (Lichfield 12): Land at St Johns Hospital, Birmingham Road

L12: Land at St Johns Hopsital, Birmingham Road

Site allocated through Policy LC1



Site area (Ha)	1.1
Approximate dwelling yield	36

The site is located close to Lichfield City Centre within the Conservation Area. The SHLAA 2016 noted that the north eastern part of the site has benefit of planning permission for 18 dwellings which had been implemented and was under construction. The site is directly adjacent to the Grade I listed St Johns Hospital. The area of the site which is not noted at under construction within the SHLAA consists of the former Lichfield Tennis Club premises incorporating five courts a club house and small area of car parking. The tennis club has closed some years ago and merged with Lichfield Lawn tennis Club located close to the city.

Key development considerations:

- Sensitive design and scale of scheme to take account of location within the conservation area and proximity to heritage assets including listed buildings.
- Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.
- Development proposals for the remainder of the site should be complimentary and link to the development which has already been approved and is under construction.

Site L13 (Lichfield 13): Lombard Court, Lombard Street

L13: Lombard Court, Lombard Street

Site allocated through Policy LC1



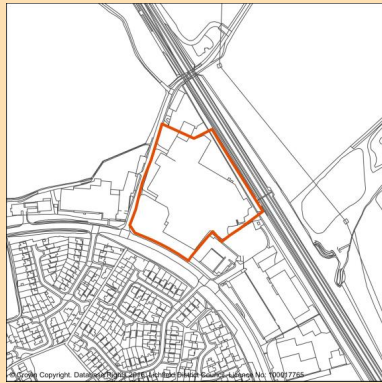
Site area (Ha)	0.1
Approximate dwelling yield	14

Former office building (Grade II listed) located within the city centre. Conversion of the building to form 14 apartments was approved in 2016 and is currently under construction.

Key development considerations: N/A

Site L14 (Lichfield 14): Former Integra Hepworth, Eastern Avenue**L14: Former Inegra Hepworth, Eastern Avenue**

Site allocated through Policy LC1



Site area (Ha)	2.7
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Approximate dwelling yield	99
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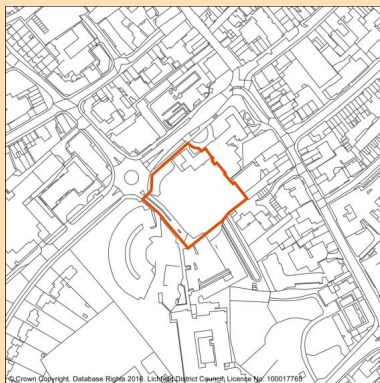
The site was a former industrial premises which ceased operation and was demolished in 2008. The site is bounded by Eastern Avenue, Watery Lane and the West Coast Main Line with an employment area located to the south east.

Key development considerations:

- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Consideration of mitigation for noise from adjacent uses, Eastern Avenue and West Coast Mainline.

Site L15 (Lichfield 15): Land adjacent to Lichfield Library, The Friary**L15: Land adjacent to Lichfield Library, The Friary**

Site allocated through Policy LC1



Site area (Ha)	0.6
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Approximate dwelling yield	45
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The SHLAA 2016 noted that the site has benefit of planning permission for 45 dwellings which had been implemented and was under construction.

Key development considerations: N/A

Site L16 (Lichfield 16): Former Windmill Public House, Grange Lane

L16: Former Windmill Public House, Grange Lane

Site allocated through Policy LC1



Site area (Ha)	0.3
Approximate dwelling yield	12

Site of the Windmill Public House which has been vacant for a number of years. The site is located within a primarily residential area in north Lichfield in close proximity to a number of local shops and facilities.

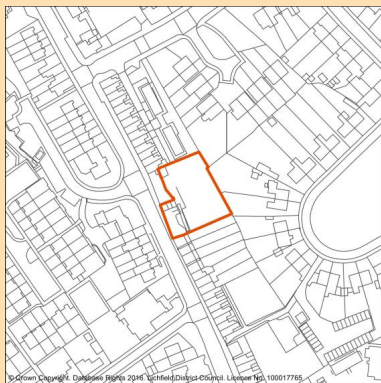
Key development considerations:

- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site L17 (Lichfield 17): Land to the rear of The Greyhound Public House, Upper St John Street

L17: Land to the rear of The Greyhound Public House, Upper St John Street

Site allocated through Policy LC1



Site area (Ha)	0.1
Approximate dwelling yield	8

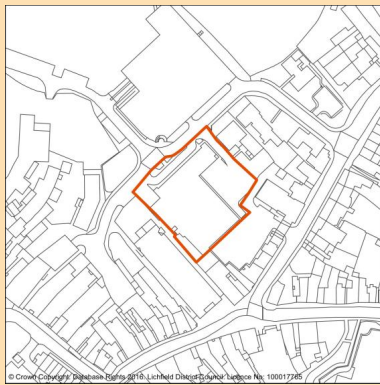
The site is an area of open land located to the rear of the Greyhound Public House and is elevated to the rear.

Key development considerations:

- Tree preservation orders adjacent to the site boundary will need to be considered and accommodated within the design of any proposals.
- Appropriate access to be provided from Upper St John Street and sufficient parking to be provided in line with the Sustainable Design SPD.

Site L18 (Lichfield 18): Land at Cross Keys (Former What! Store), Cross Keys**L18: Land at Cross Keys (Former What! Store), Cross Keys**

Site allocated through Policy LC2



Site area (Ha)	0.3
Approximate dwelling yield	35
Approximate floorspace and use	Retail in line with Policy Lichfield 3.

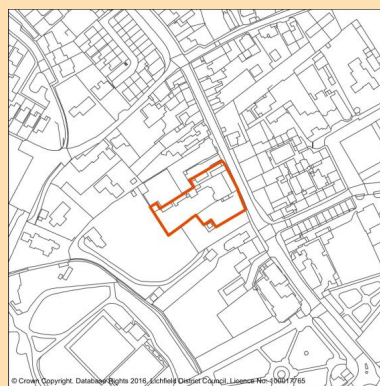
The site is located within Lichfield City Centre and the Conservation Area adjacent to the Cross Keys Car Park. The site is a vacant brownfield site as the retail unit formally located on site was demolished in 2015. The site is bounded by a number of residential and commercial properties and the site of the former Regal Cinema.

Key development considerations:

- Design and scale of development to be considered in the context of the site's location within the conservation area and proximity to heritage assets.
- Mixture of uses should be provided including residential and retail given the sites location within the City Centre.
- Consideration of how mixture of uses can be incorporated into the development and the City Centre and adjacent development sites.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site L19 (Lichfield 19): Angel Croft Hotel, Beacon Street**L19: Angel Croft Hotel, Beacon Street**

Site allocated through Policy LC1



Site area (Ha)	0.2
Approximate dwelling yield	9

Grade II* listed former hotel, building which fronts onto Beacon Street opposite Cathedral Close. The site also consists of grassed areas and car parking.

Key development considerations:

- Sensitive design and scale of scheme to take account of location within the conservation area and proximity to heritage assets including listed buildings. Any proposals should ensure the repair and use of the listed hotel building which is currently at risk.

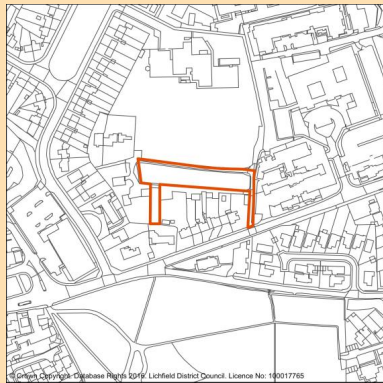
L19: Angel Croft Hotel, Beacon Street

- Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.
- Design must incorporate and protect views of Lichfield Cathedral.
- The SFRA identifies that the site is adjacent to areas of high flood risk (Flood Zone 2 & 3) although the site itself is in Flood Zone 1. Consequently consideration and implementation of suitable measures to manage the potential impacts of flooding and to manage surface water run off.

Site L20 (Lichfield 20): Land at The Rosaries, Trent Valley Road

L20: Land at The Rosaries, Trent Valley Road

Site allocated through Policy LC1



Site area (Ha)	0.3
Approximate dwelling yield	9

The site is an area of incidental open space within a primarily residential area located directly adjacent to St Chad's Primary School. Immediately adjacent to the sites eastern boundary are a number of listed buildings which front onto Trent Valley Road.

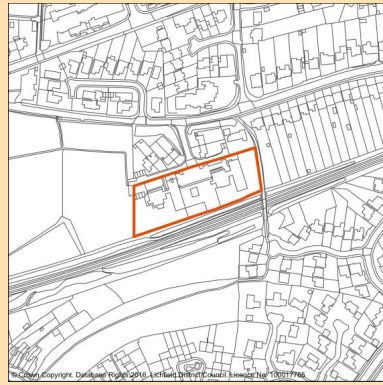
Key development considerations:

- Sensitive design and scale of scheme to take account of location within close proximity to heritage assets including listed buildings.
- Consideration of residential amenity given location adjacent to school playing fields.

Site L21 (Lichfield 21): Hawthorn House, Hawthorn Close

L21: Hawthorn House, Hawthorn Close

Allocated through policy LC1

L21: Hawthorn House, Hawthorn Close

Site area (Ha)	0.6
Approximate dwelling yield	19

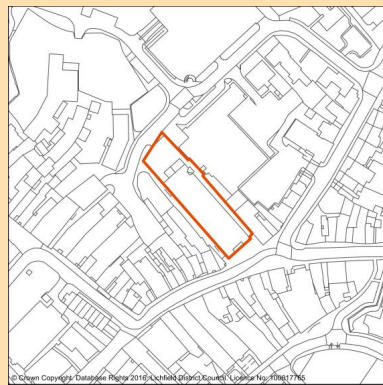
The site consists of several buildings used to provide residential care, areas of open space and car parking serving the current use. The site is located within a primarily residential area adjacent to the grounds of St Michaels Church. The site is bounded to the south by the cross city railway line.

Key development considerations:

- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Design to consider mitigation for noise from adjacent railway line.

Site L22 (Lichfield 22): Former Regal Cinema (former Kwick Save), Tamworth Street**L22: Former Regal Cinema (former Kwick Save), Tamworth Street**

Site allocated through Policy LC2



Site area (Ha)	0.2
Approximate dwelling yield	38
Approximate floorspace and use	Retail inline with Policy Lichfield 3

The site is located within Lichfield City Centre and consists of the former Regal Cinema, a locally listed building located within the Conservation Area adjacent to a number of listed buildings. The site is bounded by a public footpath (The Tanneries) to the west and Tamworth Street to the south.

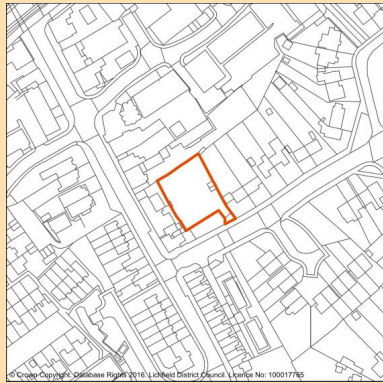
Key development considerations:

- Design and scale of development to be considered in the context of the site's location within the conservation area and proximity to heritage assets.
- Retention of locally listed cinema facade.
- Mixture of uses should be provided including residential and retail given the sites location within the City Centre.
- Consideration of how mixture of uses can be incorporated into the development and the city centre and adjacent development sites.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site L23 (Lichfield 23): land off Cherry Orchard

L23: Land off Cherry Orchard

Site allocated through Policy LC1



Site area (Ha)	0.1
Approximate dwelling yield	9
<p>The site is currently used for the siting of self storage containers and is located within a primarily residential area with direct access of Cherry Orchard.</p>	

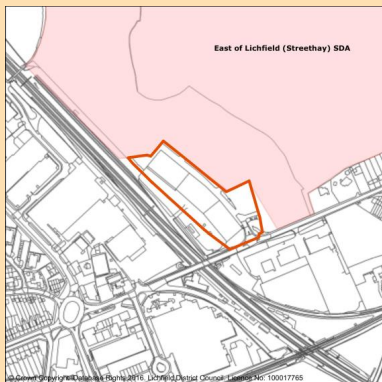
Key development considerations:

- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

L24 (Lichfield 24): Trent Valley Buffer Depot, Burton Road, Streethay

L24: Trent Valley Buffer Depot, Burton Road, Streethay

Site allocated through Policy LC1



Site area (Ha)	1.9
Approximate dwelling yield	50
<p>The site is located directly adjacent to the West Coast Mainline and has been used as a depot serving the railway, the site consists of several large warehouse buildings and areas of hard standing used for the storage of materials related to the current use. The site directly abuts the East of Lichfield (Streethay) SDA to the east.</p>	

Key development considerations:

- Development should be integrated into the wider development of the East of Lichfield (Streethay) SDA.
- Access to amenities and facilities within the wider SDA and wider area.
- Consideration of mitigation for noise from adjacent uses, Eastern Avenue and West Coast Mainline.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Additional parking provision to serve Lichfield Trent Valley Station should be considered as part of any development.

Site L26 (Lichfield 26): Land at 41 Cherry Orchard**L26: Land at 41 Cherry Orchard**

Site allocated through Policy LC1



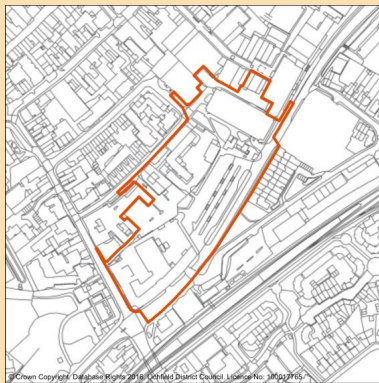
Site area (Ha)	0.2
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Approximate dwelling yield	10
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The site is currently open with the former nursery building having been demolished in 2016. The site is bounded on three sides by residential development of varying tenures and designs and Cherry orchard and a primary school bound the site to the west. The site has the benefit of planning permission for the implemented demolition and construction of dwellings.

Key development considerations: N/A**Site L26 (Lichfield 26): Friarsgate, Birmingham Road****L26: Friarsgate, Birmingham Road**

Site allocated through Policy LC2



Site area (Ha)	3.1
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Approximate dwelling yield	95
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Approximate floorspace and use	Comparison retail inline with Policy Lichfield 3
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The site consists of a large area within the City Centre which includes commercial property, a bus station, 1960s office building and multi-storey car park. Adjacent to the site are a number of listed buildings including the District Council offices and Wade Street Church. The Lichfield Garrick Theatre is located directly adjacent to the north of the site.

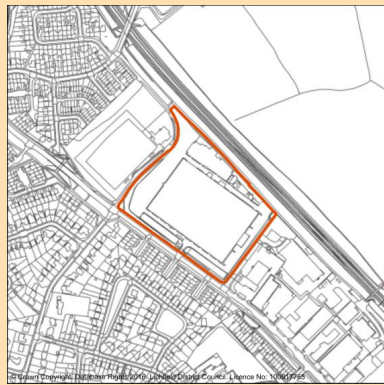
Key development considerations:

- Design and scale of development to be considered in the context of the site's location within the conservation area and proximity to heritage assets.
- Mixture of uses should be provided including residential and retail given the sites location within the City Centre - development should comply with Policy Lichfield 3 .
- Consideration of how mixture of uses can be incorporated into the development and the City Centre and adjacent development sites.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Design must incorporate and protect views of Lichfield Cathedral.

Site L27 (Lichfield 27): Former Norgren site, Eastern Avenue

L27: Former Norgren site, Eastern Avenue

Site allocated through Policy LC2



Site area (Ha)	4.1
Approximate dwelling yield	70
Approximate floorspace and use	Bulky goods retail inline with Policy Lichfield 3

A former industrial site located to the north east of Lichfield City and is bounded by Eastern Avenue and The West Coast Mainline. The site is adjacent to other employment uses and Lichfield City Football Club.

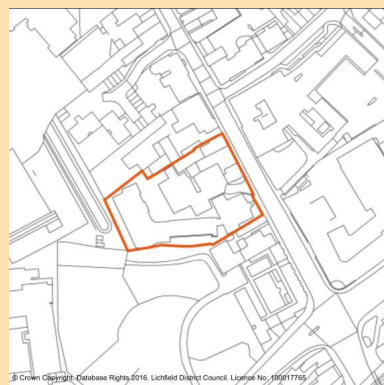
Key development considerations:

- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Consideration of mitigation for noise from adjacent uses, Eastern Avenue and West Coast Mainline.
- Mixture of uses provided for on site should be well integrated with appropriate buffer planting - development should comply with Policy Lichfield 3.

Site L28 (Lichfield 28): Former Beatrice Court, St John Street

L28: Former Beatrice Court, St John Street

Site allocated through Policy LC1



Site area (Ha)	0.6
Approximate dwelling yield	40

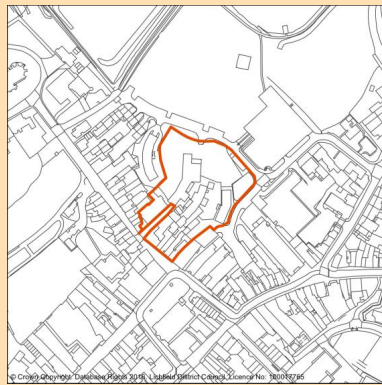
A former nursing home premises within Lichfield City Centre direct adjacent to St Johns Hospital. The site consist of a large 1980s building and a number of listed cottages which directly front onto St John Street.

Key development considerations:

- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Design and scale of development to be considered in the context of the site's location within the conservation area and proximity to heritage assets.
- Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.

Site L29 (Lichfield 29): Land at Quonians Lane (Former Auction Centre), Cross Keys**L29: Land at Quonians Lane (Former Auction Centre), Cross Keys**

Site allocated through Policy LC2



Site area (Ha)	0.8
Approximate dwelling yield	Up to 47 dwellings
Approximate floorspace and use	Mixed use development to include range of appropriate town centre uses including up to 47 residential dwellings.

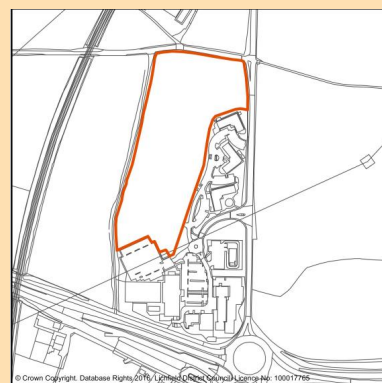
The site is currently an auction centre having previously been used as stone masonry college and incorporates a number of historic buildings along Quonians Lane. Numerous buildings of varying characters are located within the site.

Key development considerations:

- Design and scale of development to be considered in the context of the site's location within the conservation area and proximity to heritage assets.
- Mixture of uses should be provide including residential and retail given the sites location within the City Centre.
- Consideration of how mixture of uses can be incorporated into the development and the city centre and adjacent development sites.
- Linkages through the site from Quonians Lane to Stowe Fields should be accommodated.
- The SFRA identifies that the site is adjacent to areas of high flood risk (Flood Zone 2 & 3) although the site itself is in Flood Zone 1. Consequently consideration and implementation of suitable measures to manage the potential impacts of flooding and to manage surface water run off.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Design must incorporate and protect views of Lichfield Cathedral.

Site L30 (Lichfield 30): Lichfield South Business Park**L30: Lichfield South Buisness Park**

Allocated through Policy Lichfield 3



Site area (Ha)	4.4
Floorspace (m ²)	12,500

The site is located within the Green Belt to the south of Lichfield City adjacent to the existing Lichfield South Business Park. The site is located in close proximity to major road infrastructure including the A38, A5 and M6 Toll.

L30: Lichfield South Business Park**Key development considerations:**

- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Development should be integrated into the existing uses within the Lichfield South Business Park and be designed to complement to existing development.

