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Monday, 7 January 2019

Dear Sir/Madam

CABINET

A meeting of the Cabinet has been arranged to take place on **TUESDAY, 15TH JANUARY, 2019 at 6.00 PM IN THE COMMITTEE ROOM** District Council House, Lichfield to consider the following business.

Access to the Committee Room is via the Members' Entrance.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Neil Turner', is written in a cursive style.

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

To: Members of Cabinet

Councillors Wilcox (Chairman), Pritchard (Vice-Chair), Mrs Little, Leytham, A Yeates and Spruce



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AGENDA

1. Apologies for Absence
2. Declarations of Interest
3. Local Plan Review (2016 - 2036) Preferred Options and Policy Directions Consultation 3 - 444
4. Elford Neighbourhood Plan - Final Decision Statement 445 - 506
5. **Exclusion of Public and Press**

RESOLVED: "That as publicity would be prejudicial to the public interest by reason of the confidential nature of the business to be transacted, the public and press be excluded from the meeting for the following items of business, which would involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972"

6. **Processing of Dry Recycling Materials Contract** 507 - 512

This report is to be considered in private since it contains exempt information (as defined by Paragraph 3, Part 1 of Schedule 12A of the Local Government Act 1972) relating to the financial interests of the Council and the business affairs of a contractor.



Local Plan Review (2016 – 2036) Preferred Options and Policy Directions consultation

Report of the Cabinet Member for Economic Growth, Environment & Development Services:
Councillor I. Pritchard



Date: 15 January 2019
 Agenda Item: 3
 Contact Officer: Ashley Baldwin/ Craig Jordan
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 Key Decision? YES
 Local Ward All
 Members

CABINET

1. Executive Summary

- 1.1 The Local Plan Strategy adopted in 2015 commits the Authority to preparing a Local Plan Review. To inform the review consultation was undertaken on the 'Scope, Issues and Options' during April and June 2018. This report requests that the Cabinet note the representations received to the consultation, approve the officer responses and approve the next round of public consultation.
- 1.2 The responses to the previous round of consultation have helped inform the next stage of the review which is the preparation of a Preferred Options and Policy Directions document. This draft document is accompanied by a series of supporting documents. Approval of Cabinet is sought for the draft document and related supporting documents and to undertake public consultation on the same.

2. Recommendations

- 2.1 That the Cabinet note the summary of representations received to the Local Plan Review Scope, Issues and Options consultation and approve the officer responses.
- 2.2 That the Cabinet approves the Local Plan Review document (**Appendix A**), the Sustainability Appraisal (**Appendix B**) and Habitat Regulations Assessment screening assessment (**Appendix C**) for public consultation to be held between 28th January and 18th March 2019.
- 2.3 That delegated authority be granted to the Cabinet Member for Economic Growth, Environment & Development Services in consultation with the Head of Economic Growth to make any minor changes to the appearance, format and text of the Local Plan Review Preferred Options and Policy Directions Document or the supporting documents prior to consultation in the interests of clarity and accuracy.

3. Background

- 3.1 The consultation on the first stage of the Local Plan Review generated significant interest. In total 1,637 responses were received from 260 individual consultees. Table 1 identifies the marketing and consultation undertaken.

Table 1 – Local Plan Review consultation information

What was done	Marketing or consultation
Emails to Parish Council clerks ahead of the consultation period offering a presentation	Marketing
Emails to District Councillors ahead of consultation period	Marketing
Press releases	Marketing
Facebook updates	Marketing
Twitter updates	Marketing
Letters/ emails to all those on the Local Plan consultation database	Marketing
Presentations (with Q&A session) to Parish Councils	Consultation
Meetings with resident groups, stakeholders and private sector organisations	Consultation
Drop in events at Lichfield District Council and Burntwood library	Consultation
Executive summary produced	Consultation
Duty officer available during office hours	Consultation
Documents on deposit at Council offices, Lichfield library and Burntwood library	Consultation

- 3.2 Some comments were made as to the means of consultation undertaken and notification of the consultation itself. This feedback is useful and will be borne in mind when carrying out further exercises of this kind as it is important that the public and stakeholders have confidence in the processes followed and have the opportunity to have their say.
- 3.3 In terms of the consultation responses they are summarised together with officer comments at [Appendix D](#). A summary of the key themes arising from the consultation are set out in Table 2 below.

Table 2: Local Plan Review – key themes arising from consultation

Summary of response	Summary of analysis
The review should provide explicit consideration of the needs arising from the Greater Birmingham Housing Market Area (GBHMA) and this should be reflected throughout the vision, objectives and strategic priorities.	The Review does acknowledge the needs arising from the GBHMA. The needs of neighbouring authorities warrant reference within the Plan. However further consideration needs to be given as to whether this needs to be explicitly set out within the vision, objectives and strategic priorities.
There needs to be greater emphasis on economic growth and the needs associated with employment.	Economic growth is considered to be a fundamental component of the plan review process. In drafting the next stage of the review consideration will be given to ensure appropriate focus is provided to economic growth.
There is a clear requirement to release Green Belt land in order to meet future growth needs.	The Council will undertake a Green Belt review which will assist in determining Green Belt release (if required).
Some of the proposed locations for growth are in unsustainable locations, growth should be focused in	This scale and distribution of growth and the implications for areas of the district and specific sites

Summary of response	Summary of analysis
and around the existing built up area.	will be addressed as part of the consideration of options for a suitable spatial strategy.
The existing urban areas are at capacity which triggers the needs to focus growth in other areas of the District.	This scale and distribution of growth and the implications for areas of the district and specific sites will be addressed as part of the consideration of options for a suitable spatial strategy.
The needs associated with housing requires a more thorough analysis. In particular there should be greater reference to self-build/ custom build and housing for the elderly.	These additional areas warrant further consideration and will be considered as the Review is progressed. It is noted that a number of respondents suggested that a policy requiring self-build is not appropriate.
There are infrastructure deficits across much of the District.	Infrastructure is a challenging matter which is best addressed through a Local Plan rather than piecemeal planning applications. The Infrastructure Delivery Plan (IDP) will be the primary mechanism for identifying infrastructure needs. The evidence base being developed will assist in informing this work. In addition involvement of key stakeholders such as Staffordshire County Council will assist in developing the IDP.
Some respondents considered the plan period to be appropriate, others considered there to be a need to align with the other GBHMA Authorities.	This will need to be considered, however it is agreed that there is logic in aligning the Plan period with other Local Plan Authorities conducting Plan Reviews.
There is limited justification to include a density policy.	It is recognised that there needs to be flexibility within a Plan regarding density. Notwithstanding this it is important the District achieves suitable density delivery. This is something that is common across the GBHMA, arising from the GL Hearn and Wood Strategic Growth study.
Residents from Shenstone/ Stonall and Little Aston made a significant amount of generic objections opposing growth in this area. This is comparatively higher than other areas across the District.	From a planning policy perspective the number of respondents should not be a reason to halt progress with considering areas for growth. Growth in this area will need to be tested in line with the other options.

3.4 The next stage of the Plan review is to undertake a Preferred Options and Policy Directions consultation. This is important for the following reasons:

- The Council have committed to consult on this stage in its adopted Local Development Scheme;
- The recently examined Local Plan Allocations includes a modification proposed by the Inspector that will require the Council to submit the Plan review in a timely manner; and
- Evidence has been prepared (set out below) which has resulted in some policies being drafted. It is important the Council obtain feedback on the proposed policies and policy directions to adequately inform a later submission document.

3.5 When considering the role and purpose of the Preferred Options and Policy Directions document it is important that this is read as a whole. However of particular importance is the potential levels of growth proposed. At this point no definitive level of growth is required. However officers would draw Members' attention to sections 14, 15 and 22 of the document (**Appendix A**) which sets out the recommendations for growth which will be assessed further following consultation.

- 3.6 Following the earlier consultation on the Scope, Issues and Options consultation officers have undertaken work to update some of the Council's current evidence base. This has focused on the following:
- Duty to Cooperate – engagement with statutory partners to investigate cross boundary matters that have relevance to the future of the District. This work has assisted in identifying some of the policy directions. An example being the scale of growth and its relationship with the Greater Birmingham Housing Market Area.
 - Habitat Regulations Screening Assessment – an assessment which screens the potential impact on the designated sites within and adjacent to the District. The screening at this stage has identified the need for a further assessment which will be in the form of an Appropriate Assessment.
 - Settlement hierarchy assessment – This assessment shaped the spatial strategy. The assessment identifies the scale of services that exist within a settlement currently. A settlement that has a comparatively high number of services and facilities will represent a level of sustainability. However in developing the spatial strategy this is not the only consideration. While some areas might be well catered for in terms of existing services there might be limited opportunities for further growth of these facilities and/ or other land constraints. A good example of this is Alrewas which is a key rural settlement but has limited opportunities for growth.
 - Land availability assessment – An active call for sites was launched which has assisted in verifying what potential scope for development there is across the District. This has assisted in discounting some of the options previously considered, such as growth at Thorpe Constantine. In this case there was no evidence of a willing landowner. In other cases the call has identified options that the Council were previously unaware of. An example being the submission of the County Council's farm holdings. The consultation does not go as far as identifying specific sites. However the document at section 22 (**Appendix A**) states potential directions for growth.
 - Sustainability Appraisal – the sustainability appraisal has assisted in testing the policy options (e.g. level of growth, draft policies etc.) against a set of sustainability objectives. Following the appraisal process policies were redrafted to take account of the findings.
- 3.7 The initial evidence base set out above, combined with the consultation responses and changes to national planning policy has informed the consultation document (**Appendix A**). The content of the review will require additional work. At the time of writing guidance is still being issued by the Ministry of Housing Communities and Local Government (MHCLG). Additional guidance will be published by the MHCLG in due course. In particular officers are awaiting the outputs of MHCLG consultation on local housing needs. This is important because this will have a bearing on the level of growth the District needs to accommodate. This level of growth will in turn influence other pieces of evidence base. As an example being the full plan viability assessment which will need to reconcile the growth being proposed along with the draft policy framework. Appendix A of the consultation document (**Appendix A**) identifies the evidence base that will be required before the next stage of consultation.
- 3.8 The consultation document where possible sets out the preferred policies that are being suggested. These policies are based on the concluded evidence and/ or the consultation responses. Where more work is required a preferred policy direction is identified.
- 3.9 In addition to assist the consultation officers have produced an executive summary of the consultation document. This can be found in section 1 of the document (**Appendix A**) and will assist the stakeholders in providing an overview of the key components of what will be contained in the Plan when this emerges.

3.10 Following the consultation on this stage officers will need to consider the responses received. A report will then be produced for the EGED (O&S) Committee. In addition the evidence base listed in the consultation document will need to be completed. The intention is to bring a draft submission document to Cabinet for consultation in September 2019.

Alternative Options	<ol style="list-style-type: none"> 1. Cabinet recommends not to progress with the Local Plan Review at this point in time. This would present difficulties in meeting the agreed timetable for completing the Local Plan Review. 2. Cabinet recommends alternative growth options be considered before consultation is undertaken.
Consultation	<ol style="list-style-type: none"> 1. Consultation is required on the Local Plan Review document and accompanying documents for a minimum of six weeks
Financial Implications	<ol style="list-style-type: none"> 1. Officer time will be needed to run the consultation on the Local Plan Review. 2. The costs of consultation will be met within approved budgets. 3. Officer time will be needed to run consultation events on the Local Plan Review. 4. There will be a need to commission evidence associated with the Local Plan Review.
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 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 has been undertaken as part of preparing the Local Plan Review (Appendix E)
Crime & Safety Issues	<ol style="list-style-type: none"> 1. There are no crime and safety issues.
GDPR/Privacy Impact Assessment	<ol style="list-style-type: none"> 1. A Privacy Impact Assessment has been undertaken.

	Risk Description	How We Manage It	Severity of Risk (RYG)
A	An unusually high level of responses are received which has a detrimental impact on the proposed timescales.	Upon close of the consultation officers will review the quantum and complexity of responses. Officers will report progress to Members	Yellow
B	Evidence required to support the Local Plan Review has a detrimental impact on the proposed timescales and allocated budget.	Consideration of evidence base requirements is an iterative process. Officers will continue engagement with stakeholders involved in shaping	Yellow

		evidence base requirements to ensure the initial scope is clear. Project management practices are followed in the preparation and delivery of evidence base. New requirements arising from external factors such as future consultations will be considered by officers.	
C	The Council receive criticism for the methods of marketing and process of engagement.	Officers will work with the communications team in the marketing of the consultation. This will aim to respond to comments during the consultation along with aiding future learning.	Green

Background documents

Scope, Issues & Options consultation
Statement of Community Involvement
Local Development Scheme

Relevant web links

[Scope, Issues & Options consultation](#)
[Statement of Community Involvement](#)
[Local Development Scheme](#)



Lichfield District **LOCAL PLAN REVIEW** 2020 - 2036

Preferred options & policy
directions

January 2019

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Glossary & abbreviations

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1 Executive summary

Introduction

1.1 Lichfield District Council is reviewing its Local Plan with the aim to create a new local plan which will provide the planning framework for our district up to 2036.

1.2 The new local plan will help to make sure our district provides the homes, jobs, community facilities and services to meet the needs of our population in a sustainable way, while protecting and enhancing the district's environment and heritage.

1.3 Once adopted the new local plan will replace the current [local plan strategy](#) which was adopted in 2015 and the [local plan allocations](#) which is expected to be adopted in 2019. Until the new local plan is adopted, the current local plan will continue to be used when making planning decisions.

1.4 This preferred options and policy directions document is a key stage in the plan making process and provides the basis for consulting with residents, businesses and stakeholders on how the district should develop in the future. It outlines the preferred vision, objectives and key planning issues affecting the district, as well as possible approaches to new development and planned growth.

1.5 We are now seeking your views on the preferred direction for strategic policies and options for growth and your thoughts on whether there are any additional policies or growth options we should be considering.

1.6 The consultation runs from Monday 28 January until 5pm Monday 18 March. There are a number of ways in which to let us know your views:

- Online via the website: <http://lichfielddc-consult.limehouse.co.uk/portal>
- Email: developmentplans@lichfielddc.gov.uk
- In writing to: Spatial Policy & Delivery, Lichfield District Council, Frog Lane, Lichfield, WS13 6YZ

1.7 The consultation document is split into the following sections:



Spatial portrait, vision, strategic objectives & priorities

1.8 The review of the local plan will consider some of the key facts and characteristics of our district and its population. This will help identify what we consider are the key issues facing the district and opportunities that exist to overcome these as part of the local plan. This consultation document identifies fourteen key strategic issues as well as a number of more local specific issues for Lichfield city, Burntwood and rural areas.

1.9 The new local plan will need to establish a clear vision to set out what the district should look like by 2036. As part of this consultation, we set out what the preferred vision for our district. This is informed by the key issues and takes account of other relevant plans and strategies which affect the district.

1.10 The document then goes on to identify fifteen strategic objectives which reflect and underpin the vision and priorities for Lichfield District. These objectives form the basis for the strategic policy directions set out within the document.

Strategic policies

1.11 The new local plan will set out strategic policies that will underpin and guide development within the district. The strategic policies will be designed to deliver the strategic objectives and vision for the district across the plan period. As part of this consultation document, a number of strategic policies and policy directions have been proposed and categorised into nine broad themes, each of which is a chapter within the document.

- Spatial strategy - outlines the preferred settlement hierarchy which is split into five levels comprising of strategic centres, other main centres, larger service villages, smaller service villages and smaller rural villages and wider rural areas. The chapter then goes on to set out the preferred policy direction for the spatial strategy.
- Sustainable communities - sets out the strategic policy directions to guide sustainable development within the district and ensure that when development takes place sustainable communities are created. It goes on to set out policies to address climate change, flood risk and air quality.
- Our infrastructure - infrastructure is a term used to define all the requirements that are needed to make places function efficiently and effectively and in a way that creates sustainable communities. This chapter sets out the preferred policy direction to support and deliver infrastructure within our district.
- Our sustainable transport - outlines the preferred policy approach for sustainable transport by seeking to promote sustainable transport choices and support sustainable transport improvements.
- Our homes for the future - sets out possible options for the housing requirement across the plan period. It also outlines the preferred policy approach relating to housing mix, housing density and self-build and custom house building. This chapter goes on to set out our preferred approach towards provision for gypsies and travellers.
- Our economic growth, enterprise & tourism - includes a range of topics that relate to different aspects of employment and enterprise. It sets out the preferred policy approach towards the need for employment land, fostering skills and enterprise, rural employment, the role of town centres and tourism.
- Our healthy & safe lifestyles - sets out the preferred policy approach relating to healthy and safe lifestyles, participation in sport and physical activity and provision for arts and culture.
- Our natural resources - the district has a rich natural and built landscape comprising of heritage assets, protected and important landscape and habitats. This chapters sets out the preferred policy direction to protect, conserve and enhance the district's natural environment.
- Our built & historic environment - outlines the preferred policy approach to protect and improve the built environment and the district's heritage assets.

Strategic options for spatial growth

1.12 The new local plan will need to consider a range of options to deliver the development which Lichfield District needs. The initial [Local Plan Review: Scope, Issues & Options](#) document identified the following growth options:

- Residential growth option one: town focused development
- Residential growth option two: town and key rural village focused development
- Residential growth option three: dispersed development
- Residential growth option four: new settlements
- Employment growth option one: expansion of existing employment areas
- Employment growth option two: new locations

1.13 This consultation document undertakes a high level assessment of each of these options and sets out the preferred strategic approach to growth. The preferred approach would see new homes focused on the sustainable settlements identified in the preferred settlement hierarchy, with higher levels of growth going to those settlements higher in the hierarchy. With regards to employment growth, the preferred approach is to focus on the expansion of existing employment areas.

Next steps

1.14 Within this document we ask a number of questions which we would like your views on in order to shape further stages of the local plan review. At the end of the consultation period, we will consider all the comments received together with evidence collected on issues relevant to the plan which will inform the next stage of the local plan. It is anticipated that the council will consult on the next stage of the local plan review in September.

2 Introduction & context

What is a local plan?

2.1 All planning authorities are required to produce strategic plans which show how their area will develop in the future. These plans are often known as 'Local Plans'. The local plan should provide a positive vision and framework for the future development of the area, seeking to address needs and opportunities in relation to housing, the economy, community facilities and infrastructure as well as safeguarding important environments. A key task of a local plan is to provide policies which will guide decisions on whether or not planning applications can be granted. In law the local plan is described as a 'Development Plan Document' (or a DPD) and can consist of one or more documents including local plans and neighbourhood plans.

2.2 The [National Planning Policy Framework](#) (NPPF) establishes that the planning system in England should be 'genuinely plan-led' and authorities are expected to keep their local plans up-to-date. The development plan for the area must include strategic policies to address the areas priorities for development and use of land. Alongside strategic policies authorities should also consider non-strategic policies to provide more detailed policies for specific areas, neighbourhoods or types of development. These policies can be included within subsequent local plan documents and within neighbourhood plans.

2.3 The current Lichfield local plan is a district wide plan and comprises of two development plan documents:

- [The Local Plan Strategy](#) : which was adopted in February 2015 and sets out the strategic vision, objectives and spatial strategy for the district including the levels of development needed and a number of large strategic allocations for housing growth; and
- [The Local Plan Allocations](#) : which is currently at an advanced stage and likely to be adopted in early 2019. This allocations document identifies site specific proposals and policies to deliver the strategic vision established through the local plan strategy.

2.4 There are also a number of [neighbourhood plans](#) which have been produced by communities within the district which form a further layer of planning policy within the district. Neighbourhood plans are required to be in general conformity with the local plan for an area and as such compliment the local plan within the district. Once adopted neighbourhood plans also become part of the development plan.

2.5 Some of the allocations and policies within the existing local plan may be carried forward into the new local plan. Whilst we prepare and develop the local plan review the existing local plan will still be used to determine planning applications.

What is the local plan review and why are reviewing it?

2.6 The local plan review will provide a full review of the existing local plan within the district to ensure that there are appropriate and up-to-date planning policies for the area. There have been a number of important changes to the planning system in recent years including the publication of a revised national planning policy framework and its associated [planning practice guidance](#) in 2018.

2.7 Three major aspects of the governments planning reforms are the implementation of a standard method for calculating housing need in an area, a new requirement to ensure authorities are working with their neighbours to meet their housing need where it has been robustly demonstrated that their

need cannot be met and also a requirement for all authorities to consider a review of their local plans at least once every five years. Changes such as these mean it is vitally important for the district council to begin the process of reviewing its local plan.

2.8 The local plan allocations document commits Lichfield District to carrying out an early review of its local plan in order to respond to the changing needs for development, especially the need to accommodate additional housing arising from unmet needs in neighbouring authorities within the same housing market area.

2.9 The District Council commenced its local plan review in April 2018 with consultation on a [Scope, Issues and Options](#) document. The scope, issues and options document focused on identifying the key issues facing the district and presented a number of possible spatial growth options. The responses to the consultation have been instrumental in guiding this preferred options & policy directions document.

What is the scope of the local plan?

2.10 This preferred options and policy directions document begins to refine elements of the local plan based on the information we have available to date.

2.11 The final version of the local plan will include:

- Spatial profile & issues: a high level picture of Lichfield District today with its key features and issues identified;
- A vision: a high level picture of how Lichfield District will appear in 2036;
- Strategic objectives & priorities: setting out the main challenges and how these will help meet the vision;
- Spatial strategy: setting out how different areas of the district and the district as a whole should develop within the plan period, setting out how much development will take place, where this development will be located and when it will be delivered. The spatial strategy is key in delivering the vision for the district;
- Strategic policies: theme-based strategic policies which will support the delivery of the spatial strategy and establishing the principles of development. Examples of themed areas are likely to be sustainable development, the natural and built environment, infrastructure, housing, employment and health;
- Non-strategic policies: locally based detailed policies for specific areas which support the delivery of strategic policies, spatial strategy and vision. Such policies may be included within the local plan, any subsequent local planning documents and within neighborhood plans produced by our communities; and
- Monitoring and implementation framework: to ensure that the council can check that the local plan is being delivered and how effective its policies are being in ensuring the vision and spatial strategy is being delivered. Monitoring will be undertaken throughout the plan period and considered through the authority monitoring report.

How will the local plan be prepared and what stage are we at?

2.12 The timetable for the local plan review is set out in the Council's [Local development scheme](#) and is summarised in table 2.1. This is the preferred options consultation stage.

2.13 At this stage, the council is seeking your views on the local plan review, on the issues facing the district and what our vision and objectives should be to address these issues. The consultation responses that we receive will contribute to our work in preparing the local plan review and will also help to inform what further evidence may be necessary. There will be further opportunities to comment on the local plan review and its policies as it progresses.

2.14 The table below sets out the anticipated timetable for the stages of production.

Table 2.1 Local plan review timetable

Stage	Anticipated Date
Scope, Issues & Options Consultation	April 2018
Preferred Options and Policy Directions	January 2019 (current stage)
Publication	September 2019
Submission	January 2020
Examination in Public	March 2020
Adoption	December 2020

What has influenced the development of the local plan to date?

National planning policy & guidance

2.15 Since the scope, issues & options document was consulted upon the government has published a revised national planning policy framework along with associated guidance. The local plan will need to conform with national planning policy and guidance and associated legislation.

2.16 This preferred options and policy directions document has been developed to accord with the revised national planning policy framework and its associated guidance. Further detail with regards to the national policy context is set out in subsequent chapters of this document.

Engagement with other councils and our partners

2.17 The local plan review must be prepared in accordance with a duty to cooperate which sets a legal obligation for the council to engage with other authorities and public bodies on an ongoing basis on strategic planning issues which cross administrative boundaries. Strategic issues can include the delivery of housing, employment and infrastructure and the impact of development on areas of environmental importance including special areas of conservation and the green belt.

2.18 The scope, issues and options document set out a number of areas where the council will need to work with partner organisations on strategic issues. An example of such an issue is the unmet housing need arising from within the 'Greater Birmingham Housing Market Area' (GBHMA) which will need to be addressed within the local plans of each authority within the housing market area.

2.19 In addition to complying with the duty to cooperate the revised national planning policy framework requires authorities to produce and publish statements of common ground which will set out the cross-boundary issues which need to be addressed and detail the progress which has been made in dealing with them. The council may wish to produce one or a number of statements of common ground to cover the range of cross-boundary matters the local plan is addressing. The council will prepare and update the relevant statements of common ground as the local plan review progresses. In order for a local plan to be examined and considered effective it will need to demonstrate that cross-boundary strategic issues have been dealt with and that this should be evidenced through the statements of common ground.

2.20 A key aspect which has influenced this document is the ongoing consultation which has taken place with our communities and various stakeholders. The scope, issues and options consultation received a high level of response from all aspects of the community, the development industry and

other stakeholders. In total over 1,600 individual responses were received from around 260 individual consultees which provided comments on a range of issues and topics within the scope, issues and options document. These responses have been analysed and considered by the council when preparing this preferred options and policy directions document. Throughout this document we have set out a **'what you told us'** section which summarises some of the key themes which came out through the consultation and have influenced this document.

2.21 In addition to the initial consultation the council undertook a ['Call for Sites'](#) exercise during October and November 2018. This gave landowners, developers and other stakeholders the opportunity to submit sites to the council for consideration. A large number of sites were submitted through this process, with a number of new sites being submitted along with sites which have previously been promoted through the local plan process. Sites submitted through this process have been published in the call for sites schedule alongside this document. These sites will be assessed through our evidence, including our land availability assessments. The results of these assessments will be included in the annual updates of the documents which will be published in spring 2019. Whilst the initial call for sites has taken place, we are happy to continue to receive additional sites during this consultation period and beyond.

2.22 The council will continue to engage with our partners and stakeholders throughout the progression of the local plan review. This will be undertaken in line with our [statement of community involvement](#). It will ensure that all stakeholders wishing to engage in the plan-making process have the appropriate opportunities to do so. This document represents a further opportunity for stakeholders to engage and provide meaningful contributions towards the review of the local plan.

Other plans and strategies

2.23 The council works in close partnership with a number of organisations including the health authorities, the county council and housing associations. The council do this to ensure that the policies and proposals within the local plan are as closely aligned as possible to the policies and plans which partner organisations prepare. There are a number of plans which are of direct relevance and inform the local plan review, and in turn the local plan informs them. Examples of such plans and strategies are:

- Lichfield District Council's strategic plan: sets the council's strategic vision and values for the coming years. The local plan will assist in delivering the vision identified in the council's strategic plan;
- Local enterprise partnerships: the district is part of two local enterprise partnerships, the Stoke on Trent and Staffordshire local enterprise partnership and the Greater Birmingham and Solihull local enterprise partnership. Both of the local enterprise partnerships produce their own strategic economic plan which is relevant to the council and will help to inform the local plan;
- Strategic economic plan: prepared by the West Midlands Combined Authority and sets out the vision for improving the quality of life of everyone who lives and works in the West Midlands; and
- Neighbourhood plans: communities across the district have produced or are currently producing their own neighbourhood plans. These plans provide a further layer of planning policy but also provide evidence which supports this local plan review. Further detail on neighbourhood plans and their role in the context of the local plan review is included in chapter three of this document.

Our supporting evidence base

2.24 The local plan review will need to be supported by an adequate and proportionate evidence base. This is one of the main requirements of a local plan when it is independently examined. The evidence base is critical to ensuring that the council and all stakeholders have a thorough understanding of the issues and needs facing the district.

2.25 The evidence base will inform the various aspects of the local plan and will itself be tested at examination. The council has prepared a number of studies and assessments. There is a programme for further documents that will contribute to our evidence base to support the policies and proposals which will be in the local plan as the review process continues.

2.26 A range of evidence will be collected and collated along with updates and reviews of existing evidence. The council has already produced some evidence by commissioning work where appropriate such as the strategic flood risk assessment and evidence relating to Cannock Chase Special Area of Conservation. We have undertaken evidence base studies including the settlement sustainability study and updated existing evidence such as the strategic housing land availability assessment, brownfield land register and employment land availability assessment. Further evidence will continue to be collected by commissioning work, undertaking studies and updating our existing evidence.

2.27 The evidence base is not yet complete and it needs to be recognised that some aspects of this work that are currently underway or will be undertaken in due course could play a significant part in further informing the nature of the policies and proposals within the local plan review. The timescales associated with this evidence are set out at **Appendix A**. Indeed this evidence may result in changes to the preferred options and policy directions which are set out within this document. Nevertheless, it is considered that consultation on the potential development strategies and policies for the district is required now so that views and information collected through this consultation can further inform the process moving forward.

2.28 The council's evidence base is available online via the [council's website](#). These pages will be updated as new and updated evidence is prepared and published.

Assessing environmental impacts

2.29 The council is required to assess the environmental impacts of any plan which it produces. Prior to the scope, issues and options document a [sustainability appraisal scoping report](#) was produced. The scoping report was made available to the statutory consultees (Natural England, Historic England and Environment Agency) for consultation. This report provides a detailed baseline of information and its outputs were key in informing the scope of the local plan review and the scope, issues and options document produced in April 2018.

2.30 The scope, issues and options document was supported by a [sustainability assessment](#) (and its [non-technical summary](#)) and a [habitat regulations assessment](#). These documents form an important part of the supporting evidence to the local plan review and help the council to assess the possible impacts of the plan and its policies. Further sustainability appraisal and habitat regulations assessment have been undertaken on this preferred options and policy directions document. These processes will continue to be undertaken at each stage of the local plan review.

How to read this document

2.31 This preferred options and policy directions document has been produced to further inform our local plan review and provide stakeholders another opportunity to provide their views and comments. Within the document we begin to set out our preferred options and the preferred directions for planning policies and ask a series of questions which will help inform the next stages of the local plan review process.

2.32 Within this document there are a number of boxes which are colour coded to help guide you through the document, these colour coded boxes will be set out as is demonstrated below.

Pink boxes represent our preferred policies and include the preferred policy wording which we are proposing.

Blue boxes are used where we have not yet established a preferred option for policy wording but have started to understand the preferred likely direction of the policy.

Grey boxes are used to provide key information, including key facts about our district.

Light green boxes are used to show the key issues affecting the district which the local plan review will seek to address. This also includes certain location specific issues which have been identified.

Dark green boxes are used for the vision and key objectives for the local plan. These are key to the local plan review as the policies and proposals within the local plan should seek to deliver the vision and its strategic objectives.

Clear boxes are question boxes. These include specific questions which we are seeking views on through the consultation on this preferred options and policy directions document.

How can you get involved?

2.33 This consultation seeks to set out the issues, vision and key objectives for the local plan review. It also provides the direction for future strategic policies and options for growth. The Council is keen to receive representations from all interested and affected parties so that responses can be fed into the next stage of the Local Plan Review.

2.34 You can make your comments using the representation form. There are a number of ways you can make a representation:

- Online via the website: <http://lichfielddc-consult.limehouse.co.uk/portal>
- Email: developmentplans@lichfielddc.gov.uk
- In writing to: Spatial Policy & Delivery, Lichfield District Council, Frog Lane, Lichfield, WS13 6YZ

What happens next?

2.35 Following consultation on the preferred options & policy directions we will carefully consider all comments which have been submitted to us along with the evidence base which is being produced in support of the local plan review. These comments and evidence will help to inform the next stage of the local plan review process.

3 National context

3.1 National planning policy is set out within the [National Planning Policy Framework](#) which was revised in July 2018. The local plan review will be progressed inline with the new framework to ensure that our local plan is consistent with national policy. The framework is clear that the planning system in England should be 'genuinely plan-led' with up-to-date and succinct local plans being the cornerstone of the planning system.

3.2 National policy requires authorities to produce policies to address the strategic priorities for its area and these policies can be contained in plans produced either individually or jointly or by an elected Mayor. As the district is not within a combined authority area or under the remit of an elected Mayor with plan making powers then the responsibility for strategic planning rests with the district council. Through the [scope, issues and options](#) consultation council set out its intention to produce its own local plan for its area and asked whether this was an appropriate approach or whether a joint-plan should be proposed. None of the comments received indicated that a joint plan was seen as appropriate.

3.3 National policy identifies that strategic policies set out within the local plan should provide an overall strategy for the pattern, scale and quality of development. Strategic policies should look ahead over a minimum 15 year period so that they are able to anticipate and respond to long-term requirements and opportunities such as those which may arise from major improvements in infrastructure. Strategic policies should address issues such as:

- the overall strategy for growth including scale, location and quality;
- housing (including affordable housing);
- economic development to deliver employment;
- leisure, retail and commercial development;
- infrastructure and community facilities of all types (including transport, telecommunications, social and community, green infrastructure and security);
- conservation and enhancement of the natural and built environment; and
- climate change.

3.4 Plans are required to make explicit which of its policies are strategic and these should be limited to those which are necessary to address the strategic objectives and priorities for the area. Such policies will form a clear starting point for any more localised non-strategic policies which may be required. Detailed matters which would be better suited to non-strategic policies either within local plan documents or neighborhood plans should not be included within strategic policies.

3.5 Strategic policies should provide a clear strategy for bringing forward sufficient land, and at a sufficient rate, to ensure that development needs across the plan period are met. Non-strategic policies can include site allocations, the provision of infrastructure and facilities at a local level, establishing design principles, conserving the environment and setting out other appropriate development management policies.

3.6 Given that national planning policy requires the preparation of strategic and non-strategic policies it is considered that it may be appropriate for the district council to prepare a two part local plan much like the approach used for the current local plan. This will enable the council to set out its strategic policies which can then be followed with further non-strategic policies through neighbourhood plans and a subsequent local plan document.

3.7 National policy requires policies within local plans to be reviewed to assess whether they need updating at least once every five years, following such a review the plan should be updated as necessary. Reviews will need to take account of any changes to national policy, changing circumstances for an area including where the applicable local housing need figure has changed significantly.

3.8 Local Plans are required to be prepared in accordance with all legal and procedural requirements and will be examined to assess whether they are 'sound'. Plans are considered to be sound if they are positively prepared, justified, effective and consistent with national policy.

4 Local context

Current local plan

4.1 The introductory chapter of this document provided an overview of the current local plan for the district and why this is being reviewed. It is important to note that until the time the local plan review is adopted, the current local plan which is made up of the [local plan strategy](#) and [local plan allocations](#) document remains in place and will guide development and decisions on planning applications.

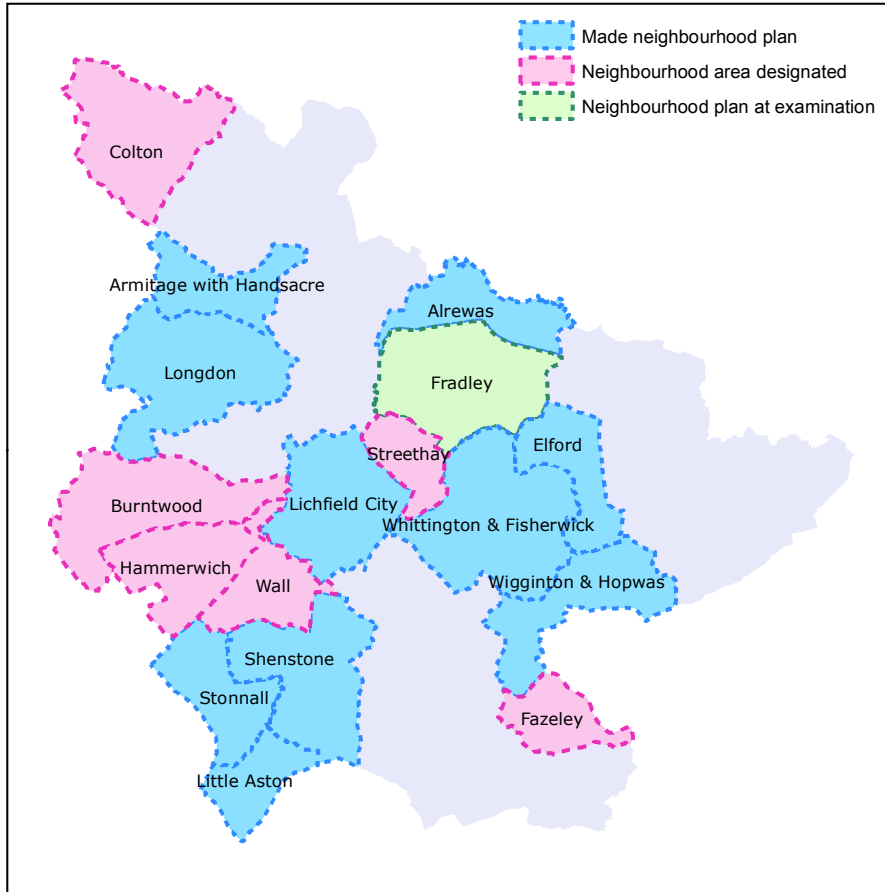
4.2 The current local plan includes a range of policies and proposals which have been developed to deliver the vision and strategy set out within the plan. The [scope, issues and options](#) document provided an analysis of those policies and considered whether policies needed to be significantly changed together with those which would require minor amendments or no amendments. The subsequent chapters of this document present preferred policy options and policy directions which draw on this analysis and in some instances provides suggested policy wording.

Neighbourhood plans

4.3 National policy has made clear that [neighbourhood plans](#) are a key part of an areas development plan. Neighbourhood plans are prepared by their community and must be examined to ensure they meet the 'basic conditions' set out in national policy. Once a neighbourhood plan has been successfully examined a referendum is held. This referendum is undertaken by the residents in the neighbourhood plan area. If the plan receives a yes vote it is used by the planning authority in making decisions on planning applications. To enable this the district council adopt the neighbourhood plan (it is then 'made') and it forms a key part of the development plan for that area.

4.4 Lichfield District has seventeen neighbourhood plans either 'made' (or adopted) or at varying stages of preparation.

Figure 4.1 Neighbourhood plans



4.5 National policy makes clear that neighbourhood plans can be used to set out non-strategic policies which assist in the delivery of the strategic policies set out within the local plan. Neighbourhood plans must be in general conformity with an areas local plan and its strategic policies and should not provide for less development than is set out within the local plan.

4.6 Where a neighbourhood plan has been produced, then the non-strategic policies within that plan would take precedence over the non-strategic policies within a local plan if the neighbourhood plan has been 'made' more recently. This situation also applies in reverse if policies within a local plan are the most recently adopted. Following the review of the Local Plan communities may wish to review their neighbourhood plans to ensure their policies are in conformity with the local plan.

5 Profile of the district

Spatial characteristics

5.1 To help us plan for the future, we need a clear understanding of the characteristics of Lichfield district today, and the issues and opportunities that these present. This section provides a snapshot of the key spatial characteristics of the district.

5.2 Lichfield District is located in south-east Staffordshire abutting the West Midlands conurbation and covers an area of 33,130 hectares with a population of 103,100. The district has two main settlements Lichfield city and Burntwood, each with a population of around 30,000 as well as many villages set within a varied and attractive rural area. There are also several larger settlements and towns located next to the district boundary including Rugeley, Tamworth and Sutton Coldfield.

Figure 5.1 West midlands



5.3 Given its location the district is an attractive place for people to live. It has been a significant destination for migrants from the West Midlands conurbation and other nearby towns. This has led to pressure for housing growth over and above the needs arising purely from within the district. The southern half of the district is covered by the West Midlands Green Belt.

5.4 The current [local plan strategy](#) focuses the majority of growth to the most sustainable locations in the district. Strategic housing allocations are made at Lichfield, Burntwood, Fradley and East of Rugeley, with North of Tamworth being identified as a broad development location and other settlements receiving more modest housing growth. The current plan protects existing employment sites and allocates a further employment site at Cricket Lane, Lichfield.

Population and communities

5.5 Whilst the demographics of different communities within the district vary considerably, there are some general characteristics of the whole population of the district that have a bearing on future needs.

Table 5.1 Population & age structure

Population	District	West Midlands	England
Total	103,061	2,928,085	55,268,067
0-14	15.9%	17.7%	17.5%
15-64	60.9%	62.5%	64.6%
65+	23.2%	19.71%	17.8%

5.6 The population of Lichfield has increased by 2,661 people (2.18%) since 2010, however, when compared with the West Midlands (3.4%) and Great Britain (4.6%) the population has grown at a much slower rate.

5.7 The district is characterised by a larger than average proportion of people over sixty five which also exceeds the number of children under of the age of fifteen. The overall population for the district is projected to increase by 4% between 2015 and 2025 with a significant growth in people over 65 (20%) and ages 85 and over (63%). This projected rate of increase is faster than the national average.

⁽ⁱ⁾ The impacts of an ageing population are recognised as a national issue. The figures for Lichfield illustrating population ageing suggests that the movement into retirement and older age groups could be a more significant issue here than in many other areas of the country.

5.8 The higher proportion of older people means there is a smaller working age population (16-64) within Lichfield District, decreasing at a faster rate (3%) than both the West Midlands or Great Britain since 2010. This is over double the rate in the West Midlands which decreased by only 1.3% and noticeably more than the figure for Great Britain which decreased by 1.6%.

5.9 The ethnic diversity of the district's population does not reflect that of the West Midlands or the rest of England, with people of White British origin accounting for a larger proportion of the population than any other ethnic group. ⁽ⁱⁱ⁾

Table 5.2 Ethnic Composition

Ethnic Composition (%)	District	West Midlands	England
White	94.6	82.8	85.5
White Irish / White Other	2.1	Not available	

i [ONS Mid-Year Population Estimates 2016](#)

ii 2011 Census ONS

Ethnic Composition (%)	District	West Midlands	England
Mixed	1.1	2.4	2.2
Asian or Asian British	1.5	10.2	7.6
Black or Black British	0.5	3.2	3.4
Chinese or Other Ethnic Group	0.3	1.5	1.7

Key characteristics: Population and communities

- The population of our district is growing at a much slower rate compared to the West Midlands and Great Britain.
- Our district has a larger than average proportion of people aged over 65, and therefore a smaller working age population when compared to the West Midlands and Great Britain.
- Our district is less ethnically diverse when compared with the West Midlands and England, with White British origin accounting for over 94% of the district.

Housing

5.10 Lichfield is seen as an attractive commuter area for Birmingham and a desirable place to live, however the affordability of houses can be an issue for many people who want to live in the district. Average house prices across the district have increased at a similar rate to the West Midlands between 2009 and 2017. However, house prices across the district are higher than the average for the West Midlands. The average house price costs £70,000 more in Lichfield than in the West Midlands⁽ⁱⁱⁱ⁾.

Table 5.3 Average house prices

	2009	2010	2011	2012	2013	2014	2015	2017
District	£206,114	£257,553	£235,515	£235,515	£229,833	£243,452	£268,247	£282,453
West Midlands	£158,245	£174,404	£166,993	£180,000	£188,000	£191,000	£202,397	£214,877

5.11 Given the average house price in the district is higher than the average price in the West Midlands, affordability of houses in the district can be an issue for many people.

5.12 Through evidence which supports the local plan strategy it was identified that Lichfield has an imbalance of housing types with high concentrations of larger, detached homes particularly in the rural areas and a lack of smaller properties, particularly two and three bedroom homes. There is a notable desire for smaller properties particularly within those areas which can support first time buyers as well as enable people to stay in their communities and continue living independently as they downsize.

5.13 Lichfield forms part of the Greater Birmingham & Black Country Housing Market Area (GBBCHMA) along with neighbouring authorities and evidence published for the GBBCHMA shows a significant unmet housing need across the housing market area. This housing shortfall will need to

iii CLG, Hometrack and Land Registry

be addressed between the authorities and whilst the final distribution of unmet need has not been determined, Lichfield District is committed to engaging with its neighbours under the duty to cooperate to help to meet the needs within the housing market area.

5.14 In terms of housing delivery the local plan strategy sets an overall housing requirement of 10,030 ^(iv) dwellings between 2008 and 2029 at an annual rate of 478 dwellings per annum. It has sought to do this through a strategy of focusing major growth within and adjoining the most sustainable settlements within the district. The council has continually monitored housing delivery against this target through the [authority monitoring report](#) (AMR), [strategic housing land availability assessment](#) (SHLAA) and its assessment of [five year housing land supply](#). This monitoring process has revealed that a shortfall has arisen in the early part of the plan period and there is a significant difference between the number of permissions granted and housing completions each year. The District Council has continued to grant planning permissions significantly in excess of the annual housing requirement to ensure that a rolling five year supply of housing land is available.

5.15 The revised [national planning policy framework](#) has introduced a new housing delivery test for local authorities. This test is designed to ensure that local authorities and other bodies are held accountable for their role in ensuring new homes are delivered. The delivery test will highlight whether the number of homes being built is below the targets within a local plan, provide mechanisms for establishing why those targets have been missed and trigger policy responses where delivery is lacking. Given the district's recent delivery profile and the government's intention to scrutinise delivery it will be important for us to understand why delivery of new homes within Lichfield District has been in the past below target.

5.16 Alongside the identified issue with regards to delivery of housing is the delivery of affordable housing. The adopted local plan strategy seeks to deliver up to 40% affordable housing on suitable developments. Since 2008 there has been a relatively low proportion of affordable homes delivered which mirrors the overall issue with regards to housing delivery.

Key characteristics: Housing

- Affordability is a key issue within our district with the average house price over £70,000 higher than the national and regional averages.
- There is an imbalance of housing types within the district with a higher concentration of larger, detached homes.
- Our district falls within the Greater Birmingham & Black Country housing market area and there is a significant unmet housing need across the Housing Market Area.
- There has been a shortfall in housing delivery including affordable homes within our district over the past decade.

Health and inequalities

5.17 Lichfield District is considered to be a relatively prosperous area in a regional and national context, ranking as low as 252 out of 326 local authorities for overall deprivation in 2015. While it is generally true that this is an indication of prosperity and the health of communities, there are pockets of increased deprivation within the district. Chadsmead and Chasetown wards falling within 20% of most deprived areas nationally ^(v).

iv The total housing requirement includes 1,000 dwellings to meet the needs of neighbouring authorities, Tamworth Borough and Cannock Chase District.

v [ONS, Index of Multiple Deprivation, 2015](#)

Table 5.4 Indices of multiple deprivation

	IMD 2007	IMD 2010	IMD 2015
Rank of average score	258	237	252
Rank of income	258	243	225
Rank of employment score	237	231	202

5.18 Overall life expectancy at birth continues to rise both locally and nationally. The table below shows the comparison of life expectancy of our residents compared to the regional and national averages. It highlights Lichfield District has a higher healthy life expectancy than the national average and this is within the top 30% nationally, although this conceals pockets where healthy life expectancy is considerably lower than the national average.

Table 5.5 Life expectancy

	Male Life Expectancy	Male Healthy Life Expectancy	Female Life Expectancy	Female Healthy Life Expectancy
Lichfield District	79.9	65	83.1	67
West Midlands	78.9	62.4	82.9	62.5
England	79.5	63.4	83.2	64

5.19 The district benefits from a range of leisure facilities including leisure centres, swimming pools, gyms and privately operated swimming pools and fitness clubs. There is a wide distribution of bowling greens, playing pitches for football, cricket, hockey and tennis courts across the district. It is noted some facilities are ageing and in need of improvement and that there are some deficiencies in specific locations.

5.20 Within the district there is a high rate of obesity, which can be seen from an early age through to adulthood with two thirds of adults either obese or overweight ^(vi). Amongst adults just over 50% meet the recommended levels of physical activity, whilst this is similar to the national figures access to opportunities to increase physical activity for all ages of the population are key to improving health and well-being.

5.21 Lichfield is considered a safe place to live with rates of crime being lower than the countywide average. The average crime rate from Lichfield is 45 crimes per 1,000 population which is lower than the average for Staffordshire at 48.3 per 1,000 population ^(vii)

Key characteristics: health and inequalities

- Our district is a relatively prosperous area ranking within the lowest 25% of local authorities for overall deprivation, however there are pockets of deprivation within the district.
- Residents of the district have a higher healthy life expectancy than the national average.
- There is a high rate of obesity within our district with just over 50% of adults meeting the recommended levels of physical activity.
- Crime rates within our district are lower than the countywide average.

vi Staffordshire Observatory, Lichfield Locality Profile 2016

vii [Lichfield District Community Safety Delivery Plan 2017 - 2021](#)

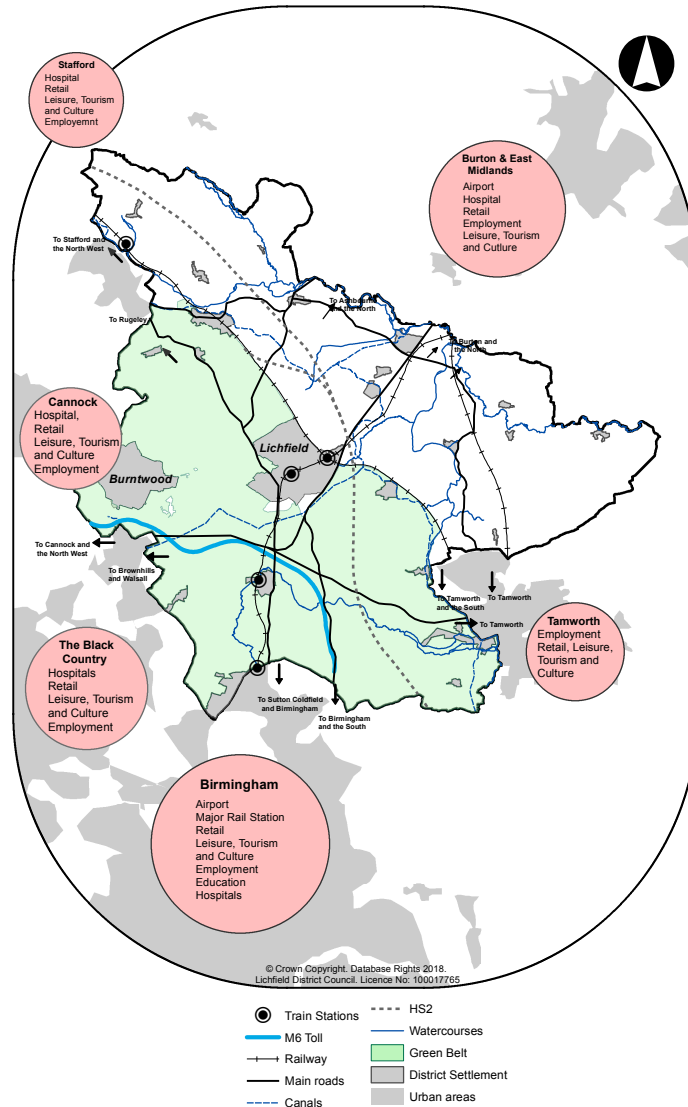
Transport movement

5.22 The district is well connected to the national transport network with the M6 toll, A38 (T), A5148 (T) and A5 (T) all passing through it. These routes are important nationally making our district attractive to employers and supporting economic growth in the key employment areas in Lichfield City, Burntwood and Fradley. In addition these nationally important routes also provide important local links as they connect our outlying settlements to the wider selection of services and products available within Lichfield city centre and Burntwood town centre, and neighbouring centres at Sutton Coldfield, Tamworth and Rugeley.

5.23 High Speed Rail 2 (HS2) will when constructed intersect the district and connect the West Midlands with London as part of Phase 1 and the West Midlands with Crewe as part of Phase 2A. Construction on Phase 1 commenced in 2017 with the first services planned for 2026 and the first services for Phase 2A planned for 2027^(viii).

viii Subject to the legislation being put in place

Figure 5.2 Infrastructure links



5.24 Lichfield District benefits from having four train stations; Lichfield City, Lichfield Trent Valley, Shenstone and Rugeley Trent Valley providing access to London via the west coast mainline and Birmingham via Walsall or the cross city line. Burntwood with its population of over 30,000 does not have direct access to the rail network along with many of the rural settlements.