11 Burntwood

Policy B1: Burntwood Housing Land Allocations

Along with the Strategic Development Allocations identified within the Local Plan Strategy the following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Site reference	Site Name	Approx. yeild of homes delivered by 2029
B1	99-101 High Street, Chasetown	7
B2	82-84 Queen Street	14
B3	Land at Maple Close/Sycamore Road	32
B4	Land at Mount Road/New Road	95
B5	Land rear of Chase Terrace Primary School	12
B6	103 High Street, Chasetown	10
B7	Land south of Cannock Road	17
B8	Cottage of Content Public House, Queen Street	10
B9	7-9 High Street, Chasetown	11
B10	Land off Milestone Way, Chasetown	150
B11	Former Greyhound Public House, Boney Hay Road	7
B12	78 Princess Street, Chase Terrace	6
B13	Bridge Cross Garage, Cannock Road	8
B14	Land south of Highfields Road	250
B15	Land east of Coulter Lane, St Matthews	80
B16	Coney Lodge Farm, Rugeley Road	8
B17	9 Queens Drive, Chasetown	5
B18	Land at Baker Street	7 (net 1)
Total		723

Changes to the Green Belt boundary will be made to the south of Burntwood to accommodate the residential allocation (Site B14) to assist in meeting the housing requirement for Burntwood. Changes to the Green Belt boundary will be made to remove the St Matthews estate from the

Green Belt, as set out in Policy Burntwood 1: Burntwood Environment (Local Plan Strategy) and accommodate residential allocations (Site B15) to assist in meeting the housing requirement for Burntwood.

Policy B2: Burntwood Mixed-use Allocations

The following site, shown on the adopted local plan policies map, are allocated for mixed-use development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address. The mix of uses which will be supported is detailed within the table below and the 'Key Development Considerations'.

Table 11.1

Site reference	Site Name	Mix of uses	Approx. Yield of uses
B13	Bridge Cross Garage, Cannock Road	Residential/Retail	8 dwellings and retail
Total			8

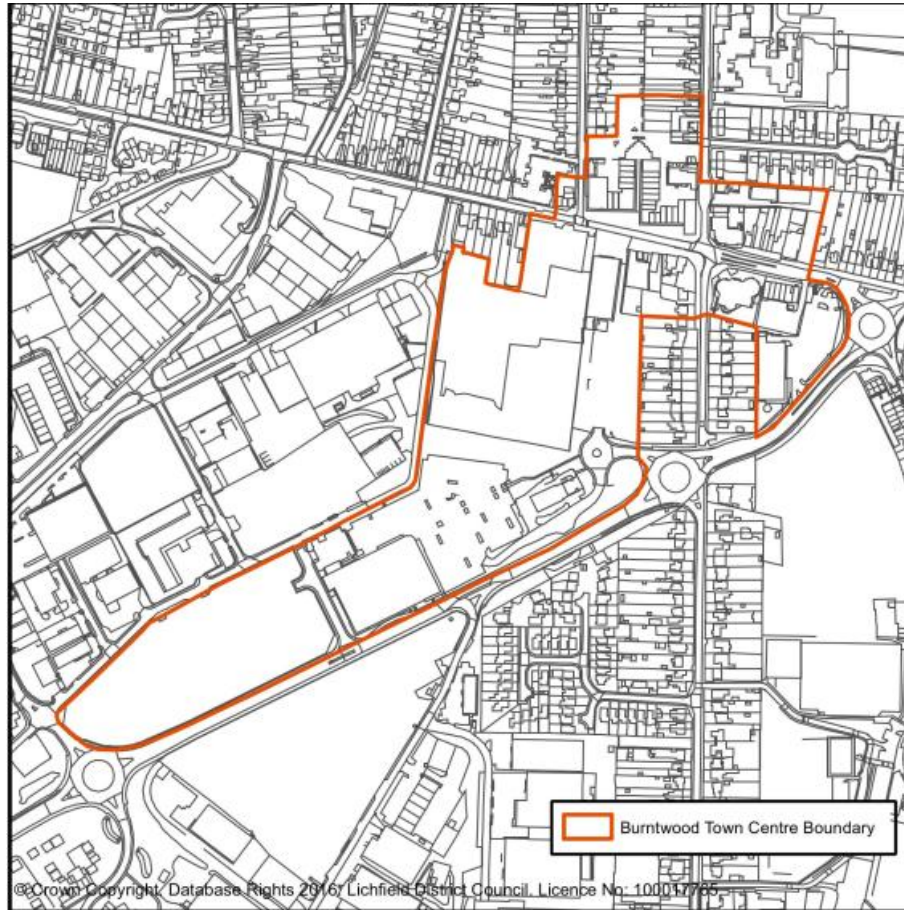
Policy Burntwood 3: Burntwood Economy

In Burntwood the focus will be on the creation of a vibrant and diverse town centre, through regeneration. The town will be promoted as an area of increased and more diverse economic activity, to include new retail, employment, leisure, residential, recreational, health, educational resources and improvements to its environmental quality and public realm. These uses, together with enhancements to pedestrian linkages and public transport facilities, will further assist in the regeneration of the area and help to meet the needs of the residential population of the town.

To assist in this regeneration, Burntwood will be a main focus for investment, including public and private sector funding. Specific projects that have been identified as part of a package of measures to deliver Burntwood's town centre regeneration are detailed within the Infrastructure Delivery Plan (IDP).

Employment opportunities will be maximised to encourage Burntwood residents to be able to access a range of locally accessible opportunities suitable to their skills and aspirations. Support will be given for an enlarged town centre to meet local needs as defined on the Policies Map and Map 11.1). The District Council will encourage new retail development comprising both comparison and convenience floorspace as well as leisure uses on the two key opportunity sites in order to increase the attractiveness and market share of the centre.

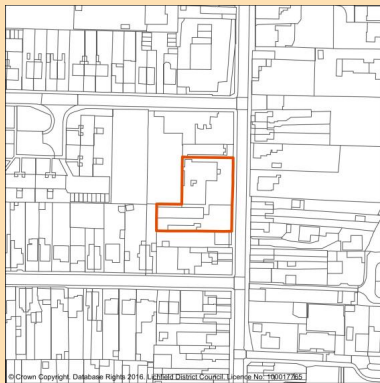
Map 11.1 Burntwood Town Centre Boundary



Site B1 (Burntwood 1): 99-101 High Street, Chasetown

B1: 99-101 High Street, Chasetown

Site allocated through Policy B1



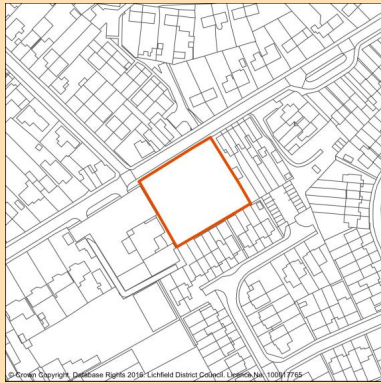
Site area (Ha)	0.2
Approximate dwelling yield	7
Located directly off High Street Chasetown and consists of a number of buildings including a former chapel.	

Key development considerations: N/A

Site B2 (Burntwood 2): 82-84 Queen Street

B2: 82-84 Queen Street

Allocated through Policy B1



Site area (Ha)	0.2
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Approximate dwelling yield	14
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The site is currently vacant land having formally been the location of a car dealership and garage. The site is located within a primarily residential area within Burntwood.

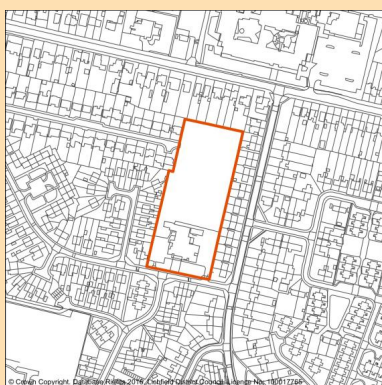
Key development considerations:

- Consideration of how design of scheme will integrate with surrounding development including adjacent allocated site.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site B3 (Burntwood 3): Land at Maple Close/Sycamore Road

B3: Land at Maple Close/Sycamore Road

Allocated through Policy B1



Site area (Ha)	1.3
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Approximate dwelling yield	32
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The site is located in a primarily residential area and currently consists of a single one and two storey building which has been used as a local social services office and a large grassed area. The site is bounded on all four sides by residential development.

Key development considerations: N/A

Site B4 (Burntwood 4): Land at Mount Road/New Road**B4: Land at Mount Road/New Road**

Site allocated through Policy B1



Site area (Ha)	2.8
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Approximate dwelling yield	95
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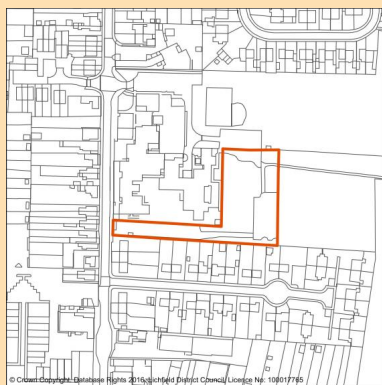
The site is located within the Mount Road Industrial Estate within Burntwood and consists of a number of vacant industrial buildings which have not been in use for a number of years, there is also a grassed area at the eastern extent of the site which fronts onto New Road.

Key development considerations:

- Design of scheme to provide appropriate residential amenity, particularly given adjacent employment uses.
- Consideration of potential mitigation measures for noise and odour pollution from adjacent uses.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site B5 (Burntwood 5): Land rear of Chase Terrace Primary School**B5: Land rear of Chase Terrace Primary School**

Allocated through Policy B1



Site area (Ha)	0.4
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Approximate dwelling yield	12
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The site is an area of vacant land to the rear of Chase terrace Primary School adjacent to the school buildings and playing fields. To the south the site is bounded by residential properties on Victory Avenue.

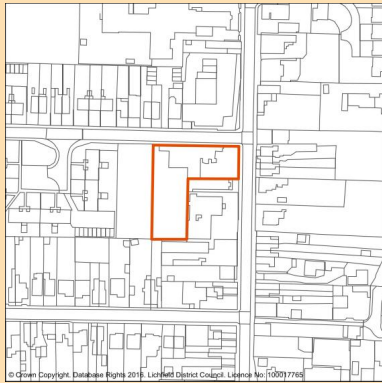
Key development considerations:

- Consideration of residential amenity given location adjacent to school playing fields.
- Suitable access to be provided from Rugeley Road.

Site B6 (Burntwood 6): 103 High Street, Chasetown

B6: 103 High Street, Chasetown

Allocated through Policy B1



Site area (Ha) 0.2

Approximate dwelling yield 10

The SHLAA 2016 noted that the site has benefit of planning permission for 10 dwellings which had been implemented and was under construction.

Key development considerations: N/A

Site B7 (Burntwood 7): Land south of Cannock Road

B7: Land south of Cannock Road

Allocated through Policy B1



Site area (Ha) 0.3

Approximate dwelling yield 17

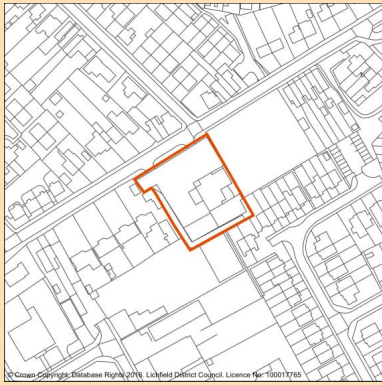
The site is a grassed area of vacant land located to the south of Cannock Road. The site is adjacent to a car sales room to the west, residential development to the north and east and employment uses to the south.

Key development considerations:

- Design of scheme to provide appropriate residential amenity, particularly given adjacent employment uses.
- Consideration of potential mitigation measures for noise and odour pollution from adjacent uses.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site B8 (Burntwood 8): Cottage of Content Public House, Queen Street**B8: Cottage of Content Public House, Queen Street**

Site allocated through Policy B1



Site area (Ha)	0.2
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Approximate dwelling yield	10
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Site is currently a public house and consists of the main building which is located to the rear of the site and large area of car parking surrounding the building.

Key development considerations:

- Consideration of how design of scheme will integrate with surrounding development including adjacent allocated site.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site 9 (Burntwood 9): 7-9 High Street, Chasetown**B9: 7-9 High Street, Chasetown**

Allocated through Policy B1



Site area (Ha)	0.1
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Approximate dwelling yield	11
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The site is located directly fronting onto High Street and consists of buildings fronting the road with an area of hard standing to the rear.

Key development considerations: N/A

Site B10 (Burntwood 10): Land off Milestone Way, Chasetown

B10: Land off Milestone Way, Chasetown

Allocated through policy B1



Site area (Ha)	4.4
Approximate dwelling yield	150

The site is currently vacant previously industrial land as the industrial units were demolished in 2014. The site is adjacent to the East of Burntwood SDA to the west, industrial units to the east and a supermarket to the north.

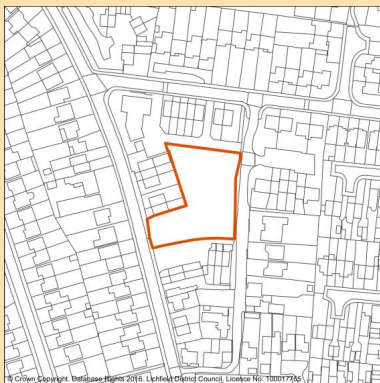
Key development considerations:

- Design of scheme to provide appropriate residential amenity, particularly given adjacent employment uses.
- Scheme should provide linkages to the town centre and adjacent East of Burntwood Bypass SDA.
- Consideration of potential mitigation measures for noise and odour pollution from adjacent uses.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site B11 (Burntwood 11): Former Greyhound Public House, Boney Hay Road

B11: Former Greyhound Public House, Boney Hay Road

Allocated through Policy B1



Site area (Ha)	0.2
Approximate dwelling yield	7

The SHLAA 2016 noted that the site has benefit of planning permission for 5 dwellings which had been implemented and was under construction. Planning permission for 7 dwellings has now been granted and is under construction.

Key development considerations: N/A

B12 (Burntwood 12): 78 Princess Street, Chase Terrace**B12: 78 Princess Street, Chase Terrace**

Site allocated through Policy B1



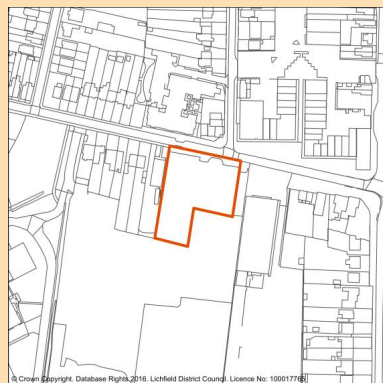
Site area (Ha)	0.2
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Approximate dwelling yield	6
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The SHLAA 2016 noted that the site has benefit of planning permission for 6 dwellings which had been implemented and was under construction.

Key development considerations: N/A**Site B13 (Burntwood 13): Bridge Cross Garage, Cannock Road****B13: Bridge Cross Garage, Cannock Road**

Site allocated through Policy B2



Site area (Ha)	0.3
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Approximate dwelling yield	8
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The site is an area of vacant previously developed land located within Burntwood Town Centre directly fronting onto Cannock Road. Residential areas are located to the north and west of the site with commercial development to the east and an area of vacant land to the south.

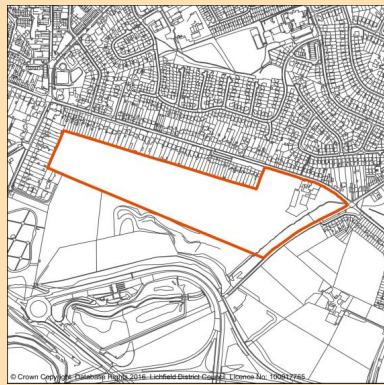
Key development considerations:

- Integration of retail and residential uses. Scheme should be designed to ensure connectivity to other areas and uses within the town centre.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site B14 (Burntwood 14): Land south of Highfields Road

B14: Land south of Highfields Road

Allocated through policy B1



Site area (Ha)	11.8
Approximate dwelling yield	250

The site is currently in agricultural use and is located to the south of Burntwood immediately adjacent to residential development on its northern and western boundaries. To the south of the site is the M6 Toll which provides a significant barrier between Burntwood and the major urban area. To the west of the site beyond Burntwood Bypass is Chasewater Country Park.

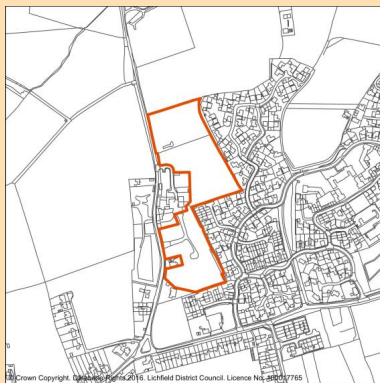
Key development considerations:

- The SFRA identifies that the site is adjacent to areas of high flood risk (Flood Zone 2 & 3) although the site itself is in Flood Zone 1. Consequently consideration and implementation of suitable measures to manage the potential impacts of flooding and to manage surface water run off.
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to designated sites.
- Potential measures to mitigate the impacts of road noise from the M6 Toll to the south of the site.
- Scheme should be designed to take account of the edge of settlement location and manage the transition from urban to rural. Areas of open space to the south of the site will remain within the Green Belt and must be designed to maintain the openness of the Green Belt.

Site B15 (Burntwood 15): Land east of Coulter Lane, St Matthews

B15: Land east of Coulter Lane, St Matthews

Allocated through Policy B1



Site area (Ha)	3.3
Approximate dwelling yield	80

The site is primarily in agricultural use and is located between to the built up area of St Matthews estate to the east and Coulter Lane to the west.

Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to designated sites.

B15: Land east of Coulter Lane, St Matthews

- Scheme should be designed to take account of the edge of settlement location and manage the transition from urban to rural.
- Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.

Site B16 (Burntwood 16): Coney Lodge Farm, Rugeley Road**B16: Coney Lodge Farm, Rugeley Road**

Allocated through Policy B1



Site area (Ha)	0.6
Approximate dwelling yield	8

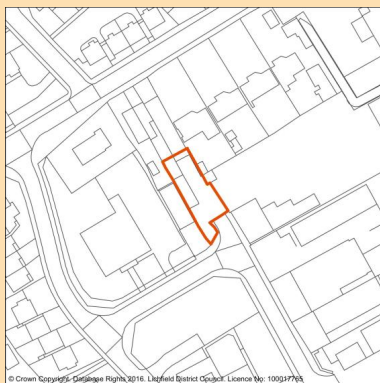
The site is currently a working farm and consists of a farm house and numerous agricultural buildings. Located to the north of Burntwood the site is within the Green Belt directly adjacent to the existing residential areas of Burntwood.

Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to designated sites.
- Scheme should be designed to take account of the edge of settlement location and manage the transition from urban to rural and retain agricultural character.

Site B17 (Burntwood 17): 9 Queens Drive, Chasetown**B17: 9 Queens Drive, Chasetown**

Allocated through Policy B1



Site area (Ha)	0.1
Approximate dwelling yield	5

The site is located adjacent to Queens Drive Industrial Estate and Chasetown Methodist Church and consists of an area of vacant brownfield land.

B17: 9 Queens Drive, Chasetown

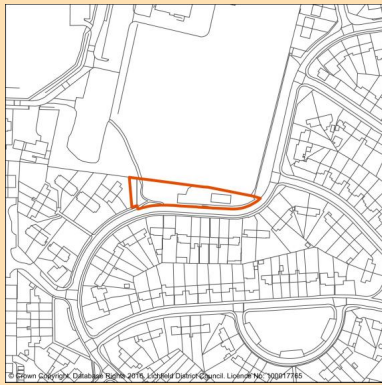
Key development considerations:

- Design of scheme to provide appropriate residential amenity, particularly given adjacent employment uses.
- Consideration of potential mitigation measures for noise pollution from adjacent employment uses.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site B18 (Burntwood 18): Land at Baker Street

B18: Land at Baker Street

Allocated through Policy B1



Site area (Ha)	0.2
Approximate dwelling yield	7 (1 net)

The SHLAA 2016 noted that the site has benefit of planning permission for 7 dwellings which had been implemented and was under construction with 6 completions having been recorded in 2015/2016.