5.25 Overall 75% of households within the district are within 350m of a half hourly or better weekday service to public transport, however this conceals that some of the rural villages have very limited access to train and bus services. Settlements with poor or no transport provision include Drayton Bassett, Colton, Longdon, Upper Longdon, Hamstall Ridware and Hill Ridware.

5.26 Despite its public transport links, as shown in the table 5.6 ^(ix) a significantly high number of Lichfield Districts population use a car or van to travel to work, with 49.1% of residents commuting out of the district to work.

ix ONS, 2011 Census

Table 5.6 Method of travel to work

Method of travel to work (%)	Lichfield	West Midlands	England
By car / van	47.2	40.5	37.0
Passenger in car / van	3.4	3.8	3.3
By train	2.3	1.6	3.5
By underground metro, light rail, tram	0.1	0.2	2.6
By bus / minibus or coach	1.4	4.8	4.9
By bike	0.8	1.2	1.9
By foot	5.1	6.2	6.0
By taxi	0.1	0.3	0.3
By motorcycle, scooter or moped	0.3	0.3	0.5
Other method of travel to work	0.3	0.3	0.4
Work mainly from home	4.4	3.0	3.5
Not in employment	34.4	37.6	35.3

Key characteristics: Transport & movement

- Given its central location Lichfield District is well connected to the national transport network.
- The district is an attractive commuter location for Birmingham and the Black Country.
- A significantly high proportion of people within our district use a car or van as opposed to public transport to travel to work when compared with the West Midlands and England.
- Almost half of residents commute outside of the district to work.

Education

5.27 There are forty seven schools within the district, including six secondary schools and colleges. Staffordshire University also offers a range of courses from its campus in Lichfield. The percentage of students achieving 5 or more GCSEs at A* to C is 60.5% which is higher than the results for both Staffordshire (54.7%) and England (53.5%).^(x) In terms of qualifications, Lichfield District has a lower proportion of working age population qualified to NVQ Level 4 and above, when compared to the rest of the West Midlands and Great Britain. However, this could be explained by the higher than average older population.

x Department for Education

Key characteristics: Education

- The percentage of students within our district achieving five or more GCSEs A* to C is higher than the regional and national average.

Economy & employment

5.28 Lichfield District is an attractive location for people to live and work. The district has a large portfolio of sites available for employment development within Lichfield City, Fradley, Burntwood, Fazeley, Armitage and Shenstone. Lichfield also has significantly fewer residents out of work and claiming benefits than the national average.

5.29 The nature of employment in the district has changed significantly over time with the decline of traditional engineering industries and in recent years an increase in digital communications. The provision of superfast broadband is now a vital component of infrastructure as it enables increased levels of mobile working and home working.

5.30 The districts primary employment sector is 'wholesale and retail trade', followed by 'accommodation and food services'. Employment in both of these sectors is more than the national and regional average ^(xi). Whilst the service sector is the largest employer in the district most of our residents are employed in the professional, scientific or technical industrial sector and thus travel beyond the district to access higher salaried jobs elsewhere. This is reflected in the weekly earnings for our residents which are higher than both the regional and national figures. However weekly earnings by workplace within the district are lower than the national figures, as shown in the table below.

Table 5.7 Average earnings

Gross weekly pay of full time workers (£)	Lichfield	West Midlands	Great Britain
Weekly earnings by resident	659.30	507.80	541
Weekly earnings by workplace	530.70	510.20	540.20

5.31 Tourism is a significant part of the local economy based on the heritage, character and environment of the area, with Lichfield City being a particular focal point. There are a number of individual important attractions within the district, there future needs are factors to be considered as part of the review. These include Lichfield Cathedral, Drayton Manor Park and the National Memorial Arboretum. The tourism sector within the district is forecast to grow and there is believed to be a high rate of occupancy levels of existing hotels.

5.32 Lichfield city centre also serves as the administrative centre for the district and has the largest shopping provision, serving a wider catchment than just the local population. As with all centres both Lichfield city and Burntwood face challenges in attracting investment and reducing their vacancy rates, this is a result of a number of factors including the impact of the recession and the growth of internet shopping. Both centres have investment opportunities which will assist them in addressing the challenges facing town and city centres over the plan period.

xi [NOMIS, Employ Jobs 2016](#)

Key Characteristics: Economy & employment

- The primary employment sectors within our district is 'wholesale and retail trade' and 'accommodation and food service', with employment within these sectors being higher than the national and regional average.
- A high proportion of residents commute to work to higher salaried jobs outside of our district.
- Tourism plays a significant part in our district's economy.

Historic environment

5.33 There are twenty one designated conservation areas across the district. A large part of Lichfield city is one of these conservation areas with the magnificent Lichfield cathedral at its centre. The cathedral spires (often called the ladies of the vale) are visible from many points in the wider rural landscape and the city centre's medieval street pattern and many listed buildings provide an attractive built environment.

5.34 The district has over 750 listed buildings including twelve of which are grade I listed, and a further sixty three are grade II*. In addition to the many listed and locally listed structures and buildings there are other assets including ancient monuments, the former Roman settlement at Wall and the National Memorial Arboretum. Hammerwich which is within the district is also the home of the Saxon Staffordshire hoard which was discovered in 2009. These historic sites and assets are of great importance as they contribute to the distinctive character of Lichfield and its tourist economy.

5.35 Burntwood is the second largest settlement within the district and formed as a consequence of more recent growth of smaller settlements from significant residential growth in the 1960's to 1990's. Its history is linked to coal mining and other industries, providing coal and water from the reservoir at Chasewater to the canal network which helped support the industrial revolution in Birmingham.

5.36 The canal network throughout Lichfield is extensive, passing through Armitage, Kings Bromley, Alrewas, Fradley, Lichfield and also a section through Fazeley all of which now provide opportunities for recreation. A project to reopen a further section of the Lichfield Canal which will link to Burntwood is being pursued by the Lichfield & Hatherton Canal Restoration Trust.

Key characteristics: Historic environment

- There are twenty one conservation areas within our district.
- Our district benefits from having a significant number of heritage assets including twelve Grade I listed and sixty three Grade II* buildings.

Landscape and ecology

5.37 The landscape of the district provides a rich tapestry complementing its settlement pattern. It ranges from 11th century royal hunting forest to river valleys in the east with their rich mineral deposits. The landscape reflects the human activity of the area throughout the bronze age, Roman occupations and the Anglo Saxon period with many sites recorded in the domesday book. The evolution of settlements, ecclesiastical and cultural expansion along with agricultural and industrial development continue throughout the 11th to 20th century.

5.38 The mineral deposits continue to shape the landscape with sites being worked across the district and further sites being safeguarded to the west of Alrewas within the [adopted minerals plan](#). The deposits follow the two main rivers that flow through the district, the River Trent and the River

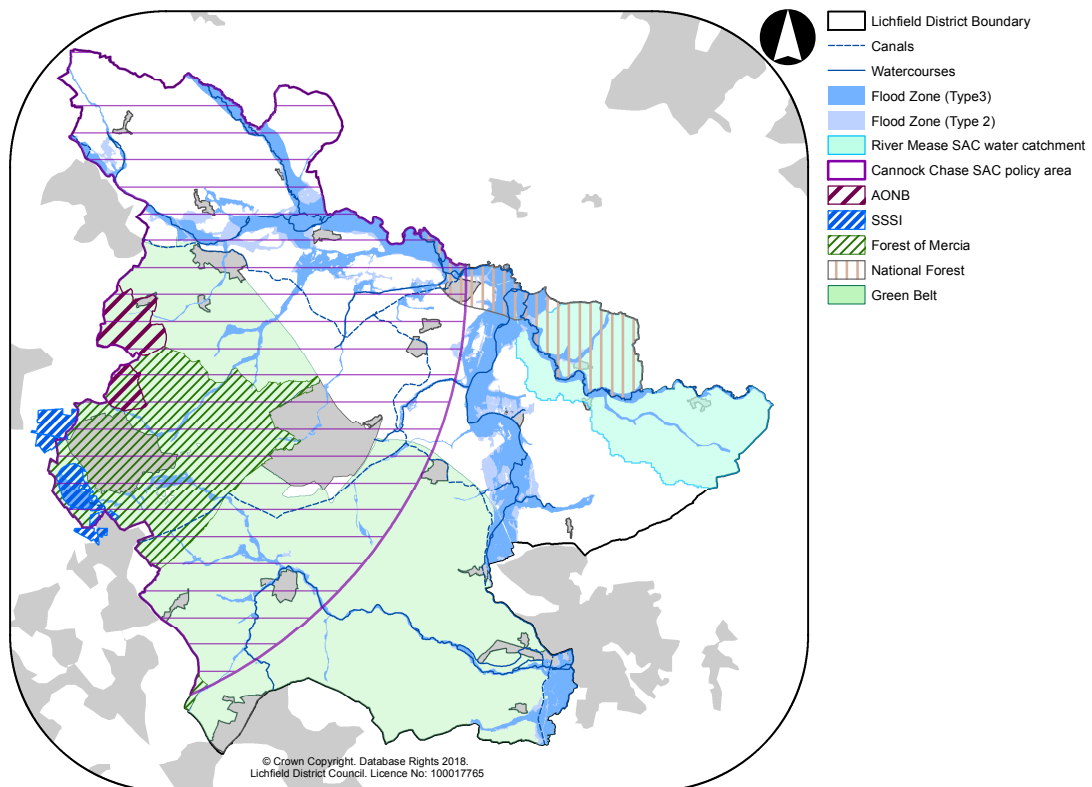
Tame. Both rivers carry large volumes of water and have wide floodplains. Most of the floodplains lie upon agricultural land however Fazeley is particularly prone to flood events. Large scale restoration of the mineral sites provide opportunities for recreation and landscape enhancement through the Central Rivers Initiative, National Forest and the expansion of the National Memorial Arboretum which itself is built upon a former mineral site.

5.39 The River Mease flows into the River Trent and supports species and habitat of European significance. The River Mease has national and European level protection, designated as a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). Parts of Cannock Chase also have the same level of protection. A part of Cannock Chase which lies within Lichfield District, around Gentleshaw Common, is designated for its landscape quality and is recognised as of national importance as an Area of Outstanding Natural Beauty (AONB). Elsewhere in the district there are a variety of wildlife rich habitats which are protected including further Sites of Special Scientific Interest, Ancient Woodlands, Veteran Trees and locally recognised Sites of Biological Importance (SBI).

5.40 During the plan period opportunities will arise to enhance and create corridors and linkages to assist in our biodiversity meeting the needs of climate change. Initiatives such as the National Forest and Central Rivers Initiative will enhance the biodiversity of the district and the health and well-being of our residents and visitors.

5.41 As shown on the map 5.3, in terms of development, Lichfield District is heavily constrained. The south-eastern part of the district falls within the Green Belt and is therefore subject to planning policy which restricts development except in exceptional circumstances. The district partially lies within Cannock Chase SAC zone of influence, River Mease SAC water catchment area and the National Forest. Whilst none of these constraints necessarily preclude development they do need to be taken into serious consideration when assessing development options as part of the local plan review.

Figure 5.3 Landscape designations and features



Key characteristics: Landscape and ecology

- Our district supports a variety of wildlife rich habitats and species which are protected under domestic or european legislation.
- The south western part of the district falls within the green belt.
- Much of the district's landscape is highly valued with various designations covering large parts of the district.
- Within our district there is a large amount of high quality agricultural land, in particular grades two and three.

Climate, energy and waste

5.42 There are two air quality monitoring zones in the district, one located at Muckley Corner and the other on the A38 between Wall Island and Alrewas both are identified because of the poor air quality related to the high volumes of traffic on these roads. Energy consumption in the district has decreased over the last 10 years at a faster rate than the national average, the average consumption of gas and electricity within the district is in line with the rest of the country.

Key characteristics: Climate, energy and waste

- Our district has two air quality monitoring zones
- Energy consumption in our district has decreased over the past decade at a faster rate than the national average.

6 Issues

6.1 The [scope, issues and options](#) document identified fourteen key issues facing the district and asked if there were any additional issues. These issues are drawn from an analysis and understanding of the key characteristics of the district and by reviewing the issues which were identified through the current local plan.

6.2 The key issues facing the district are set out below:

Issue 1

Meeting the strategic housing and employment requirements for our district, including assisting in meeting needs from within the housing market area.

Issue 2

Addressing the lack of affordable housing and housing to meet specialist needs including for older persons, people wishing to build their own homes (self and custom builders) and provision for gypsy and travellers.

Issue 3

Ensuring the delivery of market and affordable homes to meet identified needs.

Issue 4

Facilitating a wider range of employment opportunities within our district.

Issue 5

Responding to the changing demographics within our district.

Issue 6

Addressing pockets of deprivation which exist within our district.

Issue 7

Making our district a more attractive and desirable place for business and enterprise to locate and invest.

Issue 8

Reducing the number of people commuting outside of our district and reduce the number of people using a car to travel to work.

Issue 9

Providing a wider choice of means of transport to bring more sustainable patterns of transport.

Issue 10

Ensuring our district is a safe place to live and work.

Issue 11

Protecting our historic environment and assets.

Issue 12

Promoting active and health lifestyles for people living and working within our district.

Issue 13

Protecting and promoting our natural environment.

Issue 14

Tackling the causes and effects of climate change.

6.3 There are a number of [neighbourhood plans](#) throughout the district at varying stages of preparation including those which are 'made' as part of the development plan for the district and some which are still being prepared. Neighbourhood plans have been used by communities to identify and begin to address the local issues which affect them. These much more localised issues are best placed to be considered through neighbourhood plans which will work alongside the policies within the district's local plan.

6.4 In addition to these broad strategic issues there are also a number of more local matters which have been identified by our evidence through consultation and also by communities undertaking their own plan-making.

6.5 Some of the location specific issues are as follows:

Lichfield city issues

- Protection of the character of the city from large scale development pressure.
- Lichfield city is a popular destination for day visitors but there is a desire to encourage over-night and longer stays.
- Delivery of strategic development within and adjacent to the city has been slower than anticipated.
- Limited supply of sites for development within the existing urban area including brownfield sites.
- Existing social infrastructure including health provision and secondary school provision is unlikely to be able to accommodate further growth of the city.
- Nature, scale and direction of future growth.
- Transport movement and accessibility.

Burntwood issues

- Need for better town centre facilities to serve its communities.
- Existing social infrastructure including health provision requires improvement.
- Limited supply of sites for development within the existing urban area including brownfield sites.
- Nature, scale and direction of future growth.
- Significant environmental constraints in close proximity to the town, including sites of special scientific interest, area of outstanding natural beauty and special areas of conservation.
- Transport movement and accessibility.

Rural area issues

- Declining number of services and facilities in villages, such as shops, post offices, doctors, village halls, public houses and access to public transport.
- Many areas are not well served by public transport which restricts access to services and facilities which may be located in nearby settlements.
- Limited supply of sites for development within the existing urban area including brownfield sites.
- Nature, scale and direction of future growth.
- Affordability issues are greater in many rural areas with limited affordable housing opportunities.

7 Our vision

7.1 The vision for our district has been developed and informed by the key issues which have been identified in the preceding chapters of this document. The vision takes account of other relevant plans and strategies including the council's [strategic plan](#). The strategic plan outlines the council's vision which is **'to be a strong, flexible council that delivers good value, quality services and helps to support a vibrant and prosperous economy, healthy and safe communities and clean, green welcoming places to live'**. This vision is incorporated into the proposed vision for the local plan review.

7.2 The [scope, issues and options](#) document presented the vision of the current local plan which is considered to remain broadly relevant. However, it also concluded that the current vision was overly long and needed to be refined in light of the council's strategic plan.

7.3 The vision for the district is designed to be broad and strategic which addresses those key issues which have been identified and are applicable to the district as a whole. It may be through the preparation of the local plan review that area specific visions are developed to ensure that more localised and specific issues are dealt with. Such visions may also be established by our communities when preparing their neighbourhood plans or through other non-strategic plans which could be prepared by the council.

7.4 The policies and proposals within the local plan review should deliver the vision and its strategic objectives. The proposed vision for the local plan review is as follows:

Vision for our district

In 2036, residents of our district will continue to be proud of their communities. They will experience a strong sense of local identity, of safety and of belonging. Our communities will take pride in our district's history and culture, its well cared for built and natural environment, its commitment to addressing issues of climate change, and the range of facilities our district has to offer. Our residents will live in healthy and safe communities which provide opportunities for people to keep fit and healthy and people will not be socially isolated. Our residents will be able to access quality homes which meet their needs, local employment, facilities and services all of which provide communities with clean, green and welcoming places to live, to work and to play. Our residents will have access to provision for education to provide the skills and training to suit their aspirations and personal circumstances.

Those visiting the district will experience the opportunities and assets which our residents take pride in. Visitors to our district will be encouraged to stay for longer and wish to return and promote the area to others. The need to travel by car will be reduced through improvements to public transport, walkways, cycle routes and the canal network.

New sustainably located development will meet the requirements of our district and will have regard to the needs arising from within the housing market area. Such development, coupled with associated infrastructure provision will also address improvements to education, skills, training, health and incomes, leading to reduced levels of deprivation.

The districts natural environments and varied landscapes will be conserved and enhanced. Locally important green spaces and corridors will meet recreational and health needs. Sustainable development will help protect the biodiversity, cultural and amenity value of the countryside and will minimise use of scarce natural and historic resources, contributing to mitigating and adapting to the effects of climate change.

What you told us

7.5 No comments were received through the scope, issues and options consultation which suggested an alternative vision to that set out within the existing local plan, the overriding view agreed that the existing vision remained broadly relevant. As such, this vision is based upon the vision of the current local plan and has been updated to provide a refined vision fit for the local plan review.

7.6 Some comments were received which suggested the vision should make explicit reference to assist in meeting the unmet housing need from the housing market area within the vision, objectives and strategic priorities. This is identified within the issues set out earlier in this document, however it is not considered necessary for the vision to provide direct reference to meeting this need or indeed any other need as the vision is proposed to be a broad overarching statement under which the strategic policies will be located to address identified issues.

Question 1

What are your views on the proposed vision? Is there an alternative vision or parts of the vision we should be considering?

8 Our strategic objectives & priorities

8.1 The following strategic objectives and priorities outline what will need to be achieved to deliver the proposed vision and to address the key issues which have been identified. These objectives and priorities underpin the emerging spatial strategy, policies and proposals which will be included within the local plan review.

8.2 The [scope, issues and options](#) document set out the strategic objectives of the current local plan and concluded that these remain broadly relevant to the local plan review. Given that this document has set out key issues and a vision which are broadly similar to those identified in the existing local plan it is clear that the objectives and priorities are also likely to be similar. However, the strategic priorities and objectives have been updated to reflect the issues and vision set out within this document.

8.3 The objectives and priorities are likely to develop further and become more locally distinctive, as the policies and proposals which will form the local plan review are formulated. The objectives and priorities omit any specific reference to particular settlements at this stage as the spatial strategy is being refined through this document and the wider local plan review process.

8.4 The proposed strategic objectives and priorities are as follows:

Strategic objective & priority 1: Sustainable communities

To consolidate the sustainability of existing settlements, including key settlements which will be identified to accommodate sustainable growth. This will ensure the development of new homes, employment, commercial development and other facilities will contribute to the creation of balanced and sustainable communities by being focused on appropriate settlements and locations and by containing or contributing towards a mix of land uses, facilities and infrastructure appropriate to its location.

Strategic objective & priority 2: Rural communities

To develop and maintain more sustainable rural communities through locally relevant employment and housing development and improvements to public transport and access to an improved range of services whilst protecting the character of rural settlements.

Strategic objective & priority 3: Climate change

To be a district where development meets the needs of our communities whilst minimising its impact on the environment and mitigating and adapting to the effects of climate change.

Strategic objective & priority 4: Our infrastructure

To provide the necessary infrastructure to support our existing and new communities including regeneration initiatives on those existing communities where needs have been identified.

Strategic objective & priority 5: Sustainable transport

To reduce the need for people to travel by directing growth towards the most sustainable locations and increasing the opportunities for travel using sustainable forms of transport including securing improvements to public transport, walking and cycling infrastructure.

Strategic objective & priority 6: Meeting housing need

To provide an appropriate mix of market, specialist and affordable homes that are well designed and meet the needs of our existing and new residents.

Strategic objective & priority 7: Economic prosperity

To promote economic prosperity for the district and its residents by supporting measures which enable the local economy to thrive and adapt to changing economic circumstances and make the most of newly arising economic opportunities.

Strategic objective & priority 8: Employment opportunities

To ensure that employment opportunities within the district are created through the development of new enterprise and support the diversification of existing businesses to meet the identified needs and the aspirations of our communities.

Strategic objective & priority 9: Our centres

To create a prestigious city centre serving Lichfield City and beyond, and an enlarged and improved town centre for Burntwood which meets the community's needs and aspirations. Create a vibrant network of centres which stimulate economic activity.

Strategic objective & priority 10: Tourism

To increase the attraction of the district as a tourist destination through supporting and promoting the growth of existing tourist facilities and attractions, the provision of a greater variety of accommodation for visitors, the development of new attractions which are appropriate in scale and character to their locations and the enhancement of our existing attractions.

Strategic objective & priority 11: Healthy and safe lifestyles

To create environments that promote and support healthy choices and enable our residents to be healthy and safe. To improve outdoor and indoor leisure and cultural facilities available to those that live and work and those that visit the district and to ensure a high standard of community safety, promoting healthier living and reducing inequalities in health and well being.

Strategic objective & priority 12: Countryside character

To protect and enhance the quality and character of the countryside, its landscapes and villages by ensuring that development which takes place to meet identified rural development needs contributes positively to countryside character through enhancements to the local environment and preserves the openness of the green belt.

Strategic objective & priority 13: Natural resources

To protect, enhance and expand the quality and diversity of the natural environment within and outside of our urban areas and help realise the positive contributions which can be made to address climate change.

Strategic objective & priority 14: Built environment

To protect and enhance our built environment and heritage assets, the districts historic environment and local distinctiveness, ensuring an appropriate balance between built development and open space, protecting the character of residential areas, protecting existing open spaces and improving the accessibility to open spaces.

Strategic objective & priority 15: High quality development

To deliver high quality development which focuses residential, community and commercial facilities on the most sustainable locations whilst protecting and enhancing the quality and character of the existing built and natural environment.

What you told us

8.5 No responses were received to the scope, issues and options consultation suggesting that the existing strategic priorities were not appropriate or that any additional priorities needed to be identified. A number of comments received through the consultation suggested that the strategic objectives should make specific reference to meeting housing need and the unmet housing need from the housing market area. Therefore the strategic objectives have been redrafted and now make reference to meeting the housing needs of existing and new residents.

8.6 The strategic objectives and issues identified within this preferred options and policy directions document represent the strategic objectives for the local plan review. Through the preparation of neighbourhood plans our communities will be able to identify and set more locally specific objectives to address the localised issues which their plans seek to address.

Question 2

Do you agree with the proposed strategic objectives and priorities? Do you think any changes, deletions or additions are required?

9 Themes and subjects for our strategic policies

9.1 The local plan review will set out the spatial strategy for the district and along with a series of topic based policies will be used to guide development and determine planning applications. These policies and proposals will be designed to deliver the strategic objectives and priorities and overall vision for the district.

9.2 National policy requires local authorities to include strategic policies for their area to address a range of key issues. The following chapters of this document set out the broad themes or subject areas which we propose our policies will address:

- Our spatial strategy.
- Our sustainable communities.
- Our infrastructure.
- Our sustainable transport.
- Our homes for the future.
- Our economic growth, enterprise and tourism.
- Our healthy & safe communities.
- Our natural resources.
- Our built and historic environment.

9.3 This document will set out revised policy wording within these theme areas and supporting text where applicable at this stage. Full wording of draft policies and supporting text will be included within the draft local plan which will be published in line with the timescales set out in our [local development scheme](#).

9.4 There are a number of non strategic policies which we think should be carried forward from the current local plan with limited or no changes into the local plan review. Our preferred approach to how we will deal with these policies are set out at **Appendix B**.

10 Our spatial strategy

10.1 The local plan will set out the chosen spatial development strategy for the district, a strategy which will be developed to assist in delivering the overall vision and strategic objectives to 2036. The local plan and its spatial strategy will be the key long-term planning strategy for the council directing growth to chosen sustainable locations and protecting those areas where development would not be appropriate. The spatial strategy will set out the strategic approach to managing development and change within the district to 2036.

The current spatial strategy

10.2 The current spatial strategy for the district is set out in the adopted [local plan strategy](#). It focuses the majority of growth on the most sustainable locations in the district, namely Lichfield city, Burntwood, to the east of Rugeley, to the north of Tamworth and to six key rural settlements comprising of Fradley, Alrewas, Armitage with Handsacre, Fazeley, Shenstone and Whittington. These key settlements accommodate a majority of the districts planned growth for new homes, new employment and new commercial development. The current spatial strategy also promotes the use of brownfield land for both residential and employment development, particularly where that land is within the existing built-up areas of our settlements.

10.3 A majority of the new homes planned for within the current local plan have been directed to the most sustainable settlements of Lichfield, Burntwood and the key rural settlements. The current local plan identifies a number of strategic development allocations and a broad development location to accommodate a majority of the districts housing growth. Further non-strategic allocations are identified through the local plan allocations document which seeks to deliver the remaining housing requirements. Employment growth is focused on our existing employment areas within Lichfield city, Burntwood and at Fradley Park with new a employment allocation made to the south of Lichfield city at Cricket Lane.

10.4 The local plan review provides the opportunity to consider the current spatial strategy and ensure that the district continues to meet its growth needs and aspirations to 2036.

Local plan review spatial strategy

10.5 The local plan review will include a strategic policy which sets out the selected spatial development strategy. Such a policy will likely be the first strategic policy within the plan and will provide an overarching policy under which all other policies will be presented.

10.6 The [scope, issues and options](#) consultation included a high level review of the existing planning policies contained within the council's current local plan. This concluded that the current Core Policy 1: The Spatial Strategy would need to be significantly amended or replaced through the review of the local plan.

10.7 The following sections of this document will set out the evidence informing the themed policy areas which are proposed to be included within the local plan review. These areas and the wide range of evidence which will be collected will inform and define the spatial strategy.

10.8 Following these sections the document considers the range of spatial growth options which had been included and consulted upon within the scope, issues and options document. These options have been considered along with the evidence which has been prepared.

What you told us

10.9 In relation to the long term spatial strategy for the local plan review the council sought views on a number of broad spatial growth options through the [scope, issues and options](#) document. These options are considered in greater detail in the 'Our strategic options for growth' chapter of this document. These growth options covered a large range of possible growth options which could be used alone or in combination to provide the growth strategy for the district. The scope, issues and options document concluded that it was likely a combination of the growth options would be required.

10.10 Through the consultation a range of views on each of the potential growth options were provided, these are covered in greater detail in the 'our strategic options for growth' chapter of this document. As with consultations undertaken on the current local plan, the issue of the level of housing and locations can prove to be controversial and numerous and varying opinions were collected through consultation. Broadly, however, there were a number of comments which suggested some of the possible options would be unsustainable and that growth should be focused in and around the existing built up areas of our most sustainable settlements. However, to counter this view, other comments were made which suggested some of the large settlements including Lichfield and Burntwood were at capacity and that growth should be directed elsewhere.

10.11 It is clear that through analysis of the consultation responses to the scope, issues and options document there is no clear consensus favouring any particular approach. There was a comparably higher level of response from residents in Shenstone, Stonnall and Little Aston objecting to growth options within their areas compared to other areas of the district. This level of objection is noted although from a planning policy perspective, as with all responses received, if the nature of the response received as opposed to the volume of responses which is of relevant.

What the evidence tells us

10.12 National planning policy promotes the creation of sustainable communities through the delivery of sustainable development. This means that the local plan review must consider the most appropriate locations for growth, the prime factors to be taken into account are accessibility to jobs, facilities and services, public transport and the range of services and facilities within a community. National policy promotes the use of new settlements and significant extensions to existing settlements to assist in the delivery of homes to meet community's needs.

10.13 There are a range of settlements within the district, these vary significantly in size, form and character from large settlements of Lichfield and Burntwood through to small hamlets and more isolated rural communities. There are also several large settlements outside of the district boundary which are directly adjacent to our administrative boundary, such as Tamworth to the south east, Rugeley to the north west and the northern edges of Sutton Coldfield and Birmingham to the south. The [strategic growth study](#) identified possible growth options within the council's administrative areas which would if taken forward form be extensions to those settlements which are located just outside of the district.

10.14 We have updated our assessment of sustainability for the settlements within the district, The settlement sustainability study identified the following settlement hierarchy.

Table 10.1 Settlement hierarchy

Settlement hierarchy level	Settlement	Common attributes
Level 1 - Strategic centres.	<ul style="list-style-type: none"> Lichfield City. 	The largest centre within the district with the most accessible and greatest quantity of services and facilities. This includes a range of services and facilities within the city centre and at local centres across the settlement. There is a high level of access to sustainable modes of transport including public transport and access to a pedestrian network. The settlement includes significant areas of employment located within the settlement and beyond through good access to the transport network.
Level 2 - Other main centres.	<ul style="list-style-type: none"> Burntwood. 	The second largest urban area within the district with good access to a range of services and facilities. There is a significantly lesser range of facilities and services and poorer access than those within Lichfield City. Burntwood has a small town centre and does not meet the current needs of the community. There is a number of local centres providing a range of services and facilities across the settlement.
Neighbouring towns & settlements	<ul style="list-style-type: none"> Rugeley. Tamworth. Brownhills. Sutton Coldfield & Birmingham. 	These settlements have not been assessed within the settlement sustainability study as they are located outside the council's administrative area. As such they are not given a 'level' within the settlement hierarchy. However, these settlements offer a range of services and facilities and are located adjacent to the district. The strategic growth study identified options which could include the extension of such settlements within Lichfield's administrative area.
Level 3 - Larger service villages.	<ul style="list-style-type: none"> Alrewas. Armitage with Handsacre. Fazeley, Mile Oak & Bonehill. Fradley. Shenstone. Little Aston. Whittington. 	Settlements within this level of the hierarchy have been assessed as being the most sustainable of our rural villages. These settlements benefit from a range of services and facilities which help to meet the day to day needs of the community and also act as hubs for the wider rural areas. Typically these are the larger of the rural settlements and have better access to public transport which provides better access to services and facilities elsewhere.
Level 4 - Smaller service villages	<ul style="list-style-type: none"> Stonnall. Kings Bromley Streethay Hopwas 	Settlements within this level typically have access to a smaller range of services and facilities than those in levels above. They generally have access to education facilities and facilities to meet most day to day needs. These settlements have a reasonable level of access by public transport to both employment and other services and facilities.
Level 5 - Smaller rural villages and our wider rural areas.	Clifton Campville, Colton, Drayton Bassett, Edingale, Elford, Hamstall Ridware, Harlaston, Hill Ridware, Hopwas, Kings Bromley, Longdon, Stonnall, Upper Longdon, Wigginton and all other rural settlements, hamlets and wider rural areas.	Settlements within this level of the hierarchy typically have very limited access to services and facilities within the settlement and rely on other settlements for access to facilities and services.

10.15 A wide range of evidence is being assembled to support the review of the local plan and will help to further refine the settlement hierarchy and ultimately the spatial strategy which will be included within the local plan review. This evidence base will inform our judgments about the appropriate distribution of growth within the district. Our proposed evidence base is set out at **Appendix A** of this document along with the anticipated timescales for its production.

Preferred policy direction: Our spatial strategy

The strategic policy will set out the spatial strategy for all development within Lichfield District from 2016 to 2036. This will include the level of growth to be accommodated within the district and where that growth should be located.

Additional work is taking place that will allow the council to reach conclusions on the appropriate spatial strategy to be included in the local plan review. However, it is considered the strategy should be focused on:

- Balanced growth across the district with growth which will be focused on the most sustainable locations as informed by our settlement hierarchy. Where possible growth will be directed within the existing built up areas of our settlements, but also recognises that depending on the level of growth required there may be a need for sustainable extensions to existing settlements.
- The spatial strategy will need to determine and set out the level of housing growth to be accommodated within the district, including an appropriate level of provision to assist in delivering the unmet needs of our neighbours and the level of employment growth required to meet the housing growth requirements. Greater detail on the evidence which will be prepared with regards to levels of growth is set out within the 'Our homes for the future' and 'Our economic growth' chapters of this document. Further work will be carried out to establish an appropriate phasing strategy for growth to ensure a long-term supply of sites which will enable the district to meet its development needs and the housing delivery test.
- The strategy for employment will aim to provide greater opportunities for high value employment within the district, including higher wage opportunities in growth sectors related to business. Such a strategy will seek to reduce out commuting and provide opportunity for higher earners working in the district.
- Further work will be required to determine the level of provision required to meet the district's gypsy and traveller needs. The district council's will undertake a gypsy and traveller needs assessment to understand need and seek to provide appropriate provision to meet the identified need.
- Further work will be undertaken to understand the extent to which new development can be accommodated within the existing urban areas and on brownfield development sites. This will be undertaken, in part, through the progression of an urban capacity assessment and the brownfield land register.
- The role of our commercial centres and levels of development will be set out within a hierarchy of centres for the district. This should seek improvements to centres where there is an identified need for such, including Burntwood town centre.
- The spatial strategy will need to give consideration to the green belt within the district and whether the boundaries of the green belt should be changed to accommodate growth or if new green belt should be established. Where a strategic policy considers changes to the green belt boundary are necessary it may be that the exact boundaries of such changes could be considered by communities through their neighbourhood plans. Should changes to the green belt boundary be proposed then this will only be done in exceptional circumstances through strategic policies. Any such changes would be based upon evidence, including a comprehensive green belt review.
- The spatial strategy will have regard to the district's significant and high quality natural and built environment and the distinctiveness and character of the district. Further work will be undertaken to understand our natural and built environment.
- Further work will be undertaken with our infrastructure partners to understand the impacts of the spatial strategy on our infrastructure and where improvements or new infrastructure will

be needed. This will ensure that development and infrastructure is delivered at the correct time and in the appropriate locations.

Question 3

Do you think that a spatial strategy based upon the identified settlement hierarchy would be appropriate and help the council to deliver sustainable development? Is there an alternative settlement hierarchy we should consider? If so please justify why this alternative approach should be considered.

11 Our sustainable communities

Strategic objective & priority 1	Sustainable communities
Strategic objective & priority 2	Rural communities
Strategic objective & priority 3	Climate change

Introduction

11.1 This section sets out the strategic policy directions that will underpin and guide sustainable development within the district to ensure that when development takes place sustainable communities are created. It sets out policies to address climate change, flood risk and improve air quality.

Sustainable Development

11.2 The achievement of sustainable development is at the heart of the planning system. National policy sets out that there are three overarching objectives to achieving sustainable development: economic, social and environmental. These objectives need to be balanced carefully to accomplish a positive outcome and ensure that when new development takes place sustainable communities are created, where people can work, shop, learn and play near their homes.

11.3 Key to the creation of sustainable communities will be development which embodies the principles of sustainable development at a local level. This means creating a pattern of resource use that aims to meet the needs of the present without compromising the ability of future generations to meet their own needs. In addition, ensuring that new development contributes towards an improved quality of life and wellbeing along with the need to address climate change and its implications are important elements which need to be considered when creating sustainable communities. There is a need to balance these objectives with the amount of development which will be proposed across the plan period as the local plan review progresses.

11.4 Given that the presumption in favour of sustainable development is central to national policy and reflected in the existing core policy two, it is proposed that the wording of this policy, as set out below is carried forward as part of the local plan review.

Preferred strategic policy: Securing sustainable development

The council will take a positive approach when considering development proposals that reflect the presumption in favour of sustainable development contained in the national planning policy framework. The council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in the local plan and, where relevant, neighbourhood plan policies, will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise and taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the national planning policy framework taken as a whole; or
- Specific policies in that framework indicate that development should be limited.

Sustainable development principles

11.5 New development within the district must contribute towards sustainability and enhance the quality of life for our residents now and in the future. To ensure that the plan promotes sustainable development the current core policy lists the general issues that planning applications will need to address.

What you told us

11.6 The [scope, issues and options document](#) listed the current core policy as one which may require minor amendments. Whilst no specific reference was made to this policy, in general responses were supportive of the policies listed which could require minor amendments.

11.7 The environment agency suggested that issues of flood risk should be incorporated into a separate policy. This is considered in more detail later in this chapter.

What the evidence tells us

11.8 National planning policy places the presumption in favour of sustainable development at the heart of plan making and decision taking. It sets out that planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account.

11.9 The current core policy seeks to ensure development proposals address key issues to bring forward social, economic and environmental improvements. The issues listed within the policy have been reviewed in light of changes to national policy and amended where appropriate, for example the removal of the reference to code for sustainable homes.

Preferred strategic policy: Sustainable development principles

The Council will require development to contribute to the creation and maintenance of sustainable communities, mitigate and adapt to the adverse effects of climate change, make prudent use of natural resources, reduce carbon emissions, enable opportunities for renewable energy and help minimise any environmental impacts. To achieve this, development should address the following key issues:

- protect and enhance the character and distinctiveness of Lichfield District and its settlements;
- protect the amenity of our residents and seek to improve their overall quality of life through the provision of appropriate infrastructure, services and facilities;
- promote social cohesion and inclusion, and reduce inequalities; and ensure access for all sectors of the community to employment opportunities (including safeguarding local jobs through local employment provision), affordable housing of the size, type and tenure needed for different groups in the community; and a range of services and facilities, in both our urban and rural areas;
- assist in the regeneration and evolution of towns and villages, and surrounding areas, in meeting the changing needs of their population over time; and maintain the vitality, viability and vibrancy of local communities, through neighbourhood planning where required;
- be of a scale and nature appropriate to its locality;

- encourage the re-use of previously developed land; and the reuse of buildings as a sustainable option, especially the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;
- ensure that development on brownfield sites affected by contamination is remediated and that any ground instability or former land uses is addressed;
- reduce the overall need to travel, whilst optimising choice of sustainable modes of travel, particularly walking, cycling and public transport, whilst acknowledging that opportunities to maximise sustainable transport solutions will vary between urban and rural areas;
- use our natural resources prudently;
- conserve, enhance or expand natural, built and heritage assets and improve our understanding of them wherever possible;
- minimise and manage water, waste and pollution in a sustainable way, particularly through reduction, re-use and recycling measures in both the construction and use of buildings, and including incorporating adequate space provision within buildings/layouts for appropriate storage or sorting of materials for recycling ;
- give priority to using ground infiltration drainage techniques and including sustainable drainage techniques, and incorporate other sustainable techniques for managing surface water run-off such as green roofs in new development and in retro-fitting where historic surface water flooding events have been identified;
- guide development away from known areas of flood risk as identified in the Strategic Flood Risk Assessment (Level 1) and Surface Water Management Plan. Where development is proposed in flood risk areas a site-specific flood risk assessment must be undertaken in line with the national planning policy framework;
- avoid sterilisation of mineral resources;
- minimise levels of pollution or contamination to air, land, soil or water, including noise and light pollution, and avoid unacceptable uses within source protection zone 1 areas to safeguard water resources and ensure water quality;
- ensure that all new development and conversion schemes are located and designed to maximise energy efficiency, and use sustainable design and construction techniques appropriate to the size and type of development, using local and sustainable sources of building materials wherever possible; and facilitate energy conservation through energy efficiency measures as a priority and the use of renewable energy resources wherever possible, in line with the energy hierarchy; and
- maximise opportunities to protect and enhance biodiversity, geodiversity and green infrastructure, and use opportunities to facilitate urban cooling.

Question 4

Do you agree with the preferred policy approach towards sustainable development? Do you think the policy should consider any other sustainable development issues, and if so what should these be?

Planning for climate change

11.10 Addressing climate change is one of the core land use planning principles which national planning policy expects to underpin both plan making and decision taking. Local authorities have a responsibility to help secure progress on the government's target to reduce emissions by 80% by 2050.

11.11 Planning plays a key role in meeting these aspirations through the delivery of low and zero carbon development and the support and promotion of renewable energy developments. However this must be balanced with the need to protect the district's landscape, heritage, agricultural land and habitats.

11.12 In relation to climate change, the current local plan strategy contains Policy SC1: Sustainability Standards for Development and Policy SC2: Renewable Energy. Since the adoption of the local plan strategy there have been changes to national policy that restricts local authority's ability to set energy performance standards for new homes. There has also been continued development in the field of renewable energy and building design and a tightening of policy for permissions for on-shore wind turbines.

11.13 The District Council is committed to conserving natural resources and will support and promote the efficient use of energy and resources, including renewable and low carbon energy generation, water management and waste minimisation and recycling.

11.14 What you told us

11.15 Through the consultation on the scope, issues and option comments were received from a number of organisations and individuals stating the need for a review of renewables evidence in light of new evidence on climate change. Additionally, respondents requested that the council identify specific locations for wind turbines and solar panels and review the impacts these may have on the landscape.

11.16 What the evidence tells us

11.17 With regards to sustainability standards, the standards set out in the existing local plan have since been withdrawn and therefore this policy is no longer considered in line with national policy. National policy states that local requirements for the sustainability of buildings should reflect the government's policy for national technical standards. Therefore, it is not considered at this stage that a replacement policy is required to set local sustainability standards.

11.18 In relation to renewable energy, national planning policy requires all local authorities to identify areas suitable for renewable energy development in their local plan. For wind energy developments, following consultation, local authorities must demonstrate that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.

11.19 National policy expects local planning authorities to support community led initiatives for renewable and low carbon energy, including in developments outside areas identified in local plans or neighbourhood plans. Planning policy guidance states that policies should promote low carbon and renewable energy technologies, informed by evidence that considers the opportunities for different technologies, the opportunities for district heat networks and a consideration of the impacts that such developments may have on the landscape.

11.20 Locally, the current local plan seeks to achieve a minimum of 10% of the District's energy demand through renewable energy sources by 2020. This was informed by the Staffordshire county-wide renewable/low carbon energy study. This study identified that Lichfield District could

accommodate up to 6 wind turbines, generating up to 21% of the modelled renewable energy in 2020. Additionally it was identified that biomass could contribute up to 40% of the district's renewable energy resources by 2020.

11.21 It is the council's intention to commission a new study to update information relating to low carbon and renewable energy capacity and to help identify areas suitable for wind and solar energy development. The timescales for the collection of this evidence are set out at **Appendix A**.

11.22 Subject to the evidence, any areas identified and designated for wind energy developments will be shown on the Local Plan policies map. The designations will be subject to public consultation to try and address the concerns of local communities. This should enable the identification of the most suitable areas and the provision of guidance for the most appropriate development.

11.23 Lichfield District contains some very important landscape assets that will need to be protected from potential impacts associated with renewable energy infrastructure. The council will be procuring a landscape character assessment which will identify those sensitive landscapes and will help to guide unsuitable development away from those areas.

Preferred policy direction: Renewable energy

The preferred policy direction for renewable energy is to identify areas of opportunity on the local plan policies map which will accompany the local plan review.

Key opportunity areas for various forms of renewable energy will be identified on the policies map to inform and guide development towards the most suitable and appropriate areas, for example guiding it away from sensitive landscapes. Proposals for renewable energy developments in these areas will be assessed on their own merits and will need to provide the necessary evidence to ensure that the development does not have an unacceptable impact on local communities.

Question 5

Do you agree with the proposed approach towards sustainability standards, if not, do you consider that the council should set a standard that goes above the national minimum? Do you agree with proposed approach to identify locations for renewable energy developments on the local plan policies map, if not, explain why and suggest an alternative approach?

Approach to flood risk

11.24 National policy outlines that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking account of flood risk and water supply considerations. It sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. The flood zones are the starting point for identifying areas at risk of flooding. These flood zones refer only to the probability of sea and river flooding.

11.25 By applying a sequential approach, the overall aim should be to steer new development to flood zone one where there is a low probability of flooding. Development proposals in flood zone two and flood zone three will be subject to the sequential test to demonstrate that there are no reasonably available sites in areas at lower risk of flooding. Only where there are no reasonably available sites in flood zone one or two should the suitability of sites in flood zone three be considered, subject to the exception test. National policy and planning practice guidance provide further details on the sequential test and exceptions test.

11.26 It is proposed that a flooding policy will seek to direct direct development away from areas at highest risk, and where development is necessary, to make it safe without increasing flooding elsewhere.

What you told us

11.27 In response to the scope, issues and options consultation the Environment Agency outline that currently there are around 1,000 residential and 700 non-residential properties at risk of flooding from rivers in the Lichfield area with many more at risk from surface water flooding. The risk is likely to increase as a result of climate change. The Environment Agency suggest the inclusion of a standalone flood risk policy to cover all types of flooding and provide some suggested wording.

What evidence tells us

11.28 The local plan review will need to be based on up to date and robust evidence and this will include a strategic flood risk assessment which will take into account the latest climate change allowances and a Water Cycle Study. Lichfield District will work with partners to prepare a strategic flood risk assessment and water cycle study to inform the local plan review as it progresses. The timescales associated with this are set out at **Appendix A**.

Preferred policy: Flood risk

In line with national planning policy any new development should be directed away from those areas at highest flood risk. Planning applications for development within the plan area must be accompanied by site-specific flood risk assessments in line with the requirements of national planning policy and advice. These should take account of the latest climate change allowances. Consideration should also be given to the impact of new development on both existing and future flood risk. Where appropriate, development should include measures that mitigate and adapt to climate change.

Question 6

Do you agree with the preferred policy direction for flood risk? Is there anything else that should be taken into consideration as part of this policy?

Air quality

11.29 Planning has an important influence on air quality, which is in turn a major influence on public health and the natural environment. The revised national planning policy framework places significant emphasis on local authorities to ensure that the air quality impact of new developments are considered at the plan making stage.

11.30 Local plans can affect air quality in a number of ways, including through what development is proposed and where, the promotion of sustainable transport initiatives and the enhancement of green infrastructure.

What you told us

11.31 The scope, issues and options consultation did not pose a specific question related to air quality, however many respondents made comments about other aspects of the plan such as transport which relate to air quality.

11.32 More specifically, Natural England commented that air quality is a strategic issue and dialogue with neighbouring authorities in relation to plans and projects which combined may have significant effects on European sites in the area is necessary. This dialogue will continue to take place as plans evolve as part of the duty to cooperate.

What the evidence tells us

11.33 National policy states planning policies and decisions should contribute towards compliance with relevant limit values or national objectives for pollutants, giving consideration to air quality management areas as well as any potential measures to mitigate the impacts of new developments and sites.

11.34 Lichfield District contains two air quality management areas, one at Muckley Corner and the other on the A38 between Wall Island and Alrewas, both of these areas contain high levels of nitrogen dioxide as a result of high volumes of traffic. The council is currently preparing an air quality action plan aimed at reducing levels of nitrogen dioxide in the district. The recommendations from this action plan will assist in preparing the council's policy in relation to air quality.

Preferred policy direction: Air quality

New development in air quality management areas should be consistent with the local air quality action plan.

It is suggested that a specific policy relating to air quality be included within the local plan review which has regard to the following:

- National planning policy and its associated practice guidance in relation to air quality;
- Linkages to the council's air quality action plan; and
- The policy should be consistent with other local policies relating to sustainable transport, traffic and travel management and green infrastructure provision.

Question 7

Do you agree with the preferred approach for a policy relating to air quality? If not, how do you consider air quality should be dealt with as part of the local plan review process?

12 Our infrastructure

Strategic Objective & Priority 4

Our Infrastructure

Introduction

12.1 The term infrastructure is broadly used for planning purposes to define all of the requirements that are needed to make places function efficiently and effectively and in a way that creates sustainable communities. Infrastructure is commonly split into four themes: physical, green and social and community.

12.2 The vision for the district is clear in identifying the requirement for both development and infrastructure provision to deliver sustainable development. The spatial portrait identifies a broad and wide range of existing infrastructure that contributes to our district being a desirable place to live. The infrastructure delivery plan that supports the local plan identifies what infrastructure is needed to support new development.

12.3 National planning policy identifies infrastructure provision as vital to all three of the overarching sustainable development objectives: economic, social and environmental. It is also clear in its instruction that sufficient provision for a wide range of infrastructure should be set out within strategic policies and that provision should anticipate and respond to long term requirements and opportunities. There is a clear steer that community facilities and the provision of infrastructure at a local level should be set out in non-strategic policies including those within neighbourhood plans that will help shape, direct and deliver requirements.

12.4 There will be a requirement to collaborate effectively with strategic policy-making authorities including our neighbours and the country council to determine where additional infrastructure is needed, and this will inform the infrastructure delivery plan. The council is mindful that there is a need for policy that enables relevant bodies and partnerships to deliver infrastructure that our communities require, including those that cross authority boundaries. This is also extended to those organisations responsible for the provision of utilities, telecommunications, flood risk and energy that will require early engagement to ensure that they can plan for provision and identify critical triggers which could undermine the deliverability of the plan. There is also a need to ensure that infrastructure requirements do not restrict our ability to build a strong and competitive economy. Regeneration of our communities and infrastructure that enables adaption and growth is important. Local enterprise partnerships will play an important role in ensuring we are successful.

12.5 The district council adopted its [community infrastructure levy](#) (CIL) charging schedule in April 2016. The council intend to review the charging schedule in line with the local plan review process to ensure that infrastructure is delivered within the district to help support development.

What you told us

12.6 In response to the [scope, issues and options](#) document comments were received in relation to the existing policy framework. The need to base requirements on up-to date evidence was seen as important most notably in terms of transport requirements. Other respondents suggested that until the level of development within the district and within neighbouring authorities had been identified then it would be difficult to understand and plan for such need.

What the evidence tells us

12.7 The infrastructure delivery plan sets out the full range of strategic and local infrastructure needs which have been identified arising either directly or indirectly from our current [local plan strategy](#). This living document is able to change over time enabling flexibility in terms of infrastructure priorities.

12.8 Our overall spatial strategy is still emerging and the detail of the pattern, scale and location of development is not yet clear, it is therefore difficult to develop policies that support the provision of appropriate infrastructure within new developments at this stage. We also know that we have a broad range of evidence that is currently being reviewed. This will identify current inadequacies and future requirements for infrastructure. We are also mindful that work to understand triggers associated with existing infrastructure will help in inform strategic growth options and infrastructure responses.

12.9 The council is committed to early engagement enabling the delivery of appropriate infrastructure. We have taken the opportunity to set out our preferred strategic policy direction for our district which at this stage is overarching and reflective of previous adopted infrastructure policies.

12.10 In response to the overarching nature of infrastructure it will also be important that our infrastructure policy supports and enables the delivery of objectives identified within other strategic policies.

Preferred policy direction: Delivering our infrastructure

To ensure that the district's communities and businesses are able to function in a sustainable and effective manner we will work with infrastructure providers, agencies, organisations and funding bodies to enable, support and where required, co-ordinate the delivery of infrastructure.

The district council will collaborate with other strategic policy making authorities to ensure that the authority boundaries do not restrict the delivery of the most appropriate infrastructure responses.

The district council will seek to protect, and where appropriate improve services and facilities that provide a key function in the operation of existing communities. Development proposals resulting in the loss of a facility from a settlement, which is essential to the sustainable functioning of that settlement, will not be supported unless a replacement facility of improved quality, accessibility, size and which is reflective of current evidenced need is provided.

13 Our sustainable transport

Strategic objective & priority 1	Sustainable communities
Strategic objective & priority 2	Rural communities
Strategic objective & priority 4	Our infrastructure
Strategic objective & priority 5	Sustainable transport

Introduction

13.1 Sustainable transport is a key component of sustainable development and relates to any means of transport with a low impact on the environment. Both national and local planning policy promote the idea of sustainable transport choices through the reduced need to travel by car and improving accessibility by public transport, walking and cycling.

13.2 There is a high volume of residents who commute outside of the district and travel to work by car, leading to an increase in congestion, road safety issues and pollution which is an increasing concern for the strategic and local road network. As such, an important aspect of the local plan review will be to establish a strategy for locating growth and facilitating changes to travel patterns and travel behaviour that maximises the opportunities to travel less, particularly by car and to integrate transport choices within developments.

13.3 The current local plan contains core policy 10 relating to sustainable transport. This sets out the initiatives for sustainable transport improvements which will be supported within the district and lists improvements required to the road network. Two further development management policies are included in the sustainable transport section, these policies seek to secure sustainable travel patterns and set out the approach towards parking provision.

What you told us

13.4 The [scope, issues and options](#) document listed the existing sustainable transport policies as policies which will require minor amendments. Whilst no specific reference was made in any of the responses received about these policies, in general responses were supportive of the policies listed as requiring minor amendments.

13.5 There is a public perception that the district's transport infrastructure is relatively poor, with a number of issues of road traffic congestion at peak periods and poor public transport availability in both urban and rural areas.

13.6 There was a notable level of responses from residents in relation to the strategic growth options concerned about the potential impact of any new development on the existing local highway network. Many people and local organisations considered that more should be done to pursue public transport and cycling initiatives aimed at encouraging more people to use these forms of transport rather than private car. Further responses, questioned whether the council should explore the option for overnight lorry parking along the A38.

What the evidence tells us

13.7 National planning policy promotes sustainable transport and any planning policies within the local plan review should support an appropriate mix of uses across an area to minimise the number and length of journeys, be prepared with active involvement from relevant bodies, identify and protect

areas which could be critical in developing infrastructure to widen transport choice, provide high quality walking and cycling networks and provide for any large scale transport facilities and supporting infrastructure that need to be located within the district.

13.8 The census and survey information available to date tells us that Lichfield District has generally high car ownership and low levels of journeys made by public transport compared with other areas. There are varying levels of bus provision across the district, with poorer frequency and access to bus services in rural areas compared with those serving Lichfield and Burntwood. The locations with relatively poor public transport provision have difficulties with access to employment locations, facilities and services.

13.9 The district has four railway stations, Lichfield City, Lichfield Trent Valley, Rugeley Trent Valley and Shenstone and more residents commute to work by rail when compared with other areas in Staffordshire. Investment in rail services and facilities is key to encouraging a modal shift away from the high car dependency which currently exists within the district.

13.10 A wide range of evidence is being assembled to support the review of the local plan. The current local plan strategy is supported by the Staffordshire local transport plan which sets out the transport policies up to 2026 and the [Lichfield District integrated transport strategy 2011 - 2029](#) which identifies transport solutions to help deliver the policies within the local transport plan. In addition, a transport assessment will be undertaken to identify the requirements for a sustainable transport strategy which will take account of the spatial strategy and consider the transport implications for growth and how strategic housing growth can be integrated into settlements.

13.11 The infrastructure delivery plan sets out the necessary strategic and local transport improvements required to implement the current strategy and therefore will need to be updated as the review progresses.

Preferred policy direction: sustainable transport

The preferred policy approach for the strategic sustainable transport policy is to retain the wording from the initial three paragraphs of the current sustainable transport policy as this is considered still relevant and in line with national policy. The policy will then be amended to reflect the key transport schemes and priorities for the district once the evidence base is up to date.

Proposed policy wording to be retained

Within Lichfield District, accessibility will be improved and transport choice widened, by ensuring that all new development is well served by an attractive choice of transport modes, including public transport, footpaths and cycle routes to provide alternatives to the use of the private car and promote healthier lifestyles.

Development proposals will, either individually or collectively, have to make appropriate provision for:

- Reducing the need to travel;
- Widening travel choices and making travel by sustainable means of transport more attractive than private car;
- Improving road safety; and
- Reducing the impact of travel upon the environment, in particular reducing carbon emissions that contribute to climate change and not contributing to unacceptable air quality levels.

The District Council will continue to work with partners to improve accessibility, by enhancing sustainable transport opportunities and encouraging development that reduces the need to travel and changes to travel behaviour through a balance of transport measures. Future development within the district will be focused on the most accessible and sustainable locations to reduce the need to travel. Developments that are wholly car dependent or promote unsustainable travel behaviour will not be supported.

Preferred policy direction

Additional evidence base work will be undertaken in relation to transport, however it is considered the sustainable transport policy should be focused on the following:

- Identify sustainable transport improvements which will be supported in line with local, regional and national priorities
- Outline specific schemes for improvements to the existing road network
- Consider whether overnight lorry parking facilities are required within the district
- Consideration of parking provision

In addition, with regards to non- strategic development management policies, the current sustainable travel policy may be amended slightly in line with national policy and the parking provision policy will be updated in light of new evidence.

Question 8

Do you agree with the preferred policy direction for sustainable transport? Is there anything else which should be taken into consideration?

14 Our homes for the future

Strategic objective & priority 1	Sustainable communities
Strategic objective & priority 2	Rural communities
Strategic objective & priority 6	Meeting housing need

Introduction

14.1 A key aspect of the local plan review will be directing and delivering the homes which our district needs by 2036. A key area of policy will be ensuring the amount, location, mix and affordability of new housing meets our needs and assists in meeting unmet needs arising from within the housing market area. Lichfield District has historically been, and remains an area of high demand for housing which is driven by our resident population and also by the levels of migration into the district. This has resulted in average house prices that are significantly higher than those both nationally and across the West Midlands.

14.2 The [current local plan](#) seeks to deliver a minimum of 10,030 dwellings between 2008 and 2029 at an annual rate of 478 homes each year. This level of growth represents the current housing requirement for the district and is based on a significant and detailed evidence base. This housing requirement includes 1,000 dwellings to assist in meeting the needs of our neighbours Cannock Chase and Tamworth (500 homes each). This means that the housing requirement of the district itself is 430 dwellings per year.

14.3 Alongside the overall housing requirement, the local plan review will need to consider a range of matters relating to the provision of homes. National policy suggests within the context of local housing need planning policies should also reflect the type, size and tenure of need including the needs of specific groups within our community including affordable housing, families with children, older people, students, people with disabilities and provision for gypsies and travellers.

14.4 It is considered that policies or policy wording will be needed to address the following:

- Our local housing need and contribution to meeting unmet housing need within the housing market area.
- Provision of affordable housing, including the thresholds and proportion of homes to be provided.
- The housing mix developments should meet to deliver the types and tenures of properties we need, including meeting the needs of groups within our community.
- Density of new housing development.
- Provision to meet the needs of gypsies and travellers.

Our housing needs and those of the housing market area

14.5 Since the adoption of the current local plan the government has revised the [national planning policy framework](#). One of the main revisions within the new framework is the introduction of a standard methodology for councils to calculate their local housing need. This methodology uses national household projections and affordability ratios to calculate a minimum housing need for an area. Along with their own need, councils must take account of any needs which cannot be met by their neighbouring authorities, and seek to determine with these authorities how these needs can be met.

14.6 The [scope, issues and options](#) document began to consider the level of housing growth which the district may need to accommodate. Housing need will effectively be made up of two main components, the first being the district's own local housing need. The second component relates to the unmet housing need from within the housing market area, consideration as to an appropriate contribution to assist in meeting this need is a strategic issue for the local plan review.

Our local housing need

14.7 The first step is to establish the needs of our district. The national planning policy framework makes clear that the starting point for establishing the minimum local housing need is to use the [Standard methodology for calculating local housing need](#) set out in national guidance. The scope, issues and options document was produced prior to the formal publication of the standard methodology within the revised national planning policy framework, however at that time the methodology identified a figure of 340 dwellings per year for Lichfield, significantly lower than the requirement of the current local plan.

14.8 The standard methodology uses a simple three step process to determine the minimum local house need. Through the use of a standardised approach it is hoped that the process of establishing housing need will become more transparent and less open to challenge as local plans are produced. The national planning practice guidance clearly sets out the [standard approach](#) to establish the minimum local housing need. The standard methodology is set out as follows:

Step 1 - Setting the baseline

Using the most recent national household projections calculate the projected average annual household growth over a consecutive ten year period from the current year. The most recent household projections^(xii) indicate that the number of households in the district is expected to increase by 2,602 dwellings over a ten year period from 2018 to 2028, from 43,493 to 46,095 households. **This equates to an average household growth of 260 dwellings per year which is the baseline of the calculation.**

Step 2 - An adjustment to take account of affordability

The figure from step 1 is then adjusted based on the affordability of housing in the area. The adjustment factor used is the most recent national '[median workplace-based affordability ratio](#)'. This ratio takes account of the ratio of average house prices to average workplace earnings for an area. In the district, the most recent affordability ratio is 8.52 which means local house prices are over eight times the average local wage within the district. Using the calculation set out in the planning practice guidance this results in an uplift figure 28% above the baseline figure established in Step 1. **This results in a new requirement of 333 dwellings per year within the district.**

Step 3 - Capping the level of any increase

If appropriate a 'cap' can then be applied to the figure established in step 2 in specific circumstances which are set out within the planning practice guidance. As we have adopted a local plan within the last five years a cap of 40% in excess of the figure within the Local Plan Strategy would be applied. However, the figure established at step 2 is less than the housing requirement of the adopted local plan and therefore no cap is applied. **As a result the local housing need, or LHN, for the district is a yearly rate of 333 dwellings.**

xii In October 2018 the government published a consultation on revisions to the standard methodology following the publication of the 2016 household projections. This consultation states that authorities should use the [2014 household projections](#) for the purposes of calculating local housing need

14.9 The government has set out that they intend to make changes to the standard methodology for calculating local housing need to ensure that the government's commitment to deliver 300,000 homes a year across the country is planned for. The local housing need for the district will need to be reconsidered once the revised methodology is published and when new housing projections are published.

14.10 The proposed plan period for the local plan review covers a twenty year period between 2016 and 2036 as such the overall requirement for our **local housing need would be a minimum of 6,660 homes**. This will need to be updated throughout the plan's preparation to take account of the government's intended changes to the standard methodology and the publication of revised household projections or affordability ratios.

14.11 Alongside this it is intended to undertake a 'housing and economic development needs assessment' to provide a deeper understanding of the housing needs of the district, including understanding the requirements for affordable housing, provision for older people, for families, students, people with disabilities and people who wish to build their own homes. Such evidence will allow the council to consider whether any uplifts to the minimum figure established through the standard methodology are appropriate and what the implications of such uplifts could be. The proposed timescales associated with this evidence are set out **Appendix A**.

Needs from the housing market area

14.12 The national planning policy framework makes clear that in addition to an authority's local housing need, any needs which arise within wider housing market areas which an authority relates to should be taken into account in establishing the total amount of housing to be planned for. The current local plan acknowledges this in respect of Lichfield District being situated within the Greater Birmingham and Black Country Housing Market Area (GBHMA).

14.13 The Birmingham development plan which was adopted in 2017 confirmed that there was a shortfall of land for 37,900 homes which cannot be accommodated within Birmingham which means that those authorities within the housing market area would need to consider their ability to meet a share of this need. The local authorities which form the GBHMA ^(xiii), of which Lichfield is one, commissioned a [strategic housing needs study](#). As part of this housing market area Lichfield will need to have regard to the unmet needs within this area. It has also become clear though the early stages of the review of the Black Country core strategy that an additional shortfall of around 22,000 dwellings has been identified.

14.14 Following the strategic housing needs study the housing market area authorities commissioned a further [strategic growth study](#) to build upon the earlier evidence which sought to quantify the overall shortfall and consider strategic growth options and locations across the housing market area which could assist in meeting the housing market area's unmet need. The study concluded that the shortfall primarily comes from Birmingham and the Black Country and cumulatively there is a total shortfall of 60,855 dwellings to 2036. The strategic growth study recommended that if densities across the housing market area could be increased and additional urban supply brought forward, this could reduce the shortfall within the housing market area of around 48,000 dwelling to 2036.

14.15 The strategic growth study identified a range of strategic growth options across the housing market area which could possibly help to meet this significant shortfall. These options included urban extensions, new settlements and dispersed housing developments, which are to be tested by the authorities within the housing market area through the review of their local plans. The [scope, issues](#)

xiii This consists of Lichfield District, the Black Country Authorities, Bromsgrove, Redditch, Solihull, North Warwickshire, Tamworth, Cannock Chase, South Staffordshire and part of Stratford-on-Avon.

[and options](#) document consulted on by the council included a range of growth options which incorporated those suggested through the strategic growth study. These options are considered in greater detail within the 'Our strategic options for spatial growth' chapter of this document.

14.16 It is clear that given the level of unmet need there is a significant strategic issue for the authorities within the housing market area. This means that the district will need to assist in meeting the shortfall through this local plan review. Currently there is no agreement between the fourteen authorities within the housing market area in relation to the potential apportionment and locations of homes to meet the unmet need. Lichfield District Council has committed to helping to deal with this and has a statement of common ground with Birmingham City Council which confirms that this issue will be dealt with through the local plan review.

What you told us

14.17 The scope, issues and options consultation posed the question as to how should the district assist in meeting the unmet needs arising from within the housing market area. Most responses acknowledge that the district would need to assist in meeting this need and that this would be best done through the identification of housing allocations within the local plan review. Some comments suggested that an agreement between all the authorities within the housing market area with respect to the distribution of the unmet need would be helpful and provide clarity as to each authorities role in dealing with the issue. At this stage no such agreement has been reached, although most authorities within the housing market area are committed to helping address the issue through their own plan-making.

14.18 A fairly common response which came through consultation was that the unmet need could have implications for the green belt within the district and that a comprehensive evidence base would be needed. The strategic growth study included a high level green belt assessment which considered the whole housing market area, however authorities will need to undertake more detailed green belt reviews as part of the evidence for their local plans. The council propose to undertake such a piece of work, the timescales associated with this are set out at **Appendix A**.

14.19 There were many more specific comments which related to particular growth options included within the scope, issues and options document. The specific growth options are considered in greater detail within the 'Our strategic options for spatial growth' chapter of this document.

What the evidence tells us

14.20 As has been set out within the preceding paragraphs at this stage the number of houses which the district will need to plan for is unclear, however this figure will need to comprise of the local housing need for the district and a contribution towards meeting the unmet needs of the housing market area. Further evidence, including a housing and employment development needs assessment, will need to be collected to inform the local plan review and specifically to help define the overall level of housing which will planned for. The timescales associated with the collection of such evidence are detailed in **Appendix A**.

14.21 The strategic growth study identified a twenty four 'areas of search' across the whole of the housing market area, of which six are located within the district. Each of the areas of search were assessed using a number of criteria and a number of the options which scored most favourably were recommended for further testing and consideration through the authority's local plan process. Three of these were located within our district, these being: north of Tamworth, east of Lichfield and land around Shenstone. The scope, issues and options document included these broad areas as part of the strategic growth option consulted upon along with other options from the growth study which scored less favourably. These options are considered in greater detail within the 'Our strategic options

for spatial growth' chapter of this document. These areas have yet to be tested in detail through the local plan and further work including green belt review, assessments of infrastructure capacity and whether there is sufficient available land will need to be undertaken.

14.22 In order to begin to understand the level of contribution the district could make to meeting these unmet needs it is important to look at our historical housing delivery. Table 14.1 illustrates the housing delivery which has taken place within the district over the last twenty years. This shows that across a changing housing market and economy, which includes periods of varying market conditions an average of 382 dwellings has been built each year. Such a figure is in excess yet comparable to the local housing need figure produced by the standard methodology. The highest number of new home completions in one year was 647 dwellings in 2005/2006 and only on three occasions have housing completions exceed 600 homes per year. There is a risk that an annual housing target which drastically exceeds this average figure may not be a realistic representation of what can be built within our local housing market. Evidence clearly demonstrates that the local housing market is not able to deliver 550 plus homes each year on a regular basis.

14.23 The likely rates of housing delivery is an important consideration for the council, particularly since the introduction of the housing delivery test through the revised national planning policy framework. National policy requires plans to be both aspirational yet deliverable and therefore the overall quantum of housing to be provided in the district needs to be both aspirational and deliverable.

Table 14.1 Housing delivery (1998-2018)

1998-1999	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008
206	364	497	534	521	609	638	647	293	581
2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018
273	102	316	201	239	324	226	200	322	552

14.24 The following options have been considered in terms of the potential housing requirement to be set out in the local plan. Each scenario uses the current local housing need of 333 dwellings per annum as a basis. Should this base requirement change considerably then further thought would need to be given to the level of additional growth which could realistically be accommodated within the district.

Table 14.2 Housing requirement options

Housing requirement option	Annual requirement	Plan period requirement (2016-2036)
Option 1: Local housing need only.	333	6,660
This option would provide only for the local housing need for the district with no contribution to the unmet need from within the housing market area. The local housing need is established using the standard methodology as described above. Not meeting a proportion of the need arising in the housing market area would mean we would not be complying with the commitment made in our current local plan or in agreements with neighbouring authorities.		
Option 2: Local housing need plus 1,000 home contribution.	383	7,660
Such an option would provide for the local housing need established using the standard methodology plus a further 1,000 new homes to assist in meeting the unmet need from within the housing market area. This option utilises the same approach as the current local plan which included provision of 1,000 dwellings to meet the needs arising from within the housing market area (specifically Cannock Chase and Tamworth). The average annual requirement under this option is equivalent to the average annual level of new home completions which has been achieved in the last twenty years.		
Option 3: Local housing need plus 2,000 home contribution.	433	8,660
This option provides a modest contribution to the unmet need on top of the local housing need established using the standard methodology. Such an approach provides an annual requirement which is consistent with the current objectively assessed need for the district incorporated into the current local plan (excluding the cross boundary provision noted above). This approach would require a small upward lift in the average annual delivery of homes of around 14%.		
Option 4: Local housing need plus 3,000 home contribution.	483	9,660
This option would provide for the local housing need established using the standard methodology plus an additional 3,000 dwellings to assist in meet the unmet need from within the housing market area. This option provides a reasonably significant contribution towards the unmet need and gives an annual requirement which is consistent with the current local plan's requirement of 478 dwellings per year. Such an approach would require a significant uplift of 26% above the average level of housing delivery within the last twenty years.		
Option 5: Local housing need plus 4,500 home contribution.	558	11,160
This option would provide for local housing need established using the standard methodology plus an additional 4,500 dwellings. This addition is the mid-point for the range given in the strategic growth study for the sustainable urban extension options. Such an approach would mean Lichfield providing a significant contribution to the unmet need equating to almost 10% of the overall need (including the density assumptions within the strategic growth study). This would be require an uplift of 46% in annual new home completions above the average annual delivery.		
Option 6: Local housing need plus 10,000 home contribution.	833	16,660
This option would provide for local housing need established using the standard methodology plus a further 10,000 dwellings which related to the new settlement option identified within the strategic growth study. This would mean an average annual requirement some 29% higher than the highest single year of new homes completions and 118% greater than the average annual deliver of homes within the district. Such an approach would clearly not be realistic and as such should be discounted.		
Option 7: Local housing need plus 19,000 home contribution.	1,283	25,660
This option would provide for local housing need established using the standard methodology plus a further 19,000 dwellings which is the total of the three options within the strategic growth study; 10,000 for a new settlement and two 4,500 sustainable urban extensions using the mid point between the range set out for urban extensions within the growth study. Such an approach would require an uplift of 98% in annual completions when compared to the highest ever annual delivery within the district and 236% more than the average annual delivery. It is clear that such an approach would not be deliverable or realistic and as such must be discounted.		

14.25 The options within the strategic growth study require considerable further testing, however through the analysis of housing delivery and consideration of the above options the council can begin to assess the level of unmet need which it can realistically accommodate. The council is committed to assisting in meeting the unmet need, however the contribution it makes must be realistic and deliverable, a number of the options above would clearly lead to levels of growth which could not be delivered and sustained across a plan period.

14.26 The council should test accommodating between 3,000 and 4,500 additional dwellings to assist in meeting the unmet needs from within the housing market area. Such an approach would provide a significant contribution toward the unmet need and also require a sizable increase in our annual delivery of new homes when compared to the average delivery over the last twenty years. This would potentially mean an additional 150 to 225 dwellings per year on top of our local housing need. Should the local housing need be increased then this will result in changes to the level of growth which can be realistically accommodated to meet the needs of the housing market area. Committing to testing between 3,000 and 4,500 homes toward the unmet needs of the housing market area offers an assurance to other authorities that the council are taking a progressive and proactive approach in helping to deal with this strategic issue.

14.27 This could mean the local plan review should plan for between 9,660 and 11,160 new homes between 2016 and 2036. However, should the shortfall in land for housing within the housing market area be reduced, or should our local housing need change then the contribution being made by the district council would be reduced accordingly.

14.28 The scope, issues and options document suggested that the current core policy relating to the provision of housing and the subsequent non-strategic policies, would need to be revisited and potentially replaced through the review of the local plan. The strategic policy needs to be replaced to ensure that it considers the new local plans housing requirement, including the potential for the district to accommodate growth to meet unmet needs from within the housing market area.

Preferred policy direction: Our homes for the future - housing provision

The strategic policy for housing will set out the overall level of housing growth which will be planned for within the district to 2036 to ensure that a sufficient supply of deliverable and developable land is available to deliver the established housing requirement.

Additional work is taking place which will allow the council to further define elements of the strategic policy relating to housing provision. It is considered the policy should include and be focused upon the following:

- Evidence to understand and underpin the local housing need for the district and the level of housing to be accommodated to assist in meeting the unmet needs arising from the housing market area.
- The spatial distribution of growth which will be linked to the spatial strategy. This should also include the identification of any strategic allocations for residential development.
- Understanding the phasing and delivery of new homes to ensure there is a sufficient supply of land to meet the level of housing growth and to ensure the council maintains a five year housing land supply and meets the requirements of the housing delivery test.
- A focus on the delivery of brownfield sites before greenfield sites. This will be informed by further evidence including a detailed understanding of the brownfield land capacity of the district through the strategic housing land availability assessment, urban capacity work and the council's brownfield land register.

- Balancing the need for providing housing, inclusion housing to meet the need of specific groups within our community (this should link to additional policies which deal specifically with such issues as set out below).
- Understanding the requirements for gypsy and traveller provision.

Question 9

Do you agree with the preferred policy direction for the strategic policy on housing provision? Do you think the policy should consider any other issues relating to housing provision, and if so what should these be?

Affordable housing and our housing mix

14.29 National planning policy requires authorities to assess and identify the size, type and tenure of homes including those required to meet the needs of different groups within the community including affordable housing, families with children, older people, students, people with disabilities, provision for gypsies and travellers and homes for people who wish to build their own homes. The profile of the district has demonstrated that one particular issue facing the district is its aging population, and as such the council will need to plan to ensure the needs of its community are met.

14.30 Provision for gypsies and travellers and people wishing to build their own homes are considered separately below.

What you told us

14.31 The scope, issues and options consultation did not pose any specific questions relating to affordable housing or housing mix. However, a number of responses to the consultation noted the significant need for affordable housing and support for its delivery. This theme is already identified in many of our neighbourhood plans together with the requirement for smaller homes to downsize to and provision of homes for older people.

What the evidence tells us

14.32 The current local plan includes several non-strategic policies relating to housing mix (including homes for specific needs), affordable housing and provision for gypsies and travellers. In terms of housing mix the plan seeks to deliver a balanced housing market by requiring new developments to deliver a mix of house types, sizes and tenures based on evidence with the strategic housing market assessment. This seeks to address the imbalance on property types within the district and deliver a greater level of smaller properties including two and three bedroom homes. There is also a focus on providing support for specialist accommodation to meet the needs of the district's older population.

14.33 The government published the '[Independent review of build out](#)' in October 2018 which was prepared by Sir Oliver Letwin. The Letwin review provides an analysis on the cause of the gap between housing completions and the amount of land either with permission or allocated for new homes within the country. The review concluded that a fundamental driver of the build out rates for sites with planning permission is the 'absorption rate' which is the rate at which newly built homes can be sold into the local market without materially disturbing the market price. The report further concluded that if house builders and others involved in the delivery of new homes were to offer housing of varying types, designs and tenures on large sites then this could greatly accelerate the absorption and build out rates.

14.34 The lack of affordable housing within the district has been identified as one of the key issues which we will seek to address through the local plan review. National planning policy requires strategic policies to make sufficient provision for housing including affordable housing. The existing local plan sets an aspirational target of 40% for the provision of affordable housing, this target is calculated on an annual basis to provide a viable target based upon the current market. Such an approach has been difficult to implement as it provides a variable level of certainty for applicants and the council when determining applications.

14.35 The council will undertake further work in support of the local plan review including a housing and economic development needs assessment which will allow us to understand the different components of our local housing need including the level of affordable housing, needs to meet specific groups within the community and the type and tenure of homes to meet these needs. Additionally any policy which sets housing mix and appropriate provision for affordable homes will need to be tested to ensure this does not render developments unviable. The council proposes to undertake viability work as part of the evidence base for the local plan review. The anticipated timescales associated with this evidence are set out at **Appendix A**.

14.36 The scope, issues and options document concluded that the existing policies relating to housing mix and affordable housing (policy H1 and policy H2 respectively) be replaced through the local plan review as both would need to be updated to reflect the evidence base relating to housing need. The preferred approach is to replace these policies with one strategic policy relating to delivering a housing mix to meet our needs, including affordable housing.

Preferred policy direction: Our housing mix, including homes to meet specialist needs

The policy will seek to deliver a balanced housing market which meets the needs of the district's communities, including groups such as; people who require affordable housing, family homes, homes for older people including specialist care provision, people with disabilities, students and people who wish to build their own homes. New residential developments will include an integrated mix of dwelling types, sizes and tenures based on the assessment of local housing need, including the provision for those groups identified above to contribute to the creation of mixed and sustainable communities.

Additional work which will allow the council to further define elements of the strategic policy relating to the components of housing need. It is considered the policy should include and be focused upon the following:

- Establishing the affordable housing need within the district and the thresholds and levels of affordable housing which will be set.
- Establishing the appropriate mix of dwellings in terms of size, type and tenure. This should also be informed by local housing need evidence related to specialist groups within the community.
- Consideration of the appropriate densities for new residential development (see below for further detail).

Question 10

Do you agree with the policy direction for the strategic policy considering housing mix including homes to meet specific needs?

Density of housing development

14.37 National planning policy requires the council to develop policies which support the efficient use of land through development. The national planning policy framework is specific that where there is a known shortage of land to meet housing needs, as is the case within the housing market area, it is important that policies ensure developments make optimal use of sites and avoid homes being built at low densities. National policy states that minimum density standards should be used for town and city centres and locations well served by public transport. The framework goes further and suggests councils should consider the use of minimum density standards for other parts of their area.

What you told us

14.38 The scope, issues and options consultation asked whether the local plan review should include a density policy, or policy wording relating to density. This generated a considerable and wide ranging response. There was support for a policy or policy wording relating to density and ensuring that appropriate densities were achieved on developments to ensure the effective use of land with many recognising that national policy requires such an approach.

14.39 However, many comments felt that if such an approach were to be pursued the policy should not be overly prescriptive, and a more nuanced policy which accounted for local character would be appropriate. A high proportion of the comments received suggested that a density policy could be appropriate but this would need to be locally distinctive and rather than set one 'blanket' density across the district an approach which applies density standards appropriate to specific locations would be supported. Such an approach would accord with national planning policy.

14.40 A number of comments made the point that housing density is also closely related to the housing mix on a particular site. Clearly where a mix of smaller house types is achieved this will lead to higher overall density on a particular development. With this in mind it is clear that any policy wording relating to the density of housing development should be intrinsically linked to the housing mix and that these two issues should be part of the same policy.

What the evidence tells us

14.41 National planning policy requires policies to be included within the local plan which seek to ensure that appropriate densities of development are delivered, particularly where there is a shortfall in land for housing.

14.42 The strategic growth study provided a recommendation that if consistent density uplifts were provided across the housing market area this could greatly assist in meeting a proportion of the unmet need. The study concluded that it would be reasonable to assume a density of 40 dwellings per hectare within the conurbation (Birmingham and the Black Country) and 35 dwellings per hectare in other parts of the housing market area, including our district. Such an approach could provide an additional supply of around 13,000 homes over the period to 2031.

14.43 The average density of new housing development is monitored on an annual basis through our [authority monitoring report](#) and enables the council to see how effective its current policies are at ensuring appropriate densities are being delivered to ensure land is being used efficiently. The average density delivered across the last seven years is around 38 dwellings per hectare, this demonstrates that it is possible that the council could deliver growth at density of around thirty five dwellings per hectare.

14.44 Further evidence should be produced in order to understand the areas where a specific density standard may be appropriate and what that standard should be.

Preferred policy direction: Density of housing development

The preferred approach is to incorporate the appropriate policy wording relating to the density of housing development into the policy relating to housing mix (see above). This will ensure that the strategic policy relating to housing mix considers all elements of need and issues around housing mix and density which are intrinsically linked are considered through one policy.

The policy should include a range of density standards specific to particular areas of the district to ensure that the density is appropriate to the character of the surrounding area. Additional work should be undertaken that will allow the council to conclude on appropriate areas for density standards and the specific standard for those areas.

As a minimum residential development should seek to achieve a density of thirty five dwellings per hectare or the specific density standard which has been identified to ensure the efficient use of land and to assist in the delivery of developments which provide the identified housing mix. Where a density below this threshold is proposed, it will be considered on a case by case basis and it will be for the applicant to demonstrate why such a density is appropriate in that location.

In town and city centres and locations with good accessibility to public transport higher minimum density standards may be applied.

Question 11

Do you agree with the policy direction relating to housing density?

Self-build and custom house-building

14.45 Self-build and custom-build refer to homes where individuals or groups of individuals either build or have persons working for them to build a home to be occupied by them. National planning policy requires the needs of people wishing to build their own homes to be established as part of the duty to deliver the range of housing types for groups within the community. ['The Self-Build and Custom Housebuilding Act'](#) was introduced in 2015 and requires the council to maintain a register of those people who are seeking land to build their own home. The register must be promoted by the council and should be used as part of the evidence base supporting the review of the local plan. The current local plan does not include a policy related specifically to self-build or custom-house building. Presently applications for developments of this type would be considered using the current local plan. Therefore the local plan review provides the opportunity to promote and encourage self-build and custom build within the policy framework for the district.

14.46 The scope, issues and options document considered there were two main options for a policy relating to self-build and custom-build housing, these being to include specific site allocations for this type of development which would be made available to those wishing to build their own home or include within policy a requirement for developments to include a specific proportion of serviced plots which would be made available to self and custom builders.

What you told us

14.47 Through the scope, issues and options consultation there was a good level of comment on issues relating to self-build and custom build homes. Generally the provision of self and custom build homes to assist in boosting housing delivery was supported, however there was some disagreement as to how such provision should be secured.

14.48 A large proportion of the responses were received from the house building industry and suggested that a policy approach which required larger developments to provide a specific proportion of serviced plots for self and custom builders was not supported. There were concerns that such an approach would not be flexible and could have impacts on the viability and overall quality of larger developments. Other responses suggested that if a policy approach seeking a specific proportion of self and custom build homes was pursued that this should not be at the expense of the delivery of affordable housing and the overall impact of such a requirement would need to be tested in terms of viability. If such a policy approach is taken in the local plan review this would be assessed through the full plan viability work which we propose to undertake. The timescales associated with this are set out at **Appendix A**.

14.49 There was a much greater level of support for a policy which provided broad support for proposals for or incorporating self-build and custom-build homes rather than requiring it. Such comments also suggested that specific allocations could be made through the local plan for self-build and custom-build homes, these comments suggested that such allocations would tend to be for smaller developments. Such an approach could assist the council in allocating a range of sites, including smaller sites which is encouraged by national planning policy.

14.50 A smaller number of comments suggested that the council undertake a proactive review of land within its ownership to identify any suitable sites which could then be promoted and allocated for self and custom build purposes. Those responses recognised that such an approach may not be suitable for all local authorities.

What the evidence tells us

14.51 The council has prepared and maintains a register of those persons who are seeking to build or commission their own homes. The [authority monitoring report](#) published in July 2018 identifies that there were thirty four individuals and one association currently included on the council's self build register. This demonstrates that the need for such homes is relatively limited within our district. Notwithstanding this, the council needs to meet the demand on its register.

14.52 National regulations mean that self-build and custom build dwellings can be exempt from paying community infrastructure levy (CIL). The authority monitoring report demonstrates that since April 2016 thirty one plots for new homes have been considered as self-build and therefore granted exemption from the community infrastructure levy. This demonstrates that supply is generally meeting demand.

14.53 Through the call for sites there are a small number of sites which have been promoted for self-build and custom-build housing developments as illustrated in the [call for sites schedule](#). The council will undertake a detailed urban capacity assessment and housing and economic development needs assessment as part of its evidence base which alongside the strategic housing land availability assessment will enable the council to consider if there are appropriate and deliverable sites which could be allocated for self and custom build developments, if it is considered appropriate to allocate specific sites.

Preferred policy direction: self-build and custom-build housing

The preferred approach is to incorporate the appropriate policy wording relating to the support for self-build and custom-build developments into the policy relating to housing mix (see above). This will ensure that the strategic policy relating to housing mix considers all elements of need.

Additional evidence will be undertaken in terms of the dwelling mix, self-build and custom-build homes. However it is suggested that any policy should focus on:

- Providing support for self-build and custom-build developments where these are sustainably located and consistent with other national and local planning policies.
- Consideration of identifying specific allocations, or parts of an allocation, for self-build and custom-build development should the evidence base suggest there is sufficient need which needs to be met.
- The council will be maintaining, promoting and updating its self-build register which will assist, along with other evidence, in demonstrating the need for this type of development.

Question 12

Do you agree with the preferred policy direction in relation to self-build and custom-build housing?

Gypsies and travellers

14.54 National planning policy in relation to gypsies and travellers is set out within the ['National Planning Policy for Traveller Sites'](#) (PPTS) which sits alongside the national planning policy framework. This requires the council to set targets for gypsy and traveler pitches to accommodate the likely permanent and transit needs within the plan period.

14.55 The current local plan was informed by a gypsy and traveller accommodation assessment which identified a need for 14 residential pitches and 5 transit pitches within the district to 2029. The current local plan approach is to locate gypsy and traveller sites in sustainable locations based on a number of criteria including locating sites close to sustainable settlements and the A38 and A5 corridors.

What you told us

14.56 The scope, issues and options document suggested that the district council should continue to prioritise sustainable settlements and the A5 and A38 corridors as locations for gypsy and traveller sites. A number of responses agreed with this approach suggesting it would still represent an appropriate strategy for the locating of gypsy and traveller sites through the local plan review.

14.57 Some comments suggested that there was a need to update the evidence relating to gypsy and traveller needs to inform the local plan review. Since the production of the current local plan national planning policy in relation to gypsies and travellers has been updated. As such it will be important to undertake further evidence to inform the local plan review and ensure this is consistent with national policy. The National Federation of Gypsy Liaison Groups stated that the Gypsy Traveller Accommodation Needs Assessment should cover Tamworth and Lichfield as a minimum.

What the evidence tells us

14.58 The scope, issues and options document recognised that the existing planning policies relating to gypsy and travellers needs to be revisited through the local plan review. This is necessary for several reasons, the first being that national planning policy was revised and published after the adoption of the local plan, as such the policy needs to be considered in light of the new national policy. The second reason being that the council will need to establish the gypsy and traveller need which will need to be met within the plan period. The district council is working with Tamworth and North Warwickshire borough councils to establish its gypsy and traveller requirement through the preparation of gypsy and traveller needs assessment. The timescales associated with this are set out in **Appendix A**.

14.59 Through the evidence associated with the current local plan we know that there is a limited supply of potential sites to meet the needs of gypsies and travellers. The council produced a [gypsy and traveller paper](#) in 2016 to support the current local plan, this concluded that there were insufficient deliverable sites to meet the current need. The [five year housing land supply paper](#) includes a consideration of the supply to meet gypsy and traveller requirements. This also acknowledges the current lack in supply to meet this need. Through the call for sites no further sites specifically for gypsy and traveller provision have been submitted to the authority, although one site has been suggested for varying residential uses including the potential for gypsy and traveller needs. The council will undertake a proactive review of possible sites for such provision in order to seek to identify land allocations to meet the need to 2036.

14.60 Given the potential lack of deliverable sites a criteria based policy, much like that within the current local plan, which would assist in the search for sites and assist in decision making on planning applications is the preferred approach. This will provide support for proposals and seek to encourage the delivery of sites to meet the gypsy and traveller need in sustainable and appropriate locations.

Preferred policy direction: Provision for gypsies and travellers

The district council will support the delivery of residential and transit pitches to meet the identified requirement to 2036 on sustainably located sites, including specific sites sufficient to provide for the first five years of the plan period. This requirement will be established through the evidence base and included within the final policy. Site allocations for such pitches will be made through non strategic policies within the local plan. The location of site allocations to meet the identified need, and the determination of planning applications will be informed by the following criteria and having regard to other national and local planning policies:

- the site is within or adjacent to a settlement identified as sustainable within the settlement hierarchy or close to the transport corridors of the A38 and A5.
- where a proposal is located adjacent or close to a settlement, the location, number of pitches or plots should relate and be appropriate to the surrounding population's size and density and so as not to put unacceptable strain on local infrastructure.
- the site should be capable of providing adequate on-site facilities for parking, storage, play and residential amenity appropriate to the number of plots or pitches.
- vehicular and pedestrian access to the site is safe and reasonably convenient.
- the site should be located within flood zones one or two.
- the site will be landscaped and screened to provide privacy for occupiers and to maintain visual amenity with the landscape/townscape within which it is located.
- development of the site should protect the local amenity and environment and will have no significant detrimental impact on adjoining properties or neighbouring land by virtue of noise and other disturbance caused by movement of vehicles to and from the site.

Question 13

Do you agree with the preferred policy direction and approach for the locating of sites to meet the gypsy and traveller needs which will need to be identified? Are there any alternative approaches we should consider? If so please explain why this approach should be considered.

15 Our economic growth, enterprise & tourism

Strategic objective & priority 1	Sustainable communities
Strategic objective & priority 2	Rural communities
Strategic objective & priority 7	Economic prosperity
Strategic objective & priority 8	Employment opportunities
Strategic objective & priority 9	Our centres
Strategic objective & priority 10	Tourism

Introduction

15.1 Planning is a key enabler for economic growth. National policy is committed to building a strong and competitive economy and planning policies should help create the conditions in which businesses can invest, expand and adapt. The review of the local plan will aim to provide a framework that supports investment and development to achieve a successful and sustainable local economy.

15.2 The following section deals with a range of topics that relate to different aspects of employment and enterprise, including the need for employment land, fostering skills and enterprise, rural employment, the role of town centres and tourism. These aspects of employment and enterprise are grouped together within section nine of the current local plan strategy and supported by further detailed policies within section five of the local plan allocations document.

Employment & economic development

15.3 Our [strategic plan](#) seeks to support a 'vibrant and prosperous economy' and ensuring that the district is 'open for business' as an attractive location for investment. The strategic plan acknowledges the important role of the local plan in promoting the district as a good place for business and commerce to invest. A key aspect of the local plan review will be to plan for the right amount of land for employment and commercial development, and a variety of opportunities to meet different needs. This will be balanced to ensure that the right amount of jobs are created to align with the amount of new homes we are planning for.

15.4 The [current local plan](#) sets out to provide up to 9,000 new jobs and achieve a job balance ratio of 85% by the end of the plan period. To achieve this almost 80 hectares of land has been allocated for employment uses across a range of locations including in Lichfield city, Burntwood and Fradley Park. Growth in the district has increased by 24.4% since 2009. The recent high level of growth has been driven by key growth sectors, including tourism and leisure, professional services and logistics. Within the top 20 largest employers in the district, the majority of jobs are full time with part time employment being dominant in only three of the businesses.

What you told us

15.5 There was a limited number of responses to the [scope, issues and options](#) document with regards to employment growth. Those comments which were received were generally supportive of the need to ensure sufficient employment land is made available to support the delivery of jobs for our communities. The scope, issues and options document included several strategic options for future employment growth and a number of specific comments were made through the consultation to these options, these are considered in greater detail within the 'Our strategic options for spatial growth' chapter of this document.

What the evidence tells us

15.6 In order to understand the level of employment growth we will need to plan for and how this relates to our housing growth we will need to obtain further evidence in support of the local plan review. The council will produce an housing and economic development needs assessment as part of its evidence base to assist in the formulation of future policy. The timescales associated with the production of this evidence are set out at **Appendix A**.

15.7 In terms of the supply of land for employment uses the evidence supporting our current local plan has consistently shown us that there is a good supply of land to more than meet our current needs. The [employment land availability assessment](#) provides a strategic assessment of the land which could be available for employment development. This demonstrates that there is currently a range of sites, primarily located within our existing employment areas, which are available to meet our needs.

15.8 The economic development service work in partnership with other services throughout the Council to promote economic prosperity, creating a vibrant and prosperous economy. As part of this, further understanding on the local business population and commercial property market is essential to steer and develop knowledge to shape future actions to support the local economy and economic growth. The service have and will commission in the future tenders to expand local business and commercial property intelligence.

Preferred policy direction: Our employment and economic development

The strategic policy for types of provision to meet employment and economic development will set the overall level of jobs and land to be planned for within the district to 2036 to ensure that a sufficient supply of deliverable and developable land is available to deliver the established requirement for employment land. Employment growth will be focused on our current employment areas, particularly in Lichfield city, Burntwood and at Fradley Park.

The strategic policy should seek to maintain and enhance a diverse local economy and encourage opportunities for inward investment. The high environmental qualities of the district will be safeguarded to attract further investment from new and existing employers and links between the environment and the economy will be fostered. Opportunities for new business formations will be actively pursued and the long-term survival of these business encouraged with sustainable forms of business, including home-working and the expansion of ICT particularly supported. The district council will encourage education and skills development in order to provide employers with access to a skilled labour force as well as reducing levels of out-commuting.

The strategic policy should provide support for the redevelopment and modernisation of our existing industrial and employment areas to ensure businesses are able to grow and adapt. Support should also be provided for economic development and diversification of the rural economy where these do not conflict with other policies.

Additional work is taking place which will allow the council to further define elements of the strategic policy relating to employment development. It is considered the policy should include and be focused on:

- Evidence to understand and underpin the employment and economic development need for the district and how this relates to the local housing need;
- The spatial distribution of growth which will be linked to the spatial strategy. This should include the identification of employment areas and/or strategic allocations for employment development;

- Understanding the phasing and delivery of new development to ensure there is a sufficient supply of land for employment development and that any infrastructure requirements can be delivered at the appropriate times;
- A focus on the delivery of brownfield sites before greenfield sites and the re-use and redevelopment of older employment sites. This will be informed by further evidence including a detailed understanding of the brownfield land capacity of the district through the employment land availability assessment and urban capacity work; and
- Should additional employment growth be required beyond the existing identified employment areas then this should be located in the most sustainable locations, such an approach could require the consideration of changes to the green belt boundary, any such changes would be informed by evidence including a comprehensive green belt review and would only be proposed in exceptional circumstances through strategic policy.

Question 14

Do you agree with the preferred policy direction for the strategic policy on employment and economic development? Do you think the policy should consider any other issues, and if so what should these be?

Our centres

15.9 Over the past few years, town centres across the country have faced the challenge of major economic and social change which has had an impact on the way we shop and utilise our centres. This has resulted in a change to our high streets and centres, with the rapid growth of discount retailers, introduction of convenience shopping and an overall decline in demand for town centre retail floorspace apart from in the most successful centres. A key aspect of national policy is the need to ensure the vitality of town centres by supporting the role that town centres play at the heart of local communities and taking a positive approach to their growth, management and adaptation. Attractive, vibrant and prosperous town centres can act as a catalyst for attracting growth and investment into the wider area.

15.10 There are a wide range of shopping and service facilities within our district. Core policy eight of the current local plan strategy identifies Lichfield city centre and Burntwood town centre as the focus for new office, leisure, office and cultural facilities and differentiates between the centres based on their roles and functions. Lichfield is identified as the strategic centre, Burntwood as a town centre and then key rural centres and neighbourhood centres are listed.

15.11 To inform the local plan allocations document, the [Lichfield centres report](#) was prepared and consequently the specific policies relating to Lichfield city centre and Burntwood town centre were updated. Current policy seeks to promote Lichfield City 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. Achieving this through redevelopment opportunities identified in the city centre whilst retaining the special architectural and historical character of the City.

15.12 The policies map which accompanies the current local plan defines the extent of the city centre boundary, primary shopping area and primary and secondary frontages. In line with national policy, any proposals (for retail uses) outside of the primary shopping area or city centre boundary (for all other main town centre uses) are required to undertake a sequential test and impact assessment. Office provision is supported within the city centre boundary to meet the evidence based

annual floorspace requirement of 1,000m² - 1,400m² and a sequential approach to the location of offices will be applied where there is clear evidence that there are no suitable office sites within the city centre.

15.13 In Burntwood the current policy focus is on the creation of a vibrant and diverse town centre, through regeneration. This is primarily to meet local needs. The town will be promoted as an area of increased and more diverse economic activity, to include new retail, employment, leisure, residential, recreation, health, education resources and improvements to its environment quality and public realm. To assist in this regeneration, Burntwood will be a main focus for investment, including public and private sector funding.

15.14 The [scope, issues and options](#) document considers whether the current local plan policies relating to centres remain appropriate for purposes of the local plan review given that the policies are supported by the Lichfield centres report which was published in 2017. Also, whether supporting development plan documents for Lichfield city centre and Burntwood town centre should be progressed as part of the local plan review.

What you told us

15.15 The scope, issues and options consultation document listed core policy 8 as a policy which may require minor amendments. Whilst no specific comments were received in relation to this policy, in general comments were supportive of the policies listed within this category.

15.16 In general, it is considered that the retail and office requirement remains appropriate for the local plan review. However, some representations were received that commented that the distribution of housing growth needs to be determined before future household expenditure and floor space requirements can be determined, therefore the provision may need to be reviewed at this point. Several comments were made stating that the evidence needs to be completed following the completion of committed retail schemes within the district and neighbouring authorities.

15.17 In relation to progressing supporting development plan documents, in general the responses received from the development industry support a single comprehensive local plan with local planning matters being considered through neighbourhood plans. There is local support from residents within Burntwood for an area action plan to be prepared.

What evidence tells us

15.18 In relation to core policy eight, whilst the thrust of this policy remains broadly relevant, aspects of this policy will need to be updated as part of the review to reflect any new centres established as a result of new development once the spatial strategy and level of housing growth have been established.

15.19 The retail and office requirements for our district have been established recently through the [Lichfield centres report](#). The report also identified the town centre boundaries and primary and secondary retail frontages for Lichfield City. As a result of this evidence, the relevant policies, namely Policy Lichfield 3: Lichfield Economy and Policy Burntwood 3: Burntwood Economy were updated as part of the local plan allocations document in line with the recommendations of the report.

Preferred policy: Our centres

Development proposals for retail, leisure, office and cultural facilities will be focused within the city centre of Lichfield and commercial centre of Burntwood in line with the hierarchy of centres as set out below, having regard to centres outside of the District. In Lichfield City and Burntwood, town centre boundaries have been defined and set out along with the primary shopping area for Lichfield City. Retail assessments will be required in line with local threshold set out within the retail assessments policy.

Leisure uses, cultural development, attractive spaces and a balanced night time economy will be encouraged within both Lichfield City and Burntwood town centres.

Rural centres will be protected and enhanced to provide shops, services, employment and facilities to meet the needs of local communities within the settlement and as a focus for those living and working in nearby smaller villagers.

New neighbourhood centres providing local services and facilities will be required to meet the day to day needs arising from new communities that are proposed within housing growth locations. The diversity of local services will be protected and supported and mix of facilities in existing neighbourhood centres will be maintained to provide for day to day local shopping services and facilities.

Improvements to the accessibility of centres will be supported, especially sustainable means of transport together with improvements to traffic management within our settlements.

Table 15.1 Hierarchy of centres

Hierarchy of Centres	Location
Strategic Centre (with many shops, services, employment and entertainment which service a much wider catchment than just the local population).	Lichfield.
Town Centre (shops and services primarily serving local catchments but providing for main weekly convenience shopping) .	Burntwood.
Rural Centres (shops and services for day to day needs within villages to serve the wider rural area).	Alrewas, Armitage with Handsacre, Fazeley, Fradley, Little Aston, Shenstone, Whittington, Stonnall, Kings Bromley, Streethay & Hopwas.
Neighbourhood Centres (shops and services for day to day needs within urban neighbourhoods).	E.g. Boley Park, Curborough, Darwin Park, Netherstowe, Dimbles Lane, Morley Road, Park Hill Road, Chasetown, Swan Island.
Proposed Neighbourhood Centres.	<i>Will be defined once the level of housing need and growth locations have been established.</i>

15.20 Following the strategic policy our preferred approach is to include two non-strategic policies which focus on the two main centres identified within the proposed hierarchy of centres; Lichfield City and Burntwood. These two non-strategic policies are included within the current local plan allocations document and our considered important to bring forward within the local plan review.

15.21 There are several non-strategic policies within our existing local plan relating to our centres which we think should be carried forward into the local plan review. These are set out at **Appendix B**.

Preferred policy: 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 identifies the extent of the city centre boundary, primary shopping area and primary and secondary frontages.

The primary shopping area 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 primary shopping area 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 retail assessment policy.

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 m²-1,400m². 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 is allocated for Grade A office development (up to 12,500 m²)

Preferred policy: 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, recreation, 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. 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.

Question 15

Do you agree with the preferred policy approach and non-strategic policies relating to our centres? If not, what would you change and why?

Tourism

15.22 Lichfield District has a strong tourist sector, and a wealth of tourism facilities and activities of local, regional and national importance. National policy tells us that the tourism economy can help and support the viability and vitality of our town centres, and that it can support the rural economy through rural tourism and leisure developments which respect the character of the countryside. National policy guidance also states that local planning authorities should consider specific needs of the tourist industry including particular location and operational requirements and analyse the opportunities for tourism to support local services, vibrancy and enhance the natural environment.

What you told us

15.23 The scope, issues and options consultation document listed in the review of existing local plan policies that Core Policy 9: Tourism was to be reviewed and may require minor amendments. Responses received were generally supportive of the current tourism policy.

15.24 Comments were received that the review document needs to expand on how it will support the future development of the key tourist attractions in the district, namely Drayton Manor Park, Lichfield Cathedral and the National Memorial Arboretum so that that planning restrictions do not hinder future investment.

What evidence tells us

15.25 Our [strategic plan](#) acknowledges the important role that tourism plays in the district and seeks to encourage increased visitor numbers to the district, increased spend in the local economy along with more overnight visitors.

15.26 The [Greater Birmingham and Black Country Visitor Economy Strategy](#) seeks to inform and support strategies and tourism activity within destinations, ensuring that the visitor economy works effectively with other sectors to deliver wealth and position the Greater Birmingham area as a place to live, work, invest and visit. Within the visitor economy strategy, the importance of Lichfield's key tourist attractions are characterised by the historic city of Lichfield, the Staffordshire Hoard and the Mercian Trail, the National Memorial Arboretum, Cannock Chase Area of Outstanding Natural Beauty (AONB) and Drayton Manor Theme Park. The strategy outlines recent investment in Drayton Manor Park and the new visitor centre which has recently opened at the National Memorial Arboretum. This highlights the importance of supporting future investments in the tourism industry.