Key development considerations: N/A

12 North of Tamworth

Policy NT1: North of Tamworth Housing Land Allocations

The following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Site reference	Site Name	Approx. yeild of homes delivered by 2029
NT1	Land at Arkall Farm, Ashby Road	1000
NT2	Land north of Brown's Lane, Tamworth	165
Total		1165

Site NT1 (North of Tamworth 1): Land at Arkall Farm, Ashby Road**NT1: Land at Arkall Farm, Ashby Road**

Allocated through Policy NT1



Site area (Ha)	79.5
Approximate dwelling yield	1000

The site consists of a number of fields in agricultural use with the listed farm house located toward the centre of the site. The site is bounded by the West Coast Mainline to the west and the Ashby Road to the south. Beyond the Ashby Road (within Tamworth Borough) a scheme to deliver approximately 535 dwellings is allocated within the Tamworth Local Plan.

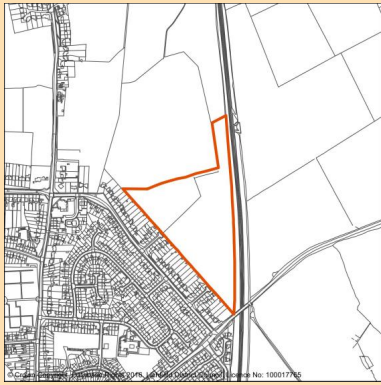
Key development considerations:

- Development should comply with Policy North of Tamworth within the Local Plan Strategy.
- Potential ecological impacts should be considered due to the greenfield nature of the site.
- Any scheme should be designed to be sensitive to the Grade II listed farmhouse within the site.
- Scheme should be designed to take account of the edge of settlement location and manage the transition from urban to rural.
- Suitable access to the site should be achieved from Ashby Road.

Site NT2 (North of Tamworth 2): Land north of Brown's Lane, Tamworth

NT2: Land north of Browns Lane, Tamworth

Allocated through Policy NT1



Site area (Ha)	6.6
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Approximate dwelling yield	165
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The site was previously open agricultural land to the rear of residential development on the northern edge of Tamworth. The SHLAA 2016 notes that the site was under construction for the permitted 165 dwellings.

Key development considerations: N/A

13 East of Rugeley

Policy R1: East of Rugeley Housing Land Allocations

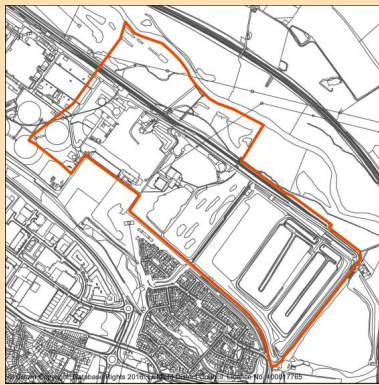
The following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Site reference	Site Name	Approx. yeild of homes delivered by 2029
R1	Former Rugeley Power Station	Minimum of 800
Total		Minimum of 800

Site R1 (East of Rugeley 1): Former Rugeley Power Station

R1: Former Rugeley Power Station

Site allocated through Policy R1



Site area (Ha) 69.0

Approximate dwelling yeild Minimum of 800

Former power station site which is located within both Lichfield and Cannock Chase Districts (Plan illustrates area within Lichfield District). Power station ceased generating power in 2016. Significant brownfield site located to the east of Rugeley.

Key development considerations:

- Development proposals should have consideration to the Rugeley Power Station Concept Statement (Appendix E).
- The Rugeley Power Station Supplementary Planning Document to be produced to guide the redevelopment of the area.

14 Key Rural Settlements

Fradley

Policy F1: Fradley Housing Land Allocations

Along with the Strategic Development Allocations identified within the Local Plan Strategy the following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

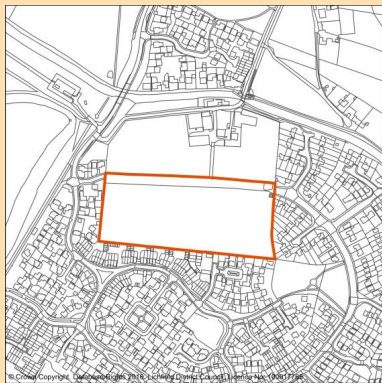
Site reference	Site Name	Approx. yeild of homes delivered by 2029
F1	Bridge Farm, Fradley	80
Total		80

Changes to the village settlement boundary, as shown on the Policies Map, to accommodate the Fradley Strategic Development Allocation.

Site F1 (Fradley 1): Bridge Farm, Fradley

F1: Bridge Farm, Fradley

Site allocated through Policy F1



Site area (Ha) 3.1

Approximate dwelling yield 80

Bridge Farm is located within the settlement boundary of Fradley to the south of the Coventry Canal which divides Fradley village and the new area of residential development known as Fradley South. It is largely open agricultural land bounded on three sides by residential development with Bridge Farm located to the north. The site benefits from a resolution to grant outline planning permission for up to 80 dwellings .

Key development considerations:

- Connectivity to the canal to the north of the site and adjacent residential areas.
- Access to site to utilise existing highway network.
- Amenity of adjacent residential areas taken account of in design or proposals.
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the canal.
- Sustainable management of surface water run-off.

Alrewas

Policy A1: Alrewas Housing Land Allocations

The following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Site reference	Site Name	Approx. yeild of homes delivered by 2029
A1	Former Park Road Printers, Park Road, Alrewas	6 (Net 4 - 2 completions in 2015/16)
A2	Land north of Dark Lane, Alrewas	110
A3	Land at Bagnall Lock, Kings Bromley Road, Alrewas	8
A4	The New Lodge, Kings Bromley Road, Alrewas	6
A5	Land east of A513/South of Bagnall Lock, Alrewas	7
Total		135

Changes will be made to the village settlement boundary , as shown on the Policies Map, to accommodate the residential allocations (Sites A2, and A3).

Site A1 (Alrewas 1): Former Park Road Printers, Park Road, Alrewas**A1: Former Park Road Printers, Park Road, Alrewas**

Site allocated through Policy A1



Site area (Ha)	0.2
Approximate dwelling yield	6 (4 net)

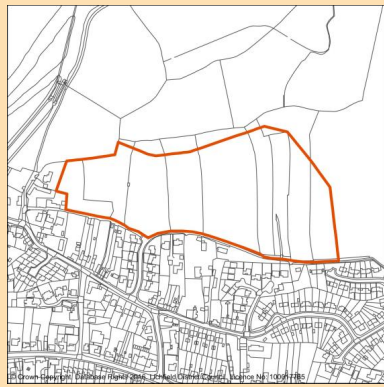
The site was formerly a printing works and represents an opportunity for a brownfield redevelopment within the village settlement boundary. Residential development surrounds the site on all sides. The SHLAA 2016 noted that the site has benefit of planning permission for 6 dwellings which had been implemented and was under construction with 2 completions recorded in 2015/16 which means net delivery of 4 dwellings within the remainder of the plan period.

Key development considerations: N/A

Site A2 (Alrewas 2): Land north of Dark Lane, Alrewas

A2: Land north of Dark Lane, Alrewas

Site allocated through Policy A1



Site area (Ha)	6.1
Approximate dwelling yield	110

Located to the north of the settlement and adjacent to the Alrewas conservation area. The site is currently open agricultural land in agricultural use. The site abuts the existing residential areas of the village to the south with Dark Lane forming the southern boundary to the site. To the west is Essington House Farm and the Trent and Mersey Canal which joins the River Trent to the north of the site.

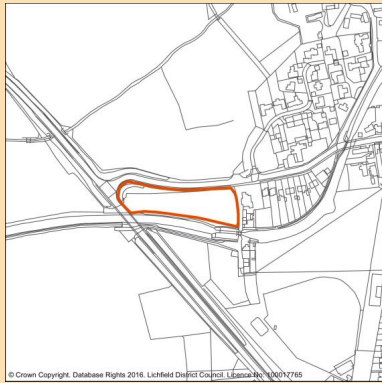
Key development considerations:

- Design and scale of development to be considered in the context of the site's location within and adjacent to the conservation area and proximity to heritage assets.
- The SFRA identifies that the site is adjacent to areas of high flood risk (Flood Zone 2 & 3) although the site itself is in Flood Zone 1. Consequently consideration and implementation of suitable measures to manage the potential impacts of flooding and to manage surface water run off.
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the canal and location within the National Forest and Central Rivers Initiative areas.
- Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.
- Access to site to minimise the impact of traffic upon the existing road network, particularly within the Conservation Area.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks.
- Potential measures to mitigate the impacts of road noise from the A38 to the east of the site.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.

Site A3 (Alrewas 3): Land at Bagnall Lock, Kings Bromley Road, Alrewas

A3: Land at Bagnall Lock, Kings Bromley Road, Alrewas

Site allocated through Policy A3

A3: Land at Bagnall Lock, Kings Bromley Road, Alrewas

Site area (Ha)	0.6
Approximate dwelling yield	8

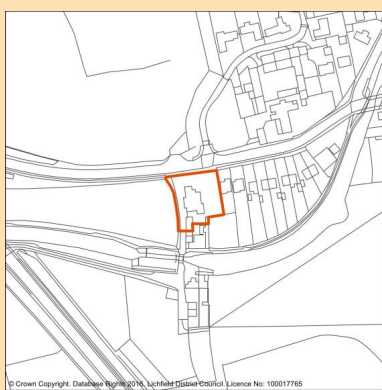
The site is located on the western edge of Alrewas, directly adjacent to the Trent and Mersey Canal and Bagnall Lock to the south. Kings Bromley Road and the A513 bound the site to the north and west respectively. The site is an open agricultural field and received planning permission for 8 dwellings in 2016.

Key development considerations:

- Design and scale of development to be considered in the context of the site's location within and adjacent to the conservation area and proximity to heritage assets.
- Design of any scheme should consider the frontage onto the Trent and Mersey Canal and the sites location at the entrance to the village.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the canal and location within the National Forest and Central Rivers Initiative areas.
- Potential measures to mitigate the impacts of road noise from the A513 to the west of the site.

Site A4 (Alrewas 4): The New Lodge, Kings Bromley Road, Alrewas**A4: The New Lodge, Kings Bromley Road, Alrewas**

Site allocated through Policy A1



Site area (Ha)	0.2
Approximate dwelling yield	6

The site is a former public house which has been used as a restaurant located on the western edge of the village. The site consists of the former public house building, hard standing car park and several outbuildings. The site received planning permission for 6 dwellings in 2015.

Key development considerations:

- Design and scale of development to be considered in the context of the site's location within and adjacent to the conservation area and proximity to heritage assets.
- Any scheme should seek to preserve the former public house (which is locally listed) building as part of the design.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.

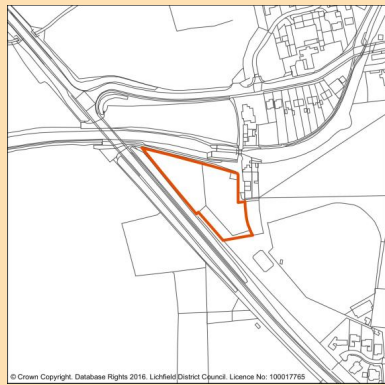
A4: The New Lodge, Kings Bromley Road, Alrewas

- Design of any scheme should consider the sites location at the entrance to the village.
- Potential ecological impacts should be considered due to proximity to the canal and location within the National Forest and Central Rivers Initiative areas.
- Potential measures to mitigate the impacts of road noise from the A513 to the east of the site.

Site A5 (Alrewas 5): Land east of A513/South of Bagnall Lock, Alrewas

A5: Land east of A513/South of Bagnall Lock, Alrewas

Site allocated through Policy A1



Site area (Ha)	0.6
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Approximate dwelling yield	7
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The site consists is a green field site located directly adjacent to the Trent and Mersey Canal south of Bagnall Lock. Mature trees and vegetation bound the remaining edges of the site. Beyond the site to the east is the village recreation ground.

Key development considerations:

- Development design must take account of HSE exclusion zone.
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the canal and location within the National Forest and proximity to the Central Rivers Initiative areas.
- Design and scale of development to be considered in the context of the site's location within and adjacent to the conservation area and proximity to heritage assets.
- Design of any scheme should consider the frontage onto the Trent and Mersey Canal and the sites location at the entrance to the village.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.
- Suitable access to the site will need to be achieved via the existing bridge over the canal to the north.
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the canal and location within the National Forest and Central Rivers Initiative areas.
- Potential measures to mitigate the impacts of road noise from the A513 to the west of the site.

Armitage with Handsacre**Policy AH1: Armitage with Handsacre Housing Land Allocations**

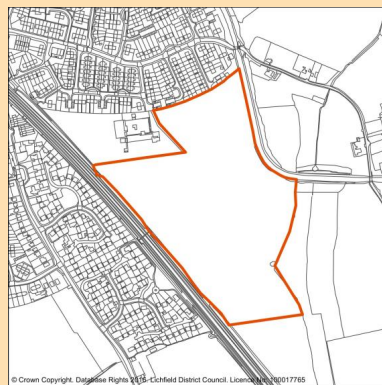
The following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Site reference	Site Name	Approx. yeild of homes delivered by 2029
AH1	Land adjacent to Hayes Meadow School, Armitage with Handsacre	200 (Net 199)
Total		199

Changes will be made to the village settlement boundary , as shown on the Policies Map, to accommodate the residential allocations (Site AH1).

Site AH1 (Armitage with Handsacre 1): Land adjacent to Hayes Meadow School, Armitage with Handsacre**AH1: Land adjacent to Hayes Meadow School, Armitage with Handsacre**

Site allocated through Policy AH1



Site area (Ha) 10.4

Approximate dwelling yield 200

The site is located to the east of Handsacre within the village settlement boundary as defined on the Local Plan Policies Maps and is bounded by the West Coast Mainline railway to the west and the Trent and Mersey Canal to the east. The site benefits from outline planning permission for up to 200 dwellings, the implementation of which will require the demolition of 1 dwelling to provide access to the site. The site will be accessed from the north via Tupperhurst Lane.

Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the canal.
- Design to take account of proximity to school and to provide additional parking/turning facilities for school.
- Suitable access should be achieved and taken from Tupperhurst Lane to the north.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.

Fazeley, Mile Oak & Bonehill

Policy FZ1: Fazeley, Mile Oak & Bonehill Housing Land Allocations

The following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

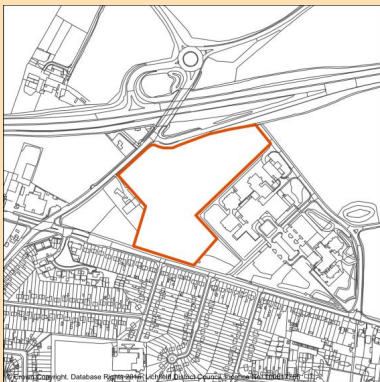
Site reference	Site Name	Approx. yeild of homes delivered by 2029
FZ1	Land west of Sir Robert Peel Hospital, Lichfield Street, Mile Oak	102
FZ2	Tolsons Mill. Lichfield Street, Fazeley	100
FZ3	Land at 14 The Green, Bonehill	7
Total		209

Changes will be made to both the Green Belt Boundary and the village settlement boundary , as shown on the Policies Map, to accommodate the residential allocation (Site FZ1) to assist in meeting the housing requirement for Fazeley, Mile Oak & Bonehill.

Site FZ1 (Fazeley, Mile Oak & Bonehill 1): Land west of Sir Robert Peel Hospital, Lichfield Street, Mile Oak

FZ1: Land west of Sir Robert Peel Hospital, Lichfield Street, Mile Oak

Site allocated through Policy FZ1



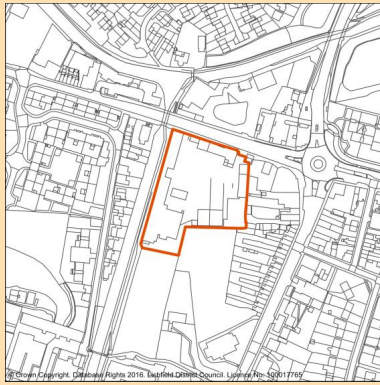
Site area (Ha)	4.2
Approximate dwelling yield	102
A greenfield site located to the north west of the settlement adjacent to the Sir Robert Peel Hospital between the A5, Lichfield Street and Bonehill Road.	

Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.
- Suitable access should be considered and taken from Lichfield Street.
- Potential measures to mitigate the impacts of road noise from the A5 to the north of the site.

Site FZ2 (Fazeley, Mile Oak & Bonehill 2): Tolsons Mill, Lichfield Street, Fazeley**FZ2: Tolsons Mill, Lichfield Street, Fazeley**

Site allocated through Policy FZ1



Site area (Ha)	0.8
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Approximate dwelling yield	100
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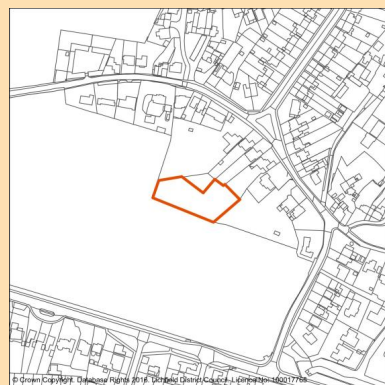
Grade II listed former mill located at the centre of Fazeley. The site is bounded by the Birmingham and Fazeley Canal to the west and Lichfield Street to the north. The Mill itself consists of a number of listed buildings and outbuildings including the five storey mill building which directly abuts the Canal.

Key development considerations:

- Design and scale of development to be considered in the context of the site's location within and adjacent to the conservation area and proximity to heritage assets.
- Design of any scheme should consider the frontage onto the Birmingham and Fazeley Canal.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.

Site FZ3 (Fazeley, Mile Oak & Bonehill 3): Land at 15 The Green, Bonehill**FZ3: Land at 15 The Green, Bonehill**

Site allocated through Policy FZ1



Site area (Ha)	0.2
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Approximate dwelling yield	7
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Presently the site is part of the garden to the rear of properties fronting onto The Green and is located within the village settlement boundary at the southern edge of Bonehill.

Key development considerations:

- Design and scale of development to be considered in the context of the site's location adjacent to the conservation area and proximity to heritage assets.
- Potential ecological impacts should be considered due to the greenfield nature of the site.

FZ3: Land at 15 The Green, Bonehill

- Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.

Policy GT1: Gypsy & Traveller Site Allocations

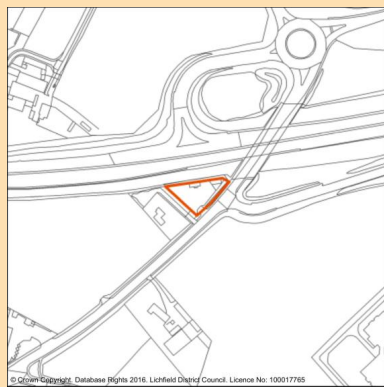
The following site as shown on the adopted local plan policies map, are allocated for Gypsy & Traveller pitch provision within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Site reference	Site Name	Approx. Number of pitches delivered by 2029
GT1	Land at Bonehill Road, Mile Oak	1
Total		1

Site GT1 (Gypsy & Traveller 1): Land at Bonehill Road, Mile Oak

GT1: Land at Bonehill Road, Mile Oak

Site allocated through Policy GT1



Site area (Ha)	0.10
Number of pitches to be allocated	1
Site Location	

Existing Gypsy and Traveller Site currently with planning permission for 1 pitch (in use). The site has all necessary utilities and has capacity for one additional pitch thereby making it a 2 pitch site. Location complies with Local Plan Strategy Policy H3 by virtue of its proximity to Key Rural Settlement and the A5. Site is within the ownership of a Gypsy and Traveller family and is considered deliverable within 5 years.