15.27 The [Lichfield City Centre Development Strategy & Action Plan](#) sets out five strategic objectives. The vision of the document and purpose of the strategy is to increase visitor numbers in Lichfield City and develop the city in a strategic way. The Economic Growth Service Plan 2018- 2019 sets out the tourism priorities for the next financial year, one of which is the relocation of the tourist information centre back into the refurbished St Mary's Centre.

15.28 In order to understand current and future hotel and visitor accommodation, Destination Staffordshire, the official tourist board for Staffordshire have commissioned a study to be undertaken taking a study for the whole of Staffordshire which will look to understand the future potential for hotel and visitor accommodation development and establish an action plan to accelerate hotel development across the city in line with identified opportunities.

Preferred policy direction: Tourism

The preferred policy approach for the strategic tourism policy is to retain some wording from the current tourism policy where this is considered still relevant and in line with national policy. This policy will then be amended to reflect the key tourism schemes and priorities for the district once the evidence base is up to date.

Proposed wording to be retained:

The District Council will support the growth of sustainable tourism in the district where this does not conflict with other local plan policies.

To help support the local economy, a variety of types of accommodation will be encouraged increasing overnight capacity and encouraging longer tourist stays.

The existing local and national tourism attractions in the district, including those in Lichfield City Centre, the National Memorial Arboretum, Drayton Manor Theme Park, Chasewater Country Park, Cannock Chase Area of Outstanding Natural Beauty (AONB), the National Forest and the Forest of Mercia, the Central Rivers Initiative, the Trent Valley way and the Canal Network will be supported and promoted where they do not conflict with other local plan policies.

Preferred policy direction:

Additional evidence base work will be undertaken in relation to tourism, however it is considered that the strategic tourism policy should focus on:

- Identification of tourism initiatives which will be supported in line with national and local policy; and
- Identification of preferred locations where appropriate for hotel and overnight stay accommodation to encourage and enable longer tourist stays.

Question 16

Do you agree with the preferred policy approach relating to tourism? If not, what would you change and why?

16 Our healthy & safe communities

Strategic Objective & Priority 4	Infrastructure
Strategic Objective & Priority 11	Healthy & Safe Lifestyles
Strategic Objective & Priority 15	High Quality Development

Introduction

16.1 A person's health and wellbeing is influenced by many things, including where they live, where they work, education, how they interact with their local community and the lifestyle choices they make. The environment that surrounds them is also very important, for example what shops, facilities and services are available in their community and what access they have to local transport. When we think of health we often consider our physical resilience and our ability to prevent, recover from and live free of illness, injury or disability. Well-being is about feeling good and functioning well.

16.2 The current local plan seeks to creating communities in the district that are healthy, safe and sustainable. Three of the current plans core polices relate to healthy and safe lifestyles, participation in sport and physical activity and provision for arts and culture.

Healthy and safe lifestyles

What you told us

16.3 The responses that we received as part of the [scope, issues and options](#) consultation linked to this section of the plan have a clear focus. Existing and proposed communities require the right type and the right level of infrastructure for their local needs. Health provision is important but so is having the opportunities to be active and lead a healthy lifestyle. It should however be noted that some of our communities do not respond as well as others to our consultations and that in its self could be an indication that those communities lack cohesion.

What the evidence tells us

16.4 National planning policy requires policies that aim to improve and change places to enable them to support healthy and safe communities. There are three clear themes, promotion of social interaction, creation of safe and accessible places and support for healthy lifestyles, especially where this would address identified local health and well-being needs. The integration of places, connectivity, and active and shared spaces are identified as key components of delivery. There is a clear requirement to link infrastructure provision to reflect local health and well-being needs and to protect unnecessary loss of valued facilities and services. There is a requirement that policies also take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. Access to a network of open space and recreation as a way of providing for opportunities for sport and physical activity is promoted. It sets out the need to protect existing open space, sports and recreational buildings and land including playing fields and there is a clear recognition that policies should be based on robust and up-to-date assessments of need. There is also an emphasis on the benefit of recreational open spaces in terms of contributing to creating sustainable patterns of urban and rural growth.

16.5 In relation to healthy lifestyles, the local health and well-being needs of our district have been explored and documented recently by a number of organisations including the District Council. The result of this work is a number of documents that fit together to provide a clear picture of local need,

and set out actions that will respond to this in the future. The important headlines from each of these documents relating to delivering healthy, inclusive and safe places have been summarised in the following paragraphs.

16.6 The [Lichfield locality profile 2016](#) identifies the following key messages that are important to this theme within our plan. Whilst life expectancy has increased, there are a significant number of people who spend a number of years at the end of their life in poor health. There are a high number of people providing unpaid care who are, often older, in poor health and isolated themselves. There are inequalities in relation to social isolation and ill health within a number of our wards, namely Chasetown, Chadsmead, Stowe, Boney Hay & Central and Curborough and these areas require a particular focus across partnerships. Obesity, unhealthy diets and inactive lifestyles are identified as needing to be addressed to improve quality of life and reduce demand for services.

16.7 The latest [district health profile](#) for Lichfield District states that the health of our residents is generally better than the national average. However, childhood obesity, smoking in pregnancy, drug misuse and ageing well are identified as local priorities for Lichfield.

16.8 The [Sustainability and Transformation Plan \(STP\)](#) of the Staffordshire and Stoke-on-Trent NHS partnership 2016 -2021 aims to support an improvement in health across Staffordshire & Stoke-on-Trent, seeking to reduce health inequalities, delivering better outcomes for citizens, and reducing the impact of the wider impacts on health. The plan seeks to deliver change through five strategic objectives and identifies the following as health issues for the population: obesity, complex frail older people, smoking, preventable mortality, diabetes and coronary heart disease, alcohol, and mental health.

16.9 The [Staffordshire Health and Well-being strategy](#) for 2018 – 2023 outlines that 40% of ill-health can be prevented if more people stop smoking, drink less, eat more healthily and get active, and highlights the huge impact our aging population will have on health and care services.

16.10 The District Council's first health and well-being strategy was prepared in 2018 and covers a two year period, it builds on the evidence contained in our strategic plan, provides a picture of the key local health and well-being indicators and highlights areas that could be improved, namely childhood obesity, smoking in pregnancy, drug misuse and ageing well. The strategy provides a foundation for delivering future activities to maintain or improve health and well-being. The strategy identifies key priorities for action which include encouraging people of all ages to be more active, supporting older and vulnerable people in our communities to live and age well and to improve workplace health, well-being and safety.

16.11 Therefore, in summary the reports above have identified that the priorities for our district include a need to address its inactivity levels, causes for obesity and plan for the impact of our ageing population to ensure people can age well and address pockets of increased need. We know that the information contained within these reports are helping to shape policies across the council and will also impact on how we work with our partners to ensure positive change in the health and well-being of all our residents.

16.12 We understand the positive opportunities that policies relating to health and safe communities can have on how our communities come together, meet and interact. To ensure that our policies are positive and address priority health issues we will undertake a health impact assessment.

16.13 With regards to safe lifestyles, the Lichfield Locality Profile 2016 states that there are lower than average levels of crime and anti-social behaviour within our district however the perception of crime is greater than the experience of crime.

16.14 In terms of making safe places for our communities the [community safety strategic assessment 2018](#) identifies domestic abuse, antisocial behaviour, child sexual exploitation, alcohol and mental health as priorities. Priority wards for action include Boney Hay & Central, Chase Terrace, Chasetown, Summerfield & All Saints, Chadsmead, Curborough, Leomansley and Stowe. A focus on prevention and early intervention has been proven to work well within our district. The Community safety delivery plan 2018-2021 reflects the priority actions and priority wards identified within the community safety strategic assessment 2018 with the addition of child sexual exploitation. In terms of feeling safe, around 99% of residents stated that they felt safe during daylight hours, and 83% feel safe after dark.

16.15 The reports set out above are detailed up to date evidence that we can base our strategic healthy and safe communities policy on. However it is clear that national planning policy sees inclusive, safe and health communities being delivered through a wide range of physical improvements, for example sustainable transport options, quality design features. These elements will be addressed within other theme areas and with alignment being achieved as each of them are completed. Therefore, at this stage we have only produced a preferred policy direction.

16.16 The council is not the lead agency for many services and initiatives that support health and well-being in our district, but through a health in all policies approach advocated with the health and well-being strategy and supported by our future health impact assessment we can ensure that polices can provide a foundation for delivery of activities and services that maintain and improve the health and well-being of our communities.

Preferred policy direction: Healthy & safe communities

The district council will support initiatives that deliver positive impact on targets identified within the current community safety strategic assessment and are in line with the Community Safety Delivery Plan 2018-2021 or future equivalent replacement documents. An emphasis will be placed on prevention and early intervention will be encouraged.

Support will be given to improvements in community infrastructure that are intending to improve access to or enable delivery of positive improvements against locally evidenced health and well-being needs.

Focus on supporting strategies that address current health priorities as identified in the district health and well-being in particular those that tackle obesity will be encouraged.

The district will support investment in health infrastructure that will address health requirements identified within the strategic transformation plan or future equivalent document.

Development proposals will understand the impact they will have on existing health infrastructure and work with those partners responsible for the delivery and maintenance of such infrastructure to ensure that any impact is addressed.

Open space and recreation

What you told us

16.17 The consultation responses that we received to the scope, issues and options consultation were linked to this section of the plan have a clear focus. Existing and proposed communities require the right type and the right level of infrastructure for their local need. Indoor leisure provision and green spaces that give communities the opportunities to be healthy are important. Standards of open

space should be based on up to date evidence. There were limited comments relating to open space provision. More general comments were received from residents regarding the need to protect green belt and greenfield land and preserve existing open space for future generations to enjoy.

What the evidence tells us

16.18 The [physical activity and sport strategy](#) sets out the council's approach to promoting sport and physical activity to encourage more residents to become active. This overarching document identifies a current picture of our district of high participation levels in sport, relative to national and regional figures, offset by large numbers of people who are classed as inactive.

16.19 The strategy links physical inactivity with excess weight and obesity issues, evidence that supports our strategic health theme. In Lichfield district it is estimated that 16.5% of children are obese. In the period 2012-14, 66.7% of adults in Lichfield were estimated as having excess weight which is higher than the national average, of these 23.5% are classed as obese. The strategy advocates a link to both the health, social and economic benefits to sport, seeing the benefits of an active community in the whole.

16.20 The strategy aims to not just bring the district up to the average but to aspire to achieve and maintain high levels of participation. It sets out eleven wide ranging objectives to achieve this including influencing attitudes and behaviours, supporting clubs and providers, provide good quality, access places to be active and increase active travel levels.

16.21 Within the district there are many such spaces and facilities that are of varying quality which are well used, these include leisure centres, parks, equipped children's play areas, outdoor football/rugby pitches, allotments, semi-natural green spaces and amenity green spaces.

16.22 Whilst the physical activity and sports strategy provides an action plan for support our current evidence which focuses on open space and recreation it is out dated. The clear emphasis within national planning policy is for open spaces, sports and physical activities policies to be based on robust on up-to-date assessment for the need for open space, sport and recreation facilities. There will also be a number of cross overs with other proposed and preferred policies which are being shaped by a changing evidence base. To ensure that there is robust alignment it is felt that our strategic open space and recreation policy will continue to evolve.

16.23 We also know that we will need a number of non- strategic policies that set out standards around facilities to support open space provision and sports and recreation provision at a local level. We are going to complete a number of studies which will support these topic areas. Timescales of completion of these documents can be found in **Appendix A**.

16.24 We know that a policy that supports the delivery of facilities which will enable people to continue to be active and also start being active will to some extent address the obesity figures the district records. Also the health impact assessment could identify a policy direction to specifically address inactivity and obesity within our communities.

16.25 The role neighbourhood plans can play in the identification and delivery of open space and recreational provision is summarised within the infrastructure section of this plan.

Preferred policy: Open space and recreation

The protection of existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless it is for one of the exceptions listed in the national planning policy framework.

In line with the evidence base the District Council will seek to encourage and enhance existing open space, sport and recreation facilities. This includes initiatives and the provision of supporting infrastructure that enhance and increase accessibility of existing provision where this does not conflict with other policies in this document.

Support will be given for appropriate improvements to community infrastructure which increase the opportunities to access activities that increase health and well being in our communities.

Support will be given to shared facilities which increase the opportunities to access activities that increase health and well being in our communities including provision within schools and colleges.

Sustainable places that make easy for our communities to become active including open space infrastructure that provides a connective active travel routes (walking and cycling) between existing open space, sports and recreational infrastructure will be supported.

Initiatives that influence attitudes and behaviours to inspire demand for sport and physical activity will be supported including those that aim to address obesity, work with our schools and colleges and support our aging population to live and age well.

Initiatives that support leisure providers including clubs will be supported.

We will support the development and growth of annual or one off sporting events that are accessible to our communities and promote an activity lifestyle where they are not in conflict with other policies within this plan.

Question 17

We know that obesity is one of our challenges and we are currently tackling this through the provision of infrastructure and support initiatives and organisations that will increase activity in our communities. Are there any other opportunities that can be supported by policy that will address the issue of obesity directly in our district?

Provision for arts and culture**What you told us**

16.26 The scope, issues and options consultation did not result in any representations that specifically address culture or arts. We do know that infrastructure to ensure our communities function inclusively is important. Whilst comments received talked generally about community needs no specific response indicated that lack of social interaction or community was identity as current issue for any of our communities.

What the evidence tells us

16.27 The current local plan provides support for improvements to facilities that promote art and cultural activity. It is acknowledged that these elements can play an important role in promoting social inclusion, instilling identity and contributing to ensuring the vitality of town centres. The district is rich in cultural and art assets and activities. We need to ensure these assets are protected, but can also grow and adapt to be relevant to our communities and play a part in social interaction.

16.28 There is very little current independent evidence that identifies gaps or plans for the future beyond that of which is available on a individual asset level. The main overarching document is the [Lichfield City Centre Development Strategy and Action Plan](#). The development of this document involved a number of key organisations and groups responsible for cultural and arts assets coming together to agree a shared vision and supporting action plan for the city. The overarching vision makes reference to cultural and heritage and the action plan contains a number of objectives that raise awareness of and support improvements to the districts assets. The document does not however have a particular cultural or arts focus or provide a district wide assessment of need. This lack evidence is a constraint in terms of developing a strategic policy for this for this plan.

16.29 Therefore due to the current nature of the existing evidence base and further the strong links to other strategic policy themes we have decided to not developed a proposed strategic policy or a proposed policy direction at this stage. We are instead going to take this opportunity to further seek views from the District Councils partners who currently delivering cultural/ art programmes and are responsibility for art and cultural assets.

16.30 We aim to use this consultation to understand more fully the cultural and art landscape of our district to inform the context and detail of this emerging policy. We also need to understand, following consultation, where gaps remain in the evidence that will support our future policy. We will review where the provision of arts and culture is best placed with the local plan to enable meaningful delivery. As this and other strategic themes develop we will take the opportunity to consider whether a stand alone policy is required or if integration within other strategic policies offers a greater opportunity to enable deliver provision for arts and culture.

Question 18

Are you aware of current evidence supporting arts and culture provision or identifying lack of provision within our district?

Question 19

Do you think a stand alone arts and cultural strategic policy is required or would integration of requirements within one or a number of other strategic polices facilitate greater opportunity for delivery?

17 Our natural resources

Strategic Objective & Priority 12	Countryside Character
Strategic Objective & Priority 13	Natural Resources

Introduction

17.1 Our district has a rich natural and built landscape, including heritage assets, protected and important landscapes and habitats. Our preferred vision seeks to protect, conserve and enhance our natural resources as well these being recreational assets for our communities.

17.2 There are a variety of wildlife rich habitats within the district including heathlands, ancient woodlands and semi-improved grasslands, along with water features supporting a wide range of flora and fauna. There are a number of internationally important areas within and close to the district including the Cannock Chase and River Mease Special Areas of Conservation (SACs), several Sites of Special Scientific Interest (SSSI's) and the Cannock Chase Area of Outstanding Natural Beauty (AONB).

17.3 National planning policy makes clear that through their local plans authorities must plan appropriately for their natural environment including internationally, nationally and locally important sites.

What you told us

17.4 There were a number of comments made in response to the [scope, issues and options](#) consultation which made clear that the districts natural resources are valued as important assets which communities value. The landscapes surrounding Lichfield city and Burntwood were considered as making an important contribution to the setting of each of these settlements.

17.5 A number of comments made in response to the consultation suggested that the green belt and the wider countryside should be protected from development while others viewed development as a way of enabling improvements and better managing our assets.

17.6 Through its response to the scope, issues and options consultation Natural England suggested that parts of the evidence base in relation to the natural environment which support our current local plan would need to be updated and revised. The timescales associated with the production of this evidence base is set out at **Appendix A**.

What the evidence tells us

17.7 National planning policy is clear in its commitment to conserve and enhance the natural environment and requires local authorities to plan appropriately for these areas. National policy suggests local plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks. There are clear requirements relating to development and designated sites, and a move towards connecting ecological networks and facilitating an increase in biodiversity.

17.8 The current local plan provides protection and support for enhancements to the districts natural environment. It focuses on improving the relationship, connectivity, interpretation and integration of our natural resources and seeks to deliver overall net gain for biodiversity. It offers protection to mineral resources, commits to contributing toward the management and protection of the internationally, nationally and locally important natural assets. Within the current local plan there are a number of

specific development management policies relating to the enhancement and protection specific elements of our natural environment for example the Cannock Chase and River Mease Special Areas of Conservation.

17.9 Our evidence base in terms of identifying and mapping the districts habitats and biodiversity requires updating in order to ensure that we are able to comply with national planning policy requirements. There is a need to understand the ecological diversity of the district as a whole. There is a range of evidence which the district council will prepare and produce, the timescales associated with this evidence are set out at **Appendix A**.

17.10 Evidence has been prepared recently national and at county council levels in relation to landscape character. This suggests that the district falls within four broad landscape character areas. This work needs to be supported by up to date evidence which enables the areas of local significance to be identified and their qualities and special characteristics to be understood. Specific evidence for the Cannock Chase Area of Outstanding Natural Beauty has been prepared detailing the landscape character types which make up this important area.

17.11 There are a number of internationally important landscapes within and close to the district which must be considered within the local plan review.

17.12 The River Mease Special Area of Conservation is located in the north east of the district. Evidence prepared to support the current local plan identified that development within the water catchment of the river could potentially have negative impacts on the water quality, habitats and species of the river system. Working in partnership with other authorities and agencies a set of measures have been established to prevent harm arising to the SAC and also enable appropriate development. We know that this way of working has led to improvements to water quality.

17.13 Cannock Chase Special Area of Conservation is located outside our district. A significant body of evidence has been prepared by a number of local authorities around the Cannock Chase SAC. The evidence established that some types of development within a zone of influence of the SAC can have a harmful effect upon this sensitive environment, part of this zone falls within Lichfield District.

17.14 Green infrastructure is a network of multi-functional green or water spaces and other environmental features. It includes a wide variety of green and blue assets including formal parks, gardens woodlands, waterways, street trees and open countryside, wildlife sites, lakes, rivers, private gardens and allotments. These assets are multi-functional, in private and public ownership and can cross administrative boundaries. The national planning policy framework states that we should set out a strategic approach which plans positively for the creation and protection of networks of green infrastructure. Biodiversity and landscapes can form part of the districts response to climate change, in particular the risk of overheating from rising temperatures and how our natural environment can enable and support healthy lifestyles.

17.15 To support the local plan review the council intends to produce a green infrastructure study, the timescales for this work are outlined at **Appendix A**. The study will identify the sub-regional and local green infrastructure assets we have in our district. We will then be able to create policies that can support identified needs and opportunities that facilitate the protection, enhancement, restoration and extension of the green infrastructure networks. We will use this evidence to enable policies to support partnerships organisations and initiatives that seek to deliver opportunities including canal networks, Central Rivers Initiative, Forest of Mercia, National Forest and Area of Outstanding Natural Beauty.

17.16 There are a number of non-strategic policies relating to our natural resources within the current local plan which it is suggested be carried forward subject to some alterations to ensure consistency with the revised national planning policy framework. **Appendix B** provides details of these policies and why it is considered that they should be considered further through the local plan review.

17.17 The individual elements of our natural resources section are broad but their robustness and ability to deliver in a consistent and cohesive manner requires an overarching strategic policy. We are also clear that we will need to address a number of statutory responsibilities. We are also mindful that we are currently gathering a significant amount of evidence across most aspects of this section which will inform the final version of the local plan policy.

Preferred policy direction

The strategic policy will set out the overarching approach relating to the districts natural resources and environmental assets to deliver a consistent and cohesive approach to managing development and protecting our assets.

The countryside of Lichfield District is valued as an asset in its own right and will be protected. Sites that receive statutory protection as part of their designation will be protected and enhanced in line with their relevant legislation.

The preferred approach will be to support the overarching strategic policy with a suite of non-strategic policies relating to specific environments and natural resources. These policies should cover:

- Green Belt and Local Green Spaces;
- Internationally important natural environments such as the Special Areas of Conservation, including Cannock Chase SAC and the River Mease SAC;
- Natural and historic landscapes;
- Water quality;
- Biodiversity and habitats including seeking to delivery an overall net gain for biodiversity; and
- Green Infrastructure and connectivity. Enhancement, restoration and extension of our green infrastructure will be supported including opportunities that enable connections or stepping stones between elements.

Question 20

Do you agree with the proposed approach towards natural resources? Is there an alternative policy approach we should be considering?

18 Our built & historic environment

Strategic objective & priority 10:	Tourism
Strategic objective & priority 12:	Countryside character
Strategic objective & priority 14:	Built environment
Strategic objective & priority 15:	High quality development

Introduction

18.1 Our built and historic environment gives Lichfield District its unique character and influences our perceptions of a place. Within Lichfield District there is an existing and extensive high quality historic environment, the district currently has 21 Conservation Areas and over 750 listed buildings including Lichfield Cathedral which acts as a focal point to the historic settlement pattern and visually from many points across the district. Other heritage assets across the district include Scheduled Monuments, locally listed buildings and historic parks and gardens. These heritage assets are inherently sustainable and their re-use reduces energy expenditure in the manufacture and sourcing of new construction materials and makes maximum use of existing embedded energy. This plan will seek the conservation and enjoyment of the historic environment which will ensure our historic assets are sustained and enhanced and the valuable contribution they make to the character of Lichfield and their cultural, economic and environmental benefits can be realised.

18.2 Good quality design is an integral part of sustainable development and should enhance the buildings and spaces around them and promote well-being now and for the future. Good quality design can raise the standard of design more generally in an area and for some areas in Lichfield District this relates to the surroundings not just new buildings. Changes such as more tree planting and improving paths can make an area more attractive and appealing and encourage people to walk more. Walking has many benefits as it can help tackle obesity and encourage community cohesion through increased opportunities for social interactions and can help address climate change by reducing the number of car journeys.

What you told us

18.3 Through the [scope, issues and options](#) consultation Historic England provided comments referring to their national guidance and advising that an up to date and robust evidence base should support the local plan. Staffordshire County Council also suggest a review of the evidence to assist in giving a better understanding of the archaeological potential. Lichfield Civic Society expressed concern about the city centre and its capability to absorb any more development, they considered that there should be greater protection and enhancement for heritage assets, particularly in relation to Lichfield city centre with its special character and environment. The civic society consider there should be a policy for protecting and extending the open space network, links and corridors within Lichfield City and the policies which seek high quality design need strengthening.

18.4 A number of representations provided by the development industry considered they had protected the character of the conservation areas within their proposed development options. Equally a number of representations by residents and interest groups expressed concern at the impact upon conservation areas, particularly those of Shenstone and Lichfield and the setting of the historic settlements of Burntwood, Thorpe Constantine and the setting of the National Memorial Arboretum. A member of the public was concerned about the impact upon Knowle Hill and the potential for archaeological remains.

What the evidence tells us

18.5 There is a duty upon council's to preserve listed buildings and their setting and to preserve and enhance the character or appearance of a conservation area. National policy states that our heritage assets are an irreplaceable resource and sets out that different levels of protection should be given to certain heritage assets and this should be reflected in local policy. National policy should establish a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or the threats. It includes tests for assessing the impacts upon the 'significance' of heritage assets and how harm to the 'significance' or loss of a heritage asset should be considered in decision making which it is not necessary to duplicate in local policy.

18.6 The council has completed a review of the 17 conservation area appraisals and management plans which have helped identify positive and negative impacts within the conservation areas. We assist in maintaining the Historic Environment Record which identifies heritage assets across the district and can assist the greatest potential for archaeology. We protect and sustain our historic assets by annually reviewing the buildings classed as 'at risk' through neglect and decay to see if any action is necessary to prevent harm and assist developers in delivering good, sensitive design through the advice in the [historic environment supplementary planning document](#). To inform the current local plan, evidence was prepared on the historic landscape. Whilst little changes in the historic environment an update of this evidence to consider the changes is appropriate to provide a robust and up to date evidence base, this will enable a refresh of the Historic Environment supplementary planning document and inform this plan.

18.7 New evidence on the landscape character of the county and a new management plan is being prepared for the AONB.

Preferred policy: Historic and built environment

The district council will protect and improve the built environment and have special regard to the conservation and enhancement of the historic environment through positive action and partnership working. The historic environment contributes to sustainable communities, including economic vitality and new development must make a positive contribution to the local distinctiveness and local character of the historic environment.

Designated heritage assets of the highest significance including Grade 1 and Grade 2* listed buildings and their settings and scheduled monuments and their settings will be conserved, enhanced and given the highest level of protection. Conservation areas, archaeological sites, locally listed buildings, locally important parks and gardens and other heritage assets will be conserved and enhanced. The character and appearance of conservation areas will be protected and enhanced by development and any physical improvements to conservation areas will be linked to the objectives contained within conservation areas appraisals and their management plans where appropriate. In conjunction with the landscape policy, landscapes and views that form the setting to the built and historic environment will also be conserved and enhanced.

Change will be directed to the most appropriate locations taking into account the District's heritage assets and their settings, including the historic landscape, as informed by local evidence base and the need to safeguard the future economic use of our centres and heritage assets. The re-use maintenance and repair of listed buildings and other heritage assets will be supported, particularly those that have been identified as being at risk. Development proposals which conserve and enhance a heritage asset or its setting will be supported where clear and convincing justification has been provided as explained further in the policy on supporting information.

Opportunities to improve the understanding of the District's historic environment and local character will be supported through partnership working with local communities and societies.

The District Council will seek to maintain local distinctiveness through the built environment in terms of buildings and public spaces and enhance the relationship and linkages between the built and natural environment. Views and vistas can add to the legibility and distinctiveness of an area and help create a strong sense of place, especially in new developments. Evidence has shown that Lichfield City is characterised by the five spires emerging above the roofs and tree canopy and this will be protected and should inform the height, scale and layout for new developments, this and other important views will be identified through evidence.

High quality design, tree planting, landscaping and green spaces will be required as part of new development throughout the district to improve quality of place, reduce the heat island effect, contribute to community safety and well being.

Question 21

What do you consider are the significant long distance views which help to identify that you are in Lichfield District and are worth further consideration for local protection?

Built environment

18.8 Design has a great influence on how we interact with our environment. It can help us identify our village or even the estate where we live. It can make us feel safe or unsafe and can promote pride and respect for our area. Not all of our settlements are protected through conservation areas or historic environment legislation, however often an area can have a locally distinct appearance which is worth respecting and can be enhanced through good design which relates well to the area. New development should help deliver an attractive environment and help sustain the historic environment by not imposing restrictions upon the potential for heritage assets to be sustained and for a changes of use to be made which enables them to be put to viable use consistent with their conservation. Promotion of high quality design throughout the district is important and relates not just to the built vernacular but also the natural environment and hard and soft landscaping. There is considerable potential to achieve a high quality built environment which can be responsive to changing weather patterns and help sustain our historic environment.

18.9 The current local plan strategy contains Policy BE1 which seeks to ensure a high quality built environment by providing a list of criteria to be considered when assessing new development proposals.

What you told us

18.10 Through the response to the scope issues and options the civic society considered that policies relating to design needed significant amendment to ensure it supports truly 'high quality development' in an effective manner.

What evidence tell us

18.11 National policy considers good design a key aspect of sustainable development as it creates better places in which to live and work and can help support the sustained use of the historic environment. National policy seeks to promote development which will function well throughout its lifetime and should make efficient use of the land. Development should be visually attractive as a

result of good architecture, layout and appropriate landscaping, sympathetic to local character and history. Policies should not prevent or discourage appropriate innovation or change, and should give consideration to the future use of electric vehicles and smart technologies within developments.

18.12 Development which helps raise the standard of design more generally in an area, development should create a strong sense of place which is attractive, welcoming, inclusive, accessible and promotes health and well-being. National guidance advises that good design should be considered early in the evolution of a proposal and plans should include policies which reflect an understanding and evaluation of the area's defining characteristics and provide clear expectations for the quality of development to provide a framework for distinctive places with a consistent and high quality standard of design. It is also recognised that it is important to maintain a high quality of design throughout the construction phases of development. The cumulative impacts of minor changes to a scheme such as changes in materials or changes over time for example minor changes to advertisements are not allowed to diminish the quality of the scheme and the built environment.

18.13 The council requires the submission of design and access statements as part of its validation guidance for development of buildings in conservation areas and all major development, which includes proposals of more than 10 dwellings. The council currently has a policy promoting high quality design which has proved effective in negotiating design within proposals, however it is worth investigating how the existing policy can be improved and strengthened. Locally a gap in evidence which supports local standards to be expected in promoting good design has been identified. Evidence will need to be prepared in order to establish local design standards. Some policies relating to design currently exists this includes neighbourhood plans, conservation area appraisals and management plans and the AONB management plan. These can be used to inform the design of new development in the areas to which they relate and which promote local distinctiveness and high quality design.

Preferred policy: High quality design

All development proposals should ensure that a high quality sustainable built environment can be achieved. Development will be permitted where it can be clearly and convincingly demonstrated that it will have a positive impact upon:

- The significance of the historic environment, such as archaeological sites, sites of historic landscape value, listed buildings, conservation areas, locally listed buildings and skylines containing important historic, built and natural features. Where the proposal does not relate to a heritage asset it will be necessary to demonstrate that the proposed development will not restrict the ability for the heritage asset to be sustained and be used for a viable economic use consistent with their conservation.
- Reducing carbon emissions, by ensuring all new development and conversion schemes are located and designed to maximise energy conservation and utilise sustainable design and construction techniques appropriate to the size and type of development, using local and sustainable sources of building materials wherever possible.
- The built vernacular. New development, including extensions and alterations to existing buildings, should carefully respect the character of the surrounding area and development in terms of plan, layout, size, scale, materials, proportion, detail, architectural design and public views.
- Public safety and perception of safety, health and reducing inequality, including the latest 'designing out crime' principles and inclusive design.
- Amenity, by avoiding development which causes disturbance through unreasonable traffic generation, noise, light, dust, fumes or other disturbance.
- The natural environment. Effective hard and soft landscaping including tree planting will be required and should be implemented in an integrated manner, making use of green corridors for movement of people as well as for biodiversity.

- Sustainable travel. New development should be located in areas which have a good safe access to public transport to reduce the need to travel by private car and should optimise choice of sustainable travel, particularly walking, cycling and public transport, creating new public transport nodes where necessary and providing space in the design for infrastructure which can encourage the use of smart technologies such as electric and driverless cars.
- Where opportunity exists for the creation of new views to important landmarks and vistas these should be encouraged and incorporated into developments.
- Specifically designed features, which are incorporated into developments in order to enhance the bespoke nature and individuality of design solutions will be encouraged where these are appropriate to the context of the area.
- The public realm, patterns of movement, streets, parking and other transport considerations integral to the design of schemes, and contribute to making high quality places.

For strategic development a masterplan will be necessary to ensure the vision of the development is not diluted over time and through cumulative minor changes. Small and medium scale development can use area wide design assessments to assist in bringing forward sites.

Question 22

Do you think having a masterplan for small and medium scale developments would assist in bringing forward sites and retaining the design quality of a development? How can we future proof through design to create sustainable development and deliver the listed buildings and conservation areas of the future?

Are there any communities in Lichfield District which would benefit from improvements to their built environment?

Evidence supporting heritage proposals

18.14 Our heritage assets are irreplaceable and great weight will be given to their conservation, it is therefore essential to identify and understand the particular significance of any heritage asset and its setting that may be affected by a proposal.

What you told us

18.15 Through the scope, issues and options consultation Lichfield Civic Society consider the policy in the current local plan should strengthened to ensure the special character of our heritage assets are safeguarded and enhanced.

What evidence tells us

18.16 Policy BE2 within the Local Plan Allocations requires sufficient information to be submitted to support the understanding of proposals affecting heritage assets. Understanding how proposals impact upon a heritage asset is essential in order to promote good design and assist in making informed decisions and assist in reducing delays in decision making. There is a considerable amount of information available which can be utilised to assist in carrying out a heritage statement and liaison with our conservation officers is recommended as the statement needs to contain enough information to be sufficient to understand the the impact of the proposal upon the heritage asset and proportionate to the asset's importance, advice will be particularly important where there is a potential impact upon archaeological assets which are either known or could potentially exist.

18.17 Understanding the wider context of the historic environment is important, for example within Lichfield City the view of the five spires above the roof and tree canopy is a significant local view and is part of the setting of the historic settlement. Understanding the impact of proposals upon the setting of the historic environment is important, especially where proposals are of a large scale or increase the mass and height of development.

18.18 Two policies which also influence design were included within the local plan allocations these relate to shopfronts and advertisements and service access within our centres. It is proposed to retain these policies unchanged from their current wording as part of the suite of policies relating to our built and historic environment. Detail of the policy is included at **Appendix B** of this document.

Preferred policy direction: Evidence supporting heritage proposals

To enable the effect of a proposal on a heritage asset (designated or non-designated) and/or their setting to be assessed a heritage statement should accompany a proposal. The Heritage Statement should be undertaken by someone with appropriate expertise and should include:

- an assessment of the significance of the heritage asset including any contribution made by their setting;
- an assessment of the impact of the proposals on the significance including how the proposal has sought to avoid or minimise any conflict between the heritage assets conservation and any aspect of the proposal. This may require an assessment of the impact of the proposal upon longer distance significant views and vistas.

It should include an archaeological assessment where relevant.

Clear and convincing evidence will be required for any harm or loss to the significance of a heritage asset.

Question 23

Are there any alternative approaches which should be considered?

19 Our growth needs & requirements

19.1 The preceding chapters of this document have set out the preferred policy options and policy directions for theme based strategic and non-strategic policies. The 'Our homes for the future' and 'Our economic growth, enterprise and tourism' chapters in particular have begun to set out the possible levels of growth that will need to be planned for.

19.2 Notwithstanding this the [scope, issues and options](#) document included a range of strategic growth options which the council felt should be considered as possible approaches to the locating and spatial distribution of growth within the district. Four strategic options for residential growth were included, along with two strategic options for employment growth. Within these options were a range of options, some of which, have been informed by the [strategic growth study](#) and the [strategic housing needs study](#). Depending on the levels of growth which the local plan review will need to plan for it may be that a combination of options may be required.

19.3 The strategic growth options identified were as follows:

- Town focused development: focusing development in and around the two largest settlements in the district, Lichfield and Burntwood, and allowing growth adjacent to towns just beyond the district boundary;
- Town and key rural village focused development: focusing development in and around the two largest settlements, Lichfield and Burntwood, and other sustainable villages identified as key rural settlements;
- Dispersed development: allowing the dispersal of development across all settlements including smaller rural settlements which may have a more limited range of services and facilities; and
- New settlement development: focusing the majority of growth on a new settlement to be located within the district.

19.4 Through the scope, issues and options document the potential opportunities and challenges of each option were set out and we asked through the consultation for peoples views on these. Generally there was a high level of response with wide ranging views these options, these are considered in greater detail in the following chapters which consider the options in turn. Generally there were varying levels of support for each option, such a response is not uncommon, particularly when issues concerning the possible locations of new growth are involved. There was a significant level of opposition to the potential option of large scale growth in the form of a new settlement close to Shenstone.

19.5 These options have now been considered in further detail, and we have undertaken a high level assessment in light of national planning policy and our current evidence in order to understand the options and consider which of those may be preferred. Options have been considered having regard to the following:

- The recommendations of the strategic growth study including the possible growth options and 'preferred' options;
- The preferred settlement hierarchy as set out within the 'Our spatial strategy' chapter of this document;
- Consideration of areas of importance including areas of constraint as set out within national planning policy (including green belt, local green space, areas of flood risk and areas of ecological importance);
- The availability of land as assessed through our land availability assessments, the call for sites schedule and other related evidence; and
- Sustainability appraisal.

19.6 For each of the options the high level assessment is illustrated by a colour-coded table. The assumptions behind this assessment and the colour-coding are set out below.

Table 19.1 Option assessment assumptions

High level assessment criteria	Green	Amber	Red
Strategic growth study recommended options	<p>Residential growth options</p> <p>The option is identified as one of the options for further exploration through a council's local plan within the strategic growth study.</p> <p>Employment growth options</p> <p>Not applicable - this criteria is not applicable to the employment growth options so is excluded from the high level assessment.</p>	<p>Residential growth options</p> <p>The option is identified within the strategic growth study but is not identified as an option for further exploration.</p> <p>Employment growth options</p> <p>Not applicable - this criteria is not applicable to the employment growth options so is excluded from the high level assessment.</p>	<p>Residential growth options</p> <p>Not applicable - this category is not applicable for this criteria. If an option is not identified within the strategic growth study then this criteria is assessed as 'not applicable'.</p> <p>Employment growth options</p> <p>Not applicable - this criteria is not applicable to the employment growth options so is excluded from the high level assessment.</p>
Preferred settlement hierarchy or Preferred employment locations	<p>Residential growth options</p> <p>The option is consistent with the preferred settlement hierarchy included within this document.</p> <p>Employment growth options</p> <p>The option is consistent with the preferred employment locations set out within this document.</p>	<p>Residential growth options</p> <p>Not applicable - no residential options are assessed as 'amber' through the high level assessment.</p> <p>Employment growth options</p> <p>The option is located within or adjacent to existing employment areas which are not identified as preferred employment locations set out within this document (e.g. smaller rural employment areas).</p>	<p>Residential growth options</p> <p>The option is not consistent with the preferred settlement hierarchy included within this document.</p> <p>Employment growth option</p> <p>The option is not consistent with the preferred employment locations set out within this document.</p>
Green belt or local green space	<p>Residential & employment growth options</p> <p>The option is not within the green belt and therefore would not impact upon the green belt. No local green spaces are designated within the area of the option.</p>	<p>Residential & employment growth options</p> <p>The option is in an area where it is possible to for growth to both impact or not impact upon the green belt or a local green space (e.g. a settlement where green belt or local green space is only present at one part of the settlement such as Lichfield city or Armitage with Handsacre).</p>	<p>Residential & employment growth options</p> <p>The option is either located wholly within the green belt or an area where growth would impact upon the green belt. Or where an option is wholly designated as a local green space.</p>
Areas of flood risk	<p>Residential & employment growth options</p>	<p>Residential & employment growth options</p>	<p>Residential growth options</p> <p>The option is within an area where flood risk risk is identified on the environment agency's flood mapping.</p>

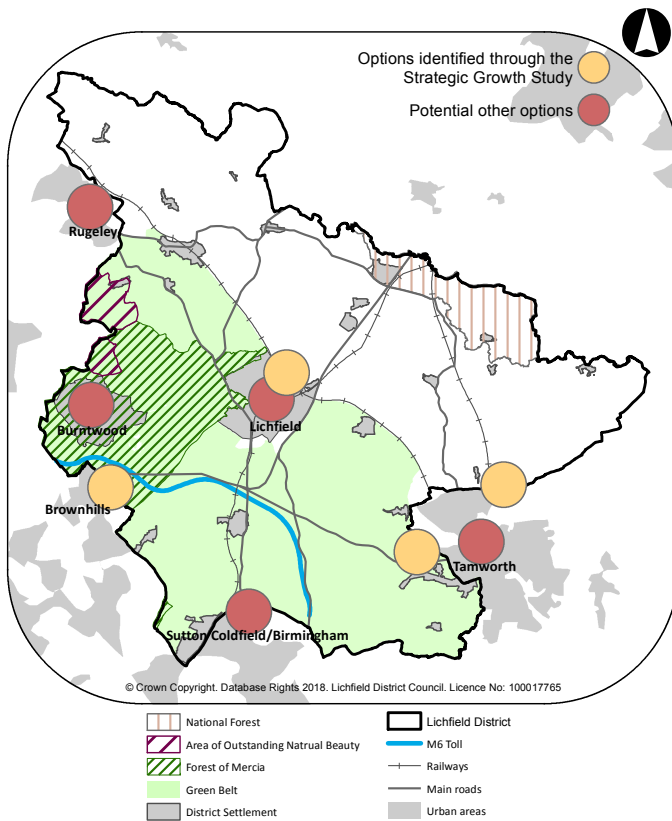
High level assessment criteria	Green	Amber	Red
	The option is not within an area of flood risk as identified on the environment agency's flood mapping.	The option is located in an area where a small area of flood risk is identified on the environment agency's flood mapping.	
Areas or assets of ecological importance	Residential & employment growth options The option is not within an area of ecological importance including zones of influence (e.g. is not within the zone of influence of Cannock Chase SAC or the River Mease SAC).	Residential & employment growth options The option is an area which is within the zone of influence of an area of ecological importance.	Residential & employment growth options Areas or assets of ecological importance are located within the area of the option.
Known heritage assets	Residential & employment growth options There are no known heritage assets in the options area.	Residential & employment growth options There are some known heritage assets which may be impacted by development within the option (e.g. this includes listed buildings, designated conservation areas and the setting of historic towns).	Residential & employment growth options There are a significant number of known heritage assets which could be impacted by the option.
Land availability	Residential & employment growth options There is sufficient land known to be available within the option to deliver a level of growth which is considered to be appropriate to the size of the option.	Residential & employment growth options There is a more limited level of land known to be available within the option to deliver a level of growth considered to be appropriate to the size of the option.	Residential & employment growth options The land availability evidence demonstrates that there is no or not sufficient land known to be available within the area of the option.

19.7 All of the choices within each of the residential and employment growth options have been subject to environmental assessment through the sustainability appraisal. The results of this assessment are set out after each option within the following chapters.

20 Residential growth options

Residential growth option 1: Town focused development

Figure 20.1 Option 1: Town focused



20.1 This possible option would see the majority of new housing being located within and around the largest settlements within and adjacent to the district. Growth would be delivered within the existing urban areas of settlements, re-using brownfield land and increasing the density of development where possible. It is likely that given the possible levels of growth to be planned for sustainably located sites beyond the existing urban area of settlements would be needed.

20.2 This approach could also include the consideration of sustainable extensions within our district next to towns which are just outside of the district boundary including Rugeley, Tamworth and Sutton Coldfield. The current local plan includes growth next to Rugeley and Tamworth to assist in meeting their needs.

What you told us

20.3 The [scope, issues and options](#) consultation showed a generally positive response to this strategic option. Many of these positive comments were

supportive of the approach as it would focus development on the largest settlements which have the best level of services and facilities. Unsurprisingly there were many supportive comments which then related specific sites and locations across the district to the strategic options identified. Whilst this is not unusual it does also demonstrate that there are various available sites which could be considered if this strategic option were chosen.

20.4 Not all the comments received in relation to the town focused development growth option were supportive, indeed a number preferred other growth options or suggested this option should not be pursued as it had the potential to impact upon the countryside and the green belt.

What the evidence tells us

20.5 The [strategic growth study](#) identifies a number of options for sustainable urban extensions to towns and settlements; including land to the east of Lichfield, to the north and to the west of Tamworth and to the north of Brownhills. Of these options the growth study recommends that more detailed consideration be given to east of Lichfield and north of Tamworth.

20.6 The strategic growth options within the scope, issues and options document were subject to environmental assessment. The [sustainability assessment](#) assessed the town focused growth option and concluded that broadly this approach would be sustainable and was one of the better scoring of the strategic options assessed. This is partly because this approach would reduce the geographic

spread of development, contribute to economic growth as well as reducing the need to travel by utilising and enhancing public transport links. Further environmental assessment has been undertaken on the individual options within this strategic growth option and this is considered in more detail below.

20.7 To further understand the possible growth options within the town focused option we have undertaken a high level assessment of the various options. This assessment draws on evidence including the strategic growth study and the strategic housing land availability assessment and call for sites schedule. The results of this assessment are set out in the following table.

Table 20.1 Option 1: Town focused growth

Option	Strategic growth study recommended options	Preferred settlement hierarchy	NPPF areas or assets of importance				Land availability
			Green belt / local green space	Areas of flood risk	Areas or assets of ecological importance	Known heritage assets	
Growth at Lichfield city	Not applicable						
Growth to the north of Lichfield							
Growth at Burntwood	Not applicable						
Growth to the north of Brownhills							
Growth to the north of Little Aston / Sutton Coldfield	Not applicable						
Growth to the north of Tamworth							
Growth to the west of Tamworth							
Growth around Rugeley	Not applicable						

20.8 The strategic growth study included a strategic green belt review of the entire green belt within the housing market area. This review identified areas of green belt which were assessed as providing either a 'principal contribution' or a 'supporting contribution' to the purposes of the green belt as defined in national planning policy. This high level review would suggest that growth options to the south, east and west of Lichfield city and Burntwood, to the west of Tamworth and around Shenstone would be in areas of green belt assessed as providing a 'principal contribution'. The council will undertake a comprehensive green belt review which will provide further detailed evidence in respect of the green belt. Through this more localised evidence the council will be able to consider the green belt in greater detail. The timescales for this are set out at **Appendix A**.

20.9 The options within table 20.1 have been assessed through the sustainability appraisal. Broadly the options were assessed as having similar effects on the environment, being assessed as providing positive effects in terms of the delivery of homes to meet housing needs, improving access to health facilities and promote welling being and increasing opportunities and access to sustainable forms of

transport. The two options which focus growth on Lichfield City could potentially have negative effects in terms of the protection of the historic environment and its setting. The growth around Rugeley option which was assessed as having significant negative effects with regards to flood risk.

20.10 National policy provides protection for areas or assets of particular importance which includes green belt, local green spaces, areas of flood risk, areas of ecological importance including sites of special scientific interest and special areas of conservation and known heritage assets. A high level desk top analysis of each of these possible options has been undertaken, and this shows that all options could potentially impact upon areas and assets of importance to some degree. It should be noted that it is possible for such impacts to be avoided or mitigated and in some instances positive impacts to be achieved.

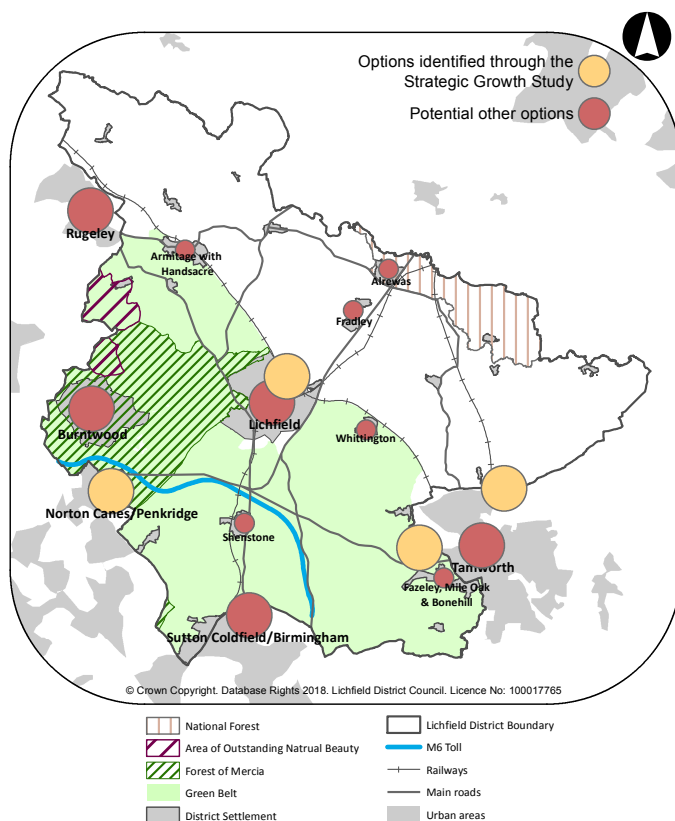
20.11 The high level analysis of these options suggests that all of the options are consistent with the preferred settlement hierarchy which seeks to focus development on the most sustainable settlements within and close to the district. Of the options only growth to the north of Lichfield and to the north of Tamworth were identified as options which should be explored further within the strategic growth study. Indeed, both of these options are assessed most positively through this high level analysis and should therefore continue to be explored further as preferred options for growth.

20.12 Clearly further work to understand such options will need to be undertaken, in particular the option of growth to the north of Tamworth is an area where there are potential infrastructure constraints. The council will continue to collect further evidence which will inform the local plan review. In the context of growth to the north of Tamworth the council will work with Tamworth borough council and prepare joint evidence which will include an infrastructure study to assist in understanding the cross boundary infrastructure issues which may exist. The timescales for this are set out at **Appendix A**.

20.13 Through the strategic housing land availability assessment and following the call for sites consultation there is some doubt over land availability to deliver two of the possible growth options. Given that land availability forms a key aspect of whether a site could be delivered for development it is suggested that the options where such doubt exists should be discounted.

Residential growth option 2: Town and key rural focused development

Figure 20.2 Option 2: Town & key rural focused



20.14 This option is broadly similar to the first growth option and includes many of the same possible growth locations with a focus for growth in the largest urban areas within and adjacent to the district. However, in this strategic growth option this would be supplemented by growth at some of the large rural villages which have access to a range of services and facilities.

20.15 In the current local plan the key villages identified are Alrewas, Armitage with Handsacre, Fradley, Fazeley, Shenstone and Whittington. These villages would, along with Lichfield and Burntwood and possible extensions to settlements beyond the council's boundary deliver the majority of the district's growth with limited growth being accommodated outside these settlements.

What you told us

20.16 As with the other strategic growth options set out within the scope, issues and options document there was a wide array of views expressed through

the consultation. Many comments acknowledged that such an approach would see a continuation of the strategy of the current local plan. On the whole there were a large number of comments which favoured this growth option as it would deliver growth in the most sustainable locations and also would assist in meeting the needs of the wider rural areas closer to where the need arises. As with strategic growth option 1 many of these supportive comments were made by parties promoting sites within and adjacent to the locations which could see growth under this option. A number of comments also suggested that other villages could be included within such an approach, not just those which had been identified previously.

20.17 Fradley Parish Council in particular provided representations that it was supportive of additional growth beyond that planned for in the current local plan which could assist in meeting the villages needs in terms of housing and community facilities.

20.18 There were also a number of comments which were less supportive of this option, these comments tended to relate to the possibility of this option leading to green belt release around particular settlements and concerns over the level of growth particular settlements could accommodate. Other comments which were less supportive of this approach suggested that the option was similar to the current strategy some individuals felt that this had not been successful.

What the evidence tells us

20.19 As with the first strategic growth option a number of the possible growth options could include sustainable urban extensions to towns and settlements within and close to the district. These options would remain unchanged from those considered under strategic growth option 2. In addition to these options, growth would also be directed toward a number of sustainable villages across the district.

20.20 The settlement sustainability study concluded that there were a number of rural settlements which were considered to be capable of supporting growth and these were included in levels three and four of the preferred settlement hierarchy. This suggests that some of these villages could be appropriate locations for a level of growth within the local plan review. These villages were not included within strategic growth option 2 within the scope, issues and options document. However, these could play an important role in the distribution of growth through the local plan review. As such these settlements have been included on the high level assessment set out in table 20.2.

20.21 The strategic growth option was subject to environmental assessment which, much like the option 1, concluded that broadly such an approach would be sustainable. It also scored well along side growth option 1. This is understandable given the similarities between the two growth options and that this would see development spread between the most sustainable settlements. Of the four residential growth options set out within the scope, issues and options document options 1 and 2 were assessed as being the most sustainable.

Table 20.2 Option 2: Town and key rural focused development

Option	Strategic growth study recommended options	Preferred settlement hierarchy	NPPF areas or assets of importance				Land availability
			Green belt / local green space	Areas of flood risk	Areas or assets of ecological importance	Known heritage assets	
Growth at Lichfield city	Not applicable						
Growth to the north of Lichfield							
Growth at Burntwood	Not applicable						
Growth to the north of Brownhills							
Growth to the north of Little Aston / Sutton Coldfield	Not applicable						
Growth to the north of Tamworth							
Growth to the west of Tamworth							
Growth around Rugeley	Not applicable						
Growth at Armitage with Handsacre	Not applicable						

Option	Strategic growth study recommended options	Preferred settlement hierarchy	NPPF areas or assets of importance				Land availability
			Green belt / local green space	Areas of flood risk	Areas or assets of ecological importance	Known heritage assets	
Growth at Alrewas	Not applicable						
Growth at Fazeley	Not applicable						
Growth at Fradley	Not applicable						
Growth at Shenstone	Not applicable						
Growth at Whittington	Not applicable						
Further settlements identified in preferred settlement hierarchy							
Growth at Little Aston	Not applicable						
Growth at Stonnall	Not applicable						
Growth at Kings Bromley	Not applicable						
Growth at Streethay	Not applicable						
Growth at Longdon	Not applicable						

20.22 Alongside the rural settlements identified within this option, the settlement sustainability study suggested that Little Aston could be considered to be a sustainable settlement. Along side this is also suggested that four further villages could be considered as sustainable. This approach would be consistent with the preferred settlement hierarchy. Streethay is located directly adjacent to Lichfield city and has, through the current local plan, seen significant growth. For the purposes of the spatial strategy growth around Streethay is considered as growth around Lichfield city.

20.23 Of the identified key rural settlements only Fradley and Alrewas are not constrained by the green belt, although Alrewas has an area of local green space to the north of the village designated through the community's neighbourhood plan. Of those villages which are located within the green belt, Armitage with Handsacre does have areas to the north of the village which are outside of the green belt. The strategic green belt review within the growth study illustrates that the green belt located around Armitage with Handsacre, Fazeley, Shenstone and Whittington serves a principal contribution. Of those further settlements identified in the preferred spatial strategy, Kings Bromley and Streethay are not constrained by the green belt.

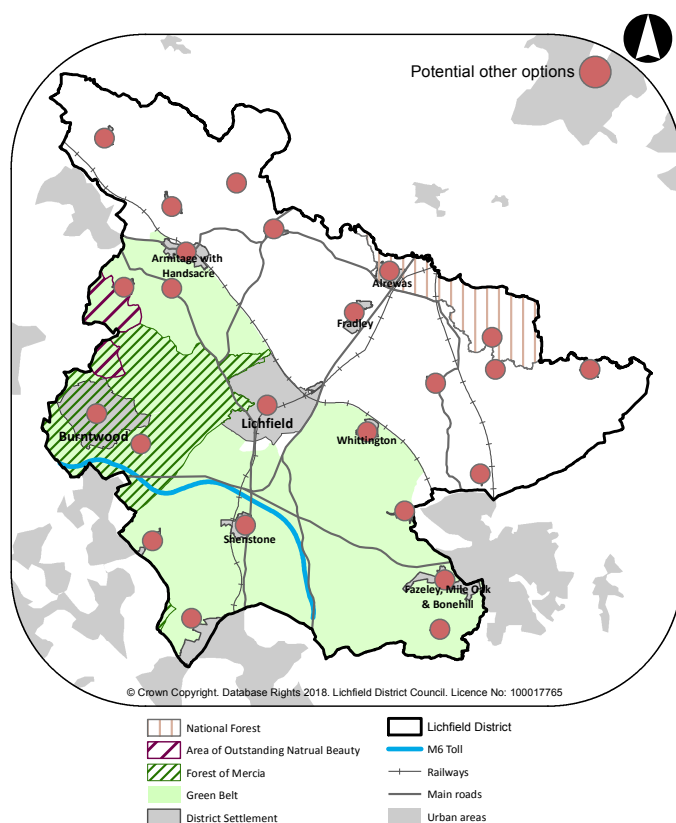
20.24 With regards to the areas or assets of importance as identified within national policy each of the rural settlements is affected by these to a degree, with Fradley being the least constrained. Alrewas is the most constrained settlement in terms of these areas and assets and also has more limited land availability when compared to other villages which would suggest the village could take a lesser role in delivering growth than the other settlements identified.

20.25 The options within table 20.2 were assessed through the sustainability appraisal. The assessments for the town focused choices within the option is consistent with those undertaken for growth option 1. The assessment of the rural settlements included at table 20.2 were broadly consistent with the main differences relating to the effects in terms of flood risk where some settlements were considered to have varying negative effects. On the whole those options relating to the villages were assessed as being less sustainable than options relating to larger settlements. This is primarily due to less opportunities to access sustainable transport and the potential for greater effects on the historic environment and its setting.

20.26 As with those options included under strategic growth option 1 there is clearly significant further work and evidence which will need to be undertaken to support the local plan. This evidence would help to inform the levels, distribution and locations for growth which could be attributed to individual settlements within the settlement hierarchy.

Residential growth option 3: Dispersed development

Figure 20.3 Option 3: Dispersed development



20.27 This potential growth option would see the new housing for the district distributed across a wide range of settlements, from our largest urban centres to the smaller villages and hamlets. The level of new housing apportioned to specific settlements would relate to the level of services and facilities available within the settlement. Such an approach would likely lead to lower levels of growth at the larger settlements than strategic growth options 1 and 2, with the balance being made up by new homes being delivered within and next to other smaller settlements.

20.28 Given the geographical spread of development which this strategic growth option would entail it is likely that sustainably located sites beyond the existing built up areas of the settlement could be required and that where settlements are located within the green belt this could result in the need to change green belt boundaries.

What you told us

20.29 Through the consultation on the scope, issues and options document a range of comments were provided in relation to the dispersed development option. A majority of those responses seemed to suggest that such an option would be less sustainable than those options which would focus more growth to the larger settlements within the district. These comments made the case that many of the smaller settlements have much poorer access to services and facilities and that such an approach would lead to increased car usage due to a lack of public transport serving smaller settlements.

20.30 A smaller number of comments did suggest that a dispersed approach to growth could help to meet housing needs closest to where they arise, particularly in those smaller villages, and that this could help to support services and facilities within those settlements where they already exist or even encourage new provision.

What the evidence tells us

20.31 This strategic option would have no relationship to the options which were set out within the strategic growth study. Indeed it is unlikely that those smaller settlements that could potentially see growth under the dispersed approach would deliver the significant levels of development which were considered within the growth study.

20.32 The strategic growth option of dispersed development was subject to an environmental assessment which concluded that this option is less sustainable than option one and two. This is primarily due to the fact that this option will spread growth across settlements including rural settlements and therefore it does not contribute positively towards the objective of reducing the need to travel.

20.33 The settlement sustainability study identified the relative sustainability of settlements across the district and this assisted in determining the preferred settlement hierarchy. This demonstrates that the wide range of settlements across the district differ greatly in terms of their access to services and facilities. This approach would lead to growth at less sustainable settlements.

Table 20.3 Option 3: Dispersed development

Option	Strategic growth study recommended options	Preferred settlement hierarchy	NPPF areas or assets of importance				Land availability
			Green belt / local green space	Areas of flood risk	Areas or assets of ecological importance	Known heritage assets	
Development dispersed across all settlements	Not applicable						

20.34 In relation to areas or assets of particular importance, this option would see growth dispersed across a wide range of settlements within the district. Given the known constraints of the district, this option could impact upon a greater number of areas or assets of importance in some way depending on the scale and location of development within each settlement.

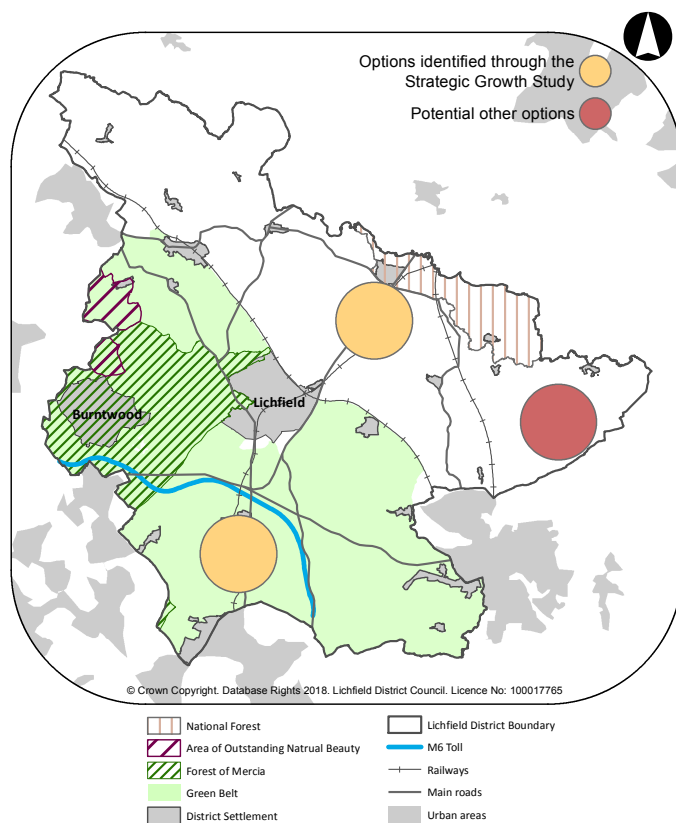
20.35 Further, land availability varies in each settlement and this has a significant impact on the ability for this option to be explored further, given that some settlements have a plethora of options for growth whilst others are restricted.

20.36 The sustainability appraisal of this option demonstrated that such an approach would be less sustainable than options 1 and 2. This is primarily because such an option would spread growth across the district which would have the potential for wider environmental effects. In particular such an approach is assessed negatively with regards to potential impacts upon the historic environment, landscape and opportunities to use sustainable transport.

20.37 It is considered that this option would not be a sustainable strategy for growth as it would disperse too high a proportion of growth to settlements within the district that are relatively unsustainable and potentially constrained in terms of green belt, subject to flood risk and impact on ecological importance and heritage assets. It would not build on existing infrastructure that exists within the district and therefore it is not considered that this is a preferred option for growth.

Residential growth option 4: New settlement development

Figure 20.4 Option 4: New settlement



20.38 This growth option would see growth focused on one or more new sustainable settlement(s) located within the District. This approach could absorb the majority of new development required in the District across the plan period, with a small amount of growth allocated to the key settlements to ensure their continued vitality.

20.39 The [strategic growth study](#) identified two potential locations for new settlements within Lichfield District including land around Shenstone and land around Fradley and Alrewas. A further option was identified by the Council to the north east of Tamworth as this is an area of limited constraints.

What you told us

20.40 Many of the responses to the [scope, issues and options](#) consultation regarding this option acknowledged whilst there are benefits associated with a new settlement, there are significant constraints notably the infrastructure costs and requirements, the long lead in times for delivery and risk of market

saturation.

20.41 As anticipated a significant amount of objections were received from residents in the Shenstone, Stonnall and Little Aston area opposing a new settlement around Shenstone given its location within the green belt and the impact it could have on existing infrastructure.

20.42 Highways England made specific comments regarding the strategic road network with regard to the possibility of new settlements. It made clear that the options for new settlements at Shenstone and east of the A38 would adversely impact the strategic road network.

20.43 Staffordshire County Council commented with regards to education in general a minimum of 5,000 dwellings would be required in any new settlement to make a secondary school viable. Comments were provided in relation to landscape and ecology and extensive further work on these aspects would be required if this option is to be progressed further.

What the evidence tells us

20.44 The [strategic growth study](#) identifies a number options for new settlements comprising of 10,000 dwellings or more; including locations around Shenstone and Fradley and Alrewas. The growth study recommends that more detailed consideration should be given to the possibility of development at Shenstone.

20.45 The sustainability appraisal which supported the scope, issues and options document assessed the new settlement option and concluded that this option is less sustainable than residential growth option one and two. In particular, this option scored negatively in terms of reducing the need to travel and encouraging the efficient use of land as it will focus new development outside of existing settlement boundaries.

20.46 To further understand the possible growth options within the new settlement option we have undertaken a high level assessment of the options. The results of this assessment are set out in the following table.

Table 20.4 Option 4: New settlement development

Option	Strategic growth study recommended options	Preferred settlement hierarchy	NPPF areas or assets of importance				Land availability
			Green belt / local green space	Areas of flood risk	Areas or assets of ecological importance	Known heritage assets	
Land around Shenstone	Green	Red	Red	Red	Yellow	Yellow	Yellow
Brookhay	Yellow	Red	Green	Red	Green	Yellow	Yellow
Land around Thorpe Constantine	Yellow	Red	Green	Green	Green	Yellow	Red

20.47 The new settlement option is contrary to the preferred settlement hierarchy which seeks to focus development in the most sustainable settlements within and close to the district.

20.48 A high level desk top analysis of these new settlement options highlights that each of the options could potentially impact upon areas and assets of importance to some degree. In particular land around Shenstone scored poorly when compared with land around Thorpe Constantine as it is Green Belt, subject to flood risk and within the Cannock Chase SAC Zone of Influence.

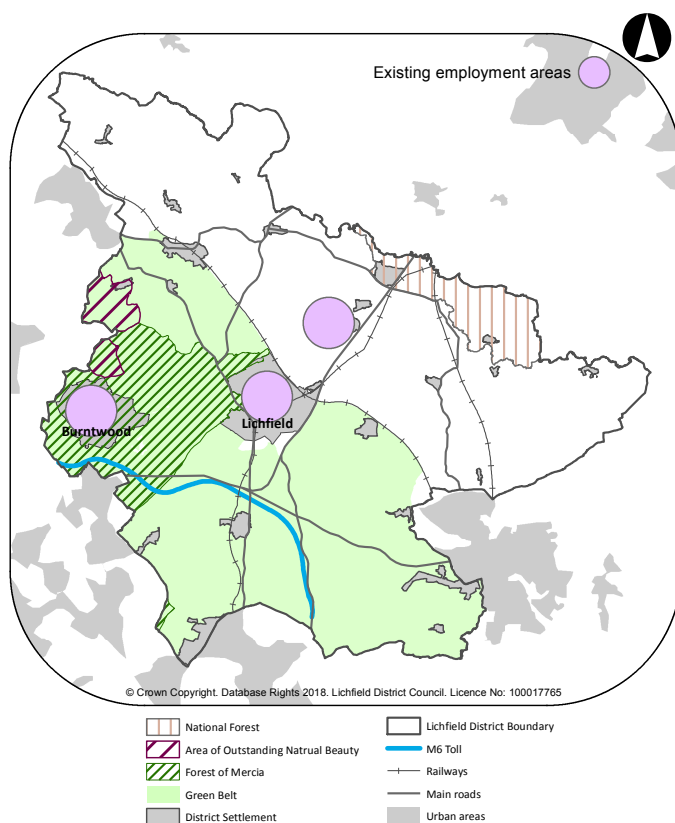
20.49 The possible new settlement options have been considered through the sustainability appraisal and all are assessed as having broadly similar effects.

20.50 With regards to land availability, whilst the strategic housing land availability assessment and call for sites consultation has identified that there is land available around Shenstone and at Fradley and Alrewas to accommodate growth, this is not of a scale for a new settlement which has been defined within the strategic growth study (10,000 dwellings). No land around Thorpe Constantine has been promoted to the Council and therefore this is not considered a deliverable option which should be explored any further.

21 Economic growth options

Employment growth option 1: Expansion of existing employment areas

Figure 21.1 Employment Option 1: Existing areas



21.1 This option would see new employment development focused on our existing employment areas including at Lichfield city, Burntwood and Fradley Park and was set out within the [scope, issues and options](#) document. These locations have traditionally been the focus for employment development within the district through previous local plans. Both Fradley Park and Burntwood Business Park are focused on one major area, whilst in Lichfield there are a number of employment areas across the settlement. These employment areas mainly consist of brownfield land and would also offer the potential for redevelopment and expansion of existing employment areas.

What you told us

21.2 Generally those people who made comments on this option through the scope, issues and options consultation were supportive of an approach which focused growth on the established employment areas. A number of the comments also acknowledged that there is land within these areas which could

accommodate further growth and that the provision of employment land could enhance the settlements.

21.3 There were a small number of comments which disagreed with this approach and suggested new locations for employment growth should also be considered, including possible options that are included within the strategic employment growth option 2. Other comments suggested that employment growth should reflect housing growth to enable a sustainable pattern of growth.

21.4 Through the consultation a number of responses were made which suggested other smaller existing employment areas including Shenstone and Fazeley should also be considered for growth and expansion. These employment areas are considerably smaller than those located in Burntwood, Fradley and Lichfield but do currently contribute to the supply of land for employment within the district. These existing areas have been considered through the high level assessment explained below.

What the evidence tells us

21.5 The [employment land availability assessment](#) demonstrates that there are large areas of land available within our existing employment areas which could deliver employment growth. The assessment demonstrates that there is a significant supply of land within these areas which could be appropriate for development. A majority of the land assessed within the employment land availability assessment is located within or close to these existing employment areas.

21.6 This strategic employment growth option from the scope, issues and options document was subject to environmental assessment as set out within the [sustainability assessment](#). The assessment concluded that the employment growth option focused on the existing employment areas scored best overall primarily as this would reduce the geographic spread of development and the option offers the best opportunities to increase non-car travel and reducing the need to travel.

Table 21.1 Option 1: Existing employment areas

Option	Preferred hierarchy	NPPF areas or assets of importance				Land availability
		Green belt / local green space	Areas of flood risk	Areas of ecological importance	Known heritage assets	
Lichfield employment areas and growth at Lichfield						
Burntwood employment areas and growth at Burntwood						
Fradley Park employment areas and growth at Fradley						
Shenstone employment area and growth at Shenstone						
Fazeley employment area and growth at Fazeley						

21.7 The table above sets out the high level desktop analysis of the possible locations for growth within this strategic growth option which were identified with the scope, issues and options document. Through this assessment the three locations all score consistently with the exception of Lichfield city where the high-level analysis considers there could be an impact upon known heritage assets. As with the residential growth options it should be recognised that this is a high level analysis and that where possible impacts upon areas or assets of importance are identified these can often be avoided or mitigated or even in some instances positive impacts could be achieved.

21.8 With regards to the green belt and local green spaces it is considered that these options are unlikely to impact upon this as the existing employment areas are not located within the green belt, nor have sites been promoted through the employment land availability assessment of call for sites adjacent to these settlements within the green belt. However, given that Burntwood and Lichfield city are both located within the green belt it is possible that future options to extend employment areas beyond the current urban areas at these locations could be explored. Clearly if this were the case the above assessment would need to be reconsidered.

21.9 The options set out in table 21.1 have been assessed through the sustainability appraisal and generally are concluded to be broadly similar. These options are assessed as having a number of positive impacts, particularly in terms of making use of brownfield land and achieving sustainable levels of economic growth.

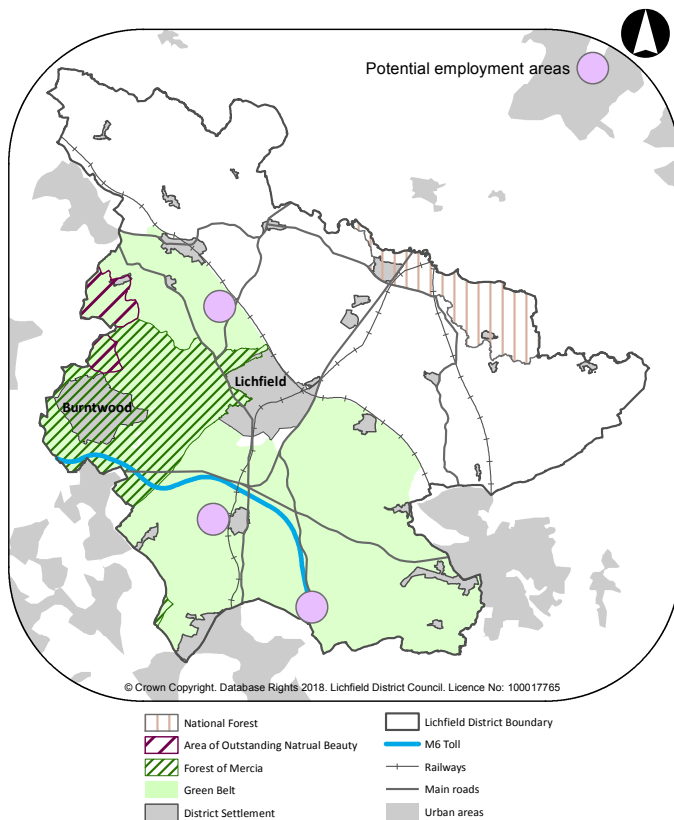
21.10 The employment land availability assessment and call for sites schedule demonstrate that there is a significant supply of potential employment land within these locations which could be delivered to meet the employment needs of the district. As with the residential growth options, as the level of employment growth required has yet to be defined it may be that additional sites beyond the existing employment areas could be required to meet our needs.

21.11 Further evidence will need to be undertaken to help define the level of employment growth which the district needs. The council will prepare a housing and employment development needs assessment to support the local plan review. This evidence along with further evidence on land availability and the wider evidence base will help the council to identify locations for employment growth. The anticipated timescales associated with this evidence base are set out at **Appendix A**.

21.12 The preferred policy direction set out within the 'Our economic growth, enterprise and tourism' chapter of this document suggests that employment growth will be focused on our current employment areas. Therefore the high-level analysis set in the table is consistent in suggesting such an approach should be the preferred option for employment growth and would align with the preferred directions for residential growth.

Employment growth option 2: New locations

Picture 21.1 Employment Option 2: Potential new locations



21.13 This option included within the scope, issues and options document would involve employment growth at new locations across the district beyond the existing employment areas. Using the employment land availability assessment three possible new locations for employment growth were identified based upon the council's land availability evidence. Three possible locations were identified in the scope, issues and options document based upon the known land availability.

What you told us

21.14 Through the scope, issues and options consultation there was a fairly limited number of comments made specifically on this possible growth option. These comments varied from those being supportive of new locations for employment growth and those which were less supportive. There were a number of comments which suggested that locating employment growth in new locations could be less sustainable than other options as these areas have less access to services and facilities. There

were a number of comments which opposed further growth at the Shenstone employment area primarily over concerns relating to increased heavy goods vehicle journeys through the village and also because of the possible impact upon the green belt.

21.15 Of the supportive comments a number were received from those persons promoting new locations for employment development, particularly land around Shenstone business park and land around Bassetts Pole.

What the evidence tell us

21.16 The employment land availability assessment demonstrates that there is a potential supply of sites within these locations which have been promoted for employment development. However, the assessment does conclude that those sites are not currently appropriate for employment development, partly because the sites which would make up all three possible options are within the green belt.

21.17 Through the scope, issues and options consultation and the call for sites process there were very few further sites put forward for potential future employment use. This has demonstrated that whilst there is a considerable supply of possible sites these are focused on a small number of areas of the district.

21.18 This potential strategic growth option was assessed through the sustainability assessment which accompanied the scope, issues and options document. The assessment concluded that the approach would score less well than the option which would focus growth on the existing employment areas as it would constitute a much wider spread of development which could have wider environmental impacts.

Table 21.2 Option 2: New employment locations

Option	Preferred hierarchy	NPPF areas or assets of importance				Land availability
		Green belt / local green space	Areas of flood risk	Areas of ecological importance	Known heritage assets	
Land at Seedy Mill (Between Lichfield and Armitage with Handsacre)						
Land at Shenstone employment area						
Land around Bassetts Pole						

21.19 The high-level assessment of the potential options for new locations for employment growth demonstrates that these are inconsistent with the preferred approach to locating employment growth and would all have impacts upon the green belt. The land around Shenstone, in particular, is the most constrained given the presence of areas of flood risk which are illustrated on figure 4.4.

21.20 All of the potential options identified are located within the green belt, The strategic green belt review within the strategic growth study concludes that the green belt in these three areas serves a principal contribution. The council will prepare a comprehensive green belt review as part of the evidence supporting its local plan, the timescales associated with this are set out at **Appendix A**.

21.21 The possible new locations for employment have been assessed through the sustainability appraisal. The three possible locations in table 21.2 scored less well than those options within growth option 1.

21.22 Subject to the level of growth needed being established, it is considered that these options would not represent the preferred approach to employment growth and should not be explored further. If further evidence demonstrates that there is not sufficient land at the existing employment locations to meet our need then the possible new locations for growth may need to be considered.

22 Our preferred strategic options for growth

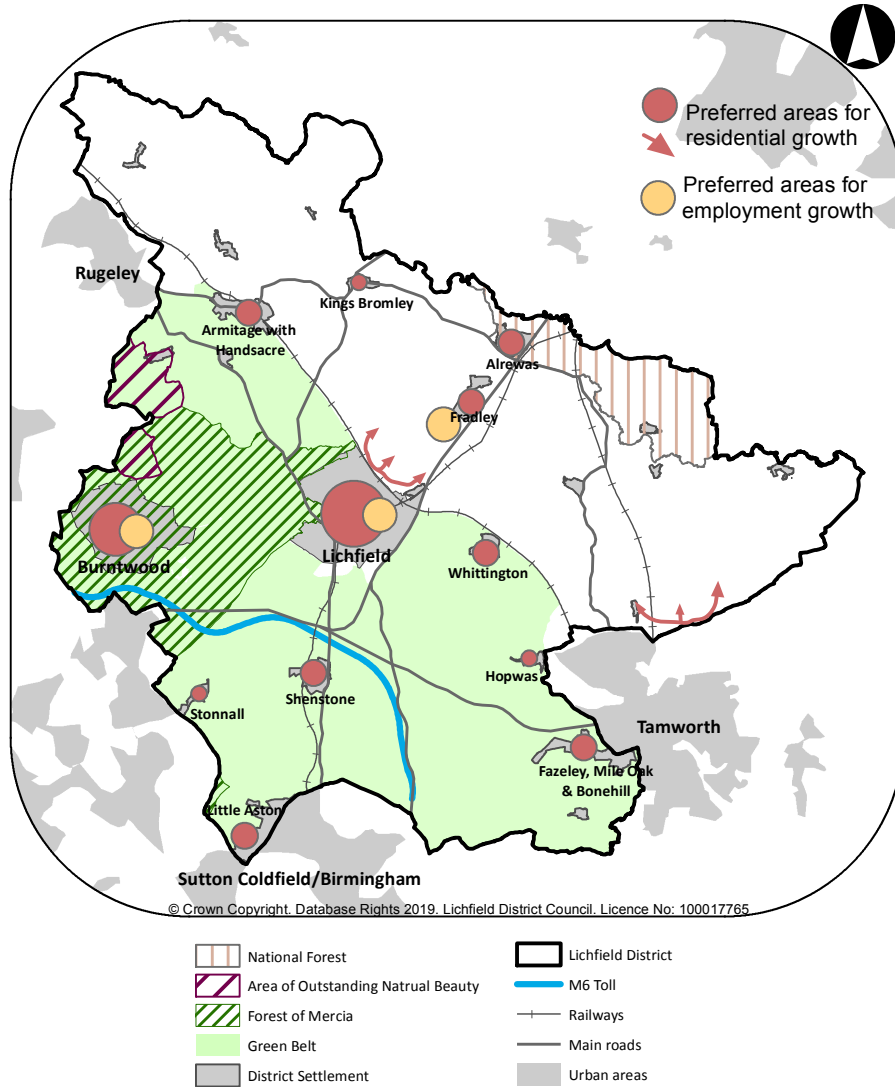
22.1 The previous chapters have provided high level consideration of the potential strategic growth options for both housing and employment development for our district. Within these strategic options are a range of areas which have now been considered in more detail. Through this process a number of these locations have been scoped out from the possible options for various reasons, including where there is a known lack of land within the area, or where a strategic growth option would not be consistent with our preferred settlement hierarchy. In turn this means that there are also other locations and options which should be considered in greater detail.

Our preferred options for growth

22.2 The preferred strategic approach to growth would see new homes focused on those sustainable settlements identified in the preferred settlement hierarchy. Growth would be attributed in accordance with the levels of the hierarchy, with larger levels of growth to those settlements higher in the hierarchy such as Lichfield and Burntwood. With regards to employment growth the preferred approach is to focus this on the existing employment areas within Lichfield, Burntwood and at Fradley Park.

22.3 Figure 22.1 illustrates our preferred strategic options for growth.

Figure 22.1 Preferred growth options



22.4 At this stage the analysis of options has suggested we should further explore growth focused on the settlements identified within the preferred settlement hierarchy, as illustrated on figure 22.1. Alongside the settlement hierarchy, the strategic growth study and the high level analysis of growth options has concluded that there are two specific areas for further exploration. These being growth to the north-east of Lichfield city and growth to the north of Tamworth given that they score more positively when compared with the other options. All options will need to be explored in much greater detail before it can be determined that they are options to be included within the local plan review. Evidence will need to be collected and considered to help determine the final locations of growth.

22.5 A number of the settlements within the preferred hierarchy are located within the green belt. It may be that in such instances there is a need to consider the green belt boundaries in some locations. Any changes to the green belt boundary would need to be made through a strategic policy within the local plan review. If such changes are identified it may be that the detail of such changes could be made through non-strategic plans including community's neighbourhood plans.

22.6 Whilst the overall levels of growth and the distribution of that growth in terms of specific levels of growth for each settlement are not known at this stage it is worth noting that some communities have expressed a desire to accept growth. For example Fradley Parish Council has, through comments made to the scope, issues and options document, suggested it would wish to take further growth which can help to deliver facilities the community wishes to have.

22.7 The table below set outs the key advantages and disadvantages of the preferred strategic growth options.

Table 22.1 Advantages and disadvantages

Advantages	Disadvantages
<ul style="list-style-type: none"> • Focuses the majority of growth in the most sustainable locations in line with national policy • Maximises the use of existing infrastructure • Supports regeneration and growth of large settlements as a foci for the district • Supports and develops services and facilities to ensure sustainable rural communities • Provides increased levels of rural housing within sustainable locations 	<ul style="list-style-type: none"> • Need to release Green Belt land around some settlements to facilitate growth • Public transport improvements required to prevent increased car travel within rural areas

22.8 The council will now undertake further work and evidence to further define the strategic growth options which will be part of the local plan review. Through the collection of evidence it may be the case that additional growth locations are identified or that locations identified within this scope, issues and options document are no longer identified as areas for growth.

23 Our next steps

23.1 It is important that we gain your feedback on the local plan review preferred options and policy directions document, both positive and negative. This will help us prepare the next stage of the local plan review in the most effective and appropriate manner.

23.2 The 'how can you get involved' section at the start of this document explains how you can submit your comments to us either online, via email or post.

23.3 At the end of the consultation period, the Councils Spatial Policy and Delivery Team will consider all the comments received together with evidence collected on issues relevant to the plan which will inform the next stage of the local plan review. The council will publish a report which summarises the comments received on this document.

23.4 Please note any comments you make will be in the public domain and will be available for public scrutiny. All information will be held on a database and used to assist with the preparation of the local plan review, in accordance with the Data Protection Act 2018.

Appendix A Our evidence base

Table A.1

Evidence base	Why we need it	Anticipated date of production
Authority monitoring report (AMIR)	To monitor the effectiveness of the local plan and it's policies.	Published annually each July.
Biodiversity mapping	To comply with legislation and inform development.	March 2019.
Brownfield land register (BLR)	To comply with legislation and to understand our supply brownfield land which is suitable for residential development.	Published annually each December.
Business data and analysis study	To gain a thorough understanding of the local business population and to examine the range of economic impacts supported by the business base.	November 2018.
Commercial property study	To develop a stronger understanding of the commercial property market within and in close proximity to Lichfield District and Tamworth Borough.	March 2019.
Employment land availability assessment (ELAA)	To understand the availability of potential land for employment development.	Published annually each July.
Five year housing land supply paper	To provide the current position in terms of the five year supply of both housing sites and sites for gypsy and traveller needs.	Published annually each July.
Green belt review	Required to understand the role of the green belt with the district and whether changes to the green belt boundary are required.	June 2019.
Green infrastructure study	To inform green infrastructure standards.	June 2019.
Gypsy and traveller needs accommodation assessment (GTAA)	To understand the gypsy and traveller needs.	April 2019.
Habitat regulations assessment (HRA)	To comply with legislation and inform the local plan.	Ongoing.
Housing and employment development needs assessment (HEDNA)	To understand housing and employment development needs.	May 2019.

Appendix A Our evidence base

Appendix A Our evidence base

Evidence base	Why we need it	Anticipated date of production
Infrastructure capacity study	To understand infrastructure triggers and capacity.	June 2019.
Landscape	To understand the sensitivities of the landscape.	May 2019.
Open space assessment	To inform open space standards.	June 2019.
Play pitch evidence	To inform sports and recreation provision.	June 2019.
Self build register	To comply with legislation and to understand the demand for self build and custom house building within our district.	Continually updated.
Special Areas of Conservation	To identify the impacts of new development upon SAC and a mitigation strategy to prevent harm.	Ongoing.
Strategic flood risk assessment (level 1) and water cycle study	To provide comprehensive evidence base in relation to flooding and identify any capacity issues and sustainable infrastructure required in relation to water and wastewater services.	June 2019.
Strategic housing land availability assessment (SHLAA)	To understand the availability of potential land for housing development.	Published annually each July.
Sustainability Appraisal (SA)	To comply with legislation and inform the local plan.	Ongoing.
Transport Modelling	To inform the local plan and infrastructure delivery plan.	Ongoing.
Urban capacity assessment	To assess the possible supply of land within the urban areas of our settlements.	May 2019.

Appendix B Our existing policies to be carried forward

B.1 There are a number of existing non-strategic policies which we consider are fit for purpose and should be carried forward as part of the local plan review. These are set out in the table below, it may be that some of these individual policies can be grouped into one larger theme based policy. Our preferred approach would be to group such policies for clarity.

Table B.1

Existing policy	Document	Why the policy should be taken forward
Policy E1: Retail assessments	Local plan strategy	Policy is considered to be compliant with national policy and is based on the latest available evidence within the Lichfield centres study.
Policy E2: Service access to our centres	Local plan allocations	Policy is considered to be compliant with national policy.
Policy E3: Shop fronts and advertisements	Local plan allocations	Policy is considered to be compliant with national policy.
Policy LC1: Lichfield city housing land allocations	Local plan allocations	Policy is considered to be compliant with national policy and is based in evidence within the land availability and land capacity assessments. The policy will need to be considered in terms of the status of the allocations which over time will be delivered. Where sites have been delivered these should be removed from the policy.
Policy LC2: Lichfield city mixed-use allocations		
Policy IP2: Lichfield Canal	Local plan allocations	Policy is considered to be compliant with national policy and the route of the Lichfield Canal including the Heritage Towpath Trail will continue to be safeguarded. Evidence will continue to be collected and the associated wording in the Infrastructure Delivery Plan amended if necessary.
Policy NR1:	Local plan strategy	Policy is considered to be compliant with national policy. The policy will need to be considered in light of the updated evidence.
Policy NR2: Development in the green belt	Local plan strategy	Policy is considered to be compliant with national policy. The policy will need to be updated in light of any strategic policy relating to the green belt, for example if changes to the green belt boundary are proposed.
Policy NR3: Biodiversity, protected species and their habitats	Local plan strategy	Policy is considered to be compliant with national policy. The policy will need to be considered in light of the updated evidence.
Policy NR4: Trees, woodlands and hedgerows	Local plan strategy	Policy is considered to be compliant with national policy. The policy will need to be considered in light of the updated evidence.

Appendix B Our existing policies to be carried forward

Appendix B Our existing policies to be carried forward

Existing policy	Document	Why the policy should be taken forward
Policy NR5: Natural & Historic Landscapes	Local plan strategy	Policy is considered to be compliant with national policy. The policy will need to be considered in light of the updated evidence.
Policy NR7: Cannock Chase special area of conservation	Local plan strategy	Policy is considered to be compliant with national policy. The policy will need to be considered in light of the updated evidence.
Policy NR8: River Mease special area of conservation	Local plan strategy	Policy is considered to be compliant with national policy.
Policy NR9: Water quality	Local plan strategy	Policy is considered to be compliant with national policy. The policy will need to be considered in light of the latest evidence available once the Water Cycle Study has been published and if necessary watercourse catchments will be added or removed to the policy.
Policy NR10: Cannock Chase Area of Outstanding Natural Beauty.	Local plan allocations	Policy is considered to be compliant with national policy. The policy will need to be considered in light of the updated evidence.
Policy NR11: National forest	Local plan allocations	Policy is considered to be compliant with national policy. The policy will need to be considered in light of the updated evidence.

Glossary & abbreviations

Term	Abbreviation	Meaning
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; and 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.
Authority/Annual Monitoring Report	AMR	A report published by local planning authorities assessing Local Plan progress and policy effectiveness. Formally known as the Annual Monitoring Report this is now known as the Authority Monitoring Report.
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.
Biodiversity		The whole variety of life encompassing all genetics, species and ecosystem variations. This includes diversity within species, between species and of ecosystems.
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.
Central Rivers Initiative	CRI	A partnership approach to managing the River Trent and River Tame in the region between Tamworth and Burton upon Trent.
Community Infrastructure Levy	CIL	A charge on development, calculated on a £ per square meter basis of development as set out within the adopted CIL Charging Schedule. 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. CIL does not replace Section 106 agreements.
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.
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.

Term	Abbreviation	Meaning
Conservation Area		Areas of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance.
Decentralised Energy Supply		The use of energy from on-site or renewable sources limiting the need to draw energy from the national supply.
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.
Employment Land Availability Assessment	ELAA	An assessment of potential employment sites to inform the Local Plan. The ELAA 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 capacity within employment areas and a range of other sites that have been submitted for consideration. The ELAA is not a policy document, but identifies the range of sites that are being given further consideration through the formulation of the Local Plan.
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.
Green Belt (not to be confused with the term ‘greenfield’)		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: <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; • 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.
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.
Historic Environment Character Area	HECA	An area of defined character in the landscape, such as medieval field patterns.

Term	Abbreviation	Meaning
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.
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.
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.
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.
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 Development Scheme	LDS	Document which sets out the timescales associated with the progression of the councils local plan and development plan documents.
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. The Local Plan Strategy was adopted on 17 February 2015
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.

Term	Abbreviation	Meaning
Mitigation		Measures to avoid, reduce or offset the significant adverse effects of an external factor e.g. Lessening the effects of climate change.
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).
National Planning Practice Guidance	PPG	An online resource containing the governments updated planning practice guidance which supports the NPPF. The online guidance is updated on a regular basis.
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.
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.
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.
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.
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.
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.
Site of Biological Importance	SBI	A non-statutory designation used to protect locally valued sites of biodiversity. Also referred to as Local Wildlife Sites.

Term	Abbreviation	Meaning
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).
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 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 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

Term	Abbreviation	Meaning
		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.
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.
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.
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.
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.

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Lichfield District Local Plan Review Preferred Options and Policy Directions

Sustainability Appraisal

January 2019

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Appendix Contents

Appendix A - Sustainability Issues and Interactions

Appendix B - Summary and Matrices of Preferred Option and Policy Directions

1.0 Introduction

1.1 Background

1.1.1 Lichfield District Council (The Council) is currently preparing the Lichfield District Local Plan Review (the Plan), which will set out the following:

- Spatial Strategy;
- Vision for the District;
- Strategic objectives for the District;
- Strategic and local policies;
- Site allocations; and
- Monitoring and implementation framework for the next 15 years.

1.1.2 The extant Lichfield District Local Plan comprises:

- The Local Plan Strategy (adopted 17th February 2015)
- Saved Policies of the 1998 Lichfield District Local Plan (adopted 17th February 2015 a set out at Appendix J of the Local Plan Strategy) and
- The Local Plan Allocations (currently at an advanced stage of preparation within consultation being undertaken on the Main Modifications. Once adopted Local Plan Allocations document will replace the saved policies of the 1998 local plan).

1.1.2 The above documents will guide new development in the District for the period 2008 to 2029. The Local Plan Review, the subject of this sustainability appraisal, comprises a review of the Spatial Strategy set out in the adopted Local Plan Strategy and an associated review of the vision, strategic objectives and planning policies that support the Spatial Strategy.

1.1.3 The Council prepared and consulted upon the Local Plan Review: Scope, Issues & Options document between April and May 2018. This represented the first stage in the Local Plan Review process. The council has now reached the next stage of this process and produced the Local Plan Review: Preferred Options & Policy Directions document.

1.1.4 The preparation of the Lichfield District Local Plan Review will be the subject of an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (hereafter referred to as SA) in line with the requirements of:

- Planning and Compulsory Purchase Act 2004;
- Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations);

- Statutory Instrument 2012 No. 767: Town and Country Planning (Local Planning) (England) Regulations 2012;
- Revised National Planning Policy Framework (NPPF); and
- Planning Policy Guidance (the Guidance).

1.1.5 Lichfield District Council has prepared the Sustainability Appraisal Report 'in house' but has retained WYG as a 'critical friend' in this process. WYG are highly experienced in completing SAs and SEAs of spatial planning documents.

1.1.6 The District Council has prepared a Habitats Regulations Assessment (HRA) of the Lichfield District Local Plan Review: Preferred Options & Policy Directions. The HRA is presented as a separate 'standalone' document but the findings of the HRA have been taken into account in this SA.

1.1.7 This document comprises the draft Sustainability Appraisal Report (SA Report) for the Lichfield District Local Plan Review: Preferred Options & Policy Directions (2019). The SA report meets the requirements of an 'Environmental Report' set out at Paragraph 12 and Schedule 2 of the SEA Regulations 2004 and a 'Sustainability Appraisal Report' required by Section 19 (5) (b) of the Planning and Compulsory Purchase Act 2004. The SA report has also been prepared in line with the Government's Guidance "Strategic environmental assessment and sustainability appraisal" 9 February 2015.

1.2 Lichfield District Local Plan Review – Purpose and Objectives

1.2.1 Lichfield District Council is preparing a plan that meets the future social, economic and environmental needs of the District. The Local Plan Review's purpose is to shape the future of the District up to 2036 with the following vision:

"In 2036, residents of our district will continue to be proud of their communities. They will experience a strong sense of local identity, of safety and of belonging. Our communities will take pride in our district's history and culture, its well cared for built and natural environment, its commitment to addressing issues of climate change, and the range of facilities our district has to offer. Our residents will live in healthy and safe communities which provide opportunities for people to keep fit and healthy and people will not be socially isolated. Our residents will be able to access quality homes which meet their needs, local employment, facilities and services all of which provide communities with clean, green and welcoming places to live, to work and to play. Our residents will have access to provision for education to provide the skills and training to suit their aspirations and personal circumstances.

Those visiting the district will experience the opportunities and assets which our residents take pride in. Visitors to our district will be encouraged to stay for longer and wish to return and promote the area to others. The need to travel by car will be reduced through improvements to public transport, walkways, cycle routes and the canal network.

New sustainably located development will meet the requirements of our district and will have regard to the needs arising from within the housing market area. Such development, coupled with associated infrastructure provision will also address improvements to education, skills, training, health and incomes, leading to reduced levels of deprivation.

The districts natural environments and varied landscapes will be conserved and enhanced. Locally important green spaces and corridors will meet recreational and health needs. Sustainable development will help protect the biodiversity, cultural and amenity value of the countryside and will minimise use of scarce natural and historic resources, contributing to mitigating and adapting to the effects of climate change."

- 1.2.2 The above vision for the District was the subject of an earlier Sustainability Appraisal as part of the the Scope, Issues and Options stage. The District Council is not proposing nificant changes to the existing Vision as part of the Preferred Options stage, it has been summarised and refined, thus the vision is not specifically assessed in this Sustainability Appraisal. The Vision has been reviewed as part of this Preferred Options stage and is considered to be '*fit for purpose*' for identifying the spatial options to be taken forward in the Lichfield District Local Plan Review. Future stages of the emerging Lichfield District Local Plan Review may result in amendments to the Local Plan Strategy Vision which should be fully assessed in future version of the SA Report.
- 1.2.3 The current Local Plan Strategy sets 15 strategic objectives for delivering sustainable economic growth, healthy and safe communities and an integrated infrastructure network within an attractive environment. These are:

Objective 1 - Sustainable Communities:

To consolidate the sustainability of existing settlements, including key settlements which will be identified to accommodate sustainable growth. This will ensure the development of new homes, employment, commercial development and other facilities will contribute to the creation of balanced and sustainable communities by being focused on appropriate settlements and locations and by containing or contributing towards a mix of land uses, facilities and infrastructure appropriate to its location.

Objective 2 - Rural Communities:

To develop and maintain more sustainable rural communities through locally relevant employment and housing development and improvements to public transport and access to an improved range of services whilst protecting the character of rural settlements.

Objective 3- Climate Change

To be a district where development meets the needs of our communities whilst minimising its impact on the environment and mitigating and adapting to the effects of climate change.

Objectives 4 – Our Infrastructure

To provide the necessary infrastructure to support our existing and new communities including regeneration initiatives on those existing communities where needs have been identified.

Objectives 5 – Sustainable Transport

To reduce the need for people to travel by directing growth towards the most sustainable locations and increasing the opportunities for travel using sustainable forms of transport including securing improvements to public transport, walking and cycling infrastructure.

Objectives 6 – Meeting Housing Need

To provide an appropriate mix of market, specialist and affordable homes that are well designed and meet the needs of our existing and new residents.

Objectives 7 – Economic Prosperity

To promote economic prosperity for the district and its residents by supporting measures which enable the local economy to thrive and adapt to changing economic circumstances and make the most of newly arising economic opportunities.

Objectives 8 – Employment Opportunities

To ensure that employment opportunities within the district are created through the development of new enterprise and the support and diversification of existing businesses to meet the identified needs and the aspirations of our communities.

Objectives 9 – Our Centres

To create a prestigious city centre serving Lichfield City and beyond, and an enlarged and improved town centre for Burntwood which meets the community's needs and aspirations and a vibrant network of district and local centres which stimulate economic activity, enhance the public realm and provide residents' needs at accessible locations.

Objectives 10 – Tourism

To increase the attraction of the district as a tourist destination through supporting and promoting the growth of existing tourist facilities and attractions, the provision of a greater variety of accommodation for visitors, the development of new attractions which are appropriate in scale and character to their locations and the enhancement of our existing attractions.

Objectives 11 – Health & Safe Lifestyles

To create environments that promote and support healthy choices and enable our residents to be healthy and safe. To improve outdoor and indoor leisure and cultural facilities available to those that live and work and those that visit the district and to ensure a high standard of community safety, promoting healthier living and reducing inequalities in health and wellbeing.

Objectives 12 – Countryside Character

To protect and enhance the quality and character of the countryside, its landscapes and villages by ensuring that development which takes place to meet identified rural development needs contributes positively to countryside character through enhancements to the local environment and preserves the openness of the Green Belt.

Objectives 13 – Natural Resources

To protect, enhance and expand the quality and diversity of the natural environment within and outside of our urban areas and help realise the positive contributions which can be made to address climate change.

Objectives 14 - Built Environment

To protect and enhance our built environment and heritage assets, the districts historic environment and local distinctiveness, ensuring an appropriate balance between built development and open space, protecting the character of residential areas, protecting existing open spaces and improving the accessibility to open spaces.

Objective 15 - High Quality Development:

To deliver high quality development which focuses residential, community and commercial facilities on the most sustainable locations whilst protecting and enhancing the quality and character of the existing built and natural environment.

- 1.2.4 The current Strategic Objectives for the District were the subject of an earlier Sustainability Appraisal process as part of the Scope, Issues and Options stage. The findings of the earlier Sustainability Appraisal have been reviewed and are considered 'fit for purpose' for identifying the spatial options to be taken forward in the Lichfield District Local Plan Review. Based on this review, the District Council is not proposing significant changes to the existing Strategic Objectives as part of the Preferred Options stage and thus the Strategic Objectives are not specifically assessed in this Sustainability Appraisal. Future stages of the emerging Lichfield District Local Plan Review may result in amendments to the Local Plan Strategic Objectives which will be fully assessed in subsequent SA Report.
- 1.2.5 To meet the above objectives and overall vision, the Lichfield District Local Plan Review will bring forward a proportionate level of new development for the period up to 2036. The precise level of growth, including the associated new dwellings and the provision of new employment land, is currently under consideration by the District Council and will be set out in future stages of the emerging Local Plan Review. However, the Vision and Strategic objectives sets out the Council's aim to accommodate growth and associated infrastructure, including the needs within the Greater Birmingham and Black Country Housing Market Area, whilst protecting the District's built and natural environment and delivering a high quality of life for the District's residents, visitors and workers.

1.3 Baseline Context

- 1.3.1 Lichfield District is located in south east Staffordshire and is situated adjacent to the West Midlands Conurbation. The District has a population of 103,100 (mid 2016) which has increased by 2.18% since 2010. However, the population of the District is growing at a slower rate than the West Midlands (3.4%). The age structure of Lichfield shows that the District has a higher than the national average of elderly people over 65 years old. In addition, the number of people of 65 years old exceeds the number of children under the age of 15.
- 1.3.2 The District has two main settlements, the cathedral city of Lichfield and the town of Burntwood but also supports many villages that are set within a predominantly rural landscape. The six key rural settlements are Armitage with Handsacre, Alrewas, Shenstone, Whittington Fradley and Fazeley. The southern extent of Lichfield District is covered by the West Midlands Green Belt.
- 1.3.3 The District has excellent transport links being well served by local routes such as the A51, A515 and A5127 together with easy access from the M6 Toll, A38 (T), A5148 (T) and A5(T). Lichfield District has four train stations, Lichfield City, Lichfield Trent Valley, Rugeley Trent Valley and Shenstone.
- 1.3.4 Economic inactivity in the working age population of Lichfield is lower than the regional and national indicators. This is due, in part, to the high level (38.5%) of working age people in Lichfield who are retired. This level is more than double the West Midlands and Great Britain figure. The number of benefit claimants in Lichfield is significantly below the regional and national averages.
- 1.3.5 The weekly earnings by residents of Lichfield District are higher than both the regional and national figures. However, as the weekly earnings by workplace within the District is lower than the national average, this indicates the significant amount of out migration of workers from the District to higher salaried jobs elsewhere. The District is ranked 252 out of 326 local authorities in terms of deprivation but Chadesmead and Chasetown represent two pockets of deprivation in the District.
- 1.3.6 Male and female life expectancy are similar to both the County and National averages at 79.9 for males and 83.1 for females. Obesity rates in the District shows that two thirds of adults are either obese or overweight which is similar to the national average. In children aged 4-5 years around 23% have excess weight (either overweight or obese) increasing to 31% for children aged 10-11.
- 1.3.7 The District contains 2 European scale environmental Sites (Cannock Chase SAC and the River Mease SAC), 4 SSSI's and an Area of Outstanding Natural Beauty. The District also supports 78 sites of Biological Interest.
- 1.3.8 The District also contains 16 scheduled monuments, a registered park and garden, 763 Listed Buildings and has 21 Conservation Areas that are designated for their 'special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance'.