Key development considerations:

- This allocation consolidates red line boundary of existing site so layout of new pitch will need to take account of existing caravans, buildings and access requirements.
- Additional pitch will be subject to the requirements of H3. Positioning/ layout of caravans and amenity block will need to consider/mitigate impacts on neighbouring residential property.
- Incorporation of SuDS and measures to control surface water run-off.

Shenstone

Policy S1: Shenstone Housing Land Allocations

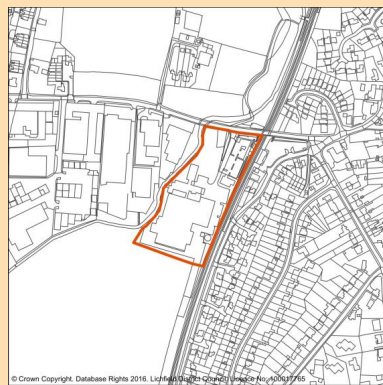
The following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

Site reference	Site Name	Approx. yeild of homes delivered by 2029
S1	Land at Lynn Lane, Shenstone	50
S2	Land adjacent Shenstone Pumping Station, Lynn Lane, Shenstone	40
S3	Land off Millbrook Drive, Shenstone	10
Total		100

Changes will be made to both the Green Belt Boundary and the village settlement boundary , as shown on the Policies Map, to accommodate residential allocations (Sites S2 and S3) to assist in meeting the housing requirement for Shenstone.

Site S1 (Shenstone 1): Land at Lynn Lane, Shenstone**S1: Land at Lynn Lane, Shenstone**

Site allocated through policy S1



Site area (Ha) 2.1

Approximate dwelling yield 50

Site is allocated for a mixed-use residential development within the Shenstone Neighbourhood Plan (**Insert date when Made**) to provide approximately 50 dwellings and 1000m² of Office/light industrial floor space (Class B1). Currently the site is industrial in character with several employment buildings being located across the site with a majority of the remaining areas of the site being hard standing and car parking. The Shenstone Neighbourhood Plan also notes that it is anticipated that the redevelopment of the site will provide step free access to the adjacent train station and suitable areas of green space within the development.

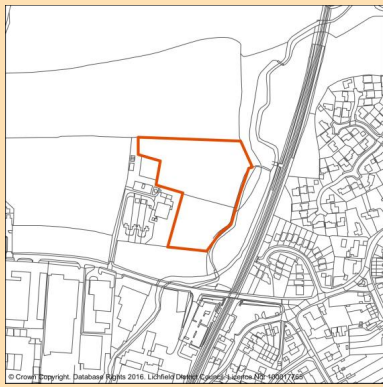
Key development considerations:

- See Shenstone Neighbourhood Plan, specifically Policy HA1 (Land at Shenstone Business Park and Birchbork Industrial Estate, Lynn Lane) and accompanying text and development principles.

Site S2 (Shenstone 2): Land adjacent Shenstone Pumping Station, Lynn Lane, Shenstone

S2: Land adjacent Shenstone Pumping Station, Lynn Lane, Shenstone

Site allocated through policy S1



Site area (Ha)	1.5
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Approximate dwelling yield	40
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The site is primarily open land partly used for agriculture and is located to the west of Shenstone adjacent to the Shenstone Pumping Station and the Cross City Line.

Key development considerations:

- The SFRA identifies that the site is adjacent to areas of high flood risk (Flood Zone 2 & 3) although the site itself is in Flood Zone 1. Consequently consideration and implementation of suitable measures to manage the potential impacts of flooding and to manage surface water run off.
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the adjacent ancient wood land and 'lomas land' (designated local green space).
- Access to site to minimise the impact of traffic upon the existing road network, particularly within the Conservation Area.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.

Site S3 (Shenstone 3): Land off Millbrook Drive, Shenstone

S3: Land off Millbrook Drive, Shenstone

Site allocated through policy S1



Site area (Ha)	0.5
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Approximate dwelling yield	10
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The site is currently open agricultural land located on the northern edge of the village

Key development considerations:

S3: Land of Millbrook Drive, Shenstone

- The SFRA identifies that the site is adjacent to areas of high flood risk (Flood Zone 2 & 3) although the site itself is in Flood Zone 1. Consequently consideration and implementation of suitable measures to manage the potential impacts of flooding and to manage surface water run off.
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the adjacent ancient wood land and 'lomas land' (designated local green space).
- Access to site to minimise the impact of traffic upon the existing road network, particularly within the Conservation Area.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural. Particular regard should be given to opportunities to preserve and enhance connectivity to the 'lomas land' which is designated as a local green space through the Shenstone Neighbourhood Plan.
- Suitable access to be provided off Millbrook Drive.

Whittington**Policy W1: Whittington Housing Land Allocations**

The following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

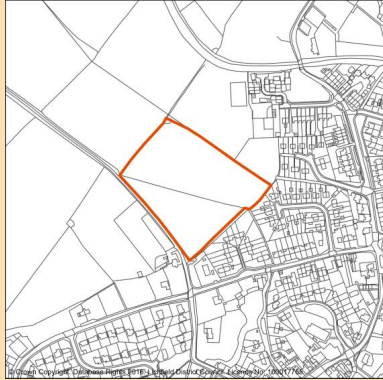
Site reference	Site Name	Approx. yeild of homes delivered by 2029
W1	Land at Huddlesford Lane, Whittington	60
W2	Former Whittington Youth Centre, Main Street, Whittington	8
W3	Land at Chapel Lane & Blacksmith Lane, Whittington	10
W4	Land west of Common Lane, Whittington	10
Total		88

Changes will be made to both the Green Belt Boundary and the village settlement boundary , as shown on the Policies Map, to accommodate residential allocations (Sites W1 and W4) to assist in meeting the housing requirement for Whittington.

Site W1 (Whittington 1): Land at Huddlesford Lane, Whittington**W1: Land at Huddlesford Lane, Whittington**

Site allocated through Policy W1

W1: Land at Huddlesford Lane, Whittington



Site area (Ha)	2.7
Approximate dwelling yield	60

The site is currently in agricultural use and is located on the north eastern edge of the village. To the north west the site is bounded by allotments and a large area of open space which provides playing pitch facilities, an equipped play area and a MUGA.

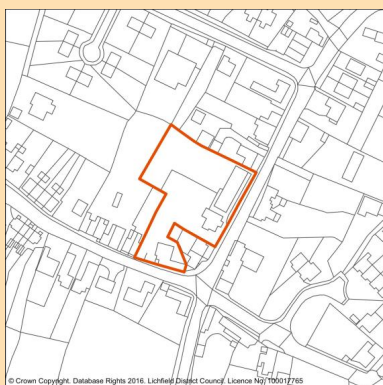
Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site. Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.
- Access to site to minimise the impact of traffic upon the existing road network, particularly within the Conservation Area. Suitable access to be provided off Huddlesford Lane.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks including potential linkages to the canal.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.

Site W2 (Whittington 2): Former Whittington Youth Centre, Main Street, Whittington

W2: Former Whittington Youth Centre, Main Street, Whittington

Site allocated through Policy W1



Site area (Ha)	0.3
Approximate dwelling yield	8

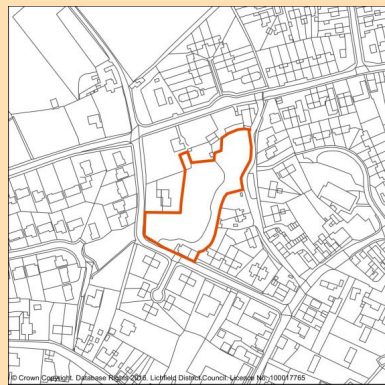
Located at the centre of the village this brownfield site was formally the Whittington Youth Centre. The has a prominent position on the cross roads of Church Street and Main Street and is located within the Conservation Area. Within the site boundary is a Grade II listed building, part of the former village school which was previously located on the site. The Whittington War Memorial is located on the southern edge of the site.

Key development considerations:

- Design of scheme will need to consider listed building within the site boundary and adjacent residential properties, particularly those located to the south east of the site on the cross roads.
- Access to site to minimise the impact of traffic upon the existing road network, particularly within the Conservation Area. Suitable access will need to be achieved from either Church Street or Main Street.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks.

Site W3 (Whittington 3): Land at Chapel Lane & Blacksmith Lane, Whittington**W3: Land at Chapel Lane & Blacksmith Lane, Whittington**

Site allocated through Policy W1



Site area (Ha)	0.6
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Approximate dwelling yield	10
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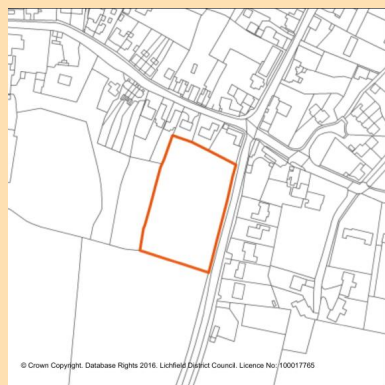
The site is located in the centre of the village within the Conservation Area. The site is bounded by mature trees and vegetation and residential development. Most recently the site has been used for the sighting of storage containers. Within the site to the south is a disused former chapel.

Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site. Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.
- Access to site to minimise the impact of traffic upon the existing road network, particularly within the Conservation Area. Suitable access to be provided off Chapel Lane or Blacksmith Lane.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks.
- Opportunities to make use of the chapel building within a proposed development should be considered.

Site W4 (Whittington 4): Land west of Common Lane, Whittington**W4: Land west of Common Lane, Whittington**

Site allocated through Policy W1



Site area (Ha)	0.6
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Approximate dwelling yield	10
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The site is located to the south of the village adjacent to the Conservation Area. The site is bounded by mature trees and vegetation on three sides and residential development to the north and east. The site is part of a larger parcel of land which extends to the south, however the appropriate site boundary is considered to coincide with the adjacent field boundaries to the west.

Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site.

W4: Land west of Common Lane, Whittington

- Access to site to minimise the impact of traffic upon the existing road network, particularly within the Conservation Area. Suitable access to be provided off Common Lane.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks.

15 Other Rural

Policy OR1: 'Other Rural' Housing Land Allocations

The following sites, shown on the adopted local plan policies map, are allocated for residential development within the Plan period, subject to the 'Key Development Considerations' set out below. 'Key Development Considerations' are not all encompassing, other matters may arise during the planning application process that applicants will need to address.

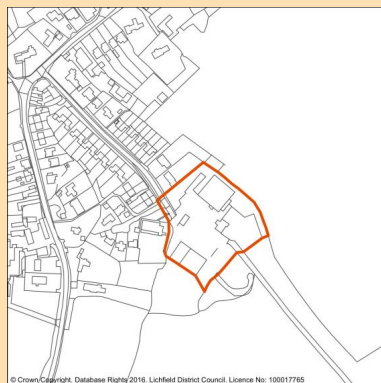
Site reference	Site Name	Approx. yeild of homes delivered by 2029
H1	Fish Pitts Farm, Harlaston	14
HR1	Land at Uttoxeter Road, Hill Ridware	51
KB1	Land at Lichfield Road, Kings Bromley	16
OR1	Packington Hall, Tamworth Road	24
OR2	Lamb Farm, London Road, Canwell	7
OR3	Footherley Hall, Footherley Lane	26
OR4	Derry Farm, Birmingham Road	6
OR5	Station Works, Colton Road	14
Total		158

Changes will be made to the village settlement boundaries for Harlaston, Hill Ridware and Kings Bromley, as shown on the Policies Map, to accommodate the residential allocations (Sites H1, HR1 and KB1).

Site H1 (Harlaston 1): Fish Pitts Farm, Harlaston

H1: Fish Pitts Farm, Harlaston

Site allocated through Policy OR1



Site area (Ha) 1.1

Approximate dwelling yield 14

The site consists primarily of a farmhouse and various agricultural buildings and is located on the southern edge of the village.

H1: Fish Pitts Farm, Harlaston

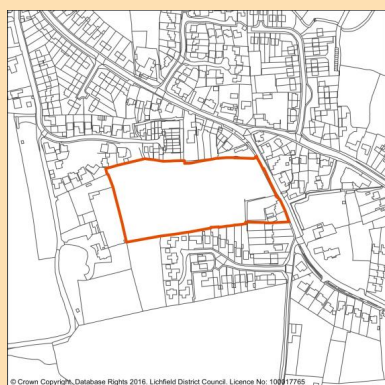
Key development considerations:

- Design and scale of development to be considered in the context of the site's location within and adjacent to the conservation area and proximity to heritage assets (including locally listed farm house).
- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the canal and location within the National Forest and Central Rivers Initiative areas.
- Tree preservation orders within the site boundary will need to be considered and accommodated within the design of any proposals.
- Access to site to minimise the impact of traffic upon the existing road network, particularly within the Conservation Area.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks.
- Scheme should be designed to take account of the edge of village location and manage the transition from urban to rural.

Site HR1 (Hill Ridware 1): Land at Uttoxeter Road, Hill Ridware

HR1: Land at Uttoxeter Road, Hill Ridware

Site allocated through Policy OR1



Site area (Ha)	2.1
Approximate dwelling yield	51

Located to the west of the village the site is currently in agricultural use and is surrounded on three sides by residential development. Within the site boundary is the former Royal Oak Public House which fronts onto Uttoxeter Road.

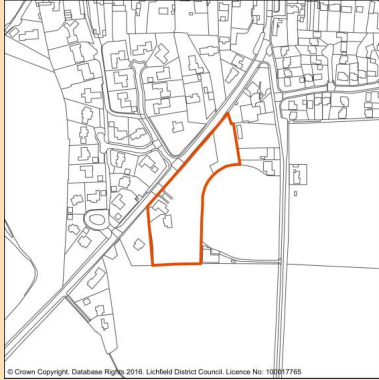
Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site and its proximity to the canal and location within the National Forest and Central Rivers Initiative areas.
- Tree preservation orders adjacent to the site boundary will need to be considered and accommodated within the design of any proposals.
- Connectivity to village and the services within the settlement along with access to green infrastructure networks.
- Suitable access to be provided off Uttoxeter Road.

Site KB1 (Kings Bromley 1): Land at Lichfield Road, Kings Bromley

KB1: Land at Lichfield Road, Kings Bromley

Site allocated through Policy OR1

KB1: Land at Lichfield Road, Kings Bromley

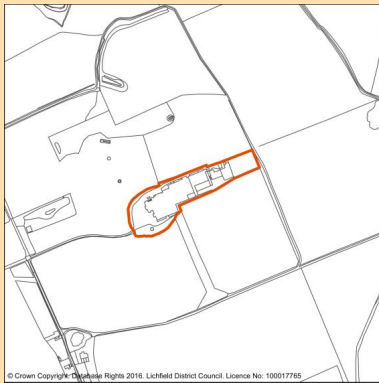
Site area (Ha)	0.8
Approximate dwelling yield	16

Located to the south of the village between the Lichfield Road and Kings Bromley cricket ground the SHLAA 2016 notes that the site was under construction for the permitted 16 dwellings.

Key development considerations: N/A

Site OR1 (Other Rural 1): Packington Hall, Tamworth Road**OR1: Packington Hall, Tamworth Road**

Site allocated through Policy OR1



Site area (Ha)	2.3
Approximate dwelling yield	24

The site is currently a disused factory attached to the Grade II listed Packington Hall building. The site is located within the open countryside between Lichfield and Tamworth.

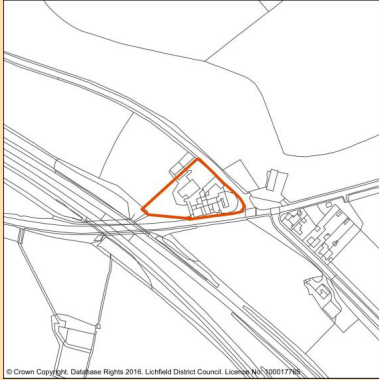
Key development considerations:

- Design of scheme should ensure listed building is protected.
- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Scheme should be designed to take account of its location within the Green Belt and should seek to preserve 'openness'.

Site OR2 (Other Rural 2): Lamb Farm, London Road, Canwell**OR2: Lamb Farm, London Road, Canwell**

Site allocated through Policy OR1

OR2: Lamb Farm, London Road, Canwell



Site area (Ha)	0.4
Approximate dwelling yield	7

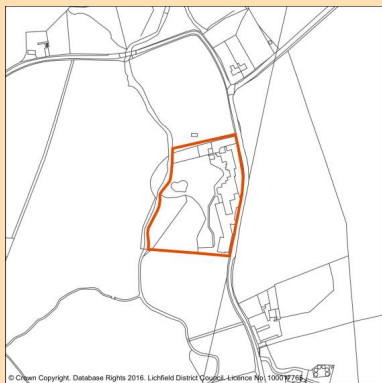
The site consists of a range of agricultural buildings and is located within the open countryside. The SHLAA 2016 notes that the site was under construction.

Key development considerations: N/A

Site OR3 (Other Rural 3): Fotherley Hall, Fotherley Lane

OR3: Fotherley Hall, Fotherley Lane

Site allocated through Policy OR1



Site area (Ha)	1.6
Approximate dwelling yield	26

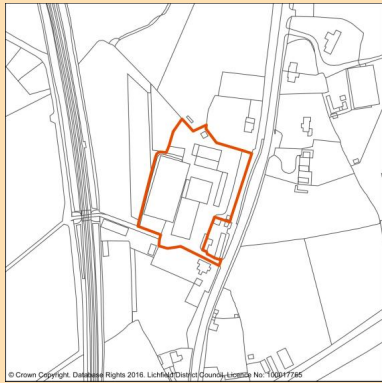
The site currently provides residential care for people suffering with dementia. Planning permission was granted in 2015 for the construction of 26 apartments. The site is located within the open countryside to the south of Shenstone.

Key development considerations:

- The SFRA identifies that the site is adjacent to areas of high flood risk (Flood Zone 2 & 3) although the site itself is in Flood Zone 1. Consequently consideration and implementation of suitable measures to manage the potential impacts of flooding and to manage surface water run off.
- Potential ecological impacts should be considered due to the greenfield nature of the site.
- Scheme should be designed to take account of its location within the Green Belt and should seek to preserve 'openness'.

Site OR4 (Other Rural 4): Derry Farm, Birmingham Road**OR4: Derry Farm, Birmingham Road**

Site allocated through Policy OR1



Site area (Ha)	0.9
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Approximate dwelling yield	6
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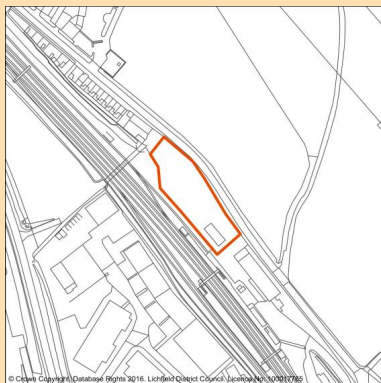
The site consists of a number of agricultural buildings and paddocks and is located directly adjacent to the Birmingham Road within the open countryside to the south of Shenstone.

Key development considerations:

- Potential ecological impacts should be considered due to the greenfield nature of the site.
- Scheme should be designed to take account of its location within the Green Belt and should seek to preserve 'openness'.

Site OR5 (Other Rural 5): Station Works, Colton Road**OR5: Station Works Colton Road**

Site allocated through Policy OR1



Site area (Ha)	0.4
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Approximate dwelling yield	14
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Site is currently a warehouse with uses associated to the adjacent railway line.

Key development considerations:

- Completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation measures are required.
- Measures to mitigate potential noise from adjacent railway line.

Appendix A Schedule of Deleted Policies

A.1 To be populated with schedule of deleted saved policies.

Appendix B Changes to Local Plan Strategy

B.1 To be populated with schedule of changes to the Local Plan Strategy.

Appendix C Implementation & Monitoring

C.1 See Local Plan Strategy Appendix A.

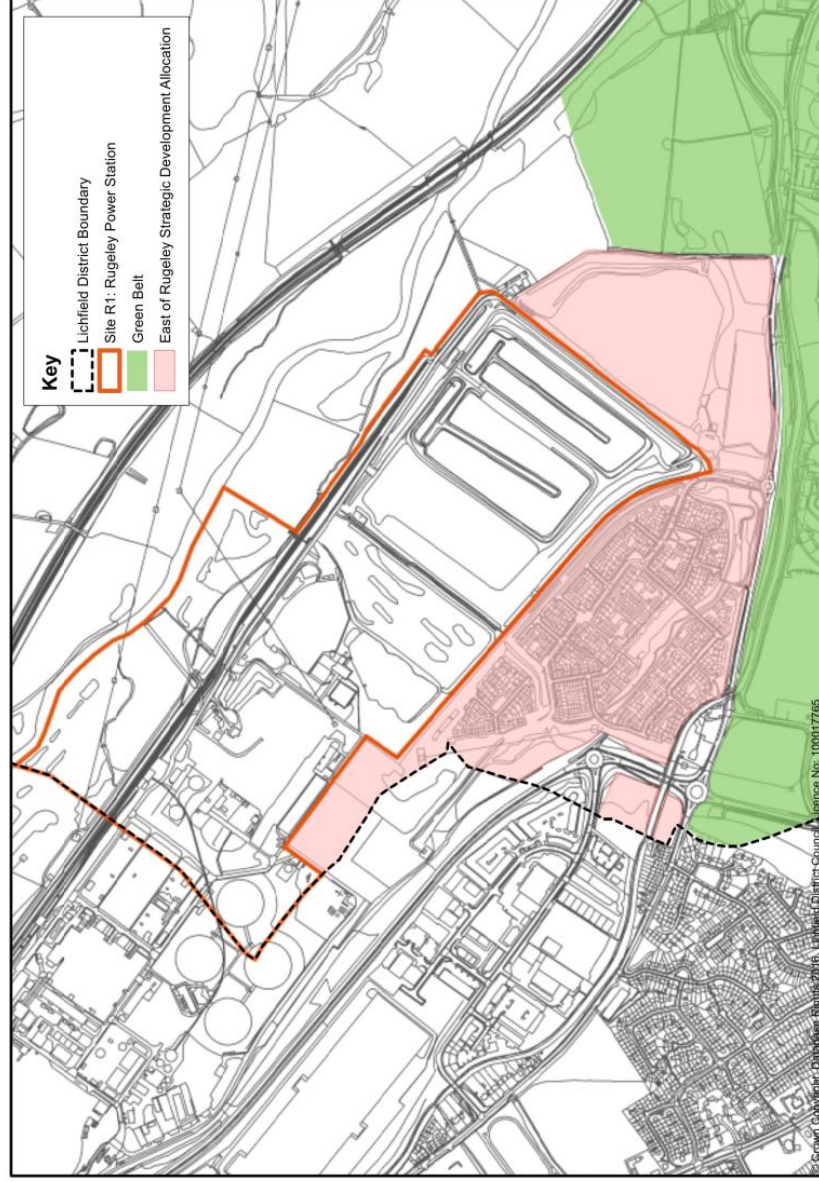
Appendix D Housing Trajectory

D.1 <Trajectory to be inserted>

Appendix E Rugeley Power Station Concept Statement

E.1 Policy R1: East of Rugeley Housing Land Allocations allocated the Former Rugeley power Station as a site for a sustainable well designed mixed use development to provide approximately a minimum of 800 dwellings, appropriate associated facilities and transport, social and physical infrastructure. The site is part of a much wider large scale site which straddles both Lichfield District and Cannock Chase District local planning authority boundaries. Only the extent of the site within Lichfield District is shown on Map E.1.

Map E.1 Site R1: Rugeley Power Station Allocation



Concept Rationale

E.2 Development to the Former Rugeley Power Station site to the east of Rugeley will create a logical extension to the East of Rugeley SDA and support the redevelopment of a significant brownfield site. It will provide physical and social integration of new development with the adjacent committed/developed residential scheme (Former Rugeley A) and the existing settlement of Rugeley, particularly with regard to creating linkages with services and facilities in Rugeley, Brereton and Armitage with Handscare. Sustainable development principles should ensure the development makes the best use of land and has regard to the character of the surrounding area, the topography of the site, the flood zone and ecological interests. The design strategy should include:

1. The precise scale of new development to be determined through a balanced view of the physical capacity of the site, including the topography, existing site constraints and assets, ecological interests, the number of dwellings required to support local services, the desired character of the development and a requirement to provide a mix of dwelling types and sizes, including affordable housing.
2. Development to have regard to the semi-rural setting, which requires a design response to ensure the development is integrated into the landscape, taking account of natural features including topography and existing vegetation and provision of appropriate new landscaping.
3. Sustainable transport principles, with the promotion of walking and cycling links to the existing settlement and provision/links to public transport facilities.

Rugeley Power Station Concept Statement

E.3 This concept statement provides further details in support of Policy R1 of the Local Plan Allocations and should be used to guide any future masterplan, SPD and development proposals for the Rugeley Power Station site.

Strategic Objectives for the site:

1. To integrate the development of a minimum of 800 homes and associated facilities within a landscape setting⁽ⁱ⁾.
2. To ensure the protection and enhancement of ecological interests including the management and future maintenance of landscape and important recreation features.
3. To provide strong walking and cycling links through the development and between the new and existing residential developments, building on existing linkages and enhancing the sustainable transport options available within the East of Rugeley area.
4. To ensure a good degree of physical and social integration with the existing settlement.

E.4 It is intended that a development/planning brief, adopted as a Supplementary Planning Document (SPD) for the whole Former Rugeley Power Station site will be produced in collaboration between Lichfield DC and Cannock Chase DC, with support from other partners. The principles of which should be followed within any future masterplan for the site. The brief and masterplan will demonstrate adherence to current best practise in urban design and specify what further, detailed design guidance (e.g. design codes etc) will be provided.

The design strategy should include:

1. The extent to which the built form responds to the topography of the site and mature landscape features.
2. A landscape framework and planting strategy should be produced as a driver for the proposed layout, that integrates the development within the landscape and shows how the new urban

ⁱ The total quantum and mixture of uses across the wider site will need to be verified by further work. Information to date identifies that a minimum of 800 dwellings is achievable.

edge will be formed and managed. This must demonstrate both how a net gain to biodiversity will be achieved via the creation of new areas of habitat in-line with the Lichfield District Habitat Opportunity Map; and that existing mature trees and hedgerows will be retained, incorporated, extended and enhanced as part of the proposed organisation of built form. Maintained and improved landscape features should be integrated with the provision of sustainable drainage systems (SuDS).

3. Natural assets within the site should be retained. This should ideally include the retention of existing sports facilities to the centre of the site (excluding the respective buildings), the borrow pit as a landscape/water feature and the mature tree belt along the Rugeley Bypass.
4. A strategy for new planting should demonstrate integration throughout the new development, clearly explaining how the countryside can be drawn into the proposed development through the integration of multi-functional green spaces. These combined with street trees, courtyard and garden planting should provide a verdant extension to the East of Rugeley. The strategy must demonstrate how an urban extension can be produced that will be visually distinctive, but also robust in terms of climate change, encouraging alternative modes of movement and creating opportunities for bringing wildlife into the town.
5. An account of views out of and across the site, which should be used to generate the planned layout.
6. A continuous network of pedestrian, cycle and vehicular route ways should be provided that connects into and integrates with the existing development (including the East of Rugeley SDA) and facilities, particularly Rugeley Town Centre, and surrounding movement networks, including public rights of way. There should be a legible street hierarchy, where streets are designed as 'linear places' rather than movement corridors.
7. A minimum of two main points of vehicular access should ideally be sought. Integration with and use of existing points of access, including those already consented for the Rugeley A site should be given priority where possible.
8. Good access to public transport, and provision for a high level of amenity, information and safety for passengers.
9. Vehicle parking as an integral part of the plan for the scheme, to ensure limited impact on visual amenity and residential privacy. Any surface level parking areas should make provision for generous planting in order to aid visual containment and help to ameliorate the effects of climate change.
10. Measures to demonstrate how the amenities of existing residents living on the boundaries of this site will be respected and protected, with any proposed layout justified on this basis.
11. A proposed built form that supports the strategic objectives for the development of this site, but also creates a locally distinctive development.
12. How the scheme proposes to provide new homes and buildings of a high quality, inspired by the character and existing architectural design of this part of Rugeley. Regard must be given to the Districts' Sustainable Design SPD.
13. The provision of sustainable drainage systems and flood mitigation measures, having regard to existing water features throughout the site and the Flood Zone to the north of the railway line.
14. Opportunities for public art should be integrated within the design of the development where possible, having regard to the historic use of the site as a power station.
15. The existing allotment provision on the site should be retained and opportunities for further provision to meet local demand where identified.
16. Regard will need to be given to impact on the Cannock Chase Special Area of Conservation and any mitigation that may be required under the Habitat Regulations.

Infrastructure

E.5 Developers' will be expected to enter into a legal agreement to ensure the provision of necessary infrastructure and facilities detailed in order to make the development acceptable.

In summary the following is required:

- A range of housing in accordance with Development Management Policies H1 and H2 and having regard to needs arising with Rugeley;
- Neighbourhood facilities including a community hub to incorporate a community/sports building and small scale convenience retail provision;
- Provision of a one form entry primary school to be accommodated within the scheme at an accessible location.
- Provision for open space, sport and recreation facilities in line with Development Management Policies HSC1 and HSC2 and incorporating playing pitches, amenity green space, equipped play, allotments, and the retention/protection of any existing sports and recreation facilities that are not justified to be surplus to requirements;
- Landscaping and Green Infrastructure provision to include the creation of areas of appropriate and sustainable habitats sufficient to achieve a measurable net-gain to biodiversity in line with the requirements of Policy NR3 and the Biodiversity and Development SPD. This must include the retention of quality hedgerows and significant trees, and their incorporation into the landscape, and the allowance for significant tree canopy cover in line with Development Management Policies NR4 and NR6 and the Trees Landscaping and Development SPD 2016;
- A clear strategy for delivering links to Rugeley Town Centre, and Armitage with Handsacre, showing how these will be incorporated into an integrated open space and green infrastructure network, including links to the canal and existing green spaces;
- Protection of local areas and habitats of biological interest;
- The provision of public transport to serve the site: all development should be within 350m of a bus stop and should promote of smarter travel choices;
- The provision of pedestrian and cycling routes throughout the site, linking to the green infrastructure network and existing settlements, services and facilities beyond the site boundaries including safe crossing points;
- Provision of a minimum of two main points of vehicular access should ideally be sought.;
- The provision and maintenance of sustainable drainage systems and flood mitigation measures, integrating the retention of existing water courses where possible and having regard to the existing Flood Zone to the north of the railway line;
- Measures to address water supply and waste water treatment, relocation and provision of utilities infrastructure
- The incorporation of public art.

Densities

E.6 Variation of densities across the site should occur with lower densities towards the southern and eastern edges in order that that the built edge can be assimilated into the countryside and associated views thereto/from.

Management & Community Engagement

E.7 The masterplan for the site should be accompanied by a framework for the management and maintenance of the physical, green, community and social infrastructure as appropriate. This should encompass a model for engagement with the local community which should empower all sections of the community to participate in the decision-making process, in line with the aims of the Council's Statement of Community Involvement (SCI).

Assumed Delivery

E.8 Assumed deliver of a minimum of 800 homes.

Glossary

Term	Abbreviation	Meaning
Adaptation		A change or modification to suit new conditions or needs ,e.g. adapting to the effects of climate change.
Adoption		The final confirmation of a development plan or Local Development Document as having statutory status by a Local Planning Authority (LPA).
Affordable Housing		Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should: <ul style="list-style-type: none"> Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.
Affordable Rent		Affordable rented homes are made available to tenants at up to a maximum of 80% of market rent and are allocated in the same way as present social housing.
Amenity Greenspace		Areas such as parks or recreational fields which can be used by all people either through visual amenity and/or for informal sport and leisure.
Annual Monitoring Report	AMR	A report submitted to Government by local planning authorities or regional planning bodies assessing Local Development Framework progress and policy effectiveness.
Appropriate Assessment	AA	An assessment of the potential effects of a proposed plan, in combination with other plans and projects, on one or more European sites of nature conservation/biological importance. As required as part of the Habitats Regulations Assessment.
Area of Outstanding Natural Beauty	AONB	A statutory National Landscape designation to provide special protection to defined areas of natural beauty. These are designated by Natural England.
B1 - Business		In terms of the Use Class Order, B1 represents businesses such as research and development and light industry.
Biodiversity		The whole variety of life encompassing all genetics, species and ecosystem variations. This includes diversity within species, between species and of ecosystems.
Biodiversity Action Plan	BAP	A plan concerned with conserving, protecting and enhancing biological diversity.
Biomass		The biodegradable fraction of products, wastes and residues from agriculture (including plant and animal substances), forestry and related industries.
Broad Development Location		A broad development location is a broad area of search, within which, allocations for development will be considered through the Local Plan Allocations document.

Brownfield Development or Sites (Previously Developed Land)		Site available for re-use which has been previously developed, and is either abandoned or underused. The definition covers the curtilage of the development.
Building for Life	BFL	A national standard for well designed homes and neighbourhoods, developed by Communities And Built Environment and the Home Builders Federation.
Bulky Goods		Retail goods of a large physical nature (for example DIY, furniture, carpets) that sometimes require large areas for storage or display.
Building Research Establishment's Environmental Assessment Method	BREEAM	A widely used environmental assessment method for all buildings setting the standard for best practice in sustainable design.
Central Rivers Initiative	CRI	A partnership approach to managing the River Trent and River Tame in the region between Tamworth and Burton upon Trent.
Circular		A paper produced by the government to provide guidance and instruction.
Climate Change		Long term change in weather patterns and increased global temperature, which is likely to be caused by an increase in Carbon emissions.
Clinical Commissioning Groups	CCG	Clinical commissioning groups are NHS organisations set up by the Health and Social Care Act 2012 to organise the delivery of NHS services in England. They replace primary care trusts.
Code for Sustainable Homes		Criteria set out by the government to help enforce sustainable residential development. The Code begins at Level 1 being the least sustainable through to Level 6, the most sustainable.
Comparison Goods		Goods that consumers buy at infrequent intervals and normally would compare prices before buying e.g. TV, fridges, clothes etc.
Combined Heat and Power	CHP	The use of waste heat from power generation to provide heating for a building or a neighbourhood.
Community Infrastructure Levy	CIL	A new provision which empowers, but not requires, Local Authorities to obtain a financial contribution on most types of new development based on the size and type of the development. The proceeds of the levy are to be spent on local and sub-regional infrastructure to support the community.
Conservation Area		Areas of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance.
Convenience Goods		Widely distributed and relatively inexpensive goods which are purchased frequently and with minimum of effort, such as petrol, newspapers, and most groceries.
Civic Spaces		An extension of the community or public institutions which form the spaces between buildings, such as market squares.
Decentralised Energy Supply		The use of energy from on-site or renewable sources limiting the need to draw energy from the national supply.

Deliverable Urban Windfalls		A small scale development in the urban area which comes forward for development and is suitable for delivery but has not been previously included in a development plan.
Developable Urban Windfalls		A small scale development in the urban area which comes forward for development but has not been previously included in a development plan, and may be considered suitable for development in the future.
Developer Contributions		Monetary contributions which may be made by a developer as part of a legal agreement (S106 or CIL) when a planning permission is granted. Monies are used to provide local facilities and all types of infrastructure.
Development		Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land."
Development Management		The management or 'control' planning system which requires planning permission to be obtained, and in line with policy, before development can take place.
District Park		A significant area of publicly accessible natural or semi-natural open space offering opportunities for recreation and play also referred to in this document as a Country Park.
Diversification of Rural Employment		The establishment of new enterprises in rural locations often re-using rural buildings and land that is no longer used for agriculture.
Ecological footprint		A measure of human demand on the Earth's ecosystems and natural resources.
Evidence Base		The information and data gathered by local authorities to justify the "soundness" of the policy approach set out in Local Plan and supporting documents, including physical, economic, and social characteristics of an area. This includes consultation responses.
Examination in Public	EIP	The consideration of public views on a development plan document, or proposed changes to it, held before an independent inspector.
Flood plain		Generally flat-lying areas adjacent to a watercourse, tidal lengths of a river or the sea where water flows in times of flood or would flow but for the presence of flood defences.
Floorspace capacity		Available space for office, retail or industrial units within a specific area.
Grant Aid		Money coming in from central government or other external sources for a specific project.
Green Belt (not to be confused with the term 'greenfield')		<p>A statutory designation of land around certain cities and large built-up areas, which aims to keep the defined area permanently open or largely undeveloped. Areas of Green Belt within Lichfield District form part of the West Midlands Green Belt. The purposes of Green Belt are to:</p> <ul style="list-style-type: none"> • check the unrestricted sprawl of large built up areas; • prevent neighbouring towns from merging; • safeguard the countryside from encroachment;

		<ul style="list-style-type: none"> • preserve the setting and special character of historic towns; and • assist urban regeneration by encouraging the recycling of derelict and other urban land.
Green Infrastructure		The physical environment within and between our cities, towns and villages. It is a network of multi-functional open spaces, including formal parks, gardens, woodlands, green corridors, waterways, street trees and open countryside.
Green Networks or Corridors		Linking rights of way, cycle routes, canals, rivers, parks and woodland to create greater accessibility to the countryside and provide potential for improved biodiversity.
Greenfield Land or Site		Land (or a defined site) which has not been built on before or where the remains of any structure or activity have blended into the landscape over time.
Greenway		Part of green infrastructure, a corridor of undeveloped land, as along a river or between urban centres, that is reserved for recreational use or environmental preservation.
Gypsies & Travellers		Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently.
Habitat Regulations Assessment	HRA	See appropriate assessment.
Heathland		An area of open uncultivated land dominated by dwarf shrubs including heath, gorse, bog, bracken and scrub.
Historic Environment Character Area	HECA	An area of defined character in the landscape, such as medieval field patterns.
Historic Environment Record	HER	A system for recording information, such as known archaeological sites & finds, designated sites, historic landscapes, historic buildings and other features in the landscape.
Historic Landscape Character		The identification of the historic development of today's landscape, and the resultant pattern of physical features due to geography, history and tradition.
Homeworking		Relates to the growing practice of working from home, especially when related to the use of Information Communication Technology.
Housing Association	HA	Private, non-profit organisations that provide social housing for people in need of a home.
Housing Market Area		A geographical area which is relatively self-contained in terms of housing demand
Housing mix		The provision of a mix of house types, sizes and tenures in an area.
Implementation		The practical delivery of a measures that form part of a plan.