1.4 Integrated Sustainability Appraisal

- 1.4.1 The Lichfield District Local Plan Review and accompanying SA represent an important opportunity to drive forward the sustainability agenda and assist with urban and rural renaissance across the District. SA is a powerful tool that can not only evaluate the sustainability of the Local Plan but also help promote patterns of development and ensure that sustainability considerations are reflected in the evolution of the plan and policy preparation, or mitigate negative effects. An independent Sustainability Appraisal will be undertaken at each stage in the preparation of the Local Plan Review.
- 1.4.2 This draft SA Report has been prepared to assist in the production of the Lichfield District Local Plan Review: Preferred Options and Policy Directions to ensure that the principles of sustainable development are at the core of the decision-making process in a transparent and open manner. The report provides an independent quantitative and qualitative assessment of the sustainability implications of the preferred potential spatial development options considered as part of the emerging Local Plan Review and Strategic Policy Directions. Some options are in the form of Policy Directions at this stage and further assessments will be undertaken upon the resultant policies and site selections as part of future stages of the Local Plan Review's evolution.
- 1.4.3 Some policies are proposed to be retained and carried forward from the adopted Local Plan Strategy. The policies recommended for retention have been the subject of an updated SA assessment to take account of changing scope and evidence base associated with the Local Plan Review and in order to ensure sustainability considerations maintain relevance.
- 1.0.1 The SA Report is made available for public consultation alongside the Lichfield District Local Plan Review: Preferred Options and Policy Directions.
- 1.0.2 The Council has considered representations on the SA for the Local Plan Review: Scope, Issues and Options and these are referenced and responded to in the rest of this report.

1.1 Structure of this Sustainability Appraisal Report

- 1.1.1 This chapter of the SA report provides an introduction to the Lichfield District Local Plan Review, the baseline context of Lichfield District and the integrated SA process. The remainder of the report is structured as follows:
- Chapter 2 – outlines the methodology of the SA;
 - Chapter 3 –provides sustainability context and objectives of the Plan;
 - Chapter 4 – appraisal of 'reasonable' options/alternatives considered;
 - Chapter 5 – appraisal of the significant effects associated with the options;
 - Chapter 6 – Mitigation;
 - Chapter 7 – Monitoring and Next Steps; and
 - Chapter 8 - Conclusions.

1.2 How to comment on this Sustainability Appraisal Report

1.2.1 This SA is being published for comment as part of the statutory consultation process alongside the Lichfield District Local Plan Review: Preferred Options & Policy Directions. The consultation methods and bodies (including the three statutory environmental consultation bodies set out in the SEA Regulations, namely Natural England, Environment Agency and Historic England).

1.2.2 If you have any comments on this report please respond in either of the following ways:

- Online via the website: <http://lichfielddc-consult.limehouse.co.uk/portal>
- Email: developmentplans@lichfielddc.gov.uk
- In writing to: Spatial Policy & Delivery, Lichfield District Council, Frog Lane, Lichfield, WS13 6YZ.

2.0 Methodology of the Sustainability Appraisal


2.1 Introduction

- 2.1.1 Under Section S19(5) of the Planning and Compulsory Purchase Act 2004 and the SEA Regulations which came into force in England and Wales in July 2004, SA and Strategic Environmental Assessment (SEA) are mandatory for all Local Plans and Supplementary Planning Documents (SPDs). Section 39 of the Act requires Local Plans/Supplementary Planning Documents to be prepared with a view to contributing to the achievement of sustainable development. SA is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. The production of a SA is one of the "*tests of soundness*" of a Local Plan/SPD.
- 2.1.2 The requirement to undertake SEA is established in the EU by the European Directive 2001/42/EC, '*The Assessment of the Effects of Certain Plans and Programmes on the Environment*' (commonly known as the SEA Directive). The SEA Directive is transposed into English law by the SEA Regulations.
- 2.1.3 SEA and SA are closely linked. SA aims to integrate sustainability issues into decision making by appraising the plan or strategy using environmental, social and economic objectives, whilst SEA also aims to facilitate sustainable development but its emphasis is on integrating environmental considerations into decision making through analysis of environmental issues.
- 2.1.4 Although the requirement to undertake both SA and SEA is mandatory, it is possible to satisfy the requirements of both parties of the legislation through a single appraisal process. This approach is confirmed at Paragraph 32 of the Revised NPPF.
- 2.1.5 Further guidance on the preparation of the SA in relation to the stages of Local Plan production together with the information to be covered within the SA Report is set out in the Planning Practice Guidance (the Guidance). The Guidance states at paragraph 11-009 "*The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan*". The level of detail set out in this SA Report is considered to be commensurate with the stage of Local Plan production.
- 2.1.6 The Guidance goes on to state at paragraph 11-018 "*sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach)*". This is the current stage of the SA process being undertaken. The findings of this SA will be used by the Council to assess "*the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan*" and ultimately "*inform the selection, refinement and publication of proposals*". An assessment of the alternatives/options considered as part of the SA process is set out at Chapter 4.

2.2 SA Key Steps and Tasks

- 2.2.1 SA/SEA is a five-stage process. Figure 1 below sets out each of the stages and the stage currently reached.
- 2.2.2 The preparation of this draft SA Report comprises part of the second major step in the SA of the Lichfield District Local Plan Review and relates to Stage B of the five stage SA process set out at Paragraph 11-013 of the Guidance (06 03 2014).
- 2.2.3 The District Council published the 'Lichfield District Local Plan Review Scoping Report' in December 2017. This document related to Stage A of the SA process. The comments received during the formal consultation period on the Scoping Report were reviewed by the District Council and the SA Framework has been refined. These are considered in more detail in Chapter 3.
- 2.2.4 This draft SA Report will be the subject of a consultation process in line with the Lichfield District Local Plan Review: Preferred Options & Policy Directions (Stage B) in January 2019.

Table 1: SA Process Stages

<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> 1: Identify other relevant policies, plans and programmes, and sustainability objectives 2: Collecting baseline information 3: Identify sustainability issues and problems 4: Develop the SA framework 5: Consult the consultation bodies on the scope of the SA report 	 <p>STAGE A COMPLETE</p>
<p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> 1: Testing the Local Plan objectives against the SA framework 2: Developing the Local Plan options including reasonable alternatives 3: Evaluate the likely effects of the Local Plan and alternatives 4: Considering way of mitigating adverse effects and maximising beneficial effects 5: Propose measures to monitor the significant effects of implementing the Local Plan 	<p>WE ARE HERE</p>
<p>Stage C: Preparing the Sustainability Appraisal Report</p>	
<p>Stage D: Seek representations on the SA report from consultation bodies and the public</p>	
<p>Stage E: Post adoption reporting and monitoring</p> <ul style="list-style-type: none"> 1: Prepare and publish post-adoption statement 2: Monitor significant effects of implementing the Local Plan 3: Respond to adverse effects 	

2.2.5 The SA Report will be reviewed in light of all consultation representations received. The consultation responses and the draft SA Report will be used by the District Council to develop a consultation draft of the Local Plan Review.

2.3 Stage A – Establishing the baseline, scope and sustainability objectives

Tasks A1-A3 – Sustainability Context and baseline

2.3.1 The Sustainability Objectives upon which this SA is based were developed as part of the SA Stage A and represent a key aspect of the Appraisal process. The scoping stage of a SA involves the collation of evidence relating to the baseline position and policy context for the Local Plan Review, culminating in a series of key sustainability issues and problems that should be a focus for the SA and to establish a sustainability framework. The Scoping Report (2017) set out, at Appendix A, a summary of the findings of the baseline review of relevant policies, plans and programmes.

2.3.2 The sustainability problems and issues relevant to the emerging Local Plan Review were set out in Section 4 (Table 4.1) of the Scoping Report. The sustainability problems and issues have been reviewed prior to the commencement of this SA and were considered to represent the current baseline position in Lichfield District. The sustainability problems and issues are presented at Appendix A of this report.

Inter-relationships

2.3.3 Each of the SA topics and issues listed in the Scoping Report, whilst presented individually, have clear inter-relationships. For example, an increase in population can result in increased pressure on community facilities and infrastructure or traffic generation, and thus air quality.

2.3.4 The main inter-relationships between each of the SA topics considered in this SA is discussed in the Scoping Report (2017). No other potential inconsistencies in the assessment were identified during this SA process.

Task A4 – Develop the SA Framework/Objectives

2.3.5 The SA Framework and associated objectives were developed on an iterative basis to reflect the sustainability problems and issues relevant to the emerging Local Plan Review. The SA Framework objectives were defined taking into account the national, EU and international obligations set out at Appendix A of the Scoping Report. The Sustainability Objectives were used in the SA for the Local Plan Review Scope, Issues and Options stage.

2.3.6 The Sustainability Objectives were reviewed prior to the commencement of this SA and were considered 'fit for purpose'. The Sustainability Objectives used in this SA are set out in Table 2. Table 2 also shows how all of the topics set out in the SEA Regulations, except inter-relationships, are linked to the SA objectives. Inter-relationships are discussed at paragraphs 2.3.3. to 2.3.5 above.

Table 2 – Sustainability Objectives (SO)

Ref. no.	Sustainability Objective	Link to topics in SEA Regulations
1	To provide housing to meet local need including provision of affordable homes.	Population Material assets
2	To promote safe communities and reduce fear of crime	Population Human Health
3	Improve access to health facilities and promote wellbeing	Population Human Health
4	Maximise the use of previously developed land/ buildings and encourage the efficient use of land	Population Human Health Material Assets
5	To improve educational attainment of the working age population	Population Human Health

6	To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	Population Human Health
7	To manage availability of water resources, and to reduce water and air pollution	Soil Water Air Climatic factors
8	To minimise waste and increase the recycling and reuse of waste materials	Climatic factors
9	9. To reduce and manage flood risk and surface water run off	Water Material Assets
10	To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	Climatic Factors
11	To promote biodiversity protection enhancement and management of species and habitats	Biodiversity Flora Fauna Soil

12	To ensure the protection and enhancement of the historic environment and its setting	Cultural heritage
13	Protect, enhance and manage the character and quality of the landscape and townscape	Landscape Cultural Heritage
14	To increase opportunities for non-car travel and reduce the need for travel	Population Human Health

2.3.7 In order to assess the preferred options & policy directions against each of the SA objectives in a consistent manner, a number of appraisal questions and associated indicators have been developed. These were set out at Section 5 (Table 5.1) of the Scoping Report (2017).

2.3.8 The SA questions and indicators have been reviewed prior to the commencement of this preferred options and policy direction stage and no modifications are made. The Revised NPPF and Planning Practice Guidance were also considered but did not highlight any significant visionary issues which changed the circumstances for the Council's SA Objectives, questions or indicators.

Tasks A5 – Consultation of the Scope of the SA - Scoping Report

2.3.9 The Lichfield District Local Plan Review: Scoping Report was published in December 2017 and was the subject of formal consultation with statutory consultees/stakeholders and the comments received taken into account. This included, as a minimum the three statutory environmental consultation bodies set out in the SEA Regulations (namely Natural England, Environment Agency and Historic England).

2.3.10 The consultation response from Historic England requested that the Council considered Historic England's document entitled "Sustainability Appraisal and Strategic Environmental Assessment". Following a review of this document, the Council has chosen a separate and specific objective on the historic environment (SA Objective 12) in accordance with paragraph 2.10 of the Advice Note 8.

2.3.11 Natural England's consultation response wished to see a move away from the reliance on the private car for transport. This matter is covered by SA Objective 14.

2.3.12 A consultation response from GVA required the Council to produce and keep up to date throughout the plan-making process, a new Sustainability Appraisal. This is accepted. However, the request that the Council should take care to consider whether certain measures of sustainability should be afforded more weight in the overall planning balance (e.g. because they are more important / significant and deliver more economic, social or environmental gains than other measures) is not accepted. Sustainability is, in itself a balancing act and additional weighting is not appropriate.

2.3.13 Similarly, the suggestion that the SA should also factor in the ability of the Council and developers to mitigate adverse impacts, is not accepted until full details of site and proposals are known. This approach accords with the Court of Justice of the European Union judgment on HRA, which is linked with this SA, as the principle of assessing plans at a base level seems appropriate.

2.3.14 The latest Authority Monitoring Report (2018) has the following findings with possible implications for this SA:-

- the weekly earnings by workplace within Lichfield District are lower than the regional and national figures. This highlights the significant amount of out migration of workers from the District to higher salaried jobs elsewhere with travel implications.
- There was an increase in fatal road related casualties in 2017.
- The average density of completions has decreased this year when compared to the previous year as a result of over 80% of completions being 2, 3 and 4 bed houses. Whereas in previous years flatted and/or apartment schemes have led to a higher than average densities being recorded. This is contrary to current Government policy.
- The Southern Staffordshire Districts Housing Needs Study and Strategic Housing Market Assessment published in May 2012 identified variations in the dwellings mix within the District. It identifies an imbalance of housing types across the District with high concentrations of larger, detached properties and a lack of smaller affordable dwellings.
- Lichfield District has an identified deficit of affordable and social housing, particularly in the main urban areas of Lichfield City and Burntwood.
- There has been no new employment development within the Districts town centres this financial year.
- No new environmental improvement schemes have been completed in the 2017/2018 financial year.

2.4 Stage B – Developing and Refining options and assessing effects

- 2.4.1 A Sustainability Appraisal (SA) should meet all of the requirements of the Strategic Environmental Assessment (SEA) Directive and the Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 12 (2) of the 2004 Regulations states that where an environmental assessment is required an environmental report shall be prepared to "*identify, describe and evaluate the likely significant effects on the environment of –*
- (a) Implementing the plan or programme; and*
- (b) Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*
- 2.4.2 An assessment of 'reasonable' alternatives to the selected plan is required to meet the requirements of Regulation 12 of the 2004 Regulations and in doing so, identify and evaluate their sustainability impacts. The Regulations imply that alternatives that are not reasonable do not need to be subject of the SA process. For the purposes of the SA it is assumed that unreasonable alternatives including policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.
- 2.4.3 The Lichfield District Local Plan Review: Scope, Issues and Options identified six broad spatial options for the distribution of housing growth and economic growth. These options were considered the '*reasonable alternatives*' for the purposes of that SA. The six spatial options were:
- Residential Growth Option 1 – Town focused development;
 - Residential Growth Option 2 – Town and Key Rural Villages Focused Development;
 - Residential Growth Option 3 – Dispersed Development;
 - Residential Growth Option 4 – New Settlement Development;
 - Employment Growth Option 1 – Expansion of existing employment locations; and
 - Employment Growth Option 2 – New Locations
- 2.4.4 Based on the finding of the SA for the Lichfield District Local Plan Review: Scope, Issues and Options and consultation responses the Council has identified a **Preferred Option for Growth**. The preferred option will focus new homes on sustainable settlements identified in the preferred settlement hierarchy with growth attributed in accordance with the level of the hierarchy i.e. larger levels of growth in settlements such as Lichfield and Burntwood. The Preferred Option for Growth will focus employment growth on existing employment areas within Lichfield, Burntwood and at Fradley Park.
- 2.4.5 In terms of the quantum of growth, the Lichfield District Local Plan Review: Preferred Options and Policy Directions sets out seven potential housing requirements, namely:

Option	Annual Requirement	Plan Period Requirement (2016 - 2036)
Option 1 - Local Housing Need only	333	6,660
Option 2 – Local Housing need plus 1,000 home contributions	383	7,660
Option 3 – Local Housing need plus 2,000 home contributions	433	8,660
Option 4 – Local Housing need plus 3,000 home contributions	483	9,660
Option 5 – Local Housing need plus 4,500 home contributions	558	11,160
Option 6 – Local Housing need plus 10,000 home contributions	833	16,660
Option 7 – Local Housing need plus 19,000 home contributions	1,283	25,660

2.4.6 Lichfield District Council has also considered an alternative policy options against not implementing the plan. This 'no development' option will result in the Council relying on extant local plan policy until it becomes out of date and national guidance only. It is acknowledged that this option is not supported by the Government and also does not give the Council control over the quantum or direction of future growth or the delivery of associated infrastructure requirements but represents a reasonable alternative. Policies and policy directions have been assessed against a no development option in order to provide a 'baseline' or fall back environmental state as required by the Strategic Environmental Assessment Directive. This option is not the Council's preferred option and fails to deliver Government's planning policy objectives.

2.4.7 The options set out above are considered to be the '*reasonable alternatives*' in this SA. The above options are considered in more detail in Section 4.

2.5 Defining 'Significant effects'

2.5.1 An important factor to be identified as part of the scoping exercise of the environmental report prepared under the 2004 Regulations is the definition of '*likely significant effects*'. The 2004 Regulations (Schedule 1) specify the criteria that should be taken into account when determining likely significant effects. These criteria, which principally relate to the characteristics of the effects arising from the plan and the value and vulnerability of the area likely to be affected, are summarised as follows:

- How valuable and vulnerable is the area that is being impacted?
- What is the duration and how probable, frequent, long lasting and reversible are the effects?
- What is the magnitude and spatial scale of the effect?
- What is the cumulative nature of the effects?

2.5.2 Further detail on the nature of the significant environmental issues and the duration of effects to be assessed in the Environmental Report is provided at Schedule 2 of the 2004 Regulations which states that the likely significant effects on the environment include:

"issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects".

2.5.3 Whether an effect is significant or not is the product of two factors:

- The value of the environmental resource affected; and
- The magnitude of the impact.

2.5.4 A significant effect arises as a result of a minor impact on a resource of national value or a major impact on a resource of local value. In addition, the accumulation of many non-significant effects on similar local resources geographically spread throughout the scheme may give rise to an overall significant effect.

2.5.5 This approach to assessing and assigning significance to an environmental effect relies upon such factors as legislative requirements, guidelines, standards and codes of practice, consideration of the SA/SEA Regulations, the advice and views of statutory consultees and other interested parties and expert judgement. Based on the above, the following questions are relevant in evaluating the significance of potential environmental effects:

- Is the effect positive or negative?
- Which risk groups are affected and in what way?
- Is the effect reversible or irreversible?
- Does the effect occur over the short, medium or long term?

- Is the effect continuous or temporary?
- Does it increase or decrease with time?
- Is it of local, regional, national or international importance?
- Are national standards or environmental objectives threatened?
- Are mitigating measures available and is it reasonable to require these?

2.5.6 Each spatial option was assessed (guided by the above questions) to identify the potential impact on the SA objectives. A combination of expert judgment, analysis of baseline data (contained in the Scoping Report 2017) and the definitions set out below were used to judge the potential significance of the specified effect on the plan’s objectives.

2.6 Definitions

2.6.1 The following definitions are used in this Environmental Report:

Duration of Effects

2.6.2 The duration of environmental effects in this SA are defined as follows:

- Short-term 0-5 years
- Medium-term 6-10 years
- Long-term 11 years plus

Nature of Effects

2.6.3 In assessing significance account will be taken as to whether effects are:

Effect	Description
Positive effects	Effects that have a beneficial influence on the environment;
Negative effects	Effects that have an adverse influence on the environment;
Indirect/secondary effects	Effects that are due to activities that are not part of the specific plan proposal/policy;

Permanent effects	Effects will have an unchanging impact on the plan proposal/policy;
Temporary effects	Effects that are a consequence of a limited effect of the plan proposal/policy;
Synergistic (effects combining)	Combined effects or interactive effects are the result of impact interactions between the plan proposals/policies. Assessment of the individual proposal/policy effects may be insignificant but Combined the effects can have an overall significant impact;
Cumulative effects	Cumulative effects are the result of the interaction between effects associated with the plans proposals/policies.

2.7 **Assessing effects**

- 2.7.1 SA is a powerful tool in the development and refinement of development plan document options. The assessment provides a means by which the relative merits of the individual options can be assessed. The appraisal process seeks to ascertain the environmental, social and economic effects of each option as well as the identification of mitigation or enhancement to be included in the emerging Local Plan Review. This assessment process is done in the context of the level of information that is currently available for each site and so represents a desk based assessment. However, recommendations put forward at each stage have helped to refine and enhance the sustainability performance of the options.
- 2.7.2 This stage offers the opportunity to review the preferred spatial options against the initial spatial options set out in the Lichfield District Local Plan Review: Scope, Issues and Options, backed up against the Sustainability Objectives developed at the scoping stage. Each of the options were tested against the sustainability objectives developed for the purposes of the Sustainability Appraisal.
- 2.7.3 The assessment considers the effects of the preferred policy or site on the environment. The performance of each site option was scored using the following six-point scale:

Score	Description
++	Option likely to result in a significant positive effect
+	Option likely to result in a minor positive effect
N	Neutral (neither positive or negative significant effect)
?	The impact between the option and SA objective is uncertain
-	Option likely to result in a minor negative effect
--	Option likely to result in a significant negative effect

2.7.4 The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

2.7.5 The full appraisal results are set out in the matrixes presented at Appendix B for each option considered in this SA. Each matrix contains a summary of the overall environmental effects. A summary of the appraisal results is presented at Section 4.

Assumptions

2.7.6 The assessment was based on available information in respect of each sites, policies and options considered, and has been based on the SA team's judgement. In order to ensure consistency in the appraisal of the options a set of appraisal questions were developed to enable the SA team to consider each effect within clear parameters. Where mitigation measures have been proposed within the appraisal table, the long-term effects have been assessed on the basis that the mitigation measures have been applied. The appraisal questions are set out in the table below:

SA Objective	Questions
1. To provide housing to meet local need including provision of affordable homes.	1 Will the site deliver affordable housing?
	2 Will the site use previously developed land or buildings?
	3 Will it give a high housing yield?
	4 Will the site meet local need?
2. To promote safe communities and reduce fear of crime	5 Will the site meet cross boundary and/or neighbouring needs?
	1 Will it reduce crime through design measures?
3. Improve access to health facilities and promote wellbeing.	2 Will it contribute to a safe built environment?
	1 Will it improve accessibility to health care for existing residents (including older residents) and provide additional facilities for new residents?
	2 Will it support wellbeing including opportunities for recreational/physical activity?
	3 Will it provide new accessible green space?
4. Maximise the use of previously developed land/ buildings and encourage the efficient use of land	1 Will it result in the loss of land that has not previously been developed?
	2 Is the site capable of supporting higher density development and/or a mix of uses?
	3 Does the site allow for the re-use of existing buildings?
	4 Will it reduce the amount of derelict, degraded and underused land within the District?
5. To improve educational attainment of the working age population.	1 Will it reduce the number of working age residents who have no, or lower level qualifications?
6. To achieve stable and sustainable levels of economic growth and maintain economic competitiveness.	1 Will it encourage higher skilled economic sectors in the District?

	2 Will it encourage new employment that is consistent with local needs?
	3 Will it encourage growth of existing businesses?
	4 Will it encourage small businesses to grow?
7. To reduce water and air pollution.	1 Which Source Protection Zone does the development fall within?
	2 Does the site fall within the River Mease SAC?
	3 Is the site within or directly connected by road to an AQMA?
8. To minimise waste and increase the recycling and reuse of waste materials.	1 Will it reduce household and/or commercial waste?
	2 Will it increase waste recovery and recycling?
	3 Will it reduce the proportion of waste sent to landfill?
9. To reduce and manage flood risk and surface water run-off.	1 Is the site located outside an area of risk from flooding?
	2 Will there be an opportunity for flood risk reduction?
10. To reduce and manage the impacts of climate change and the Districts contribution to the causes.	1 Will it reduce the causes of climate change?
	2 Will it encourage prudent use of energy?
	3 Will it provide opportunities for additional renewable energy generation capacity within the District?
11. To promote biodiversity protection enhancement and management of species and habitats.	1 Will it conserve protected/priority species?
	2 Will it conserve protected/ priority habitats and local nature conservation sites?
	3 Will it protect statutory designated sites?
	4 Will it encourage ecological connectivity (including green corridors and water courses)?
12. To ensure the protection and enhancement of the historic environment and its setting.	1 Will it preserve and enhance buildings and structures and their settings and contribute to the Districts heritage?

	2 Will it improve and broaden access to, and understanding of, local heritage , historic sites, areas and buildings?
	3 Will it preserve and enhance conservation areas including their setting?
	4 Will it offer opportunities to bring heritage assets back into active use?
13. Protect, enhance and manage the character and quality of the landscape and townscape.	1 Will it achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality?
	2 Does it value and protect diverse and locally distinctive settlement and townscape character?
	3 Does it safe guard historic views and valuable skylines of settlements?
	4 Is the site within a main settlement or a key rural settlement?
	5 Is the site within close proximity to key services (e.g. Schools, food shops, public transport, health centres etc.)?
14. To increase opportunities for non-car travel and reduce the need for travel.	1 Does the site location encourage the use of existing or provide sustainable modes of travel?
	2 Will it reduce the overall impact on traffic sensitive areas?
	3 Will it help develop walking cycling rail and bus networks to enable residents access to employment, services and facilities?

2.7.1 Further details on the assumptions used in this SA are set out at Section 5.2 of this report.

Difficulties Encountered

2.7.2 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process. During the appraisal of the various options the fact that options had not yet been worked up in detail (comprising only suggested policy approaches) meant that at times it was difficult to assess in detail the likely effects on each SA objective. Once the draft policies had been finalised it was possible to draw more certain conclusions about their likely effects.

2.7.3 Each of the individual matrices include, to a greater or lesser degree, specific mitigation. For the purpose of the SA it is assumed that the proposed mitigation is delivered and the SA objective is 'scored' accordingly. To ensure consistency we have assumed that an SA 'score' may only be increased by one place on the scoring matrix i.e. a negative effect is changed to a neutral effect as a result of mitigation.

2.8 Stage C – Prepare SA Report

2.8.1 The Publication Draft of the Lichfield District Local Plan Review will be accompanied by an SA report referenced at Stage C. The report outlines the significant effects on the environment, social and economic factors of the options Local Plan Review. The SEA Directive sets out at Article 5 and Annex I the information required to form part of the environmental report. This information is repeated as Schedule 2 of the 2004 Regulations.

2.9 Stage D – Consultation on SA Report

2.9.1 The SA report will be published for comment alongside the Lichfield District Local Plan Review: Submission. The consultation period will comprise a period of 8 weeks and will be undertaken in accordance with the Council's Statement of Community Involvement.

2.10 Stage E – Post adoption Reporting and Monitoring

2.10.1 The SEA Regulations require the significant environmental effects of plans and programmes to be monitored in order to identify at an early stage unforeseen adverse effects.

2.10.2 The Local Plan Review will set out a monitoring programme to identify if the policies and site allocations meet the overall Plan Objectives and Vision. This programme will allow the Council to monitor the success of individual policies and also monitor the baseline environmental, social and economic conditions of the Plan area. The results of the monitoring programme will be presented in the Authority Monitoring Report.

2.10.3 The final SA monitoring programme will be included in the SA adoption Statement (once the Local Plan Review is adopted) and this will reflect any changes made during the Examination Stage.

3.0 Sustainability Assessment – Context and Objectives

3.1 Lichfield District Local Plan Review: Preferred Options & Policy Directions

3.1.1 The Lichfield District Local Plan Review is a spatial development plan introduced by the Government under the Planning and Compulsory Purchase Act 2004 (hereafter referred to as the 2004 Act) as amended by the Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter referred to as the 2012 Regulations). The Act requires each Local Planning Authority (LPA) to prepare a Local Plan for its administrative area. Local Plans set out the spatial framework which largely determine where, how and what development takes place.

Sustainability Context – Plans, Policies and Programmes (Task A1)

3.1.2 The Lichfield District Local Plan Review is not prepared in isolation but is greatly influenced by other plans, policies and programmes and by broader sustainability objectives. The adopted plan needs to be consistent with international and national guidance together with relevant environmental protection legislation.

3.1.3 Appendix A of the Local Plan Review SA Scoping Report (2017) set out a comprehensive list of the policy documents that are relevant to the preparation of the Local Plan Review together with a summary of the relevance of each document to the Local Plan Review and, more specifically, this SA. This outline will be updated at each stage of the process and published online as part of the evidence base.

Key International plans, policies and programmes

3.1.4 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the "SEA Directive") and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Local Plan Review.

3.1.5 These processes have been undertaken in an iterative and integrated manner in tandem with the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated. This matter is discussed further at Section 3.5 of this report.

3.1.6 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however a complete list of the relevant international directives have been included in Appendix A of the Scoping Report (2017).

Key National plans, policies and programmes

3.1.7 Sustainable development is a cornerstone of Government policy in relation to planning and the use of land. The Government's approach to sustainable development is set out in the national strategy "Securing the Future". The Strategy, published in March 2005 focuses on five principles; Living within Environmental Limits, Ensuring a Strong, Healthy and Just Society, Achieving a Sustainable Economy, Promoting Good Governance and Using Sound

Science Responsibly. The Strategy identifies four key priority areas: Sustainable Consumption and Production, Climate Change and Energy, Natural Resource Protection and Environmental Enhancement, and Sustainable Communities.

3.1.8 The Government's general statements of planning policy are set out in the National Planning Policy Framework (NPPF) which establishes the policies and principles which should be taken into account in the preparation of development plans and consideration of individual proposals. The NPPF was revised in July 2018.

3.1.9 The NPPF highlights the economic, social and environmental roles of the planning system and planning's contribution towards a strong, responsive and competitive economy; strong, vibrant and healthy communities; and the protection of the natural, built and historic environment. These objectives are seen as mutually dependent and should be pursued in an integrated way.

3.1.10 The NPPF has at its heart a presumption in favour of 'sustainable development' "*so that sustainable development is pursued in a positive way*".

3.1.11 Paragraph 11 states that

"for plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".

3.1.12 Section 14 of the NPPF emphasises that sustainable development involves securing radical reductions in greenhouse gas emissions; minimising vulnerability and improving resilience to the impacts of climate change; and supporting the delivery of renewable and low carbon energy and associated infrastructure. The NPPF contains a sequential approach designed to direct new development towards areas with the lowest probability of flooding.

Conserving and Enhancing the Natural Environment

3.1.13 Section 15 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by, amongst other things:

- minimising impacts on biodiversity and providing net gains in biodiversity; and

- preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

Conserving and Enhancing the Historic Environment

- 3.1.14 Section 16 of the NPPF aims to conserve and enhance the historic environment and both designated and undesignated heritage assets and the general principle is that heritage assets should be conserved in a manner appropriate to their significance.
- 3.1.15 The NPPF states at paragraph 16 that "*Plans should be prepared with the objective of contributing to the achievement of sustainable development*".
- 3.1.16 Paragraph 32 of the NPPF specifically references the approach to the Sustainability Appraisal. Paragraph 32 states; "*Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)*".

Local Plans, policies and programmes

- 3.1.17 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Staffordshire and Lichfield District, and which provide further context for the emerging Local Plan Review. These plans and programmes relate to issues such as housing, employment land, transport, renewable energy and green infrastructure.

Summary

- 3.1.18 Based on the review of the relevant policies, plans and programmes the key sustainability issues and problems for the District were identified. These are set out in full in Appendix A.

3.2 Baseline information (Task A2)

- 3.2.1 The Sustainability evidence baseline for Lichfield District used for the purposes of this Assessment is set out Appendix B of the Scoping Report (2017) and is not repeated in this report. This sets out updated empirical data on all relevant economic, social and environmental factors. The baseline information provides the basis for identifying trends, predicting the likely effects of the Plan and monitoring its outcomes. This will be updated at each stage.

3.3 Relationship between the SA and HRA

- 3.3.1 In accordance with Article 6(3) of the EU Habitats Directive an assessment is required where a plan or project not directly connected to or necessary to the management of a European protected site for nature conservation (i.e. designated and proposed/candidate SPA's and SAC's sites) may give rise to significant effects upon a the designated site. The Habitats

Directive is primarily transposed in England under the Conservation of Habitats and Species Regulations 2010.

- 3.3.2 Lichfield District has two designated European sites within its boundary, namely Cannock Chase SAC and River Mease SAC. Lichfield District Council have prepared a Habitats Regulations Assessment of the Lichfield District Local Plan Review: Preferred Options to consider whether the options in the emerging plan are likely to have significant effects on European habitats or species. A HRA of the Lichfield District Local Plan Review is presented as a separate 'standalone' document.

4.0 Developing and assessing options and reasonable alternatives (Stage B)

4.1 Introduction

4.1.1 Regulation 12 (2) of the 2004 Regulations states that where an environmental assessment is required an environmental report shall be prepared to "*identify, describe and evaluate the likely significant effects on the environment of –*

(a) Implementing the plan or programme; and

(b) Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".

4.1.2 An assessment of 'reasonable' alternatives to the selected plan is required to meet the requirements of Regulation 12 of the 2004 Regulations and in doing so, identify and evaluate their sustainability impacts. The Regulations imply that alternatives that are not reasonable do not need to be subject of the SA process. For the purposes of the SA it is assumed that unreasonable alternatives include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.

4.1.3 The Lichfield District Local Plan Review: Scope, Issues and Options identified six broad spatial options for the distribution of housing growth and economic growth. These options were identified by the District Council for the purposes of that SA. The six spatial options were:

- Residential Growth Option 1 – Town focused development;
- Residential Growth Option 2 – Town and Key Rural Villages Focused Development;
- Residential Growth Option 3 – Dispersed Development;
- Residential Growth Option 4 – New Settlement Development;
- Employment Growth Option 1 – Expansion of existing employment locations; and
- Employment Growth Option 2 – New Locations.

4.1.4 Based on the finding of the SA for the Lichfield District Local Plan Review: Scope, Issues and Options and consultation responses the Council has identified a **Preferred Option for Growth and Policy Directions**. The Lichfield District Local Plan Review: Preferred Options & Policy Directions sequentially considers more detailed locations for housing in terms of settlement based directions for growth before identifying specific new housing sites as part of future stages of the Local Plan Review.

4.1.5 The preferred strategic approach to growth will see new homes focused on those sustainable settlements identified in the preferred settlement hierarchy. Growth will be attributed in accordance with the levels of the hierarchy, with larger levels of growth to those settlements higher in the hierarchy such as Lichfield and Burntwood. With regards to employment growth the preferred approach is to focus this on the existing employment areas within Lichfield, Burntwood and at Fradley Park.

4.1.6 The Council has also used current guidance to produce seven reasonable options for housing need requirements:-

- **Option 1: Local housing need only.**
(This option would provide only for the local housing need for the district with no contribution to the unmet need from within the housing market area.)
- **Option 2: Local housing need plus 1,000 home contribution.**
(This option uses the same approach as the current local plan which included provision of 1,000 dwellings to meet the needs arising from within the housing market area (specifically Cannock Chase and Tamworth).)
- **Option 3: Local housing need plus 2,000**
(Such an approach provides an annual requirement which is consistent with the current objectively assessed need for the district incorporated into the current local plan.)
- **Option 4: Local housing need plus 3,000**
(This option provides a reasonably significant contribution towards the unmet need and gives an annual requirement which is consistent with the current local plan's requirement of 478 dwellings per year.)
- **Option 5: Local housing need plus 4,500**
(This addition is the mid-point for the range given in the strategic growth study for the sustainable urban extension options.)
- **Option 6: Local housing need plus 10,000 home contribution.**
(This option would provide for local housing need established using the standard methodology plus a further 10,000 dwellings which related to the new settlement option identified within the strategic growth study.)
- **Option 7: Local housing need plus 19,000 home contribution.**
(This option would provide for local housing need established using the standard methodology plus a further 19,000 dwellings which is the total of the three options within the strategic growth study; 10,000 for a new settlement and two 4,500 sustainable urban extensions using the mid-point between the range set out for urban extensions within the growth study.)

4.1.7 The Council's preferred spatial options are, for residential growth in:

- Lichfield City, Burntwood, Little Aston, Tamworth, Armitage with Handsacre, Kings Bromley, Alrewas, Fradley, Whittington; Fazeley, Mile Oak & Bonehill, Shenstone, Stonnall and Hopwas.

4.1.8 These are the options for town & key rural village focussed development, defined as Residential Growth Option 2 at the Scope, Issues and Options stage, with the exceptions of the deletions of Rugeley, Brownhills and Norton Canes/Penkridge, and the additions of Kings Bromley and Hopwas from the dispersed development option (Residential Growth Option 3).

4.1.9 These options, taken together, were considered to meet the requirement for 'reasonable' alternatives in the 2004 Regulations.

4.1.10 The work undertaken by the Council to date suggests that further growth options should be explored. The strategic growth study and the high-level analysis of growth options has concluded that there are two specific areas for further exploration; these being growth to the north-east of Lichfield city and growth to the north of Tamworth.

4.1.11 Both these options were considered at the Scope, Issues and Options stage as part of Residential Growth Option 4 and scored more positively when compared with the other options. All options will need to be explored in much greater detail before it can be determined whether they are options to be included within the local plan review. Evidence will need to be collected and considered to help determine the final locations of growth.

5.0 Appraisal of 'significant' environmental effects associated with Lichfield Local Plan Review: Preferred Options & Policy Directions

5.1 Introduction

5.1.1 An appraisal of the policy options in the Lichfield Local Plan Review: Preferred Options & Policy Directions considered in this SA is contained at Appendix B. This section of the report summarises the findings of the Sustainability Assessment of the Lichfield Local Plan Review: Preferred Options & Policy Directions in respect of any significant effects associated with the SA objectives and also considers ways of mitigating adverse effects and any cumulative effects arising from the Local Plan Review as a whole. This accords with Tasks B3 and B4 of the five stage SA process.

5.2 Assumptions, uncertainties and difficulties

5.2.1 An appraisal of environmental effects inevitably relies on assumptions and an element of subjective judgement. As the Local Plan Review contains strategic policy directions there are no short, medium or long term effects associated with this stage of the Local Plan.

5.2.2 It is a requirement of the SEA Regulations that consideration is given to difficulties that are encountered during the SA process. This could include any data limitations or other the availability of other relevant assessments. This is noted in the individual option matrices. As the Local Plan Review evolves the evidence base for the document will expand and been refined resulting in a more robust understanding of the effects of the site options on the Sustainability Objectives.

5.2.3 If any other uncertain effects or difficulties have been encountered as part of the assessment process then these are noted under the relevant sections alongside the assessor's comments.

5.2.4 At this stage of Local Plan Review preparation the proposed spatial options do not have clear geographic boundaries and dimensions and therefore the effects of the spatial options on a number of the SA objectives could not be determined at this stage. For example, precise quantum of development in flood risk areas, the Green Belt and the landscape. These elements will be assessed in detail during the next stages of the Local Plan Review's evolution and the accompanying sustainability appraisal.

5.3 Lichfield Local Plan Review: Preferred Options & Policy Directions

5.3.1 The policies in the Local Plan Review Preferred Options and Policy Directions are set out as the broad themes or subject areas:

- Our spatial strategy.
- Our sustainable communities.
- Our infrastructure.
- Our sustainable transport.
- Our homes for the future.
- Our economic growth, enterprise and tourism.
- Our healthy & safe communities.

- Our natural resources.
- Our built and historic environment.

5.3.2 Each Policy has been assessed. A summary of the SA assessments are set out, in turn, below under the three SA objective groupings of environmental, economic and social effects, highlighting significant effects only as required by regulation. Further general summaries are included from paragraph 8.2.

5.3.3 **Preferred Policy Direction for Strategic policy: Our spatial strategy-** will set out the spatial strategy for all development within Lichfield District from 2016 to 2036. This will include the level of growth to be accommodated within the District and where that growth should be located. This is a preferred policy direction as additional work is taking place that will allow the council to conclude on the appropriate spatial strategy which will be included in the local plan review.

5.3.4 The spatial strategy was considered three reasonable scenarios based on Government policy-balanced growth subject to constraints such as Green Belt, meeting neighbour local planning authority needs, and provision above locally assessed need in order to follow market signals and boost economic growth. The Council is working to respond to these alternatives as evidence becomes available and therefore it is a policy direction.

Environmental: most effects are neutralised by existing policy and mitigation.

Economic: no significant effects until policy detail is known.

Social: all development options deliver homes and will meet local housing need and therefore has a positive effect on **SA Objective 1**. Meeting neighbouring Authority needs will impact upon the state of Lichfield District without mitigation such as infrastructure. Health facilities may benefit from planning obligations and additional population as mitigation for the growth resulting a positive effect on **SA Objective 3** although, again, meeting neighbouring Authority needs will add pressure on local provision.

5.3.5 **Preferred Strategic Policy: Securing sustainable development** is a preferred strategic policy for delivering sustainable development in Lichfield District.

Environmental: significantly supports efficient use of land (**SA Objective 4**), managing flood risk (**SA Objective 9**) and climate change cause (**SA Objective 10**).

Economic: significant support by being positive when appropriate.

Social: significantly supports homes and community safety.

5.3.6 **Preferred Strategic Policy: Sustainable development principles.** This policy sets out the key issues that all planning applications will need to address.

Environmental: significant positive effects on reducing water and air pollution (**SA Objective 7**), minimising waste (**SA Objective 8**), managing flood risk (**SA Objective 9**) and climate change (**SA Objective 10**).

Economic: no significant effect.

Social: significant positive effects on landscape and townscape (**SA Objective 13**), and travel (**SA Objective 14**).

- 5.3.7 **Preferred Policy Direction - Renewable energy.** This is a preferred policy direction for which three policy options were considered namely a flexible policy using criteria, site allocations, and the preferred option of identifying areas of opportunity on the policies map.

Environmental: the preferred option would have significant positive effects on the water and air pollution (**SA Objective 7**), flood risk (**SA Objective 9**) and climate change objectives (**SA Objective 10**).

Economic: significant support if sites were allocated due to more certainty of delivery.

Social: no significant effects.

- 5.3.8 **Preferred Policy Direction - Flood risk.** This is a preferred policy direction in line with Government policy, any new development should be directed away from those areas at highest flood risk, and its sustainability.

Environmental: will have a significant positive effect on the management of flood risk (**SA Objective 9**).

Economic: no significant effects.

Social: no significant effects.

- 5.3.9 **Preferred Policy Direction: Air quality.** This is a preferred policy direction ensuring that new development in air quality management areas are consistent with the Council's forthcoming air quality action plan.

Environmental: will have a significant positive effect on reducing air pollution (**SA Objective 7**).

Economic: no significant effects.

Social: no significant effects.

- 5.3.10 **Preferred Policy Direction: Delivering our infrastructure.** This is a preferred policy direction supporting the provision, in conjunction with other agencies, the delivery of appropriate infrastructure within new development.

Environmental: will have a significant positive effect on reducing water and air pollution (**SA Objective 7**), minimise waste (**SA Objective 8**) and managing flood risk (**SA Objective 9**).

Economic: significant positive effects on economic growth (**SA Objective 6**).

Social: significant positive effects on these objectives- homes provision (**SA Objective 1**), health/wellbeing (**SA Objective 3**) and educational attainment (**SA Objective 5**).

5.3.11 **Preferred Policy direction: Sustainable transport.** This is a preferred policy direction as, although some content is to be retained, additional up to date evidence, including from other agencies, will be required as part of the evolution of a new sustainable Transport Policy.

Environmental: no significant effects until evidence detail is known.

Economic: sustainable transport is essential to economic growth and thus will have a significant positive effect on **SA Objective 6**.

Social: no significant effects until evidence detail is known.

5.3.12 **Preferred Policy Direction - Our homes for the future - housing provision.** This is a preferred policy direction for a strategic housing need policy. The Government is currently consulting on the changes to planning policy and guidance including the standard method for assessing local housing need. In the meantime, the Council has used current guidance to produce seven reasonable options for housing requirements during the Plan Period. The seven options are:-

- Option 1: Local housing need only.
(This option would provide only for the local housing need for the district with no contribution to the unmet need from within the housing market area.)
- Option 2: Local housing need plus 1,000 home contribution.
(This option uses the same approach as the current local plan which included provision of 1,000 dwellings to meet the needs arising from within the housing market area (specifically Cannock Chase and Tamworth).)
- Option 3: Local housing need plus 2,000
(Such an approach provides an annual requirement which is consistent with the current objectively assessed need for the district incorporated into the current local plan.)
- Option 4: Local housing need plus 3,000
(This option provides a reasonably significant contribution towards the unmet need and gives an annual requirement which is consistent with the current local plan's requirement of 478 dwellings per year.)
- Option 5: Local housing need plus 4,500
(This addition is the mid-point for the range given in the strategic growth study for the sustainable urban extension options.)
- Option 6: Local housing need plus 10,000 home contribution.
(This option would provide for local housing need established using the standard methodology plus a further 10,000 dwellings which related to the new settlement option identified within the strategic growth study.)
- Option 7: Local housing need plus 19,000 home contribution.
(This option would provide for local housing need established using the standard methodology plus a further 19,000 dwellings which is the total of the three options within the strategic growth study; 10,000 for a new settlement and two 4,500 sustainable urban extensions using the mid-point between the range set out for urban extensions within the growth study.)

Environmental: Each of the proposed options will have potential significant effects on the use of previously developed land (**SA Objective 4**), positive where local need can be met within or adjacent to existing settlements, significant/minor negative effects for a new settlement probably requiring greenfield land. Other environmental effects are unknown until the precise locations are defined.

Economic: The provision of new homes are beneficial to economic growth (**SA Objective 6**). Each of the proposed options will result in a significant positive effect on this objective.

Social: Each of the proposed options will have potential significant effects on the provision of new homes and affordable housing (**SA Objective 1**). As the objective is based on the provision of local need, then options to provide for unmet need from neighbouring local planning authorities and go beyond the local needs of Lichfield objective, will put pressure on local infrastructure making overall delivery more difficult. Health facilities (**SA Objective 3**) may significantly benefit from the local need and new settlement options because of either links to existing infrastructure or economies of scale in providing necessary new facilities. Similarly, for educational resources (**SA Objective 5**) in a potential new settlement.

5.3.13 **Preferred Policy Direction: Our housing mix, including homes to meet specialist needs.** This is a preferred policy direction as the Council considers the components of housing need. Two affordable homes options are assessed- the current 40% policy and the Government's 10% minima. The benefit of mixed housing is assessed against market housing only, although it is acknowledged that, only on financially unviable sites, is affordable housing requirement absolved.

Environmental: The policy will have a potential significant effect on use of previously developed land (**SA Objective 4**), significant positive where local need can be met within or adjacent to existing settlements, significant negative for a new settlement probably requiring greenfield land.

Economic: The provision of new homes are beneficial to economic growth and will have a positive effect on economic growth (**SA Objective 6**).

Social: mixed housing significantly benefits the provision of homes to meet local needs (**SA Objective 1**) because it requires affordable homes for implementation. Market housing, however, is more financially viable for providing health facilities. A 40% affordable homes requirement is more likely to give educational access in appropriate locations for a sector of the population.

5.3.14 **Preferred Policy Direction: Density of housing development.** This a preferred policy direction seeking to set a range of housing density standards - higher around sustainable centres as current policy, thirty-five dwellings/hectare and variable standards for flexibility, and a broad density range for full flexibility.

Environmental: the policy will result in the efficient use of land and thus represents a positive effect on previously developed land (**SA Objective 4**).

Economic: no significant effect.

Social: the thirty-five dwellings/hectare and variable standards for flexibility option is considered to be the best opportunity for delivering housing by balancing design and viability. This option will also be flexible to fit design for landscape and townscape. The Policy will reduce the need to travel therefore resulting in a positive effect (**SA Objective 14**).

Preferred Policy Direction: Self-build and custom-build housing. This is a preferred policy direction supporting self-build and custom-build developments.

Environmental: no significant effects.

Economic: no significant effect.

Social: This policy will have a positive effect on the provision of new homes and affordable housing (**SA Objective 1**).

5.3.15 **Preferred Policy Direction: Provision for gypsies and travellers.** This is a preferred policy direction on the provision of gypsies and travellers pitches.

Environmental: no significant effects.

Economic: no significant effect.

Social: This policy will have a positive effect on the provision of new homes and affordable housing (**SA Objective 1**). Site allocations will be significantly beneficial by giving certainty on delivery for the housing need objective.

5.3.16 **Preferred Policy Direction for Strategic policy: Our employment and economic development.** This is a preferred policy direction for delivery of strategic economic growth in the District. The Policy accords with Employment Growth Option 1 assessed at the Local Plan Review: Scope, Issues and Options stage and involves the expansion of existing employment locations, and therefore the scope assessments are reproduced.

5.3.17 Other options considered for inclusion in the policy including- home-working, the rural economy, brownfield and greenfield development, and additional employment growth.

Environmental: the use of brownfield land will result in a significantly positive effect on the efficient use of land compared to other greenfield options (**SA Objective 4**).

Economic: This policy will have a positive significant effect on the provision of economic growth (**SA Objective 6**).

Social: Given the intrinsic link between housing and employment, site allocations will be result in a positive indirect effect on the delivery of housing (**SA Objective 1**).

5.3.18 **Preferred Strategic Policy: Our centres.** This is a preferred strategic policy for supporting town and other centres.

Environmental: no significant effects.

Economic: the policy will have a significant positive effect on the economic growth (**SA Objective 6**).

Social: The Policy will support centres and reduce the need to travel therefore resulting in a positive effect (**SA Objective 14**).

5.3.19 **Preferred Policy: Lichfield economy.** This is a preferred policy seeking to promote the economy of Lichfield City.

Environmental: potential significant positive effect on the use of previously developed land (**SA Objective 4**) and the historic environment (**SA Objective 12**).

Economic: this policy will result in a significant positive effect on economic growth (**SA Objective 6**).

Social: no significant effects.

5.3.20 **Preferred Policy: Burntwood economy.** This is a preferred policy seeking to promote the economy of Burntwood Town Centre.

Environmental: potential significant positive effect on the use of previously developed land (**SA Objective 4**)

Economic: this policy will result in a significant positive effect on economic growth (**SA Objective 6**).

Social: potential significant positive effect on educational attainment (**SA Objective 5**)

Preferred Policy Direction: Tourism. This is a preferred policy direction based on the existing adopted Policy which supports the growth of sustainable tourism in the District.

Environmental: no significant effects.

Economic: this policy will result in a Significant/Minor positive effect on economic growth (**SA Objective 6**).

Social: no significant effects

5.3.21 **Preferred Policy Direction: Healthy & safe communities** This is a preferred policy direction for community safety, community infrastructure and health infrastructure.

Environmental: no significant effects.

Economic: no significant effect.

Social: the policy will have a significant positive effect on access to health facilities /well-being (**SA Objective 3**) and community safety (**SA Objective 2**).

5.3.22 **Preferred Policy Direction: Open space and recreation** is a preferred policy direction seeking to protecting existing open space, sports and recreation buildings/land and seek to encourage and enhance existing facilities.

Environmental: no significant effects.

Economic: no significant effect.

Social: the policy will have a significant positive effect on reducing the need for travel through support for local facilities (**SA Objective 14**).

- 5.3.23 **Preferred Policy Direction: Our natural resources.** This is a preferred policy direction, for Green Belt and Local Green Spaces; Internationally important natural environments; natural and historic landscapes; water quality; biodiversity; and Green Infrastructure.

Environmental: The policy offers significant positive effects on climate change (**SA Objective 10**), biodiversity (**SA Objective 11**), and landscape and townscape (**SA Objective 13**).

Economic: no significant effect.

Social: no significant effects.

- 5.3.24 **Preferred Policy Direction: Historic and built environment** This is a preferred policy direction seeking to protect and improve the historic and built environment.

Environmental: The Policy offers significant positive effects on the historic environment (**SA Objective 12**), and landscape and townscape (**SA Objective 13**).

Economic: no significant effect.

Social: no significant effects.

- 5.3.25 **Preferred Policy Direction: High Quality Design** This is a preferred policy direction seeking the promotion of high-quality design in all new development.

Environmental: The policy offers significant positive effects on the climate change (**SA Objective 10**), biodiversity (**SA Objective 11**), historic environment (**SA Objective 12**), and landscape and townscape (**SA Objective 13**).