Indices of Multiple Deprivation	IMD	The index combines a number of indicators which focus on a range of social, economic and housing issues, and are then used to provide an overall deprivation rank for these areas. Published by the Office of the Deputy Prime Minister.
Information Technology and Communication	ITC	Communication devices and the services contained within them, such as computers, mobile phones and satellite systems.
Infrastructure		The basic structures and facilities needed to support a society or organisation.
Infrastructure Delivery Plan	IDP	A plan to implement the necessary social, physical and green infrastructure, required to create sustainable communities in line with a Local Plan.
Intermediate Affordable Housing		Housing at prices and rents above those of social rent, but below market price or rents. These can include shared equity products (e.g. HomeBuy), other low cost homes for sale and intermediate rent.
Issues, Options & Preferred Options , Policy Directions and Shaping Our District		The "pre-submission" consultation stages carried out on an emerging Local Plan document with the objective of gaining public consensus over proposals ahead of submission to Government for independent examination.
Key Rural Settlements		Defined settlements outside major towns/urban areas providing services and facilities.
Lichfield District Council	LDC	The local authority responsible for matters including planning, environmental health, waste collection, housing, parks and open space.
Lichfield Transport and Development Strategy	LTaDS	A package of measures to deliver road and public transport improvements for Lichfield City.
Lichfield Sustainability Working Group	LSWG	A group established to undertake the sustainability appraisal and SEA for the Local Plan.
Local Centre		Small shops and perhaps limited services, serving a small catchment. Sometimes also referred to as a local neighbourhood centre or key rural centre.
Local Planning Authority	LPA	The Local Authority or Council that is empowered by law to exercise planning functions. Often the local Borough or District Council.
Local Plan		The plan for future development within Lichfield District up to 2029, drawn up by the local planning authority in consultation with communities and other bodies. The Local Plan when adopted forms the statutory plan for the District. The Lichfield District Local Plan will be divided into two documents; the Local Plan Strategy and the Local Plan: Allocations.
Local Plan: Strategy		This document. The local plan strategy contains the broad policy directions and long term strategy to manage development, infrastructure and services across the District. The strategy consists of strategic policies which set out how the strategy will be implemented and monitored.
Local Plan: Allocations		Second part of the Lichfield District Local Plan which will contain policy based allocations to manage development within the District until 2029

Local Geological Sites	-	Non-statutorily protected sites of regional and local importance for geodiversity (geology and geomorphology) in the United Kingdom. Local Geological Sites together with Local Wildlife Sites are often referred to as Local Sites.
Local Transport Plan	LTP	A five-year integrated transport strategy, prepared by local authorities in partnership with the community. The plan sets out the resources for delivery of the targets identified in the strategy.
Major Development		For residential development this includes sites of 1.5ha or more, or for sites of 10 dwellings or more. For commercial development this includes sites of 1 ha or more, or change of use of site for 1,000 square metres or more.
Manual for Streets		A joint publication by the Departments for Transport and Communities and Local Government to provide guidance for practitioners involved in the development of new streets, with a strong focus on people friendly streets.
Midlands Plateau Integrated Biodiversity Delivery Area		An area that comprises important concentrations of biodiversity which are to be improved.
Mitigation		Measures to avoid, reduce or offset the significant adverse effects of an external factor e.g. Lessening the effects of climate change.
Mixed use (or mixed use development)		Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.
National Forest		A national project for woodland creation, tourism and economic revival.
National Planning Policy Framework	NPPF	Document containing all national planning policy published in March 2012. The National Planning Policy Framework replaced all previously issued Planning Policy Statements (PPS) and Planning Policy Guidance Notes (PPG).
Natural assets		Stocks of natural raw materials, including forests, fisheries, soil, and minerals; and the capacity of the environment media such as air and water to absorb and decompose the wastes from production and consumption.
Natural & Semi-natural Greenspace		Includes woodlands, wetlands, urban forestry, Local Geological Sites, scrub and grassland.
Nature Reserves		A protected area of wildlife or other geological interest. Can also be used to provide opportunity for special areas of research.
Neighbourhood Centre		An group of essential local services which may comprise a shop, post office, take away, health centre and a pharmacy. See also, local centre.
Neighbourhood Plan		An area based plan prepared by it's community as defined in the Neighbourhood Planning (General) Regulations 2012. Once 'made' a neighbourhood plan becomes part of the development plan for the area.
Neighbourhood Area (Designated Neighbourhood Area)		An area designated for the purposes of undertaking and producing a Neighbourhood Plan for that area as defined in the Neighbourhood Planning (General) Regulations 2012.
Offices		Defined by Class A2 of the Use Class Order, including financial and professional services, rather than businesses which are covered by Class B1 of the Use Class Order.

Open Space		All space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation. They can also act as a visual amenity and a haven for wildlife.
Other Rural Settlements		Smaller villages that do not have a good range of public services.
Pitch (Gypsy and Traveller Sites)		A designated place for a family of Gypsies or Travellers to live.
Phasing		Distinct stages of development implemented in a sequential manner appropriate to demand.
Previously Developed Land	PDL	Land which is currently or has in the past been occupied by a permanent structure and associated infrastructure.
Primary Care Trust	PCT	An NHS primary care trust is a type of NHS trust, which is part of the National Health Service in England. The PCT formerly provided some primary and community services or commissions them from other providers, and are involved in commissioning secondary care.
Policies Map		A map of the District which shows planning policy designations spatially.
Regeneration		The economic, social and environmental renewal and improvement of rural and urban areas.
Regional Spatial Strategy	RSS	The RSS was a strategy for how a region should look in 15 to 20 years time and possibly longer. It identified the scale and distribution of new housing in region, indicates areas for regeneration, expansion or sub-regional planning and specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal. Regional Spatial Strategies were revoked by the Secretary of State. The Regional Spatial Strategy for the West Midlands no longer forms part of the development plan.
Registered Provider	RP	Also known as Registered Social Landlords. Is the generic name for all social landlords who provide low-cost social housing for people in housing need on a non-profit making basis.
Regulated Energy		Elements of a building's energy consumption to which minimum standards must be achieved to comply with Building Regulations. 'Regulated' energy includes space heating, hot water, lighting and ventilation (fans and pumps), but does not include appliances and small electrical items.
Renewable Energy		Energy produced from a sustainable source that avoids the depletion of the earth's finite natural resources, such as oil or gas. Sources in use or in development include energy from the sun, wind, hydro-power, ocean energy and biomass.
Retail Floorspace		Total floor area of the property that is associated with all retail uses. Usually measured in square metres.
Rural Housing Needs Survey		Research to establish housing demand and the satisfaction of existing residents within the rural area.
Rural Regeneration		Careful development in rural areas to ensure local housing needs are met and that there are suitable opportunities for employment to ensure economic sustainability.

Safeguarding		To ensure that no harm is caused to a particular feature.
Scoping Report		The first stage in the Sustainability Appraisal process.
Section 106 Agreement		A legal agreement under Section 106 of the 1990 Town & Country Planning Act. It is a way of addressing matters that are necessary to making a development acceptable in planning terms such as providing highways, recreational facilities, education, health and affordable housing.
Severn Trent Water Ltd.	STWL	The water treatment company for Lichfield District.
Site of Biological Importance	SBI	A non-statutory designation used to protect locally valued sites of biodiversity. Also referred to as Local Wildlife Sites.
Site of Special Scientific Interest	SSSI	A site identified under the Wildlife and Countryside Act 1981 (as incorporated in the Countryside and Rights of Way Act 2000) as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (basically, plants, animals, and natural features relating to the Earth's structure).
Social Rented Housing		Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant.
Soundness		A term referring to the justification of a Local Plan Document in line with legislation and national and regional guidance. To be tested at an Examination in Public.
Spatial Planning		Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. This includes policies which can impact on land use, for example by influencing the demands on, or needs for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.
Spatial Strategy		The overview and overall approach to the provision of jobs, homes, and all infrastructure over the plan period.
Special Area of Conservation	SAC	Strictly protected sites for rare and threatened species and habitats on land or sea as designated under the EC Habitats Directive.
Staffordshire County Council	SCC	The local authority responsible for matters including education, transport, highways, minerals and waste.
Staffordshire Strategic Partnership	SSP	A framework for all agencies, sectors and partners to work collectively to promote the economic, social and environmental well being of the County.
Strategic Centre		A local or town centre which provides a wide range of services and facilities such as shops, supermarkets, post office, banks, health centres etc.

Strategic Development Allocation	SDA	An area which has been identified and allocated for new development, which is significant to the spatial strategy as a whole. These allocations are usually complex, have long lead in times and can assist in the delivery of strategic infrastructure.
Strategic Flood Risk Assessment	SFRA	An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.
Strategic Housing Land Availability Assessment	SHLAA	An assessment of potential housing sites to inform the Core Strategy and subsequent allocations of land. The Strategic Housing Land Availability Assessment (SHLAA) which has been prepared in line with good practice guidance with the involvement of the development industry, local property agents and the local community, identifies the committed sites, additional urban capacity and a range of other sites that have been submitted for consideration. The SHLAA is not a policy document, but identifies the range of sites that are being given further consideration through the formulation of the Local Plan.
Strategic Housing Market Assessment	SHMA	An assessment of the estimated demand for market housing and need for affordable housing in a defined geographical area, in terms of distribution, house types and sizes and the specific requirements of particular groups and which considers future demographic trends.
Supplementary Planning Document	SPD	An SPD is a document that supports the Local Plan. It may cover a range of issues, thematic or site specific, and provides further detail of policies and proposals in a 'parent' Local Plan.
Supported Housing		A housing service aimed at helping people live more stable lives, including those who may have suffered from homelessness, addiction or other serious challenges to life.
Sustainability Appraisal	SA	An assessment to establish if the plan is promoting sustainable development. An assessment to comply with Section 39(2) of the Planning and Compulsory Purchase Act 2004 and further guidance, and the requirements for Strategic Environmental Assessment from European Directive 2001/42/EC
Sustainable Communities		Central Government refers to sustainable communities as 'places where people want to live and work, now and in the future'. Creating communities that are more sustainable will generally mean seeking to provide a range of homes, jobs and facilities that enables people to meet more of their needs locally without the need to make long journeys by private transport.
Sustainable Community Strategy	SCS	A strategy prepared by a community to help deliver local aspirations, introduced under the Local Government Act 2000. There is no longer a requirement for Local Authorities to prepare an SCS.
Sustainable Development		A widely used definition drawn up by the World Commission on Environment and Development in 1987: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The Government has set out four aims for sustainable development in its strategy "A Better Quality of Life, a Strategy for Sustainable Development in the UK". The four aims, to be achieved at the same time, are: social progress which recognises the needs of everyone; effective protection

		of the environment; the prudent use of natural resources; and maintenance of high and stable levels of economic growth and employment.
Sustainable travel / Sustainable Transport		Often meaning walking, cycling and public transport (and in some circumstances “car sharing”), which is considered to be less damaging to the environment and which contributes less to traffic congestion than one-person car journeys.
Sustainable Drainage Systems	SuDS	A replicate natural system which aims to reduce the potential impact of new and existing developments on surface water drainage discharges such as permeable paving or on site retention basins.
Third Sector		The Third Sector is a term frequently used to describe voluntary, community and not-for-personal profit organisations. The term is taken in reference to the private and public sectors.
Traffic Impact Assessment	TIA	An assessment of the effects upon the surrounding area by traffic as a result of a development, such as increased traffic flows that may require highway improvements.
Travelling Showpeople		Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently.
Unregulated energy		The expected energy use in a building which is not 'regulated' (see 'Regulated energy' above). Unregulated energy does not fall under Building Regulations, and most typically includes appliances and small electrical items.
Urban Cooling		The effect which can be achieved by increasing vegetation cover and reducing hard surface cover in built up areas to reduce very high temperatures.
Urban open space		Parks, play areas, sports fields, commons, allotments, green corridors alongside rivers/canals/railways and other open areas vital to the cultural, aesthetic and historic heritage of urban life.
Veteran Trees		Trees that are of interest biologically, culturally or aesthetically because of age, size or condition. Normally this means the tree is over 250 years old with a girth at breast height of over 3 metres. However, other factors must be considered such as the location and past management of the tree.
Viability		In terms of retailing, a centre that is capable of success or continuing effectiveness. More generally the economic circumstances which would justify development taking place.
Vibrancy		An area or street which is alive with activity.
Vitality		In terms of retailing, the capacity of a centre to grow or develop.
Waste Hierarchy		The waste hierarchy is the cornerstone of most waste minimisation strategies and refers to the 3Rs of reduce, reuse and recycle. The Staffordshire & Stoke-on-Trent Joint Core Strategy refers to 5 stages: eliminate, reduce, re-use,

		recycle, energy recovery & dispose. The aim of the waste hierarchy is to generate the minimum amount of waste and to extract the maximum practical benefits from products.
Water Framework Directive	WFD	A European Union Directive committing member states to achieve good qualitative and quantitative status of all water bodies by 2015.
Windfall Development or Site		A site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan. Most “windfalls” are referred to in a housing context.

Lichfield District



Local Plan Allocations Open Consultation

Regulation 18 Consultation

August – October 2016

Local Plan Allocations Open Consultation – Regulation 18 Consultation

The Local Plan Strategy was adopted in February 2015 and formed the first part of the new Lichfield District Local Plan. It sets out the spatial strategy and strategic planning policy for the District between 2008 and 2029. The Local Plan Strategy makes clear that a second document; the Local Plan Allocations will be progressed to consider a range of issues and add further detail to the strategic policy within the adopted plan.

Lichfield District Council is currently preparing the aforementioned Local Plan Land Allocations document. This document principally seeks to:

- Identify land allocations associated with meeting the growth requirements set out in the Local Plan Strategy (2015) including;
 - Determining remaining housing land requirements to deliver the overall 10,030 homes to 2029 in line with the adopted spatial strategy, including allocations of sites within the Broad Development Location (BDL) to the north of Tamworth, for housing in rural areas and the ‘Key Rural’ settlements;
 - Consideration of ‘infill’ boundaries for Green Belt villages (as set out in Core Policy 1);
 - Sites to meet the identified Gypsy and Traveller requirements;
 - Land allocations to meet the Employment Land/ requirements, including an additional 10 hectares to ensure flexibility of provision;
- Review the City and Town centre retail and office requirements, including identifying primary and secondary retail areas;
- Complete a review of any remaining Local Plan (1998) Saved policies;
- Consider Green Belt boundaries including the integration of the developed area of the former St Mathews hospital into Burntwood and development needs beyond the plan period; and
- Consider any issues arising through ‘Made’ and emerging Neighbourhood Plans where communities have sought the support of Lichfield District Council to progress with matters outside the scope of the Neighbourhood Plan. An example of this is review of local Green Belt boundaries.

For clarity the table below references the items above having regard to the relevant policies in the Local Plan Strategy:

TABLE 1

Issue to be addressed within Local Plan Allocations document.	Policy(s) within Local Plan Strategy
Delivering the remaining housing requirement through urban capacity and further allocations.	Core Policies 1 and 6, Policies Lichfield 4, Burntwood 4, North of Tamworth, Rural 1,

Allocation of sites within the Broad Development Location to the north of Tamworth and the Key Rural Settlements (Alrewas, Armitage with Handsacre, Fazeley, Mile Oak & Bonehill, Shenstone, Whittington) and other rural settlements/areas.	Frad4, Alr4, Arm4, Faz4, Shen4, Whit4, Rural 2.
'Infill' boundaries for settlements within the Green Belt.	Core Policy 1, Policy NR2.
Sites to meet Gypsy and Traveller requirements.	Policy H3.
Allocations to meet employment land requirements.	Core Policies 1 and 7.
City and Town centre retail and office requirements, including identifying primary and secondary retail areas.	Core Policies 1 and 9, Policies Lichfield 3 and Burntwood 3.
Review of remaining 1998 Local Plan Saved Policies	Local Plan Strategy Appendix J
Consideration of Green Belt boundaries including the integration of the developed area of the former St Mathews hospital into Burntwood and development needs beyond the plan period	Core Policy 1, Policies NR2, Burntwood 1, Arm4, Shen4, Whit4.
Consideration of issues arising from 'Made' or emerging Neighbourhood Plans	For example Little Aston Neighbourhood Plan Policy GB1 and where necessary.

This 'open' consultation represents an opportunity to feed into the formulation of the Local Plan Allocations document at an early stage. Following this consultation Lichfield District Council will be undertaking a 'Publication stage' consultation in due course. Following that we will then submit the Plan to the Secretary of State.

We'd like to take this opportunity to receive feedback on the above proposed content of the Local Plan Land Allocations document. A questionnaire has been developed to help feed comments received into the preparation of the document and is included at the end of this document.

This stage of consultation will be open until 5pm on the 10th October 2016. All responses should be made by this time via the following:

- Online through our 'Consultation Portal' - <http://lichfielddc-consult.limehouse.co.uk/portal> - using this method will enable you to register for email alerts for all upcoming planning policy consultations;
- Via Email – all responses must be emailed to developmentplans@lichfielddc.gov.uk ; and
- Via Post to - Spatial Policy & Delivery Team, District Council House, Frog Lane, Lichfield, WS13 6YZ.

All responses received by the close of the consultation will be considered, however individual acknowledgement of receipts will not be possible.

Local Plan Allocations Questionnaire

Question 1:

The primary purpose of this document is to ensure that we are including the correct matters within the Local Plan Allocations. Table 1 highlights the main matters which are to be considered through the Local Plan Allocations document. These are drawn from the adopted Local Plan Strategy.

Are there any other themes/issues that you feel need to be considered through the Local Plan Allocations document? Is there anything else you would like the council to consider at this stage?

In addition to confirming the content of the Local Plan Allocations we have identified some additional questions which are designed to assist in the development of the plan. You do not have to complete every question.

Question 2:

Lichfield District Council adopted the Local Plan Strategy in 2015. It sets out the strategic planning framework for Lichfield District. Find out more and download the Local Plan Strategy at www.lichfielddc.gov.uk/localplan

Although the council is not looking to change the Local Plan Strategy (2015) policies, there is some scope for policies to be reviewed if they appear based on evidence not to be working.

Are there any policies in the Local Plan Strategy that you consider are not effective/require immediate review? Please state which policies and why.

Question 3:

The Local Plan Allocations will identify sites to meet the housing need identified within the Local Plan Strategy (10,030 dwellings). The Local Plan Strategy already identifies seven large sites (known as strategic development allocations and broad development allocations).

The Local Plan Allocations document will only seek to allocate the residual amount of housing sites (removing the numbers allocated on the Strategic Development Allocation and Broad Development Location, planning permissions and commitments) and does not plan to review, nor allocate additional large scale housing sites. However if you have evidence which suggest that there are issues with the existing strategic land allocations or broad development location the council will need to review this.

Do you have any evidence which indicates the existing strategic housing allocations or land forming the broad development location north of Tamworth will not come forward?

Question 4:

Lichfield District Council has an open call for sites, this questionnaire is designed to supplement this process. When developing the Local Plan Allocations document the council will be using its existing evidence to determine which sites to allocate.

However, it's possible for us to consider additional sites now if you have a site that has not previously been assessed.

Are there any sites that you would like the council to consider for development?

Question 5:

The Local Plan Allocations document will seek to delineate settlement development boundaries based on existing and emerging evidence. The identification of a settlement boundary is important because this has an impact on the determination of planning proposals. As an example, being outside the boundary of a settlement can result in a proposal being more difficult to approve, particularly where the land outside the boundary has a policy designation such as open countryside or Green Belt.

Having regards to defining settlement development boundaries, do you have any information you would like us to consider for your settlement or settlements that you have an interest in?

Question 6:

The Local Plan Strategy identifies the need to review appropriate locations for retail outlets that sell bulky goods, such as fridge freezers and TVs.

Are there any locations you would like us to consider for this type of use?

Question 7:

When a Neighbourhood Plan has been made it forms part of the Development Plan and is used as part of the decision making process.

In some instances Neighbourhood Plans have sought the support of Lichfield District Council to progress with matters outside the scope of the Neighbourhood Plan. An example of this is a review of the Green Belt.

Where a Neighbourhood Plan is emerging is there anything outside of its scope that you wish the District Council to consider as part of the Land Allocations Plan?

Local Plan Allocations Sustainability Appraisal Scoping Report: Consultation Sheet

Comment	Response
<p>Statutory Organisation: Historic England</p> <p>Historic England has published guidance on the SA/SEA process and the historic environment which may be of interest – this can be found at https://content.historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-envirnment/SA_SEA_final.pdf. This includes a list of international, national and local plans and programmed that could usefully supplement the list on pages 14-16.</p>	<p>Duly noted,</p> <p>Recommendation</p> <p>The following documents will be included in the review of Relevant Plans, Programmes and Policies.</p> <ul style="list-style-type: none"> • UNESCO World Heritage Convention 1979 • European Landscape Convention (Florence Convention) • The Convention for the protection of the Architectural Heritage of Europe (Granada Convention). • The European Convention on the Protection of Archaeological Heritage (Valetta Convention) • National Policy Statement for Waste Water March 2012 • National Policy Statement for Energy July 2011 • Streets for all: Guidance for Practitioners- English Heritage’s regional manuals on the design and management of streets and public open spaces
<p>We welcome the section on the built and natural environment baseline data on page 20. In our view, this should be expanded to include data on Heritage at Risk within the district (https://historicengland.org.uk/advice/heritage-at-risk/) as well as locally designated heritage assets. The Staffordshire Historic Environment Record (HER) will also offer information to identify areas that have a high potential for archaeology.</p>	<p>Duly Noted</p> <p>Information requested is contained within the following sections of Appendix B</p> <p>Main Heading</p> <p>Archaeology</p> <p>Sub Headings</p> <p>Landscape Character</p> <p>Historic Farmsteads</p> <p>Historic Environment</p>

	<p>Conservation Areas Listed Buildings Recommendation None</p>
<p>We also welcome SA objectives 2, 3, and 4 – all of which relate to the historic environment to differing degrees.</p>	<p>Duly noted Recommendation None</p>
<p>In terms of the last two boxes of page 25, it would be helpful to be consistent and insert some text explaining Why the sustainability objective is included. As per the objectives across pages 24-30. Here, this could be along the lines of ‘To ensure new development does not affect the significance of the local historic environment.</p>	<p>Duly noted Recommendation Insert “<i>To ensure new development does not affect the significance of the local historic environment</i>”. In the why sections for Objective 2 and 3 pages 25.</p>
<p>In the last section of page 25 we feel that there is something of a disconnect between the proposed decision making criteria and the suggested indicators. We do not feel that the suggested indicators would be able to clearly demonstrate whether the Local Plan Allocations documents had positively or otherwise addressed the baseline findings. This could be addressed by inserting a new question 5, along the lines of ‘Will it offer opportunities to bring heritage assets back into active use?’</p>	<p>Duly noted Recommendation Against the Detailed Decision Making Criteria relating to SA indicator 3 include the addition of the following question:</p> <ul style="list-style-type: none"> • Will it offer opportunities to bring heritage assets back into active use?
<p>The text against Why in the first box on page 26 could be extended to include the words ‘...jobs and services <i>and to ensure the retention of local distinctiveness and character</i>’.</p>	<p>Duly noted Recommendation Amend the Why sentence relating to SA indicator 4.</p> <p>Why To reduce the need to travel through closer integration of housing, jobs and services and to ensure the retention of local distinctiveness and character.</p>
<p>In relation to possible mitigation strategies we would note that the NPPF makes clear that harm should always be avoided in</p>	<p>Duly noted Recommendation</p>

<p>the first instance in relation to mitigation be considered – any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm.</p>	<p>none</p>
<p>Statutory Organisation: Natural England</p>	
<p>We acknowledge the passage of time since the SA for the LPS took place and have aimed to facilitate the Council achieving the relevant outcomes described in the NPPF with a focus in particular upon maximising opportunities and recognising synergies between the various interests themes.</p>	<p>Duly noted (support for the amendments to the SA Objectives) Recommendation none</p>
<p>NE advises that the council scopes in issues only where there are likely to be significant effects (either positive or negative). We recognise that a balance needs to be struck between a robust review of the evidence base now, as compared with that in 2007. We offer advice below on those themes and issues where we believe SA/SEA can add particular value to the allocations stage of the LPS.</p>	<p>Duly noted Recommendation None</p>
<p>Habitats Regulations Assessment (HRA) “The allocations Document will be developed in conformity with the LPS (2015) spatial strategy. It is therefore considered that accepted mitigation measures are sufficient to support the Allocations Documents.” (p6 HRA). We accept this approach in principle provided that no substantive issues have been pushed down to HRA at the project level (e.g. Hatherton & Lichfield canal restoration project) that might benefit from further consideration on the basis of new information that has been added to the evidence base since the SA for the LPS.</p>	<p>Duly Noted. Confirmation that no additional information has been submitted in regard to the Hatherton & Lichfield Canal Transportation Project. Mindful that during the SA process that the existing mitigation measures remain if amendments are required these are address in the SA process. Recommend direct discussions with Natural England. Recommendation None</p>
<p>Sources of info Sources of Good Practice/Information NE has a range of data sources that may be useful in the production of an SA. Our data sets are now all downloadable and responsible authorities should be referred to the website at (weblink). Other data sources include:</p>	<p>Duly Noted Recommendation none</p>

<p>MAGIC (Defra’s GIS package for environmental assets) Landscape Character Assessment for National Parks and Areas of Outstanding Natural Beauty Management Plans for National Parks and Areas of Outstanding Natural Beauty SSI/European Sites condition assessments National Character Areas</p>	
<p>Comments on the detail 1. Relationship with other relevant plans and programmes Please refer to our comments above regarding the balance to be struck between checking and updating the evidence base and the opportunity, in recognition of the subsidiary nature of site allocations to the overall Local Plan Strategy, to adopt an approach to SA/SEA at the allocations stage which focuses in on a finer grain of detail consistent with the nature of site allocations. We welcome the comprehensive list included in the report and note that the Cannock Chase Strategic Access Management and Monitoring Measures (SAMMM) and the R.Mease SAC related plans have been included in the regional and local plans and programmes evidence base respectively.</p>	<p>Duly Noted Recommendation None</p>
<p>2. The relevant aspects of the current state of the environment and their likely evolution without implementation of the plan or programme. We are satisfied that the relevant aspects of the environment have been identified but we offer comments below on how the sustainability objectives arising from a sustainable development approach employing multi-functional green infrastructure.</p>	<p>Duly Noted Recommendation None</p>

<p>3. The environmental characteristics of areas likely to be significantly affected.</p> <p>We are satisfied that the environmental characteristics of the <u>district</u> have been identified.</p> <p>At this stage, over and above existing initiatives such as the River Mease and Cannock Chase SAC projects the scoping report does not appear to explicitly identify further locations likely to be significantly affected in terms of landscape and biodiversity.</p> <p>We comment separately (below) on sources of information that may be used to help inform subsequent stages of the SA/SEA process for those areas e.g. Cannock Chase AONB and its setting (AONB 'special qualities' and National Character Area profile 'Statements of Environmental Opportunity').</p> <p>In terms of wider themes we note the district's high levels of car use and 'out commuting'. The Council should consider related air quality impacts on 'ecological receptors' (semi natural habitats and their wildlife) in order to understand potential effects arising from site allocations The Highway Agency 'Design Manual for Roads and Bridges' provides the accepted methodology for the assessment of such impacts while the Air Pollution Information System (APIS) describes the nature and causes of adverse impacts on ecological receptors from air pollution.</p>	<p>Duly Noted. Recommendation. None.</p> <p>Duly Noted. Recommendation. Section 4: Baseline Information inclusion of a Landscape focused paragraph under Built and Natural Environment heading.</p> <p>Duly Noted. Recommendation. None</p> <p>Duly Noted. Recommendation. The following site specific question will be added to Table 1 against Sustainability Objective Seek to improve air, soil and water quality.</p>
<p>4. Existing environmental problems which are relevant to the plan or programme</p> <p>We welcome the reports reference to the River Mease SAC and Cannock Chase SAC in relation to environmental pressures on these European designated sites.</p>	<p>Duly Noted Recommendation None</p>

<p>5. The environmental protection objectives relevant to the plan or programme and the way those objectives and environmental considerations have been taken into account during its preparation</p> <p>Biodiversity – “1. To promote biodiversity and through protection, enhancement and management of species and Habitats”.</p> <p>Is this a Typo? Should it read” To promote biodiversity through the protection, enhancement and management of species and habitats?</p> <p>6. To reduce, manage and adopt to the impacts of climate change” – Typo - <u>adapt</u> to...</p> <p>Table 1- Allocations Scoping report Sustainability Objectives – Comments on the “ Detailed decision making questions” and “detailed indicators”</p> <p>Biodiversity – ‘Site specific questions’. We would encourage you to consider the ‘helicopter view’ i.e. district wide, parish, groups of sites. A focus on each specific site (individually) may overlook SA/SEA issues that are relevant at a larger scale and contribute to decision over which individual sites (or groups of sites) should proceed. A ‘cascade ‘approach may be needed from the district down to the individual site. This approach reflects the Lawton Review whereby biodiversity is safeguarded for the future by achieving a biodiversity resource which is ‘Bigger, better, more and joined’. Please refer also to our comments below regarding multifunctional green infrastructure.</p>	<p>Duly Noted. Recommendation. Amend Sustainability Objective Number 1 to read: To promote biodiversity through the protection, enhancement and management of species and habitats. Page 23, 24</p> <p>Duly Noted. Recommendation. Amend Sustainability Objective 7 to read: To reduce, manage and adapt to the impacts of climate change. Page 23, 29.</p> <p>Duly Noted. Recommendation. See amended Site Specific Questions and indicators listed against Staffordshire County Council : Ecology rep box three.</p>
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<p>“Site specific questions – 3. What affect will there be on green corridors/water courses. Will it reduce/eliminate fragmentation/wildlife connectivity”</p> <p>We welcome this question as a test to establish the specific site’s contribution to the connectivity and wider context issues we have commented on above.</p> <p>Detailed indicators e.g. “Amount of priority habitat created/recreated – lowland/heathland”</p> <p>A simpler and more practical approach may be to step back from individual habitat types and simply seek to express the amount of green infrastructure and/or priority habitat created, restored or maintained as part of that site allocation. It is difficult to see how the SA/SEA process can accurately predict a finer grain of detail than this. However reference to biodiversity opportunity maps, the relevant National Character Area profile and Staffordshire County Council’s ‘planning for Landscape Change’ SPD may be helpful in understanding which parts of the district would be most suited to a particular type of semi-natural habitat(s).</p>	<p>Duly Noted. Recommendation. None</p> <p>Duly Noted. Recommendation. See amended Site Specific Questions and indicators listed against Staffordshire County Council : Ecology rep box three</p>
<p>Detailed indicators: 4. Number of hectares of Local Nature Reserves 5. Number and type of internationally/nationally designated sites 6. Number of species relevant to the district which have achieved BAP Veteran trees, ancient woodland.</p> <p>It isn’t clear from the SA scoping report how these types of indicators would help us understand the SA/SEA performance of the proposed sites.</p>	<p>Duly Noted. Recommendation See amended Site Specific Questions and indicators listed against Staffordshire County Council : Ecology rep box three</p>

<p>Sustainability objective – ‘To protect and enhance the rich diversity of natural archaeological/geological assets, and landscape character of the district’.</p> <p>Site Specific questions:</p> <ol style="list-style-type: none"> 1. Will it promote and maintain an attractive and diverse landscape 2. Will it protect areas of highest landscape quality 3. Will it improve areas of lower landscape quality 4. Will the development create a new landscape character. <p>We refer the Council to the Statements of Environmental Opportunity (SEO) for the relevant NCA profile and the ‘special qualities’ of the Cannock Chase AONB (see AONB Management Plan 2014-19).</p> <p>Where proposals are for over 100 homes and/or 3Ha in extent Natural England consider this may represent a strategic site. Landscape & Visual Impact Assessment should be carried out accordingly. The following NPPF material is relevant:</p> <p>Para 17. Within the overarching roles that the planning system ought to play, a set of core land use planning principles should underpin plan-makingplanning should... take account of the different roles and character of different areas, ... recognising the intrinsic character and beauty of the countryside.</p> <p>Para 109 The Planning system should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes...</p> <p>Para 170 Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.</p>	<p>Duly Noted. Recommendation.</p> <p>The following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2</p> <ol style="list-style-type: none"> 1. Proximity to an internationally or nationally designated landscape 2. In terms of Landscape Character Types what is the sites sensitivity rating? 3. Proximity to an internationally or nationally designated geodiversity sites 4. Is it on previously undeveloped land? 5. Does it offer the opportunity to promote landscape connectivity? 6. Does it offer the opportunity to improve or create the landscape character of the District? <p>The following questions will remain.</p> <p>Will it improve existing green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiatives.</p> <p>Will it prevent the sterilisation of mineral resources.</p> <p>In addition the Assumption Appendix will provide further clarity in regard to assessment.</p>
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<p>Site Specific questions</p> <p>5. Will it improve existing green infrastructure including national Forest, Forest of Mercia and the Central Rivers Initiative.</p> <p>We welcome this question and refer you to ur comments above regarding the need to consider the context for each site in terms of the adverse impacts or positive opportunities it presents in terms of SA/SEA , from the district level down to the site specific level.</p>	<p>Duly Noted</p> <p>Recommendation</p> <p>None.</p>
<p>Detailed Indicator: 3 The proportion of housing completions on sites of 10 or more which have been supported, at the planning applications stage by an appropriate and effective landscape character and visual assessment with appropriate landscape proposals.</p> <p>AGI led approach would help provide the framework for such mitigation (& enhancement) measures.</p>	<p>Duly Noted. The adopted Local Plan Strategy and Supplementary Planning Document support the delivery of Green Infrastructure holistic approach.</p> <p>Recommendation</p> <p>None</p>
<p>Sustainability Objective: Create places, spaces and buildings that are well designed, integrate effectively with one another, respect significant views and vistas, and enhance the distinctiveness of the local character.</p> <p>NCA profiles and SCC 'Planning for landscape change' SPD contribute to the evidence base and would help to facilitate a GI led approach. The Site Allocations part of the local plan process provides a platform for the implementation of the strategic approach in the LPS. Clear linkage between the allocated sites' performance in terms of offering opportunities e.g. improvements in <u>Landscape character</u> and <u>creating and linking GI</u> would be desirable and positive.</p>	<p>Duly Noted</p> <p>The proposed amendments to the Site Specific Questions relating to the Sustainability Objective 2, See above.</p> <p>Recommendation</p> <p>None</p>
<p>Sustainability Objective – “Maximise the use of previously developed land/buildings and the efficient use of Land”</p>	<p>Duly Noted</p> <p>Recommendation</p>

<p>Site specific questions –formatting typo to correct. Detailed indicator – “% of permissions granted on previously developed land as a % of previously developed land available within the District”.</p> <p>We refer you to our comments above on landscape character and multifunctional GI. Regarding the wording of the detailed indicator – would <u>numbers of units</u> be valuable too? i.e. to give a sense of the <u>scale</u> as well as the percentage balance being achieved.</p>	<p>Table 1 Sustainability Objective 5, Site Specific Questions, amend bullet point 3 to read:</p> <ol style="list-style-type: none"> 1. Would the development of the site involve the loss of greenfield? <p>Bullet point 4 to be removed</p> <ol style="list-style-type: none"> 2. Would the development of the site involve the loss of gardens? <p>Table 1 Sustainability Objective 5, Detailed Indicator, amend to read:</p> <p>% of permissions granted on previously developed land.</p> <p>Table 1 Sustainability Objective 5 Detailed Indicator add.</p> <p>Number of homes granted permission on previously developed land.</p>
<p>Sustainability Objective – “Reduce the need to travel to jobs and services through sustainable integrated patterns of development, efficient use of existing sustainable modes of travel and increased opportunities for non-car travel”.</p> <p>Our comments about ‘site specific questions’ apply equally here. The performance of individual sites in terms of SA/SEA will reflect their strategic location and relationship with existing infrastructure. Detailed indicators should refer to sustainable transport links (bus routes, cycleway and paths) created or enhanced through the provision of multi-functional GI.</p>	<p>Duly Noted Recommendation</p> <p>Add the following against Table 1 Sustainability Objective 6 Detail Indicator</p> <ul style="list-style-type: none"> • Access to bus services • Access to cycle ways • Increase in the provision of multi-functional space: cycle and walking networks that include green Infrastructure gain.

	<p>Remove the following Indicators</p> <ol style="list-style-type: none"> 1. Traffic Counts on selected strategic roads in the District 2. Journey to work by mode 3. Access to bus services <p>In addition see recommended amendments made against SCC highway comments.</p> <p>In addition the assumptions will further link sites to existing sustainable transport infrastructure.</p>
<p>We welcome reference to sustainable transport links under the sustainability objectives for climate change mitigation and adaption.</p>	<p>Duly Noted Recommendation None</p>
<p>6 The likely significant effects on the environment</p> <p>1. Biodiversity – Themes 11, 14, and 15 are recorded as ‘potential incompatibility’. We acknowledge the potential, however this is a matter of perspective as multifunctional GI offers a model whereby these themes (11, 14 and 15) within SA/SEA can positively benefit from multi-functional GI.</p> <p>Similar comments apply in respect of themes 2 (with regard to 11 and 14) and 4 (with regard to 11).</p>	<p>Duly Noted. We are aware of and understand the potential opportunities which could be identified, they feature as key compounds within a number of the Districts SPD’s.</p> <p>Amendments to Site Specific Questions and Detailed Indicators relating to Sustainability Objective 1, 6 and 2 do however further identify the benefits of GI and identify the linkages.</p> <p>However, a significant benefits are likely to only become apparent at detailed design stage and secured through application.</p> <p>As such ‘potential incompatibility’ remains. Recommendation None</p>
<p>7 The measures envisaged to prevent, reduce and offset any significant adverse effects on the environment of implementing the plan and programme.</p>	<p>Duly Noted Sustainability Objective 9: Seek to improve air, soil and water quality.</p>

<p><u>Soils</u> The site allocations SA/SEA should consider the scale of impacts arising from the proposed housing and employment site resources across the district and describe what avoidance and mitigation measures may be used to minimise loss of the district’s soil resource including ‘best and most versatile land’. Site allocations’ performance in this respect should form an important criteria for inclusion in the site selection decision-making process.</p>	<p>Recommendation Table 1 sustainability Indicator 9, the following Soil related Detailed Indicator to be added.</p> <ul style="list-style-type: none"> • % of permissions granted on previously developed land. <p>No further amendments are recommended see response to comments made by the Environment Agency.</p>
<p><u>Climate Change & green infrastructure (GI)</u> A positive opportunity arises in respect of this site allocations stage in the local plan process. Synergies between climate change mitigation/adaption and multi-functional GI are strong and have recently been expressed as ‘nature based solutions’. These address the value of nature for people and what bio diverse, multifunctional green infrastructure can do for us. It has the potential to: Cool buildings, reduce need for air conditioning, reduce ‘urban heat island’ effect, help reduce flooding and water pollution, provide recreation and green transport routes, store carbon, increase biodiversity, health, climate change adaption.</p> <p>SA/SEA criteria might include – location (relative to existing development), proximity to public transport routes/routes that could be reinstated, massing/orientation opportunities (topography/aspect – solar gain) etc.</p>	<p>Duly Noted Amendments have been made to the Sustainability Objective 6 in relation to GI and sustainable transport links. Adopted SPD’s clearly outline the role of GI in addressing Climate Change.</p> <p>Recommendation None</p>
<p>Statutory Organisation :Environment Agency</p>	
<p>Environmental Issues From an EA perspective, the River Mease SAC is probably the most important area of protection in the district. The section in Lichfield District however, is relatively</p>	<p>Duly Noted Recommendation None</p>

<p>rural and is unlikely to be subject to much development, unlike further up the catchment in North West Leicestershire that is more urbanized and has more pressure on it. The most likely threats in Lichfield District are from farming, i.e. pesticides/ammonia/grazing on the banks and non-mains foul drainage systems on small developments not working properly We would not therefore expect significant impacts on this are when applying the SA Framework to the Site Allocation process.</p>	
<p>With reference to the flood risk element, we would concur that the main areas of floodplain are in the rural areas of the River Trent and Tame valleys so would expect very few if any, greenfield sites to be allocated in the floodplains given the extensive areas of Floodplain Zone 1 around our major settlements and elsewhere.</p>	<p>Duly Noted Recommendation None</p>
<p>Sustainability Framework For the Sustainability Framework, we suggest you consider a follow up question for the Sustainability Objective 'To reduce and manage flood risk'. Following the question Is the site located outside an area at risk from flooding? Does it pass the Sequential Test? This will help to ascertain whether a site is that in the floodplain is there legitimately form a policy perspective.</p>	<p>Duly Noted Recommendation Table 1 page 24, To reduce and manage flood risk add the following questions.</p> <ul style="list-style-type: none"> • Does the site pass the Sequential Test?
<p>We suggest Green/blue Corridors to refer to green networks and watercourses together in the objective To promote Biodiversity through protection, enhancement and management of species and habitats.</p>	<p>Duly Noted Recommendation Table 1 Page 24 Sustainability Objective 1, To promote biodiversity and through protection, enhancement and management of species and habitats, Site Specific Question 3 amend from</p> <p>3 What affect will there be on green corridors /water courses?</p> <p>To</p>