Economic: no significant effect.

Social: The policy offers a significant positive effect on community safety (**SA Objective 2**).

- 5.3.26 **Preferred Policy Direction: Evidence Supporting heritage proposals** This is a preferred policy direction seeking to ensure that proposals affecting a heritage asset (whether designated or no-designated) are supported by a Heritage assessment.

Environmental: The Policy offers significant positive effects on the historic environment (**SA Objective 12**), and landscape and townscape (**SA Objective 13**).

Economic: no significant effect.

Social: no significant effects.

- 5.3.27 **Preferred Strategic Options for Growth.** The preferred strategic options for growth derive from the most sustainable residential and employment growth options identified as part of the Local Plan Review: Scope, Issues and Options stage. The preferred strategic option for growth will see new homes focused on those sustainable settlements identified in the

preferred settlement hierarchy. Growth will be attributed in accordance with the levels of the hierarchy, with larger levels of growth to those settlements higher in the hierarchy such as Lichfield and Burntwood. With regards to employment growth the preferred approach is to focus this on the existing employment areas within Lichfield, Burntwood and at Fradley Park.

Environmental: Lichfield City will have a significant positive effect on the efficient use of land (**SA Objective 4**). Development around Rugeley may have a significant negative effect on the flood risk (**SA Objective 9**). Lichfield City and north of Lichfield may have significant negative effects on the historic environment objectives (SA Objective 12) due to their high heritage assets.

Alrewas and Kings Bromley have potential significant negative effects on the flood risk (**SA Objective 9**).

Economic: no significant effects or for the non-key villages.

Social: Lichfield City would have a significant positive effect on the educational attainment (**SA Objective 5**) due to the potential increase in access to its infrastructure, and on the travel objective due to its highest local accessibility (**SA Objective 14**). Fazeley and Streethay have accessibility to high level (hospital) existing health facilities and so there will be a significant positive effect on access to health facilities (**SA Objective 3**).

5.4 Cumulative Effects

- 5.4.1 Cumulatively, the town focused development residential growth options are the most sustainable, followed by the new settlement options, the town and rural focused development options, and the dispersed development option.
- 5.4.2 Cumulatively, the expansion of existing employment areas growth options are the most sustainable, ahead of the new locations options.

5.5 Conclusions

- 5.5.1 The precise location of new development is not identified in the Lichfield District Local Plan Review: Preferred Option & Policy Direction document, however the appraisal of the preferred options reveals positive effects on SA objectives.
- 5.5.2 Overall, the meeting local homes needs only option is the most sustainable, with options in town focused development being spatially the most sustainable for residential growth; and the expansion of existing employment areas growth options are the most sustainable employment growth options.
- 5.5.3 The delivery of new development in line with the preferred option is likely to deliver a critical mass of development to enable significant development contributions towards community and transport infrastructure.

6.0 Mitigation (Task B4)

6.1 Introduction

- 6.1.1 As the Lichfield District Local Plan Review develops a number of site specific and policy mitigation measures will be identified via the SA process.
- 6.1.2 This stage has suggested some mitigation measures as part of the assessments of the Policy Directions in order to emphasise best sustainability or make them acceptable. The Infrastructure Delivery Plan is seen to be a significant contributor to this aim. Sites could be selected from across the growth options as desired and combined if the most sustainable locations do not all fit into an assessed growth direction.
- 6.1.3 During the evolution of the Local Plan Review the evidence base will expand and more detailed environmental assessment work will be undertaken on each of the proposed site allocation options. The increased information will result in the identification of the specific items of mitigation and enhancement which will be fully considered in future SAs that accompany future stages of the Local Plan Review.

7.0 Monitoring (Task B5)

7.1 Introduction

- 7.1.1 The SEA Regulations state *"the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"*. The Environmental Report is required to provide information *"a description of the measures envisaged concerning monitoring"*. Monitoring proposals are designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 7.1.2 Monitoring will be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.
- 7.1.3 It is considered that the Sustainability Report on the Publication document is the appropriate stage to identify indicators.

7.2 Next Steps

- 7.2.1 This SA has been prepared to support the Lichfield District Local Plan Review: Preferred Option and Policy Directions Document. Consultation on this version of the initial stage of the Plan is taking place in January 2019.
- 7.2.2 Following consultation on the Plan, the District Council will take into account any consultation responses and the findings of sustainability appraisal during the preparation of the next stage of the Local Plan Review.

8.0 Conclusions

8.1 Introduction

8.1.1 This SA has considered the Preferred Option and Policy Directions each of the options in the Lichfield District Local Plan Review: Preferred Options and Policy Directions document against the agreed Sustainability Objectives agreed at Stage A of the SA process. The role of the SA process is to promote sustainable development by assessing the extent to which the emerging Local Plan Review, taken together, will help to achieve relevant environmental, economic and social objectives.

8.1.2 A combination of meeting local homes needs in town focused development with expansion of existing employment areas is the most sustainable development.

8.1.3 The delivery of new development under all of the options assessed in this SA are likely to deliver a critical mass of development to enable significant development contributions towards community and transport infrastructure.

8.1.4 Overall, the assessment concludes that the Spatial Options set out in the Lichfield District Local Plan Review: Preferred Options and Policy Directions document will generally result in a neutral to positive effect on the majority of the SA objectives, although site options each have sustainable merits and drawbacks.

8.1.5 The following conclusions are made on the sustainability of the Preferred Local Plan Policy Directions:

Preferred policy direction for Strategic policy: Our spatial strategy

8.1.6 The Policy will result in the efficient use of land (**SA Objective 4**) by utilising previously development land and buildings within the Settlement Hierarchy which will, in turn, reduce the need to travel (**SA Objective 14**)

Preferred strategic policy: securing sustainable development

8.1.7 Generally, having no policy would be significantly detrimental to sustainability. The policy has significant benefits on the homes, community safety, efficient use of land, economic, flood risk and climate change objectives; and no negatives; therefore having the policy is better than not.

Delivering Sustainable Development

8.1.8 The policy is generally positive with significant positive effects upon the pollution, waste, flood risk, climate change, landscape and townscape and travel objectives.

Preferred Policy Direction: Renewable Energy

8.1.9 No policy has generally negative effects, especially on the economic growth, pollution and climate change objectives.

8.1.10 Policy Map identifying areas of opportunity for renewable energy is the most sustainable option, significantly for the pollution, flood risk and climate change objectives, and no negative effects.

8.1.11 Site allocations would have significant positive effects on the economic growth objective, and the climate change objective shared with the Policy Map option but is less effective on flood risk and has question marks on some objectives which could be mitigated by site choices.

8.1.12 A flexible policy has some negative effects, significantly upon the historic environment objective.

Preferred policy: air quality

8.1.13 No policy would have mostly negative effects upon the objectives, significantly upon the pollution objective. A policy would have mixed effects upon the sustainability objectives with a significant positive effect on the pollution objective as would be hoped.

Preferred Policy Direction: Delivering our infrastructure

8.1.14 Generally, having no policy would have negative effects upon this objective, significantly on the homes, community safety, health, efficient use of land and economic growth objectives. The policy would have significant positive effects on seven objectives; and no negatives; therefore having the policy is better than not.

Preferred policy direction: sustainable transport

8.1.15 Generally this policy is positively sustainable, especially to the economic growth objective, with no negative effects.

Preferred policy direction for strategic policy: Our homes for the future - housing provision

8.1.16 The no development option for SEA has been considered under the our spatial strategy option for residential growth, therefore only development options are now considered.

8.1.17 The local housing need only option is the most sustainable, with no negative effects and significant benefits to the 'housing to meet local need including provision of affordable homes', 'improve access to health facilities and promote wellbeing', and 'maximising the use of previously developed land/ buildings and encouraging the efficient use of land' objectives.

8.1.18 The up to 4,500 home contributions options in the mid-range of sustainability.

8.1.19 The larger home contributions options are the least sustainable with significant negative effects on the community safety and crime, and the 'maximising the use of previously developed land/ buildings and encouraging the efficient use of land' objectives; although this is balanced by the significant positive effects on the 'improve access to health facilities and promote wellbeing' and 'improve educational attainment of the working age population' objectives.

Preferred policy direction: Our housing mix, including homes to meet specialist needs

Preferred policy direction: self-build and custom-build housing

8.1.20 Having a housing mix has significant positive effects on the housing provision and efficient use of land objectives. Having open market housing could have a significant benefit of generating finance for other planning obligations such as health facilities.

8.1.21 Other parts of the housing mix are generally positive but the only potential significant benefit is to high affordable housing through providing access to educational attainment.

Preferred policy direction: Density of housing development

8.1.22 The proposed thirty five dwellings per hectare or the specific density standard option has mostly positive effects on most objectives, significant with respect to the housing provision, use of previously developed land, landscape and townscape, and travel objectives. The current higher density around sustainable centres policy is also mostly positive but less so because of a lack of certainty without specific standards; and, to an even lesser extent, the broad density range option. The no density policy option is mostly negative or neutral with no positives. Therefore, a density policy is recommended.

Preferred policy: Provision for gypsies and travelers

8.1.23 No policy will have generally negative effects, significantly upon the homes provision and health objectives.

8.1.24 Site allocations are the most sustainable option, especially for the homes provision and health objectives, although they would have some uncertainties until sites are identified and they can be assessed.

8.1.25 The criteria and over-provision options are similar in effects and have some positives but no significant benefits.

Preferred policy direction for strategic policy: Our employment and economic development

8.1.26 This latest appraisal assesses the details of the policy which support the locational direction. Having no policy generally has neutral or negative effects, significant in respect of previously developed land use and economic growth objectives.

8.1.27 Home-working is generally positive across objectives but its significance is limited by its current limited scale relative to all employment and economic development.

8.1.28 Supporting the rural economy is marginally more positive than detrimental to sustainability, but significantly beneficial to economic growth objective. The minor negatives result from remoteness reducing accessibility.

8.1.29 Promoting brownfield development is significantly more beneficial than greenfield development, especially, of course, on use of previously developed land, with no negatives; whilst use of greenfield land would be marked by negative effects.

8.1.30 Additional economic growth has some negative effects but none significant, balanced by positive effects on economic related objectives.

Preferred strategic policy: Our centres

8.1.31 Generally, having no policy would have negative effects on sustainability objectives, significantly upon efficient use of land, economic growth, the historic environment and travel; with no positives. The policy would have generally positive effects and significant benefits on the economic growth and travel objectives; and no negatives; therefore having the policy is better than not.

Preferred policy: Lichfield economy

8.1.32 Generally this policy is positively sustainable, especially to the economic growth objective, with no negative effects.

Preferred policy: Burntwood economy

8.1.33 Generally this policy is positively sustainable, significantly to the efficient use of land, educational attainment, economic growth and travel objectives, with no negative effects.

Preferred Policy Direction: Healthy & Safe Communities

8.1.34 No policy will have a significant negative effect on the health objective. The policy will have significant positive effects on the health and community safety objectives.

Preferred Policy Direction: Open Space and Recreation

8.1.35 Generally, having no policy would have negative effects on sustainability objectives; with no positives. The policy would have generally positive effects and significant benefit on the travel objective; and no negatives; therefore having the policy is better than not.

Preferred policy direction: Our natural resources

8.1.36 Generally, having no policy would have negative effects on sustainability objectives, significantly upon the climate change and biodiversity objectives; with no positives. The policy would have mostly positive effects and significantly for the climate change, biodiversity, and landscape and townscape objectives; therefore having the policy is better than not.

8.1.37 **Preferred Policy Direction : Cannock Chase Special Area of Conservation**

8.1.38 Generally, having no policy would have negative effects on sustainability objectives, significantly upon the biodiversity objective; with no positives. The policy would have mostly positive effects and significant benefits on the biodiversity and travel objectives as hoped; therefore having the policy is better than not.

8.1.39 **Preferred Policy Direction historic and built environment**

8.1.40 Generally, having no policy would have negative effects on sustainability objectives, significantly upon the historic environment and landscape and townscape objectives; with no positives. The policy would have mostly positive effects and significantly for the historic environment and landscape and townscape objectives as expected; therefore having the policy is better than not.

Preferred Policy Direction: High Quality Design

8.1.41 Generally, having no policy would have negative effects on sustainability objectives, significantly upon the community safety, historic environment and, landscape and townscape objectives; with no positives. The policy would have mostly positive effects and significantly for the community safety, climate change, biodiversity, historic environment, and landscape and townscape, and travel objectives as expected; therefore having the policy is better than not.

Preferred Policy Direction: Evidence supporting heritage proposals

8.1.42 Having no policy would have some negative effects on sustainability objectives, significantly upon the historic environment and its setting objective; with no positives. The policy would have some positive effects and significantly for the historic environment and its setting objective; therefore having the policy is better than not.

Preferred Option for Growth

- 8.1.43 Our preferred strategic options for growth generally derive from the most sustainable residential and employment growth options from the scope, including town focused Lichfield City, Brentwood, north and north-west of Tamworth, and Little Aston, and Armitage with Handsacre, Kings Bromley, Alrewas, Fradley, Whittington, Fazeley, Mile Oak & Bonehill, Shenstone key rural settlements. However, the addition of Hopwas and Stonnall from the dispersed option would share the generally negative effects, significantly so on the travel objective.
- 8.1.44 The preferred areas for employment growth derive from the most sustainable existing employment areas Option 1 at the Local Plan Review: Scope, Issues and Options stage.

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Appendix A – Key Sustainability Issues identified in the Scoping Report (December 2017)

Scoping Report Topics	Sustainability Issues	Likely Evolution without the Plan
Population, Housing and Communities	<p>Lichfield has a higher elderly population, 5% higher than the national average. Over 65s already outnumber the under 15s.</p> <p>Significant growth in people over 65 and 85 is projected between 2015 – 2025.</p> <p>The working age population has decreased by 3% since 2010 which is higher than both the regional and national average.</p> <p>Average house price in Lichfield is considerably more expensive when compared to the regional and national averages. The lowest quartile house price is 6.72 times the lowest quartile income.</p> <p>Crime in the District has increased by 16.1% when compared to the previous 12 months. There has been an increase of burglary from dwellings, other violence against the person and public order offences.</p> <p>There has been a decrease in the proportion of completions on brownfield land, although the majority of development still occurs on brownfield land.</p>	<p>Services and infrastructure unable to keep up with requirements of an ageing population, leading to communities without access to required infrastructure and service's.</p> <p>A less co-ordinated approach to housing and delivery and risk of undersupply of affordable housing.</p> <p>Population forced to move out of District to have access to affordable housing</p> <p>Risk the ability for communities to interact and remain inclusive. Reduce the ability to create environment where crime and disorder and the fear of crime does not undermine quality of life or community cohesion.</p>
Health and Inequalities	<p>Higher than national average number of working age people having no qualifications. The District has a lower proportion of working age adults qualified to NVQ Level 4 than the national average.</p>	<p>The population will be less likely to contribute to and enable the reinforcement of a strong competitive economy.</p> <p>The district will be unable to proactively meet development needs of business and support a fit economy.</p>

	<p>Although Lichfield has a higher life expectancy and healthy life expectancy than the national average, residents can still expect to spend a large number of years in ill health. There is also some disparity between wards.</p> <p>A high rate of obesity can be seen in the District, from an early age through to adulthood.</p>	<p>A Local Plan can ensure the built environment contributes to delivering health benefits and supports the wellbeing of a population. Without a Plan developments are less likely to provide accessible open space or other infrastructure requirements that will have a positive impact on health and wellbeing.</p>
Economy and Employment	<p>High level of out commuting by residents of the District.</p> <p>Disparity between the gross weekly pay of residents in the District and those whose workplace is within the District.</p> <p>Both Lichfield City Centre and Burntwood Town Centre have the lowest vacancy rates in a number of years, with 19 out of 302 shops in Lichfield City Centre and 3 out of 67 in Burntwood being vacant.</p>	<p>Fewer residents being employed within the District leading to a lack of a skilled workforce and a strong competitive economy.</p> <p>Less co-ordinated approach to new employment and commercial infrastructure leading to the impediment of sustainable growth.</p> <p>Place at risk the continued vitality of our town centres to remain competitive providing customer choice access to services and facilities.</p>
Townscape and Historic Environment	<p>There are 21 conservation areas within the District, a total of 16 scheduled ancient monuments, a registered historic park and garden and 762 listed buildings of which 12 are Grade I, 63 are Grade II* and 687 Grade II. 17 listed buildings are on the 'Buildings at risk survey' with 4 of those being Grade I and II*.</p> <p>Within Lichfield there are many rural villages that are set within a varied and attractive rural area.</p>	<p>Loss of heritage assets due to a less co-ordinated approach to housing and delivery.</p> <p>Uncontrolled or unsympathetic development could harm local landscape and townscape character.</p>

Landscape and Ecology	Lichfield supports a variety of wildlife rich habitats and species, with 2 SACs, 4 SSSIs, an AONB, and 78 Sites of Biological Interest. Areas within the District are at risk of pluvial and fluvial flooding.	Lack of local protection could lead to a degradation and loss of valued landscapes.
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	<p>Within the District there is a large amount of high quality agricultural land, in particular Grades 2 and 3.</p>	<p>Lack of strategic oversight leading to inappropriate development, damaging Districts valuable habitats and species.</p> <p>Potential risks from inappropriately located development.</p>
<p>Transport and Movement</p>	<p>Public transport provision across the District is variable.</p> <p>3% of employed residents commute by rail, which is the highest in Staffordshire.</p> <p>49.1% of residents commute out of the District to work. Lichfield District also has one of the highest rates of car drivers at 75%.</p> <p>In Lichfield City 83% of households are within 350 metres of a half hourly or better weekday bus service. Some settlements are limited to just 1-2 bus services a week with some rural villages having no bus service at all.</p>	<p>A less strategic overview of development and infrastructure delivery may occur.</p> <p>Necessary highway infrastructure may not be strategically implemented.</p> <p>Ensure that new development is in accessible locations that reduce the need to travel.</p> <p>Ensuring that new growth is integrated with new transport infrastructure.</p>
<p>Climate, Energy and Waste</p>	<p>Traffic continues to compromise air quality in the AQMA.</p> <p>50.65% of all household waste was recycled in 2015/16 which is above the EU target of 50% of waste being recycled by 2020.</p> <p>Over a ten year period average domestic consumption has decreased by 26% in Lichfield which is larger than both the regional (-22%) and national (-12%) figures.</p> <p>Bring up water to a 'good quality' rating in line with Environment Agency objectives.</p>	<p>Without a strategic approach to development and infrastructure, existing issues of air quality may be exacerbated.</p> <p>Positive trends could be reversed reducing the ability of the District to contribute a low carbon future.</p> <p>A Local Plan can provide further support in the long-term approach to climate change mitigation and adaption. Therefore, without a Local Plan development may be less ambitious in its energy performance.</p>

Appendix B - Assessments of the Preferred Options & Policy Directions

Score	Description
++	Option likely to result in a significant positive effect
+	Option likely to result in a minor positive effect
N	Neutral (neither positive or negative significant effect)
?	The impact between the option and SA objective is uncertain
-	Option likely to result in a minor negative effect
--	Option likely to result in a significant negative effect

Preferred policy direction for Strategic policy: Our spatial strategy

Sustainability Objective	No development	Balanced growth- Urban & Key Rural Settlements	Plus neighbour needs	Above need for market signals	Appraisal Comments
<p>To provide housing to meet local need including provision of affordable homes.</p>	--	++	-	++	<p>Providing everyone with an opportunity to live in a decent and affordable home is a key objective of the Lichfield Local Plan Review (Strategic Objective 6). There is a shortage of affordable housing in the district.</p> <p>No growth would have a significant effect by not meeting local need especially for those who cannot afford to live in the district in existing stock.</p> <p>By definition, helping to meet neighbouring lpa needs is not meeting local need but there may be some benefit if in-migrants work locally and boost the local economy.</p> <p>Responding to local market signals would meet not just basic need but also latent demand to live in an attractive district.</p> <p>The preferred balanced growth option is a significantly beneficial one in that it would meet exactly local need.</p>
<p>To promote safe communities and reduce fear of crime</p>	+	N	-	-	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Crime and anti-social behaviour could further increase due to the anticipated levels of growth in all three growth options. Strategic Objective 11 seeks to ensure a high standard of community safety and thus the preferred growth option will need to include reference to specific measures, including designing out crime and investment in local policing, to minimise crime and fear of crime. On this basis, the preferred growth option will have a neutral effect on this sustainability objective.</p> <p>A no development option would maintain the status quo on crime rate.</p> <p>Taking neighbouring district's needs increases crime opportunities but is small risk relative to the overall situation and therefore insignificantly negative.</p>

Preferred policy direction for Strategic policy: Our spatial strategy

Sustainability Objective	No development	Balanced growth- Urban & Key Rural Settlements	Plus neighbour needs	Above need for market signals	Appraisal Comments
Improve access to health facilities and promote wellbeing	N	++	+	++	<p>Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities therefore all of the residential growth options will have a positive effect on this sustainability objective. No future development would prevent the opportunity for health-related regeneration.</p> <p>Balanced growth and above need development offer the opportunity for a significant positive effect. Helping to meet neighbour needs would mean relatively lower level of investment/resources for health and leisure related facilities for that need and thus will only have a minor positive effect on this sustainability objective.</p> <p>The IDP will mitigate on this objective.</p>
Maximise the use of previously developed land/ buildings and encourage the efficient use of land	--	+	+	-	<p>No development would miss the opportunity to positively use previously developed land and thus will have a significant negative effect on this sustainability objective.</p> <p>Balanced growth seeks to focus development within or adjacent to the settlement boundaries of the Towns and Key Villages. This will include previously developed land but also open land outside the settlement boundaries; however, this approach will ensure that land is used efficiently and thus represents a minor positive effect on this sustainability option. Meeting neighbour needs may have a similar effect on this sustainability objective depending upon development locations and whether the growth can be accommodated on previously developed land . There may be opportunities for cross boundary locations on neighbouring previously developed land.</p>

Preferred policy direction for Strategic policy: Our spatial strategy

Sustainability Objective	No development	Balanced growth- Urban & Key Rural Settlements	Plus neighbour needs	Above need for market signals	Appraisal Comments
					Above need growth may put pressure on to focus new development outside of existing settlement boundaries on open land. This option, therefore, represents a negative effect on this sustainability objective.
To improve educational attainment of the working age population	-	+	+	+	All growth options have the potential to indirectly improve education attainment providing new education investment/facilities are brought forward if brought forward within a mix of uses in conjunction with the residential development. No development negates the opportunity for improvement.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	--	+	+	+	<p>All growth options have the potential to indirectly improve economic growth in the District by providing employment in the housing building sector and within a mix of uses being brought forward in conjunction with the residential development. The policy explicitly promotes integrated development to prevent unsustainable out-commuting.</p> <p>No development would stagnate the local economy and possibly export growth.</p> <p>The promotion of economic prosperity is a strategic objective of the Local Plan Review (Strategic Objective 8). The development of all the Growth Options will contribute to this sustainability objective and represents a minor positive effect.</p>
To manage water availability and reduce	N	N	N	N	Specific measures relating to the management of water availability and the minimisation of water or air pollution levels have been considered in the Lichfield District Local Plan Review: Core Policy 3.

Preferred policy direction for Strategic policy: Our spatial strategy

Sustainability Objective	No development	Balanced growth- Urban & Key Rural Settlements	Plus neighbour needs	Above need for market signals	Appraisal Comments
water and air pollution					Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will not result in water or air pollution. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.
To minimise waste and increase the recycling and reuse of waste materials	N	+	+	+	<p>Specific measures relating to the minimisation of waste and recycling have been considered in the Lichfield District Local Plan Review: Core Policy 3. This is an important consideration as waste arisings will inevitably increase due to the increase in the District's households and economic activity, which it is hoped CP3 will mitigate.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will provide facilities to allow the recycling of materials. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the growth options represent a positive effect on this sustainability objective.</p> <p>A no development alternative would maintain the current situation.</p>
To reduce and manage flood risk and surface water run off	N	N	N	N	<p>Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change.</p> <p>The spatial options of the Lichfield District Local Plan Review: Preferred Options document do not have geographic boundaries and therefore impacts on flood risk areas cannot be fully assessed at this stage. The future stages of the Sustainability Appraisal of the Local Plan Review will assess flood risk in detail. Development under all options will inevitably increase impermeable surfaces resulting in increased water run-off and potential pollution of water courses.</p>

Preferred policy direction for Strategic policy: Our spatial strategy

Sustainability Objective	No development	Balanced growth- Urban & Key Rural Settlements	Plus neighbour needs	Above need for market signals	Appraisal Comments
					Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development is accompanied by initiatives to reduce run off. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	N	N	N	N	<p>Strategic Objective 3 seeks to minimise the effect of new development, required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change.</p> <p>Mitigating the effects of climate change is a 'cross discipline' issue and existing policies in the Lichfield Local Plan Strategy, especially Core Policy 3, seek to address this sustainability objective in the context of promoting sustainable development. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
To promote biodiversity protection enhancement and management of species and habitats	N	N	N	N	<p>All growth options have the potential to impact negatively on the District's biodiversity assets in both the urban and countryside areas but also offer the opportunity for significant ecological enhancement and habitat creation. Ultimately impacts on the biodiversity will depend on quantum of new land take together with the location and design of the proposed growth areas.</p> <p>Existing Policy NR3 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse effect on biodiversity, protected species or their habitats. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the growth</p>

Preferred policy direction for Strategic policy: Our spatial strategy

Sustainability Objective	No development	Balanced growth- Urban & Key Rural Settlements	Plus neighbour needs	Above need for market signals	Appraisal Comments
					options. Based on the above, all the options represent a neutral effect on this sustainability objective.
To ensure the protection and enhancement of the historic environment and its setting	-	N	N	N	<p>All growth options have the potential to result in negative impacts on the historic environment, including archaeological remains, and their settings.</p> <p>The spatial options Lichfield District Local Plan Review: Preferred Options document do not have specific geographic boundaries and therefore impacts on the historic environment cannot be assessed at this stage.</p> <p>Existing Core Policy 14 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse impact on the built or historic environment. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the growth options. Based on the above, all the growth options represent a neutral effect on this sustainability objective.</p> <p>The no development option would have a negative effect as there would be no opportunity for enhancement of the historic environment.</p>
Protect, enhance and manage the character and quality of the landscape and townscape	-	N	N	N	<p>All growth options have the potential to impact negatively on the District's landscape and townscape. Ultimately impacts on the landscape and townscape will depend on quantum of new land take together with the location and design of the proposed growth areas. The spatial options Lichfield District Local Plan Review: Preferred Options document does not have specific geographic boundaries and therefore impacts on the landscape and townscape cannot be fully assessed at this stage.</p> <p>Strategic Objective 12 seeks to protect and enhance the quality and character of the District's landscape character including the openness of the Green Belt. Existing policies in the Lichfield Local Plan Strategy seek to ensure</p>

Preferred policy direction for Strategic policy: Our spatial strategy

Sustainability Objective	No development	Balanced growth- Urban & Key Rural Settlements	Plus neighbour needs	Above need for market signals	Appraisal Comments
					<p>that new development does not result in an adverse effect on the landscape and townscape of the District. These policies will be taken forward into the Local Plan Review and thus the implementation of the policies will apply to all the growth options. Based on the above, all the growth options represent a neutral effect on this sustainability objective.</p> <p>The no development option would have a negative effect as there would be no opportunity for enhancement of the character and quality of the landscape and townscape.</p>
To increase opportunities for non-car travel and reduce the need for travel	N	+	N	-	<p>The Balanced Growth option offers the best opportunity to increase non-car travel and reducing the need for travel due to the focussing of new development in existing settlements where public transport, including opportunities for enhanced services, is available. Based on this, it has a minor positive effect on this sustainability objective.</p> <p>No development would maintain the status quo on travel pattern.</p> <p>Meeting neighbour needs is assessed as neutral as it would depend on how the compulsion to live in Lichfield District rather than in the need hosts areas will lead to sustainability negative travel needs to work and services. It is for the host lpas to help assess these effects.</p> <p>Above need growth would lead to increased travel pressures on infrastructure which become less mitigatable as growth spreads.</p> <p>It is accepted that existing policies in the Lichfield Local Plan Strategy seek to promote sustainable transport which, if implemented, will improve the assessment for growth options by the provision/investment in new or enhanced public transport in conjunction with the proposed residential</p>

Preferred policy direction for Strategic policy: Our spatial strategy					
Sustainability Objective	No development	Balanced growth- Urban & Key Rural Settlements	Plus neighbour needs	Above need for market signals	Appraisal Comments
					development. Specific measures have been considered in the Lichfield District Local Plan Review: Preferred Options document under Core Policy 5.

Summary

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On the maximising the use of previously developed land/ buildings and encouraging the efficient use of land objective, the Council's balanced growth preferred option is not as sustainable as the Scope document Option1: Town focussed Development but is still positive effect. It is much more sustainable than no development which would not use land positively and efficiently, and better than above need growth option which would become dependent upon undeveloped land.

For the travel objective, the balanced growth option is less sustainable than Option1: Town focussed Development with its concentrated travel availability but better than the greater than local need options which lead to more dispersed development with diminishing infrastructure.

Preferred strategic policy: securing sustainable development			
Sustainability Objective	No policy	securing sustainable development	Appraisal Comments
To provide housing to meet local need including provision of	--	++	Providing everyone with an opportunity to live in a decent and affordable home is a key objective of the Lichfield Local Plan Review (Strategic Objective 6). There is a shortage of affordable housing in the district. No policy would not give the certainty developers need to provide homes.

Preferred strategic policy: securing sustainable development

Sustainability Objective	No policy	securing sustainable development	Appraisal Comments
affordable homes.			The policy would have a significant positive effect upon the objective as homes are the principal contribution to sustainable development.
To promote safe communities and reduce fear of crime	--	++	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Crime and anti-social behaviour could further increase due to the anticipated levels of growth in all three growth options. Strategic Objective 11 seeks to ensure a high standard of community safety.</p> <p>No policy would fail to deliver this objective as it is contrary to delivering the social conditions SD involves.</p> <p>The policy's reference to social conditions would include community safety.</p>
Improve access to health facilities and promote wellbeing	-	+	<p>Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities.</p> <p>No policy would fail to deliver this objective through planning, although health facilities may be delivered by other means.</p> <p>Health facilities would be part of the social conditions promoted by the policy.</p> <p>The IDP will mitigate on this objective.</p>
Maximise the use of previously developed land/ buildings and encourage the efficient use of land	--	++	<p>No policy would fail to deliver this objective as the Council could not ensure efficient use of land.</p> <p>Efficient use of land is the core of securing sustainable development.</p>
To improve educational attainment of	-	+	No policy would fail to promote the social condition of this objective, however, education could be provided irrespectively.

Preferred strategic policy: securing sustainable development

Sustainability Objective	No policy	securing sustainable development	Appraisal Comments
the working age population			The policy would support education as part of social conditions but is beyond the total control of planning.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	--	++	No policy would fail to deliver this objective due to lack of management. This may be the principal result of the policy on this objective.
To manage water availability and reduce water and air pollution	-	+	No policy would limit control on this objective, although other agencies share responsibility. The policy's support for environmental conditions would include this objective.
To minimise waste and increase the recycling and reuse of waste materials	-	+	No policy would limit control on this objective. The policy's support for environmental conditions would include this objective.
To reduce and manage flood	--	++	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No policy would significantly remove the Council's control on this objective.

Preferred strategic policy: securing sustainable development

Sustainability Objective	No policy	securing sustainable development	Appraisal Comments
risk and surface water run off			The policy will be a significant contributor to this objective, as a significant component of environmental conditions.
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	--	++	No policy would fail to deliver on this objective which is central to sustainable development. The policy would be a significant contributor to the Council supporting this wide objective.
To promote biodiversity protection enhancement and management of species and habitats	--	+	No policy would fail to deliver on this objective. The policy will contribute to this environmental condition but balanced against other needs arising from economic and social conditions.
To ensure the protection and enhancement of the historic environment and its setting	--	+	Because the historic environment is so ubiquitous, no policy would significantly fail to deliver on this objective. The policy will contribute to this environmental condition but balanced against other needs arising from economic and social conditions.
Protect, enhance and manage the character and quality of the	--	+	Because the spatial scope of this objective is universal, no policy would significantly fail to deliver on it. The policy will contribute to this environmental condition but balanced against other needs arising from economic and social conditions.

Preferred strategic policy: securing sustainable development

Sustainability Objective	No policy	securing sustainable development	Appraisal Comments
landscape and townscape			
To increase opportunities for non-car travel and reduce the need for travel	-	+	<p>No policy would reduce the Council's control on this objective but other agencies are also involved.</p> <p>The policy would contribute to this objective so long as opportunities are taken up, including by other agencies.</p>

Summary

Generally, having no policy would be significantly detrimental to sustainability. The policy has significant benefits on the homes, community safety, efficient use of land, economic, flood risk and climate change objectives; and no negatives; therefore having the policy is better than not.

Delivering Sustainable Development Policy

Sustainability Objective	Delivering Sustainable Development policy	Appraisal Comments
To provide housing to meet Local need including	?	Most of the policy criteria could be seen as a constraint on housing provision by limiting options, but the affordable housing criteria mitigate this negativity. The limitations will be locationally determined and therefore uncertain.
To promote safe communities and reduce fear of crime	N	The policy could be enhanced on this objective by reference to community safety.
Improve access to health facilities and promote wellbeing	+	Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. Air quality has an effect on wellbeing in various ways including health. References in criteria to facilities include health, therefore positive.

Sustainability Objective	Delivering Sustainable Development policy	Appraisal Comments
Maximise the use of previously developed land/ buildings and encourage the efficient use of land	+	There is a criteria for previously developed land, therefore positive but may be limited by other criteria locationally.
To improve educational attainment of the working age population	?	The facilities criteria may support this objective but delivery of them uncertain.

Sustainability Objective	Delivering Sustainable Development policy	Appraisal Comments
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	+	Several criteria support this objective but other criteria may limit delivery.
To manage water availability and reduce water and air pollution	++	Criteria are designed to meet this objective.
To minimise waste and increase the recycling and reuse of waste materials	++	Criteria are designed to meet this objective.

Sustainability Objective	Delivering Sustainable Development policy	Appraisal Comments
To reduce and manage flood risk and surface water run off	++	Criteria are designed to meet this objective.

<i>Sustainability Objective</i>	<i>Delivering Sustainable Development policy</i>	<i>Appraisal Comments</i>
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	++	<p>Strategic Objective 3 seeks to localize the effect of new development, required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change.</p> <p>The overarching purpose of this policy is to deliver this objective.</p>
To promote biodiversity protection enhancement and management of species and habitats	+	There is a positive criteria on this objective but delivery may be limited by other criteria promoting development in conflicting locations.

Sustainability Objective	Delivering Sustainable Development policy	Appraisal Comments
To ensure the protection and enhancement of the historic environment and its setting	+	There is a positive criteria on this objective but delivery may be limited by other criteria promoting development in conflicting locations.
Protect, enhance and manage the character and quality of the landscape and townscape	++	There is a strongly positive criteria on this objective.

Sustainability Objective	Delivering Sustainable Development policy	Appraisal Comments
To increase opportunities for non-Car travel and reduce the need for need for travel	++	There is a positive criteria on this objective.

Summary

The policy is generally positive with significant positive effects upon the pollution, waste, flood risk, climate change, landscape and townscape and travel objectives.

Preferred Policy Direction: Renewable Energy

Sustainability Objective	No policy	Flexible	Site allocations	areas of opportunity	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	N	N	N	No relevance to this objective.
To promote safe communities and reduce fear of crime	N	N	N	N	No direct link to this policy.
Improve access to health facilities and promote wellbeing	?	?	?	?	No direct relevance to this policy but renewable energy could contribute to wellbeing through tackling issues like fuel poverty.
Maximise the use of previously developed land/buildings and encourage the efficient use of land	-	-	+	?	<p>No policy would fail to deliver this objective as the Council could not ensure delivery of renewables.</p> <p>A flexible policy would fail to deliver this objective as the Council could not ensure efficient use of land.</p> <p>Specific allocation of sites for renewable energy could guide options to previously developed land.</p> <p>Identifying areas of opportunity for renewable energy could include guidance to previously developed land.</p>
To improve educational attainment of the	N	N	N	N	No direct link to this policy.

Preferred Policy Direction: Renewable Energy

Sustainability Objective	No policy	Flexible	Site allocations	areas of opportunity	Appraisal Comments
working age population					
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	--	+	++	+	<p>No policy would fail to deliver this objective.</p> <p>A flexible policy would allow developers to choose sites to their perceived economic advantage.</p> <p>Site allocations would provide most certainty on delivery.</p> <p>Identifying areas of opportunity for renewable energy would give some certainty on delivery and would be in line with the opportunities to maximise the economic benefit but within environmental limits.</p>
To manage water availability and reduce water and air pollution	--	-	+	++	<p>No policy would fail to deliver on this objective.</p> <p>A flexible policy would fail to sufficiently guide developers in meeting this objective.</p> <p>Specific allocation of sites for renewable energy would support the air pollution element of this policy.</p> <p>Identifying areas of opportunity for renewable energy would have the benefit of supporting the air pollution element of this policy and protect the water environment where relevant.</p>
To minimise waste and increase the	N	N	N	N	No direct link to this policy.

Preferred Policy Direction: Renewable Energy

Sustainability Objective	No policy	Flexible	Site allocations	areas of opportunity	Appraisal Comments
recycling and reuse of waste materials					
To reduce and manage flood risk and surface water run off	-	?	+	++	<p>Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change.</p> <p>No policy would remove the Council’s control on this objective.</p> <p>Site allocations would provide infrastructure to indirectly reduce flood risk by contributing to reducing climate change.</p> <p>Identifying areas of opportunity for renewable energy will be a significant contributor to this objective as it could provide infrastructure to indirectly reduce flood risk by contributing to reducing climate change, and guide options away from sensitive landscapes which could include those at flood risk.</p>
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	--	+	++	++	<p>No policy would fail to deliver on this objective for an issue which could significantly contribute.</p> <p>A flexible policy may support this objective through infrastructure which contributes.</p> <p>Both site allocations and identifying areas of opportunity would be a significant contributor to the Council supporting this objective through relevant infrastructure.</p>
To promote biodiversity protection enhancement and	N	N	N	N	<p>No direct link to this policy but this type of energy is the least harmful to biodiversity so long as the buildings are appropriately located, which would be best controlled by site allocations and guiding away from sensitive landscapes which may support biodiversity.</p>

Preferred Policy Direction: Renewable Energy

Sustainability Objective	No policy	Flexible	Site allocations	areas of opportunity	Appraisal Comments
management of species and habitats					
To ensure the protection and enhancement of the historic environment and its setting	-	--	?	+	<p>No policy would miss the opportunity to promote a type of energy which indirectly benefits the historic environment by reducing harmful pollution and climate change.</p> <p>Renewable energy infrastructure can often conflict with the historic environment.</p> <p>A flexible policy may lead to conflict with the historic environment through other objectives.</p> <p>Depends upon the location of site allocations in relation to the historic environment.</p> <p>Identifying areas of opportunity for renewable energy may include guidance to locations away from sensitive landscapes which could include historic environment.</p>
Protect, enhance and manage the character and quality of the landscape and townscape	-	-	?	+	<p>No policy would miss an opportunity to control conditions which are harmful to this objective such as degrading pollution and climate change.</p> <p>A flexible policy may lead to options which conflict with this objective.</p> <p>Renewable energy infrastructure may be presently alien to some landscape and townscape so site allocations could conflict with this objective.</p> <p>The safeguards on sensitive landscapes in identifying areas of opportunity for renewable energy benefit this objective and by</p>

Preferred Policy Direction: Renewable Energy

Sustainability Objective	No policy	Flexible	Site allocations	areas of opportunity	Appraisal Comments
					guiding options to appropriate locations for the mutual benefit of the policy and the objective.
To increase opportunities for non-car travel and reduce the need for travel	N	N	N	N	No direct link to this policy as options depend upon resources locations but accessibility for workers would be determined by location which is better controlled by the less flexible policy options.

Summary

Having no policy would be generally negative, significantly for economic growth, pollution and climate change objectives.

A Policy Map identifying areas of opportunity for renewable energy is the most sustainable option, being mostly positive with significant benefits for the pollution, flood risk and climate change objectives.

A flexible policy would have a significant negative effect upon the historic environment objective and no significant benefit. Site allocations would have significant positive effects on the economic and climate change objectives.

Preferred policy direction: flood risk

Preferred policy direction: Flood Risk		
Sustainability Objective	Preferred policy direction: Flood Risk	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	No direct link to this policy
To promote safe communities and reduce fear of crime	N	No direct link to this policy.
Improve access to health facilities and promote wellbeing	N	No direct link to this policy.
Maximise the use of previously developed land/buildings and encourage the efficient use of land	N	No direct link to this policy.
To improve educational	N	No direct link to this policy.

Preferred policy direction: Flood Risk

Sustainability Objective	Preferred policy direction: Flood Risk	Appraisal Comments
attainment of the working age population		
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	No direct link to this policy.
To manage water availability and reduce water and air pollution	++	This policy will contribute to this objective.
To minimise waste and increase the recycling and reuse of waste materials	N	No direct link to this policy.
To reduce and manage flood risk and surface water run off	++	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No direct link to this objective but the use of sustainable urban drainage systems will support it.
To reduce and manage the	N	No direct link to this policy.

Preferred policy direction: Flood Risk

Sustainability Objective	Preferred policy direction: Flood Risk	Appraisal Comments
impacts of climate change and the Districts contribution to the causes of.		
To promote biodiversity protection enhancement and management of species and habitats	N	No direct link to this policy.
To ensure the protection and enhancement of the historic environment and its setting	N	No direct link to this policy.
Protect, enhance and manage the character and quality of the landscape and townscape	N	No direct link to this policy.
To increase opportunities for	N	No direct link to this policy.

Preferred policy direction: Flood Risk		
Sustainability Objective	Preferred policy direction: Flood Risk	Appraisal Comments
non-car travel and reduce the need for travel		

Summary

The Policy will have a significant effect on managing water resources and flood risk. The policy is in line with the National Planning Policy Framework and therefore shares its assessment as sustainable.

Preferred policy direction: Air quality

Sustainability Objective	No policy	Air quality policy	Appraisal Comments
To provide housing to meet local need including	N	?	No policy has no correlation to this objective. In the presence of AQMAs, if homes cannot be allocated in these areas or permitted in combination which impact upon them, then an air quality could be a constraint on housing provision.
To promote safe communities and reduce fear of crime	N	N	There is no direct link to the objective.
Improve access to health facilities and promote wellbeing	-	+	No policy would fail to promote wellbeing. Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. Air quality has an effect on wellbeing in various ways including health.
Maximise the use of previously developed land/ buildings and encourage the efficient use of land	N	-	No policy would maintain the current situation. Existing adverse air quality areas are more likely to be in built up areas of previously developed land/ buildings, therefore air quality constraints on development location are likely to negatively affect the use of previously developed land/ buildings.
To improve educational attainment of the working age population	N	N	No relationship is expected.

Sustainability Objective	No policy	Air quality policy	Appraisal Comments
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	N	There would be negligible effect on a sustainable economy.
To manage water availability and reduce water and air pollution	--	++	No policy would fail to meet this objective. The proposed policy is designed to meet this objective.
To localise waste and increase the recycling and reuse of waste materials reuse of waste materials	N	N	No correlation.
To reduce and manage flood risk and surface water run off	N	N	No correlation.

Sustainability Objective	No policy	Air quality policy	Appraisal Comments
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	-	+	<p>Strategic Objective 3 seeks to localize the effect of new development, required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change.</p> <p>No policy would fail to support this objective.</p> <p>An air quality policy will help to meet this objective by controlling a source of climate change.</p>
To promote biodiversity protection enhancement and management of species and habitats	-	+	<p>No policy would fail to support this objective.</p> <p>An Air quality policy will have a positive effect on biodiversity as air quality is known to have a negative impact on biodiversity, especially the SAC.</p>

Sustainability Objective	No policy	Air quality policy	Appraisal Comments
To ensure the protection and enhancement of the historic environment and its setting	N	+	<p>No policy would maintain the status quo.</p> <p>An Air quality policy will have a positive effect on the historic environment as air quality is known to have a negative impact on it through deterioration of asset materials.</p>
Protect, enhance and manage the character and quality of the landscape and townscape	?	?	Any effects on this objective would be determined by the alternative locations of development if it is displaced by implementation of an air quality policy.

Sustainability Objective	No policy	Air quality policy	Appraisal Comments
<p>To increase opportunities for non-</p> <p>Non-car travel and reduce And reduce the need for need for travel</p>	?	?	<p>Any effects on this objective would be determined by the alternative locations of development if it is displaced by implementation of an air quality policy.</p> <p>There may be a link as travel is the source of air pollution in Lichfield district.</p>

Summary

No policy would have mostly negative effects upon the objectives, significantly upon the pollution objective. A policy would have mixed effects upon the sustainability objectives with a significant positive effect on the pollution objective as would be hoped.

Preferred Policy Direction: Delivering our infrastructure

Sustainability Objective	No policy	Delivering our infrastructure	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	--	++	<p>Providing everyone with an opportunity to live in a decent and affordable home is a key objective of the Lichfield Local Plan Review (Strategic Objective 6). There is a shortage of affordable housing in the district. It is considered that homes are a key part of the infrastructure of the District.</p> <p>No policy would not give the certainty developers need to provide homes.</p> <p>The policy would have a significant positive effect upon the objective.</p>
To promote safe communities and reduce fear of crime	--	+	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Crime and anti-social behaviour could further increase due to the anticipated levels of growth. Strategic Objective 11 seeks to ensure a high standard of community safety.</p> <p>No policy would fail to deliver this objective as infrastructure contributes to the conditions for community safety.</p> <p>The policy would be positive to this objective through meeting local needs to support development but reference could be made to community safety engineered through infrastructure in line with paragraphs 91 and 95 Of the NPPF.</p>
Improve access to health facilities and promote wellbeing	--	++	<p>Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities.</p> <p>No policy would fail to deliver this objective through planning, although health facilities may be delivered by other means.</p> <p>The policy is intended to deliver health facilities as part of infrastructure.</p>
Maximise the use of previously developed land/ buildings and	--	+	<p>No policy would fail to deliver this objective as the Council could not ensure efficient use of land.</p> <p>The policy would assist this objective by supporting the efficient use of land.</p>

Preferred Policy Direction: Delivering our infrastructure

Sustainability Objective	No policy	Delivering our infrastructure	Appraisal Comments
encourage the efficient use of land			
To improve educational attainment of the working age population	-	++	<p>No policy would fail to deliver on this objective, however, education could be provided irrespective.</p> <p>The policy would support education as part of infrastructure delivery.</p>
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	--	++	<p>No policy would fail to deliver this objective by not delivering infrastructure to support development in order to support economic growth.</p> <p>Provision of infrastructure is critical to achieving economic growth.</p>
To manage water availability and reduce water and air pollution	-	++	<p>No policy would fail to deliver on this objective due to the necessary infrastructure requirements, although other agencies share responsibility.</p> <p>The policy includes provision for this objective.</p>

To minimise waste and increase the recycling and reuse of waste materials	-	++	No policy would limit control on this objective. The policy supports provision for this objective.
To reduce and manage flood risk and surface water run off	-	++	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No policy would remove the Council's provision for this objective, although other providers exist. The policy will be a significant contributor to this objective.
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	-	+	No policy would fail to deliver on this objective through appropriate infrastructure. The policy would contribute to infrastructure which could support this objective.
To promote biodiversity protection enhancement and management of species and habitats	N	?	There is no direct link to this objective. Delivering infrastructure could be mitigated on this objective by location and design.
To ensure the protection and enhancement of the historic	N	?	No policy would remove the circumstances which could impact on this objective. Effects would depend upon the locations of the infrastructure.

environment and its setting			
Protect, enhance and manage the character and quality of the landscape and townscape	N	?	No policy would remove the circumstances which could impact on this objective. Effects would depend upon the locations of the infrastructure which could be mitigated by design.
To increase opportunities for non-car travel and reduce the need for travel	-	+	No policy would reduce the Council's control on this objective but other agencies are also involved. The policy could contribute to this objective by the design of the infrastructure, including by other agencies.

Summary

Generally, having no policy would have negative effects upon this objective, significantly on the homes, community safety, health, efficient use of land and economic growth objectives. The policy would have significant positive effects on seven objectives; and no negatives; therefore having the policy is better than not.

Preferred policy direction: sustainable transport		
Sustainability Objective	Preferred policy direction: sustainable transport	Appraisal Comments

Preferred policy direction: sustainable transport

Sustainability Objective	Preferred policy direction: sustainable transport	Appraisal Comments
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To provide housing to meet local need including provision of affordable homes.	N	No direct link to this policy but homes are difficult to deliver without sustainable transport especially if the residual cumulative impacts on the road network would be severe.
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To promote safe communities and reduce fear of crime	N	No direct link to this policy.
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Improve access to health facilities and promote wellbeing	N	No direct link to this policy.
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Maximise the use of previously developed land/buildings and encourage the efficient use of land	+	Sustainable transport is a contributor to delivering this objective by encouraging the efficient use of land.
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To improve educational attainment of the	N	No direct link to this policy.
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Preferred policy direction: sustainable transport

Sustainability Objective	Preferred policy direction: sustainable transport	Appraisal Comments
working age population		
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	++	Sustainable transport is a significant contributor to economic growth.
To manage water availability and reduce water and air pollution	+	Sustainable transport as promoted by this policy will contribute to this objective.
To minimise waste and increase the recycling and reuse of waste materials	?	No direct link to this objective but the use of sustainable construction method will support it.
To reduce and manage flood risk and surface water run off	?	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No direct link to this objective but the use of sustainable urban drainage systems will support it.
To reduce and manage the impacts of	+	Sustainable transport supports this objective but some projects will lead to consequential negative effects on this objective through provision for traffic.

Preferred policy direction: sustainable transport

Sustainability Objective	Preferred policy direction: sustainable transport	Appraisal Comments
climate change and the Districts contribution to the causes of.		
To promote biodiversity protection enhancement and management of species and habitats	?	Sustainable transport would be beneficial to this objective but dependent upon location and consequential effects such as pollution.
To ensure the protection and enhancement of the historic environment and its setting	?	Depends upon locations.
Protect, enhance and manage the character and quality of the landscape and townscape	?	Depends upon project locations and if the landscape and townscape can absorb constructions.
To increase opportunities for	+	By definition the policy should meet this objective but the road linked projects negate some positive effect.

Preferred policy direction: sustainable transport		
Sustainability Objective	Preferred policy direction: sustainable transport	Appraisal Comments
non-car travel and reduce the need for travel		

Summary

Generally this policy is positively sustainable, especially to the economic growth objective, with no negative effects.

Preferred policy direction for strategic policy: Our homes for the future – housing provision

The assessment of this policy is covered by assessments of the various options to deliver it, as included:-

housing requirement reasonable alternatives; our spatial strategy reasonable alternatives; our housing mix reasonable alternatives; the traveller policy; and maximising the use of previously developed land/ buildings and encouraging the efficient use of land is an objective for this sustainability appraisal.