	<p>3 What affect will there be on green networks and watercourses?</p>
<p>The objective Seek to improve air, soil and water quality – Will it reduce water pollution? Is not particularly clear or specific. For example, just off site or in the nearest watercourse? What type of pollution – Foul, runoff from developments as suspended solids such as dirt or oil/petrol? There is probably only one scenario where water quality issues could not be overcome and that would be lack of foul capacity going into the River Mease SAC for example. Depending on what type of water pollution you had in mind, you could ask whether the development would be likely to utilise SuDs or whether there is capacity in the receiving Sewage Treatment works; you may have this information to hand from either a Water Cycle Study or an Infrastructure Delivery Plan.</p>	<p>Duly Noted. Agree that the effect of new development on water quality will depend on factors such as whether there is capacity at the relevant sewage treatment works to accommodate the new development, which cannot be assessed at this stage unless directly related to sites within the River Mease SAC. It is recognised that Development Management Policies (Policy NR9: Water Quality) may require any necessary upgrades to be made before development proceeds.</p> <p>Recommendation Table 1, Sustainability Objective : Seek to improve air, soil and water quality amend as follows;</p> <p>Why To reduce air, water and soil pollution.</p> <p>Site Specific Questions Which Source Protection Zone does the development fall within? Does the site fall within River Mease SAC? Is the site within or directly connected by road to an AQMA? Is the site mainly or entirely on brownfield land? If the site is on greenfield land which class of agricultural quality is it?</p>
<p>Document List In this document list, I cannot see the Planning Practice Guide included anywhere. This offers lots of useful advice on Policy Guidance for Water Quality, Sustainability Drainage and Flood Risk amongst much else. Locally, you may also wish to review the Tame Valley Wetlands Landscape</p>	<p>Duly Noted</p> <p>Recommendation Insert the following under the National Planning Practice Guidance (2014) reference in Appendix A page 56</p>

<p>Partnership Scheme (TVWLPS) Landscape Conservation action Plan (LCAP) in order to assess any impacts or potential conflict with the Site Allocations.</p>	<p>National Planning Practice Guidance (2014) The National Planning Practice Guidance provides technical guidance in topic areas in order to support policies set out within the NPPF. It aims to allow for sustainable development as guided by the NPPF. The allocation documents should seek to ensure that it reflects the objectives</p> <p>Insert the following under CAMS: Staffordshire Trent Valley Abstraction Licensing Strategy, Environment Agency (2013) reference in Appendix A page 70</p> <p>Tame Valley Wetlands Landscape Partnership Scheme Landscape Conservation Action Plan Landscape scale approach to restoring conserving and reconnecting the physical and cultural landscape of the Tame Valley.</p> <p>Allocations within the identified wetland area should consider the key priorities of the vision.</p>
<p>Staffordshire County Council</p>	
<p>Thank you for consulting SCC on the SA scoping report we acknowledge that we are not a statutory consultee and appreciate the opportunity to input in relation to the Duty to Co-operate and joint working. We will seek to engage with you throughout the plan preservation including the SA as it is produced.</p>	<p>Duly Noted Recommendation none</p>
<p>We are content with the general approach set out in the scope and support the incorporation of a Health Impact Assessment in to the SA. We would suggest that you should engage with us on evidence gathering and preparation of the SA moving forward.</p>	<p>Duly Noted Recommendation none</p>
<p>Staffordshire County Council: Highways</p>	

<p>Section 4 Baseline information – transport (page 22) the bus accessibility statistic should be updated to 71% for Lichfield City or 61% for Lichfield District which is accurate to October 2016 bus timetable information</p>	<p>Duly Noted Recommendation Page 22 para 2 change 83% to 71%.</p>
<p>Appendix B p 108, row relating to Traffic Congestion – could the last bullet point be changed to say ‘manage routing of heavy commercial vehicles and consider the provision of lorry park at Fradley.</p>	<p>Duly Noted Recommendation Page 108 Traffic Congestion Bullet 10 Replace with “Manage routing of heavy commercial vehicles and consider the provision of lorry park at Fradley”.</p>
<p>Table 1 Allocation Scoping Report Sustainability Objectives – for the sustainability objective ‘reduce the need to travel to jobs and services through sustainable integrated patterns of development. Efficient use of existing sustainable modes of travel and increased opportunities of non-car travel’ includes the following site specific questions:</p> <ol style="list-style-type: none"> 1. Will it use and enhance existing transport infrastructure 2. Will it help to develop a transport network that minimises the impact on the environment 3. Will it reduce journeys undertaken by car by encouraging alternatives modes of transport. 4. Will it increase accessibility to services and facilities 5. Will it reduce the overall impact on traffic sensitive areas. 	<p>Duly Noted Recommendation None</p>
<p>It may be useful to separate out walking and cycling from bus and rail to highlight the differences between sites. The most sustainable sites are those where residents can utilise public transport as well as access services and facilities by walking in and cycling. Superfast broadband, home working and car sharing would be ways to reduce trips by car.</p>	<p>Duly noted Recommendation Add the following site specific questions to Sustainability Objective 6 page 29 enable separation and improve the ability to accurately score sites.</p> <p>Will it help to develop walking and cycling networks to enable residents to access to employment, services and facilities?</p>

	Will it help develop bus and rail transport networks to access employment, services and facilities?
Question 2 may be difficult to score as none of the sites are likely to lead to road schemes apart from site accesses but the delivery of a walk and cycle route can have negative impacts on the environment. For example a cycle route is unacceptable if it crosses an environmentally sensitive area; lighting in walk/cycle bridge is unacceptable for bats; air quality issues due to buses; and the selection of paving; signing; coloured paint on roads requires careful selection in a conservation area.	Duly noted Recommendation Remove Question 2 Sustainability Objective 6 page 29. The question is included as part of amendments proposed in previous recommendations and will enable clear scoring.
Question 3 no development can reduce journeys undertaken by car. We are working to provide development in the most sustainable locations to enable the new residents to undertake as many journeys as possible by non-car modes. The question used in the previous sustainability appraisal is better phrased 'will it provide opportunities to reduce trips by car?'	Duly noted Recommendation Replace Question 3 Sustainability Objective 6 page 29 Will it reduce journeys undertaken by car by encouraging alternative modes of transport? With Will it provide opportunities to reduce trips by car?
Question 4 can relate to increased accessibility to services and facilities by walking, cycling and public transport or to the provision of additional services and facilities by the development itself.	Duly noted Recommendation Remove Question 4.
Staffordshire County Council: Ecology	
The statement on page 6 in regard of Habitats Regulations Assessment (HRA) only applies if the site allocations for residential are in accordance with spatial strategy figures within the 15km zone of influence on the Cannock Chase SAC and that windfalls have not meant that the proposed figures will be exceeded. Should housing allocation figures be above the assessed in HRA of the spatial strategy further HRA will be required. The Cannock Chase SAC Partnership is in the process	Duly Noted Recommendation None

<p>of commissioning assessment of the impacts of increased housing allocations to enable impacts and mitigation requirements to be assessed.</p>	
<p>The Built and Natural Environment section on page 20 fails to mention the natural environment including sites of international and national importance let alone locally important sites and habituates and species of principal importance. Neither is landscape character mentioned. This is a significant omission.</p>	<p>Duly Noted Recommendation See landscape comments</p>
<p>In Table 1 Indicators for designated sites should refer to site condition rather than number of sites as the number of sites or their size is not within Local Plan influence. Sites outside the District but affected by the Plan need to be included – e.g. Cannock Chase SAC and the River Mease SAC outside of the District. We recommend the indicator be percentage of international/national sites in favourable condition. This reflects Natural England condition assessment phraseology. An indicator for Local Wildlife Sites (sites of Biological Importance) should be included.</p>	<p>Duly Noted Recommendation The following text will replace the Detailed Decision Making Criteria and Detailed Indicator information that relates to Sustainability Objective Table 1.</p> <p>Detailed Decisions making Criteria</p> <p>Why</p> <p>Site Specific Questions:</p> <ol style="list-style-type: none"> 1. What affect will there be on protected/priority species 2. What affect will there be on priority habitats and local nature conservation sites? 3. What affect will there be on statutory designated sites? 4. What affect will there be on veteran trees? 5. What affect will there be on green corridors and water courses? 6. Will it reduce ecological connectivity? 7. What affect will there be on the RIGS site <p>Detailed Indicator</p> <ol style="list-style-type: none"> 1. Performance SBAP Action Plan Targets

	<ol style="list-style-type: none"> 2. Amount of priority habitat created, restored or maintained as part of the site allocation. 3. Amount of green and blue infrastructure restored or maintained as part of the site allocation 4. Increased links between woodland, hedgerows, copes, individual trees – including veteran and aged trees. 5. Number of and area of RIGS within the District.
<p>We also note that the proposed indicators fail to answer most of the questions and recommend a rethink.</p>	<p>Duly Noted Recommendation See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above.</p>
<p>There is no mention of water quality or ecological status despite Water Framework Directive requirements for Local Plans to contribute to objectives.</p>	<p>Duly Noted Recommendation See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above</p>
<p>In Table 1 there appears to be a typo in the biodiversity Detailed Indicator column for item 1 which should read Lowland Heathland (i.e. without the slash). There appears to be a typo in the biodiversity Detailed Indicator column for item 3 which should read either wildflower grassland or species-rich grassland. There appears to be a typo in the biodiversity Detailed indicator column for item 6 which makes no sense as worded.</p>	<p>Duly Noted Recommendation See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above.</p>
<p>Appendix A There is missing text under Staffordshire Biodiversity Action Plan (SBAP) On page 66</p>	<p>Duly Noted Recommendation Typo amendment Appendix A page 66 Staffordshire Biodiversity Action Plan in the key messages, targets and indicators relevant to the LDF and sustainability appraisal</p> <p>Amend 4 to 14</p> <p>And also include the following bullet points</p>

	<p>Cannock Heath Central Farmlands River Gravels</p>
<p>Appendix A In regard of the Cannock Chase SAC Strategic Access Management and Monitoring Measures (SAMM) (should be SAMMM) on page 68 of the text regarding Implications for plan and sustainability appraisal is incorrect. The SAMMM will not shape the assessment of significant effects. Its purpose is to provide mitigation of Local Plan impacts already identified.</p>	<p>Duly Noted Recommendation Typo amendment Appendix A page 68 SAMM to SAMMM. Page 68 Amend text against Implications for plan and sustainability appraisal section of the SAMMM entry to read The SAMMM mitigates for planned housing growth within the 0-15km zone of influence and identified in the Local Plan Strategy.</p>
<p>Appendix B There are errors in the Nature Conservation Sites Section. It is Chasewater and Southern Staffordshire Coalfields Heath SSSI. Local Wildlife Sites are Sites of Biological Importance. Cannock Chase AONB is not a nature conservation site. AONBs are designated for landscape quality. The section of Biodiversity is inadequate and fails to reference species or Staffordshire Ecological Record which is the data holder for the data that will be essential for monitoring</p>	<p>Duly Noted Recommendation Appendix B Page 99 Nature Conservation Sites amend typo Chasewater and Southern Staffordshire Coalfields to Chasewater and Southern Staffordshire Coalfields Heath. Appendix B Page 99 Nature Conservation Sites amend typo Sites of Biological Interest to Sites of Biological Importance Remove reference to Cannock Chase AONB and reposition in the additional Landscape Section. See response to SCC Landscape representation for further information. Add the following text: There are 78 SBI's within Lichfield District; however the total number of sites changes periodically.</p>

	<p>Up to date information on these sites and their boundaries is provided by Staffordshire Ecological Record.</p> <p>Add the following text: Lichfield District contains a wide variety of species which are defined by and received protection under domestic or European Legislation. Particular protected species that have been encountered within Lichfield District include:</p> <ul style="list-style-type: none"> • Bats • Birds • Great crested newts • White clawed crayfish • Water voles • Otters • Badgers • Invertebrates • Reptiles • Plant species
<p>Staffordshire County Council: Landscape</p>	
<p>Section 3 European Landscape convention (Florence 2002)</p>	<p>Duly Noted Recommendation Include European Landscape convention (Florence 2002) within list of International documents page 14 and Appendix A</p>
<p>Section 4 Built and Natural Environment perhaps this heading would be better titled Cultural Heritage</p>	<p>Duly Noted Recommendation None</p>
<p>There should be a separate paragraph dealing with Landscape Character, which is not the same as Historic Landscape Characterisation, although an understanding of landscape character is informed by Historic Landscape Characterisation.</p>	<p>Duly Noted Recommendation Agree insert paragraph detailing landscape character between Built and Natural Environment and Environmental Issues page 20.</p>

<p>The National Character Area Profiles published by Natural England provide broad scale characterisation, and Planning For Landscape Change which contains more fine grained county level landscape character descriptions Web link. Although Planning For Landscape Change is under review it remains a useful reference documents for the time being.</p>	<p>Include Planning for Landscape Change in Other Relevant Plans and Programmes.</p>
<p>Table 1 Sustainability Objective: To protect and enhance the rich diversity of the natural archaeological/geological assets, and landscape character of the District. SCC opinion that these topics are too broad to be dealt with in the same objective, particularly in relation to the decision making criteria given. Suggest a more appropriate objective would be 'To protect and enhance the diverse landscape character of the District', and deal with archaeological /geological assets elsewhere.</p>	<p>Duly Noted Recommendation The Sustainability Objective 2 will remain unchanged the Site Specific question will be amended as follows to include the following. Will it result in the loss of historic landscape features? Will it safeguard sites of archaeological importance (scheduled or unscheduled) and their settings?</p>
<p>Under decision making criteria number 4 "Will the development create a new landscape character? SCC suggest adding – sympathetic with existing character.</p>	<p>Duly Noted Recommendation Sustainability Indicator 2 Site Specific Question4 amend to read Will the development create a new landscape character sympathetic with existing character?</p>
<p>Don't understand the relevance of 5 'Will it prevent sterilisation of mineral resources' in this list of criteria.</p>	<p>Duly Noted the Site Specific Question has been included to encourage the prudent use of natural resources. Recommendation None</p>

<p>Extent and use of detailed characterisation studies should include landscape character assessments (e.g. Planning For Landscape Change or its successor, local Landscape Character assessments).</p>	<p>Duly Noted Recommendation Include the following to the list of Other Relevant Plans and Programmes Planning for Landscape Change Local Landscape Character Assessments.</p>
<p>Cannock Chase Council</p>	
<p>While it is more appropriate for the statutory consultees to comment on the technical detail of this documents, it would be helpful if the scoping report also contained details of the assumptions which will be applied when undertaking the assessment of the plan's allocations (and Policies if applicable), especially as there may potentially be cross boundary implications.</p>	<p>Duly Noted Recommendation Assumptions are not required to ensure regulation compliance they are however part of a raft of measures to ensure consistency and proportionate delivery of the SA assessment. As such set of assumptions will be developed prior to Stage B of the SA process being undertaken. The assumptions will form a separate standalone appendix of the SA report.</p>
<p>We would also emphasise the importance of keeping the dialogue going as part of the Duty to Co-operate so that relevant information can be shared in the shaping of our restive plans.</p>	<p>Duly Noted Recommendation None</p>
<p>Cannock Chase AONB</p>	
<p>Satisfied that LDC is taking a sound approach and we have no detailed comments to make in the SA Scoping report.</p>	<p>Duly Noted. Recommendation None</p>
<p>Burntwood Town Council</p>	
<p>The Town Council received the above Scoping Report at a recent meeting. Members agreed to receive and note the Report, adding that it would be retained for future reference.</p>	<p>Duly Noted. Recommendation None</p>
<p>Armitage with Handsacre Parish Council</p>	
<p>The Armitage with Handsacre Parish Council do not have any comments to make on the report, at this time</p>	<p>Duly Noted. Recommendation None</p>
<p>Walsall Council</p>	

<p>Identification of European sites for assessment. The scoping report (page 6) identifies the River Mease SAC and Cannock Chase SAC as the only European sites as being considered to be affected by the implementation of the Local Plan Allocations. It does not include consideration of the Cannock Extension Canal SAC on the basis of the HRA produced in support of the Local Plan Strategy ‘Main Modifications of the Lichfield District Local Plan : Strategy Addendum to Habitat Regulations Assessment (January 2014), which concluded:</p> <p>“The modifications propose the safeguarding of a route for a heritage towpath trail utilising the line of the Lichfield Canal and identifies this on the maps contained with the Local Plan. As this is for a path and there is reference to the requirements for further studies to satisfy the requirements for the Habitat Regulations with regard to the construction/reinstatement and watering of a canal which would link to the Cannock Extension Canal, no likely significant effects upon the Cannock Extension Canal will arise from these changes.”</p> <p>While impacts to the Cannock Extension Canal SAC were understandably ruled out on the basis, it might be beneficial. Although it is note the Local Plan Allocations document will be developed in conformity with the LPS (2015), that the Cannock Extension Canal SAC be considered as a result of the project potentially featuring in greater detail than in did within the LPS, and /or the emerging documents providing an opportunity to specify the technical/regulatory requirements of the project in order to avoid significant effects to the SAC.</p>	<p>Duly Noted. HRA for the Local Plan Strategy determined that only two European Sites, Cannock Chase SAC and the River Mease SAC could experience significant harm through the delivery of the Local Plan Strategy.</p> <p>Recommendation</p> <p>There is however a typo in relation to the Cannock Extension Canal SAC in Appendix B. Page 99: Change Cannock Extension Canal to Cannock Extension Canal SAC.</p> <p>In addition following comments received from Staffordshire County Council a landscape section has been included in Section 4 Baseline Information. This paragraph will reflect the link between the line of the Lichfield Canal and the Cannock Extension Canal SAC.</p>
<p>Compliance with SEA Regulation 12 (the assessment of reasonable alternatives). In respect of the HRA, the scoping report states on page 6 that the SAD "will be developed in</p>	<p>Duly Noted.</p> <p>Recommendation</p>

<p>conformity with the LPS (2015) spatial strategy. It is therefore considered that accepted migration measures are sufficient to support the Allocations Documents.”</p> <p>While, on page 33, the scoping report states: “Policy considerations within the Adopted Local Plan Strategy (2015) and those also include those contained with Neighbourhood Plans may act to restrict alternatives options assessed.”</p> <p>It could be interpreted from the above extracts that the LPA plans not to consider what might be reasonable alternatives for some of its allocation options as a result of existing Local Plan policies. While these policies might well have been tested and informed at examination, having been assessed alongside reasonable alternatives, I am unsure as to whether it is appropriate to restrict the identification of new reasonable alternatives options on this basis, particularly as they might offer improved or more appropriate outcomes.</p>	<p>In terms of p6 reference. Natural England (one of the three statutory consultees) within their representation accept this approach in principle – no amendments proposed.</p> <p>In terms of the p33 reference. The intention was not to artificial restricted the options assessed at Stage B (1) by imposing adopted policy requirements before SA assessment. To avoid confusion this sentence will be removed from the text.</p>
<p>Appendix A (page 68) It is stated under the heading ‘Cannock Chase SAC Strategic Access Management and Monitoring Measures (SAMM) “A list of priority project are identified to mitigate for a 15% increase in visitors numbers.”</p> <p>The most recently produced housing monitoring, within 15km of the SAC, indicates that there are matters to be addressed in relation to the above statement. Walsall Council is working with the Cannock Chase SAC Partnership to agree what evidence is relevant to the consideration of housing numbers. This matter is of fundamental importance to additional work that might be commissioned to support Lichfield’s emerging Local Plan Allocations.</p>	<p>Duly Noted. Lichfield District is a member of the Cannock Chase SAC Partnership. Recommendation None</p>