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	++	+	+	N	N	-	-	<p>Providing everyone with an opportunity to live in a decent and affordable home is a key objective of the Lichfield Local Plan Review (Strategic Objective 6). There is a shortage of affordable housing in the district.</p> <p>By definition, helping to meet neighbouring lpa needs, all the options except the local housing need only option, is not meeting local need but there may be some benefit if in-migrants work locally and boost the local economy.</p> <p>The up to 2000 homes contributions</p>

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								<p>options would have positive effects as the contributions are consistent with the current objectively assessed need for the district incorporated into the current local plan.</p> <p>The 3, and 4,500 options are considered to be neutral as they are consistent with sustainable urban extensions evidence.</p> <p>The greatest contributions options are considered to have negative effects as they provide significantly beyond local need with consequential negative effects on sustainable infrastructure</p>

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								<p>supporting local need.</p> <p>All options do however give positive potential for affordable housing which reduces any significant effect which would be contrary to this objective.</p>
To promote safe communities and reduce fear of crime	N	-	-	-	-	-	-	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Crime and anti-social behaviour could further increase due to the anticipated levels of growth in all these growth options.</p>

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								<p>Strategic Objective 11 seeks to ensure a high standard of community safety and thus the preferred growth option will need to include reference to specific measures, including designing out crime and investment in local policing, to minimise crime and fear of crime. On this basis, the local need only growth option will have a neutral effect on this sustainability objective.</p> <p>Taking neighbouring district's needs increases crime opportunities but is small risk relative to the overall growth and therefore</p>

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								insignificantly negative. It may therefore be considered that LDC is importing crime opportunities but at this scale of growth it is considered that the above mitigation could be absorbed.
Improve access to health facilities and promote wellbeing	++	+	+	+	+	++	++	Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities therefore all of the residential growth options will have a positive

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								<p>effect on this sustainability objective.</p> <p>Meeting local residential need offers the opportunity for a significant positive effect.</p> <p>Meeting neighbour needs would mean relatively lower level of investment/resources for health and leisure related facilities for that need and thus will only have a minor positive effect on this sustainability objective.</p> <p>A new settlement may have a significant positive effect as new self-contained health</p>

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								facilities would be required. The IDP will mitigate on this objective.
Maximise the use of previously developed land/ buildings and encourage the efficient use of land	++	+	+	+	-	--	--	Meeting local housing need only growth seeks to focus development within or adjacent to the settlement boundaries of the Towns and Key Villages. This will include previously developed land but maybe also open land outside the settlement boundaries; however, this approach will ensure that land is used efficiently and thus represents a significant positive effect on this sustainability option

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								<p>relative to making contributions, which will increase pressure on the previously developed land resource and the likelihood of passing the threshold where greenfield land would be required. Meeting neighbour needs may have a positive effect on this sustainability objective depending upon development locations and whether the growth can be accommodated on previously developed land . There may be opportunities for cross boundary locations on neighbouring</p>

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								<p>previously developed land .</p> <p>The 4,500 home contribution growth option will require sustainable, but probably greenfield, extensions through pressure to focus new development outside of existing settlement boundaries on open land. This option, therefore, represents a negative effect on this sustainability objective.</p> <p>The largest growth options requiring a new settlement will almost inevitably involve use of greenfield land unless a substantial previously developed</p>

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								land site is available.
To improve educational attainment of the working age population	+	+	+	+	+	++	++	<p>All growth options have the potential to indirectly improve education attainment providing new education investment/facilities are brought forward if brought forward within a mix of uses in conjunction with the residential development.</p> <p>The larger growth options offer the probability of new educational facilities to service a new settlement.</p>
To achieve stable and sustainable levels of	+	+	+	+	+	+	+	All growth options have the potential to indirectly improve economic growth in

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
economic growth and maintain economic competitiveness								<p>the District by providing employment in the housing building sector and within a mix of uses being brought forward in conjunction with the residential development.</p> <p>The promotion of economic prosperity is a strategic objective of the Local Plan Review (Strategic Objective 8). The development of all the Growth Options will contribute to this sustainability objective and represents a minor positive effect.</p> <p>A new settlement may offer the opportunity to be a</p>

Sustainability Objective	Local housing need only.	Local housing need plus 1,000 home contribution	Local housing need plus 2,000 home contribution	Local housing need plus 3,000 home contribution	Local housing need plus 4,500 home contribution	Local housing need plus 10,000 home contribution	Local housing need plus 19,000 home contribution	Appraisal Comments
								self-contained economic unit so long as it doesn't become a dormitory for larger economic areas.
To manage water availability and reduce water and air pollution	N	N	N	N	N	N	N	<p>Specific measures relating to the management of water availability and the minimisation of water or air pollution levels have been considered in the Lichfield District Local Plan Review: Core Policy 3.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will not result in water or air</p>

								<p>pollution. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
<p>To minimise waste and increase the recycling and reuse of waste materials</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>Specific measures relating to the minimisation of waste and recycling have been considered in the Lichfield District Local Plan Review: Core Policy 3. This is an important consideration as waste arisings will inevitably increase due to the increase in the District's households and economic activity,</p>

								<p>which it is hoped CP3 will mitigate.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will provide facilities to allow the recycling of materials. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the growth options represent a positive effect on this sustainability objective.</p>
<p>To reduce and manage flood risk and surface water run off</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change.</p>

								<p>The spatial options of the Lichfield District Local Plan Review: Preferred Options document do not have geographic boundaries and therefore impacts on flood risk areas cannot be fully assessed at this stage. The future stages of the Sustainability Appraisal of the Local Plan Review will assess flood risk in detail. Development under all options will inevitably increase impermeable surfaces resulting in increased water runoff and potential pollution of water courses.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development is accompanied by initiatives to reduce</p>
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								<p>run off. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
<p>To reduce and manage the impacts of climate change and the Districts contribution to the causes of.</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>Strategic Objective 3 seeks to minimise the effect of new development, required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change.</p> <p>Mitigating the effects of climate change is a 'cross discipline' issue and existing policies in the</p>

								<p>Lichfield Local Plan Strategy, especially Core Policy 3, seek to address this sustainability objective in the context of promoting sustainable development. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
<p>To promote biodiversity protection enhancement and management of species and habitats</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>All growth options have the potential to impact negatively on the District's biodiversity assets in both the urban and countryside areas but also offer the opportunity for significant ecological enhancement and habitat creation. Ultimately impacts on</p>

								<p>the biodiversity will depend on quantum of new land take together with the location and design of the proposed growth areas.</p> <p>Existing Policy NR3 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse effect on biodiversity, protected species or their habitats. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
To ensure the protection and	N	N	N	N	N	N	N	All growth options have the potential to

<p>enhancement of the historic environment and its setting</p>								<p>result in negative impacts on the historic environment, including archaeological remains, and their settings.</p> <p>The spatial options Lichfield District Local Plan Review: Preferred Options document do not have specific geographic boundaries and therefore impacts on the historic environment cannot be assessed at this stage.</p> <p>Existing Core Policy 14 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse impact on the built or historic environment. This policy will be taken forward into the Local Plan Review</p>
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								<p>and thus the implementation of the policy will apply to all the growth options. Based on the above, all the growth options represent a neutral effect on this sustainability objective.</p>
<p>Protect, enhance and manage the character and quality of the landscape and townscape</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>-</p>	<p>-</p>	<p>All growth options have the potential to impact negatively on the District's landscape and townscape. Ultimately impacts on the landscape and townscape will depend on quantum of new land take together with the location and design of the proposed growth areas. The spatial options Lichfield District Local Plan Review: Preferred Options document does not have specific</p>

								<p>geographic boundaries and therefore impacts on the landscape and townscape cannot be fully assessed at this stage.</p> <p>Strategic Objective 12 seeks to protect and enhance the quality and character of the District's landscape character including the openness of the Green Belt. Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development does not result in an adverse effect on the landscape and townscape of the District. These policies will be taken forward into the Local Plan Review and thus the implementation of the policies will apply to all the growth options. Based on</p>
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								<p>the above, the up to 4,500 homes growth options represent a neutral effect on this sustainability objective.</p> <p>The largest growth options will introduce alien development into the landscape but other design policy should ensure a high quality townscape.</p>
<p>To increase opportunities for non-car travel and reduce the need for travel</p>	<p>+</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>The local housing need only Growth option offers an opportunity to increase non-car travel and reducing the need for travel due to the focussing of new development in existing settlements where public transport, including opportunities for enhanced services, is available. Based on this, it has a minor positive effect on this</p>

								<p>sustainability objective.</p> <p>Meeting neighbour needs is assessed as neutral as it would depend on how the compulsion to live in Lichfield District rather than in the need hosts areas will lead to sustainability negative travel needs to work and services. It is for the host Ips to help assess these effects.</p> <p>Above local housing need growth would lead to increased travel pressures on infrastructure which become less mitigatable as growth spreads.</p> <p>A new settlement for the larger growth options offers potential for new travel infrastructure at major scale, as long as it is self-contained for</p>
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								<p>facilities to dissuade outcommuting.</p> <p>It is accepted that existing policies in the Lichfield Local Plan Strategy seek to promote sustainable transport which, if implemented, will improve the assessment for growth options by the provision/investment in new or enhanced public transport in conjunction with the proposed residential development. Specific measures have been considered in the Lichfield District Local Plan Review: Preferred Options document under Core Policy 5.</p>
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The no development option for SEA has been considered under the our spatial strategy option for residential growth, therefore only development options are now considered.

The local housing need only option is the most sustainable, with no negative effects and significant benefits to the 'housing to meet local need including provision of affordable homes', 'improve access to health facilities and promote wellbeing', and 'maximising the use of previously developed land/ buildings and encouraging the efficient use of land' objectives.

The up to 4,500 home contributions options are in the mid-range of sustainability.

The larger home contributions options are the least sustainable with significant negative effects on the community safety and crime, and the 'maximising the use of previously developed land/ buildings and encouraging the efficient use of land' objectives; although this is balanced by the significant positive effects on the 'improve access to health facilities and promote wellbeing' and 'improve educational attainment of the working age population' objectives.

Our housing mix reasonable alternatives							
Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current)	Affordable housing- 10% (NPPF).	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	--	N	++	+	+	?	<p>Providing everyone with an opportunity to live in a decent and affordable home is a key objective of the Lichfield Local Plan Review (Strategic Objective 6). There is a shortage of affordable housing in the district.</p> <p>Providing no housing would obviously not meet local need or affordable need.</p> <p>Market housing only would meet local need but not affordable need, therefore neutral overall on this objective.</p> <p>Mixed housing meets all needs.</p> <p>Self build and custom housing meet some needs but insignificant relative to all housing provision.</p> <p>40% affordable housing maximizes local possibilities on sites but reduces viability of those sites.</p> <p>10% affordable housing meets less need and the NPPF criteria do not guarantee delivery so uncertain sustainability.</p>
To promote safe communities and reduce fear of crime	N	N	N	-	N	N	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Crime and anti-social behaviour could further increase due to the anticipated levels of growth in all these growth options. Strategic Objective 11 seeks to ensure a high standard of community safety and thus the preferred option will need to include reference to specific measures, including designing out crime and investment in local policing, to</p>

Our housing mix reasonable alternatives							
Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current)	Affordable housing- 10% (NPPF).	Appraisal Comments
							<p>minimise crime and fear of crime. The delivery of community safety standards should be the same for all housing mixes.</p> <p>No housing will have a neutral (status quo) effect on this sustainability objective.</p> <p>There should be no variation between market and mixed housing for this objective.</p> <p>Self build and custom housing is mostly at the discretion of the developer and therefore LDC has less input on community safety mitigation leading to a negative effect on this objective.</p> <p>There should be no variation on this objective with affordable housing, giving a neutral effect.</p>
Improve access to health facilities and	--	++	+	-	N	+	<p>Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities.</p>

Our housing mix reasonable alternatives							
Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current)	Affordable housing- 10% (NPPF).	Appraisal Comments
promote wellbeing							<p>No housing provision would not improve health at best and at worst see degeneration without renewal.</p> <p>Market housing may generate the funding for health.</p> <p>Mixed housing reduces the viability for health provision but provides some stimulus.</p> <p>Self build and custom housing will provide no input or stimulus to significant health resourcing.</p> <p>40% affordable housing absorbs funding from the pot for all obligations including health, although its provision adds to the stimulus for health facilities, therefore a neutral effect. 10% affordable housing would leave, potentially, a relatively larger pot for health facilities. All affordable housing is a major contributor to wellbeing.</p> <p>The IDP will mitigate on this objective.</p>
Maximise the use of previously	--	+	++	?	-	N	<p>No housing would fail to contribute to this objective.</p> <p>The contribution of market housing may depend upon viability and attractiveness to that market, and not all</p>

Our housing mix reasonable alternatives							
Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current)	Affordable housing- 10% (NPPF).	Appraisal Comments
developed land/ buildings and encourage the efficient use of land							<p>developers favour or take up options on previously developed land .</p> <p>Mixed housing offers more options which may take advantage of previously developed land and its usual better proximity to services, benefitting some community groups.</p> <p>Self build and custom contribution will be relatively small and will depend upon land availability and desirability, therefore an uncertain effect.</p> <p>Maximum affordable housing obligation may impact upon the viability of previously developed land development.</p> <p>The NPPF requirement would allow flexibility on viability and therefore be neutral on the effect of land type.</p>
To improve educational attainment of the working age population	-	+	+	+	++	+	<p>No housing would fail to deliver on this objective.</p> <p>All housing options have the potential to indirectly improve education attainment providing new education investment/facilities are brought forward if brought forward within a mix of uses in conjunction with the residential development.</p>

Our housing mix reasonable alternatives							
Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current)	Affordable housing- 10% (NPPF).	Appraisal Comments
							Affordable housing at the maximum level in particular would provide the opportunity for disadvantaged people to access Lichfield's education provision.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	+	+	+	+	+	<p>All housing options have the potential to indirectly improve economic growth in the District by providing employment in the housebuilding sector and within a mix of uses being brought forward in conjunction with the residential development.</p> <p>The promotion of economic prosperity is a strategic objective of the Local Plan Review (Strategic Objective 8). The development of all the Housing Options will contribute to this sustainability objective and represents a minor positive effect.</p>

To manage water availability and reduce water and air pollution	-	N	N	N	N	N	<p>Specific measures relating to the management of water availability and the minimisation of water or air pollution levels have been considered in the Lichfield District Local Plan Review: Core Policy 3.</p> <p>No housing would negate the opportunity to reduce water and air pollution.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will not result in water or air pollution. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the housing options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
To minimise waste and increase the recycling and reuse of waste materials	N	+	+	+	+	+	<p>Specific measures relating to the minimisation of waste and recycling have been considered in the Lichfield District Local Plan Review: Core Policy 3. This is an important consideration as waste arisings will inevitably increase due to the increase in the District's households and economic activity under the housing mix options, which it is hoped CP3 will mitigate.</p> <p>No housing would miss the opportunity to increase the recycling and reuse of waste materials.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will provide facilities to allow the recycling of materials. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the options. Based on the above, all the housing mix options represent a positive effect on this sustainability objective.</p>

To reduce and manage flood risk and surface water run off	N	N	N	N	N	N	<p>Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change.</p> <p>The spatial options of the Lichfield District Local Plan Review: Preferred Options document do not have geographic boundaries and therefore impacts on flood risk areas cannot be fully assessed at this stage. The future stages of the Sustainability Appraisal of the Local Plan Review will assess flood risk in detail. Development under all options will inevitably increase impermeable surfaces resulting in increased water run-off and potential pollution of water courses.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development is accompanied by initiatives to reduce run off. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the housing mix options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	-	N	N	N	N	N	<p>Strategic Objective 3 seeks to minimise the effect of new development, required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change.</p> <p>No housing would miss the opportunity for regeneration and to reduce the impacts of climate change and the Districts contribution to the causes of.</p> <p>Mitigating the effects of climate change is a 'cross discipline' issue and existing policies in the Lichfield Local Plan Strategy, especially Core Policy 3, seek to address this sustainability objective in the context of promoting sustainable development. These policies will be taken forward into the</p>

							Local Plan Review and thus the implementation of the existing policies will apply to all the housing mix options. Based on the above, all the housing options represent a neutral effect on this sustainability objective.
To promote biodiversity protection enhancement and management of species and habitats	N	N	N	N	N	N	<p>No housing would maintain the status quo.</p> <p>All development options have the potential to impact negatively on the District's biodiversity assets in both the urban and countryside areas but also offer the opportunity for significant ecological enhancement and habitat creation. Ultimately impacts on the biodiversity will depend on quantum of new land take together with the location and design of the proposed growth areas.</p> <p>Existing Policy NR3 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse effect on biodiversity, protected species or their habitats. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
To ensure the protection and enhancement of the historic environment and its setting	N	N	N	N	N	N	<p>No housing would maintain the status quo.</p> <p>All growth options have the potential to result in negative impacts on the historic environment, including archaeological remains, and their settings.</p> <p>The spatial options for Lichfield District Local Plan Review: Preferred Options document do not have specific geographic boundaries and therefore impacts on the historic environment cannot be assessed at this stage.</p>

							<p>Existing Core Policy 14 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse impact on the built or historic environment. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the housing mix options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>
<p>Protect, enhance and manage the character and quality of the landscape and townscape</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>No housing would maintain the environment for this objective.</p> <p>All housing options have the potential to impact negatively or positively on the District's landscape and townscape. Ultimately impacts on the landscape and townscape will depend on quantum of new land take together with the location and design of the proposed housing mix developments. The spatial options for the Lichfield District Local Plan Review: Preferred Options document do not have specific geographic boundaries and therefore impacts on the landscape and townscape cannot be fully assessed at this stage.</p> <p>Strategic Objective 12 seeks to protect and enhance the quality and character of the District's landscape character including the openness of the Green Belt. Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development does not result in an adverse effect on the landscape and townscape of the District. These policies will be taken forward into the Local Plan Review and thus the implementation of the policies will apply to all the options. Based on the above, the options represent a neutral effect on this sustainability objective.</p>

							There should be no variation in standards between the housing mix types, although self build and custom may become more distinctive.
To increase opportunities for non-car travel and reduce the need for travel	N	N	N	N	N	N	<p>It is accepted that existing policies in the Lichfield Local Plan Strategy seek to promote sustainable transport which, if implemented, will improve the assessment for housing mix options by the provision/investment in new or enhanced public transport in conjunction with the proposed residential development. Specific measures have been considered in the Lichfield District Local Plan Review: Preferred Options document under Core Policy 5.</p> <p>No housing would be neutral in maintaining the status quo.</p> <p>Opportunities for non-car travel may be more significant to occupiers of affordable housing.</p>

Proposed commentary

Having a housing mix has significant positive effects on the housing provision and efficient use of land objectives. Having open market housing could have a significant benefit of generating finance for other planning obligations such as health facilities.

Other parts of the housing mix are generally positive but the only potential significant benefit is to high affordable housing through providing access to educational attainment.

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	--	N	++	+	+	?	Providing everyone with an opportunity to live in a decent and affordable home is a key objective of the Lichfield Local Plan Review (Strategic Objective 6) . There is a shortage of affordable housing in the district. Providing no housing	-	+	++	+	No density policy may reduce the amount of housing due to a lack of enforceability on efficient use of land, especially affordable homes of smaller units. The existing policy has a positive effect on providing more homes but is open worded and less certain in delivery than

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 273							<p>would obviously not meet local need or affordable need.</p> <p>Market housing only would meet local need but not affordable need, therefore neutral overall on this objective.</p> <p>Mixed housing meets all needs.</p>					<p>defined standards.</p> <p>A defined limit which is spatially flexible maximises efficient use of land and amount of housing including affordable homes.</p> <p>A broad density range across the District would be still positive on this objective but likely to reduce delivery by</p>

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 274							Self build and custom housing meet some needs but insignificant relative to all housing provision. 40% affordable housing maximizes local possibilities on sites but reduces viability of those sites. 10% affordable housing meets less					following the lowest common density in the District.

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 275							need and the NPPF criteria do not guarantee delivery so uncertain sustainability.					
To promote safe communities and reduce fear of crime	N	N	N	-	N	N	Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Crime and anti-social	N	N	N	N	It is considered that there is no correlation between housing density and community safety, although there may be incidental variations

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 276							behaviour could further increase due to the anticipated levels of growth in all these growth options. Strategic Objective 11 seeks to ensure a high standard of community safety and thus the preferred option will need to include reference to specific					between the city and town centres the NPPF requires higher densities in and other parts of the plan area. Self build and custom housing is considered to be a negative due to the uncertainty of design, including therefore designing out crime.

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 277							<p>measures, including designing out crime and investment in local policing, to minimise crime and fear of crime. The delivery of community safety standards should be the same for all housing mixes.</p> <p>No housing will have a neutral (status quo)</p>					

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 278							<p>effect on this sustainability objective.</p> <p>There should be no variation between market and mixed housing for this objective.</p> <p>Self build and custom housing is mostly at the discretion of the developer and therefore LDC has less input on</p>					

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 279							community safety mitigation leading to a negative effect on this objective. There should be no variation on this objective with affordable housing, giving a neutral effect.					
Improve access to health facilities and	--	++	+	-	N	+	Strategic Objective 11 seeks to	N	+	+	N	There is considered to be no link

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
promote wellbeing Page 280							promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities. No housing provision would not					between uniform or nil density requirements and health. The implementation of higher density standards is considered to improve accessibility to health facilities as they are likely to be located in city and town centres or other locations that are well served by

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 281							<p>improve health at best and at worst see degeneration without renewal.</p> <p>Market housing may generate the funding for health.</p> <p>Mixed housing reduces the viability for health provision but provides some stimulus.</p> <p>Self build and custom</p>					public transport.

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 282							housing will provide no input or stimulus to significant health resourcing. 40% affordable housing absorbs funding from the pot for all obligations including health, although its provision adds to the stimulus for health facilities, therefore a					

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 283							<p>neutral effect. 10% affordable housing would leave, potentially, a relatively larger pot for health facilities. All affordable housing is a major contributor to wellbeing.</p> <p>The IDP will mitigate on this objective.</p>					
Maximise the use of previously	--	+	++	?	-	N	No housing would fail to contribute to	-	+	++	N	No density policy is likely to lead to an

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
developed land/buildings and encourage the efficient use of land Page 284							this objective. The contribution of market housing may depend upon viability and being attractive to that market, and not all developers favour or take up options on previously developed land . Mixed housing offers more options					inefficient use of land with no compulsion to use previously developed land which is more likely to be suitable for high density. The current policy directs development to sustainable centres which, by definition, are more likely to recycle land. A differentiated policy is highly likely to guide development to locations

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 285							<p>which may take advantage of previously developed land and its usual better proximity to services, benefitting some community groups.</p> <p>Self build and custom contribution will be relatively small and will depend upon land availability and desirability,</p>					<p>with previously developed land given the specified requirement which favours built up locations which are more likely to have previously developed land and dissuade low density suburban development.</p> <p>A district-wide density policy would be neutral as use of previously developed land would be irrespective of</p>

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 286							<p>therefore an uncertain effect.</p> <p>Maximum affordable housing obligation may impact upon the viability of previously developed land development.</p> <p>The NPPF requirement would allow flexibility on viability and therefore be neutral on</p>					location for policy purpose.

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 287							the effect of land type.					
To improve educational attainment of the working age population	-	+	+	+	++	+	No housing would fail to deliver on this objective. All housing options have the potential to indirectly improve education attainment providing new education investment/facilities are	N	+	+	N	No and universal policy options would be neutral as they would have no population implications. Targeted options may have positive effects as higher density developments of smaller size would be located in

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 288							<p>brought forward if brought forward within a mix of uses in conjunction with the residential development.</p> <p>Affordable housing at the maximum level in particular would provide the opportunity for disadvantaged people to access</p>					town and city centres giving ready access to educational facilities and/or public transport to facilities.

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 289							Lichfield's education provision.					
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	+	+	+	+	+	All housing options have the potential to indirectly improve economic growth in the District by providing employment in the housebuilding sector and within a mix of uses being	N	+	+	+	No density policy would leave the market to determine growth pattern with potentially no local consideration. Density options would give local control of development

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 290							<p>brought forward in conjunction with the residential development.</p> <p>The promotion of economic prosperity is a strategic objective of the Local Plan Review (Strategic Objective 8). The development of all the Housing Options will contribute to this</p>					<p>patterns to benefit local circumstances, especially the town and city centres.</p>

Our housing mix reasonable alternatives incorporating density of housing development

Sustainability Objective	No housing.	Market housing only.	Mixed housing.	Self build and custom.	Affordable housing- 40% (current).	Affordable housing- 10% (NPPF).	Appraisal Comments	No density policy	Higher around sustainable centres (current)	Thirty-five dwellings/ hectare and variable standards	Broad density range	Appraisal Comments
Page 291							sustainability objective and represents a minor positive effect.					

To manage water availability and reduce water and air pollution	-	N	N	N	N	N	Specific measures relating to the management of water availability and the minimisation of water or air pollution	N	N	N	N	Density should have no effect on this objective, although mitigation may need to be considered where higher density buildings in
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levels have been considered in the Lichfield District Local Plan Review: Core Policy 3.

No housing would negate the opportunity to reduce water and air pollution.

Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will not result in water or air pollution.

These policies will be taken forward into the Local Plan Review

town and city centres lead to a potential negative 'canyon' effect on air quality.

							<p>and thus the implementation of the existing policies will apply to all the housing options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>					
<p>To minimise waste and increase the recycling and reuse of waste materials</p>	<p>N</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>Specific measures relating to the minimisation of waste and recycling have been considered in the Lichfield District Local Plan Review: Core Policy 3. This is an important consideration as waste</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>Density should have no effect on this objective.</p>

arisings will inevitably increase due to the increase in the District's households and economic activity under the housing mix options, which it is hoped CP3 will mitigate.

No housing would miss the opportunity to increase the recycling and reuse of waste materials.

Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will provide

facilities to allow the recycling of materials. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the options. Based on the above, all the housing mix options represent a positive effect on this sustainability objective.

To reduce and manage flood risk and surface water run off

N	N	N	N	N	N	N
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Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change.

?	?	?	?
----------	----------	----------	----------

The impact of density control or lack of it on flooding is locationally dependent and therefore

The spatial options of the Lichfield District Local Plan Review: Preferred Options document do not have geographic boundaries and therefore impacts on flood risk areas cannot be fully assessed at this stage. The future stages of the Sustainability Appraisal of the Local Plan Review will assess flood risk in detail. Development under all options will inevitably increase impermeable surfaces

indeterminate at this stage.
Higher density development reduces the development surface area for surface water run off.

							<p>mix options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>					
<p>To reduce and manage the impacts of climate change and the Districts contribution to the causes of.</p>	-	N	N	N	N	N	<p>Strategic Objective 3 seeks to minimise the effect of new development , required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change.</p> <p>No housing would miss the opportunity for regeneration</p>	N	N	N	N	<p>Density should have no effect on this objective at the District scale as the distribution of development will only re-distribute the effects.</p>

and to reduce the impacts of climate change and the Districts contribution to the causes of.

Mitigating the effects of climate change is a 'cross discipline' issue and existing policies in the Lichfield Local Plan Strategy, especially Core Policy 3, seek to address this sustainability objective in the context of promoting sustainable development . These policies will be taken forward into the Local

Plan Review and thus the implementation of the existing policies will apply to all the housing mix options. Based on the above, all the housing options represent a neutral effect on this sustainability objective.

To promote biodiversity protection and management of species and habitats

N

N

N

N

N

N

No housing would maintain the status quo.
All development options have the potential to impact negatively on the District's biodiversity assets in both the urban and countryside

-

+

+

-

No and broad density options would have negative effects by potentially dispersing development and thus land take.
Controlling density would conversely concentrate development and reduce risk of

areas but also offer the opportunity for significant ecological enhancement and habitat creation. Ultimately impacts on the biodiversity will depend on quantum of new land take together with the location and design of the proposed growth areas.

Existing Policy NR3 in the Lichfield Local Plan Strategy seeks to ensure that new development

negative impacts on biodiversity rich areas.

							<p>does not result in an adverse effect on biodiversity, protected species or their habitats. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.</p>					
<p>To ensure the protection and enhancement of the historic</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>No housing would maintain the status quo.</p>	<p>N</p>	<p>?</p>	<p>?</p>	<p>?</p>	<p>No density policy would maintain the status quo so long as</p>

environment and its setting

Page 303

All growth options have the potential to result in negative impacts on the historic environment, including archaeological remains, and their settings.

The spatial options for Lichfield District Local Plan Review: Preferred Options document do not have specific geographic boundaries and therefore impacts on the historic environment cannot be assessed at this stage.

Historic England's design guidance is followed for individual applications.

Density control options effects depend upon location so are indeterminate but density can have a negative effect on heritage assets, and conservation areas in particular are more likely to occur in town and city centres where higher density is promoted.

Existing Core Policy 14 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse impact on the built or historic environment. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the housing mix options. Based on the above, all the options represent a neutral effect on this

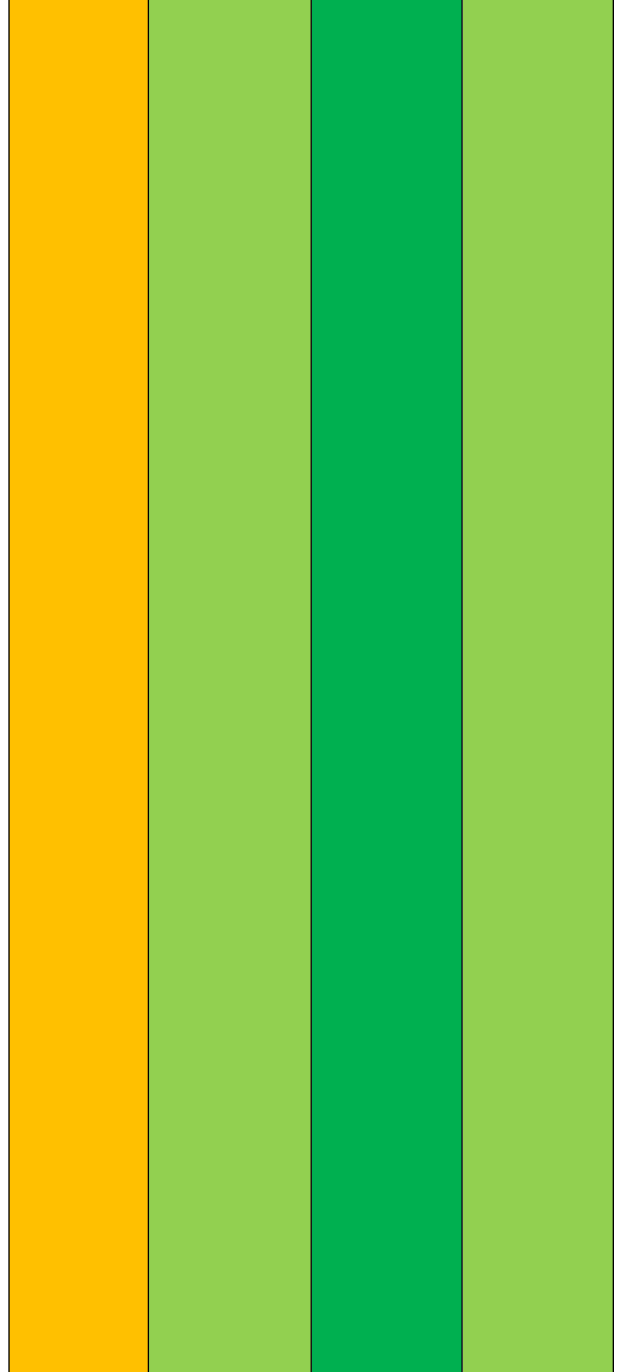
							sustainability objective.					
Protect, enhance and manage the character and quality of the landscape and townscape	N	N	N	N	N	N	<p>No housing would maintain the environment for this objective.</p> <p>All housing options have the potential to impact negatively or positively on the District's landscape and townscape. Ultimately impacts on the landscape and townscape will depend on quantum of new land take together with the location and design of the proposed housing mix development</p>	-	+	++	+	<p>No density policy would give a lack of control of effects on this objective.</p> <p>The current policy supports this objective but is not detailed enough to judge effects.</p> <p>A detailed policy would have a significant positive effect on this objective due to the control over design which supports meeting this objective.</p> <p>A broad density range gives support but relatively lacks a reflection on</p>

s. The spatial options for the Lichfield District Local Plan Review: Preferred Options document do not have specific geographic boundaries and therefore impacts on the landscape and townscape cannot be fully assessed at this stage.

Strategic Objective 12 seeks to protect and enhance the quality and character of the District's landscape character

the locational aspect of landscape and townscape.

including the openness of the Green Belt. Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development does not result in an adverse effect on the landscape and townscape of the District. These policies will be taken forward into the Local Plan Review and thus the implementation of the policies will apply to all the options. Based on the above, the



options represent a neutral effect on this sustainability objective.

There should be no variation in standards between the housing mix types, although self build and custom may become more distinctive.

To increase opportunities for non-car travel and reduce the need for travel

N **N** **N** **N** **N** **N**

It is accepted that existing policies in the Lichfield Local Plan Strategy seek to promote sustainable transport which, if implemented, will improve the assessment

- + ++ +

No density policy would have a negative effect due to not acting positively on this objective.

The current policy has a positive effect but is limited due to a lack of specificity and certainty.

for housing mix options by the provision/investment in new or enhanced public transport in conjunction with the proposed residential development . Specific measures have been considered in the Lichfield District Local Plan Review: Preferred Options document under Core Policy 5.

No housing would be neutral in maintaining the status quo.

Opportunities for non-car

A specific density policy would have a significant positive effect by concentrating development in town and city centres with specific reference to good accessibility to public transport in accordance with the NPPF and this objective.

A broad density range would have a positive effect but does not steer development to the locations of highest accessibility.

							travel may be more significant to occupiers of affordable housing.					
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Summary

The proposed thirty five dwellings per hectare or the specific density standard option has mostly positive effects on most objectives, significant with respect to the housing provision, use of previously developed land, landscape and townscape, and travel objectives. The current higher density around sustainable centres policy is also mostly positive but less so because of a lack of certainty without specific standards; and, to an even lesser extent, the broad density range option. The no density policy option is mostly negative or neutral with no positives. Therefore, a density policy is recommended.

Preferred Policy Direction – Provisin for Gypsies and Travellers

Sustainability Objective	No Traveller policy	Criteria based	Site allocations	Over GTANA provision	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	--	+	++	+	<p>Providing everyone with an opportunity to live in a decent and affordable home is a key objective of the Lichfield Local Plan Objective 6). There is a shortage of local sites in the District. No policy would fail this objective.</p> <p>A criteria-based policy would deliver but subject to applications developers.</p> <p>Site allocations would give greater certainty to developers about suitability.</p> <p>Over provision to meet localize needs and mitigate localised encampments would partially exceed this objective, being beyond local need.</p>
To promote safe communities and reduce fear of crime	N	N	N	N	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Strategic Objective 11 seeks to ensure a high standard of mutual community safety for localized and the settled community. On this basis, the proposed option will have a neutral effect on this sustainability objective.</p>

<p>Improve access to health facilities and promote wellbeing</p>	<p>--</p>	<p>?</p>	<p>++</p>	<p>?</p>	<p>Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New localized sites have the potential to offer the opportunity to give localized access to health facilities.</p> <p>No policy would fail to deliver this policy for localized.</p> <p>A criteria-based policy would leave delivery of this policy indeterminate, dependent upon developer applications but guidance towards key settlements should place sites closer to existing facilities.</p> <p>Site allocations would give greater certainty over linking to this objective.</p>
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<p>Maximise the use of previously developed land/buildings and encourage the efficient use of land</p>	N	N	N	N	<p>None of the options have a direct effect upon this objective unless it is made a criteria of policy, in which case site allocations could be made to meet this objective.</p>
<p>To improve educational attainment of the working age population</p>	-	+	+	+	<p>The promotion of sustainable communities is a strategic objective of the Local Plan Review (Strategic Objective 1). The proposed policy by giving potential access to education for a disadvantaged community will contribute to this sustainability objective.</p> <p>No policy would fail to deliver this objective.</p> <p>The development options would help by giving localized potential access, the criteria by guiding developers to existing educational provision locations; the sites could be allocated in appropriate locations.</p>

Preferred policy direction: Provision for gypsies and travellers

Sustainability Objective	No Traveller policy	Criteria based	Site allocations	Over GTANA provision	Appraisal Comments
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	-	+	?	+	<p>The promotion of economic prosperity is a strategic objective of the Local Plan Review (Strategic Objective 8). The promotion of mixed use sites will contribute to this sustainability objective and represents a minor positive effect.</p> <p>No policy would fail to deliver this objective.</p> <p>The effect of site allocations would depend upon whether they would be mixed use.</p>
To manage water availability and reduce water and air pollution	N	N	N	N	This is not considered to be an appropriate criterion for the proposed policy and is therefore neutral.
To localise waste and increase the recycling and reuse of waste materials	N	+	+	+	This is an important consideration as waste arisings will inevitably increase due to the increase in the District's sites and economic activity. The local authority will need to provide a waste service to the sites.

Sustainability Objective	No Traveller policy	Criteria based	Site allocations	Over GTANA provision	Appraisal Comments
					<p>No policy would maintain the current situation.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will provide facilities to allow the recycling of materials. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to the option. Based on the above, the development options represent a positive effect on this sustainability objective.</p>
To reduce and manage flood risk and surface water run off	N	+	+	+	<p>No policy would maintain the current situation.</p> <p>The current policy includes a criterion of the site is located within Flood Zones 1 or 2 which represents an insignificant positive effect on this sustainability objective as localized accommodation needs are relatively lower than other homes; if this criteria is carried forward then the effect would still be positive and site allocations could be made accordingly.</p>

Sustainability Objective	No Traveller policy	Criteria based	Site allocations	Over GTANA provision	Appraisal Comments
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	N	N	N	N	<p>Strategic Objective 3 seeks to localize the effect of new development, required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change. Mitigating the effects of climate change is a 'cross discipline' issue and existing policies in the Lichfield Local Plan Strategy seek to address this sustainability objective in the context of promoting sustainable development. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to these options.</p> <p>Based on the above, all the growth options represent a neutral effect on the sustainability objective.</p>

<p>To promote biodiversity protection enhancement and management of species and habitats</p>	<p>N</p>	<p>N</p>	<p>?</p>	<p>N</p>	<p>No policy would maintain the current situation.</p> <p>The development options have the potential to impact negatively on the District's biodiversity assets in both the urban and countryside areas, although development is guided towards urban areas, but also offer the opportunity for ecological enhancement and habitat creation.</p> <p>Ultimately impacts on the biodiversity will depend on quantum of new land take together with the location and design of the proposed sites, which will be better controlled by site allocations.</p> <p>Existing Policy NR3 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse effect on biodiversity, protected species or their habitats. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the sites. Based on the above, the development options represent a neutral effect on this sustainability objective but the site allocations would have a potentially better controlled link to the objective dependent upon land availability.</p>
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Sustainability Objective	No Traveller policy	Criteria based	Site allocations	Over GTANA provision	Appraisal Comments
To ensure the protection and enhancement of the historic environment and its setting	N	N	?	N	<p>No policy would maintain the status quo.</p> <p>All sites have the potential to result in negative impacts on the historic environment, including archaeological remains, and their settings. The specific sites are not identified and therefore impacts on the historic environment cannot be assessed at this stage. Existing Core Policy 14 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse effect on the built or historic environment. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply.</p> <p>Based on the above, the development options represent a neutral effect on this sustainability objective but the site allocations would have a potentially better controlled link to the objective dependent upon land availability.</p>

Protect, enhance and manage the character and quality of the landscape and townscape	N	N	N	N	<p>No policy would maintain the current situation.</p> <p>All sites have the potential to impact negatively on the District's landscape and townscape. Ultimately impacts on the landscape and townscape will depend on quantum of new land take together with the location and design of the proposed sites. The sites are not identified and therefore impacts on the landscape and townscape cannot be fully assessed at this stage.</p> <p>Strategic Objective 12 seeks to protect and enhance the quality and character of the District's landscape character including the openness of the Green Belt. Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development does not result in an adverse effect on the landscape and townscape of the District. These policies will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to the option. Based on the above, the option represents a neutral effect on this sustainability objective.</p>
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Sustainability Objective	No Traveller policy	Criteria based	Site allocations	Over GTANA provision	Appraisal Comments
To increase opportunities for non-Car travel and reduce the need for travel	-	+	+	+	<p>No policy would fail to deliver this objective.</p> <p>It is accepted that existing policies in the Lichfield Local Plan Strategy seek to promote sustainable transport which, if implemented, will</p> <p>by the provision/investment in new or enhanced public transport in conjunction with the proposed residential development.</p> <p>This policy is carried forward into the LPR, therefore, this would be a minor positive for the assessment. This</p> <p>will be enhanced by a criteria in the policy, and site allocations would be made in line with it; although it should be acknowledged that localize development is relatively limited.</p>

Summary

No policy will have generally negative effects, significantly upon the homes provision and health objectives.

Site allocations are the most sustainable option, especially for the homes provision and health objectives, although they would have some uncertainties until sites are identified and they can be assessed.

The criteria and over-provision options are similar in effects and have some positives but no significant benefits.

Preferred Policy Direction: Our Employment and economic development

Sustainability Objective	Employment Growth Option 1 – Expansion of existing employment locations	Employment Growth Option 2 – New locations	Appraisal Comments
Social Factors			
To provide housing to meet local need including provision of affordable homes.	N	N	<p>Both Growth Options have the potential to indirectly improve housing growth in the District by promoting economic growth.</p> <p>However, as the Growth options are focussed on the delivery of employment land only it is considered that both the options will result in a neutral effect on this sustainability objective.</p>
To promote safe communities and reduce fear of crime	N	N	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Crime and anti-social behaviour could further increase due to the anticipated levels of growth in each option.</p> <p>Strategic Objective 11 seeks to ensure a high standard of community safety and thus the preferred growth option will need to include reference to specific measures, including investment in local policing, to minimise crime and fear of crime. On this basis, both the growth options will have a neutral effect on this sustainability objective.</p>
Improve access to health facilities and promote wellbeing	N	N	Both Growth Options seek to bring forward new employment land in order to contribute to economic growth in the District. Accordingly, there is no direct link between the Growth Options and this sustainability objective.

Sustainability Objective	Employment Growth Option 1 – Expansion of existing employment locations	Employment Growth Option 2 – New locations	Appraisal Comments
			On this basis, both the growth options will have a neutral effect on this sustainability objective.
Maximise the use of previously developed land/ buildings and encourage the efficient use of land	N	--	<p>Employment Growth Option 1 seeks to focus new development within or adjacent to existing employment locations in the first instance. However, this will not occur in all cases and thus it cannot be concluded that this option will maximise the use of previously developed land. This growth option will, on balance, result in a neutral effect on this sustainability objective.</p> <p>Employment Growth Option 2 will focus new development outside of existing settlement boundaries on open land. This option, therefore, represents a significant negative effect on this sustainability option.</p>
To improve educational attainment of the working age population	+	+	<p>Both Growth Options have the potential to indirectly improve education attainment by bringing forward opportunities for apprenticeships and on-job training in conjunction with the employment development.</p> <p>The promotion of sustainable communities is a strategic objective of the Local Plan Review (Strategic Objective 1). The development of both the Growth Options will contribute to this sustainability objective and represent a minor positive effect.</p>
Economic Factors			
To achieve stable and sustainable levels of economic growth and	++	++	The promotion of economic prosperity is a strategic objective of the Local Plan Review (Strategic Objective 8) .

Sustainability Objective	Employment Growth Option 1 – Expansion of existing employment locations	Employment Growth Option 2 – New locations	Appraisal Comments
maintain economic competitiveness			Both options will bring forward economic growth and prosperity to the District. On this basis, both the growth options will have a significant adverse effect on this sustainability objective.
Environmental Factors			
To manage water availability and reduce water or air pollution	N	N	<p>Specific measures relating to the management of water availability and the minimisation of water or air pollution levels have not been considered in the Lichfield District Local Plan Review: Scope, Issues and Options document.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will not result in water or air pollution. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to both the employment growth options. Based on the above, the growth options represent a neutral effect on this sustainability objective.</p>
To minimise waste and increase the recycling and reuse of waste materials	+	+	<p>Specific measures relating to the minimisation of waste and recycling have not been considered in the Lichfield District Local Plan Review: Scope, Issues and Options document. This is an important consideration as waste arisings will inevitably increase due to the increase in the District’s economic activity.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will provide facilities to allow the recycling of materials. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, both the growth options represent a positive effect on this sustainability objective.</p>
To reduce and manage flood risk and surface water run off	N	N	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change.

Sustainability Objective	Employment Growth Option 1 – Expansion of existing employment locations	Employment Growth Option 2 – New locations	Appraisal Comments
			<p>The proposed Employment Growth Options do not have precise geographic boundaries and therefore impacts on flood risk areas cannot be fully assessed at this stage. The future stages of the Sustainability Appraisal of the Local Plan Review will assess flood risk in detail. Employment Development in either options will inevitably increase impermeable surfaces resulting in increased water run-off and potential pollution of water courses.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development is accompanied by initiatives to reduce run off. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the growth options represent a neutral effect on this sustainability objective.</p>
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	N	N	<p>Strategic Objective 3 seeks to minimise the effect of new development, required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change.</p> <p>Mitigating the effects of climate change is a 'cross discipline' issue and existing policies in the Lichfield Local Plan Strategy seek to address this sustainability objective in the context of promoting sustainable development. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the growth options represent a neutral effect on this sustainability objective.</p>
To promote biodiversity protection enhancement and management of species and habitats	N	N	Both Employment Growth Options have the potential to impact negatively on the District's biodiversity assets via the loss of open land but also offer the opportunity for significant ecological enhancement and habitat creation. Ultimately impacts on the biodiversity will depend on quantum of new land take together with the location and design of the proposed growth options.

Sustainability Objective	Employment Growth Option 1 – Expansion of existing employment locations	Employment Growth Option 2 – New locations	Appraisal Comments
			Existing Policy NR3 in the Lichfield Local Plan Strategy seek to ensure that new development does not result in an adverse effect on biodiversity, protected species or their habitats. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the growth options. Based on the above, both the growth options represent a neutral effect on this sustainability objective.
To ensure the protection and enhancement of the historic environment and its setting	N	N	<p>Both Employment Growth Options have the potential to result in negative impacts on the historic environment, including archaeological remains, and their settings.</p> <p>The spatial options Lichfield District Local Plan Review: Scope, Issues and Options document do not have specific geographic boundaries and therefore impacts on the historic environment cannot be assessed at this stage.</p> <p>Existing Core Policy 14 in the Lichfield Local Plan Strategy seek to ensure that new development does not result in an adverse effect on the built or historic environment. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the growth options. Based on the above, all the growth options represent a neutral effect on this sustainability objective.</p>
Protect, enhance and manage the character and quality of the landscape and townscape	N	N	Both Employment Growth Options have the potential to impact negatively on the District’s landscape and townscape. Ultimately impacts on the landscape and townscape will depend on quantum of new land take together with the location and design of the proposed growth areas. The spatial options Lichfield District Local Plan Review: Scope, Issues and Options document do not have specific geographic boundaries and therefore impacts on the landscape and townscape cannot be fully assessed at this stage.

Sustainability Objective	Employment Growth Option 1 – Expansion of existing employment locations	Employment Growth Option 2 – New locations	Appraisal Comments
			<p>Strategic Objective 12 seeks to protect and enhance the quality and character of the District’s landscape character including the openness of the Green Belt.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development does not result in an adverse effect on the landscape and townscape of the District. These policies will be taken forward into the Local Plan Review and thus the implementation of the policies will apply to all the growth options. Based on the above, all the growth options represent a neutral effect on this sustainability objective.</p>
To increase opportunities for non-car travel and reduce the need for travel	+	-	<p>Employment Growth Option 1 offer the best opportunities to increase non-car travel and reducing the need for travel due to the focussing of new development in existing employment locations were public transport, including opportunities for enhanced services, is available. Based on the above, Employment Growth Option 1 score as a minor positive effect on this sustainability objective.</p> <p>Employment Growth Option 2 is less suited to reducing the need for travel due to the dispersed nature of the likely development, i.e. away from existing public transport route.</p> <p>It is accepted that existing policies in the Lichfield Local Plan Strategy seek to promote sustainable transport which, if implemented, will improve the score for Employment Growth Options 2 by the provision/investment in new or enhanced public transport in conjunction with the proposed employment development. However, as no specific measures have been considered in the Lichfield District Local Plan Review: Scope, Issues and Options document impacts on this objective cannot be fully assessed at this stage. Based on the above, Employment Growth Options 2 represent a minor negative effect on this sustainability objective.</p>

Summary

Both options tend to match each other except for a significant negative effect on the efficient use of land objective. Both have a significant positive effect on the economic growth objective as anticipated.

Sustainability Objective	No policy.	Home-working.	Rural economy.	Brownfield.	Greenfield.	Additional employment growth.	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	?	N	N	N	-	-	<p>Although employment and economic development may occur incrementally in any case, this would be speculative and therefore any arising need to provide for new local employees is difficult to predict.</p> <p>Home-working would be locally neutral but may lead to more need if employees who would have worked outside the District find Lichfield to be a more desirable residential location.</p> <p>Support for the rural economy would tend to benefit local residents.</p> <p>Brownfield sites would tend to favour local residents as by definition they are in the built up areas. Greenfield sites may be more accessible and attractive to the external workforce, and increase local need.</p> <p>Additional employment growth may increase pressure on local need to the detriment of existing residents.</p>
To promote safe communities and reduce fear of crime	N	N	-	N	-	-	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Strategic Objective 11 seeks to ensure a high standard of community safety and thus the preferred option will need to</p>

Sustainability Objective	No policy.	Home-working.	Rural economy.	Brownfield.	Greenfield.	Additional employment growth.	Appraisal Comments
							<p>include reference to specific measures, including designing out crime and investment in local policing, to minimise crime and fear of crime.</p> <p>No policy would maintain the status quo on this objective.</p> <p>Home-working has the potential to reduce commercial crime if less facilities are needed.</p> <p>A more prosperous rural economy offers more opportunity for crime and in more remote places.</p> <p>Brownfield sites should be integrated with existing community safety operations. Greenfield sites would add new operational community safety areas.</p> <p>Additional employment growth offers new opportunities for crime.</p>
Improve access to health facilities and promote wellbeing	N	N	N	N	N	N	None of the policy options would have a direct effect on this objective.
Maximise the use of previously developed land/ buildings and encourage	--	+	?	++	-	+	<p>Having no policy would fail to deliver on this objective.</p> <p>In several senses, home-working helps this objective by using existing spaces more effectively and potentially reducing</p>

Sustainability Objective	No policy.	Home-working.	Rural economy.	Brownfield.	Greenfield.	Additional employment growth.	Appraisal Comments
the efficient use of land							<p>land take by decreasing the need for workspace.</p> <p>The effect on this objective depends on the demand for any additional development on non-brownfield land, for example outside the curtilage of rural buildings.</p> <p>The brownfield part of the policy delivers this objective. Greenfield development would be contrary, although there may always be a choice of these types of land for developers even with a greenfield option.</p> <p>Additional employment growth offers more option for re-use of land.</p>
To improve educational attainment of the working age population	-	+	+	+	N	+	<p>No policy would limit the opportunity for employment and economic development which enables education. This could be mitigated by a policy supporting high quality jobs in sectors appropriate to the area.</p> <p>Home-working could accompany access to wider educational opportunities.</p> <p>Boosting the rural economy will improve access to educational opportunities from those areas.</p> <p>The land type will have no effect on this objective.</p>

Sustainability Objective	No policy.	Home-working.	Rural economy.	Brownfield.	Greenfield.	Additional employment growth.	Appraisal Comments
							The greater the employment and economic development, generally the greater the educational opportunities.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	--	+	++	+	+	+	<p>The promotion of economic prosperity is a strategic objective of the Local Plan Review (Strategic Objective 8). The promotion of employment and economic development through all the policy options will contribute to this sustainability objective.</p> <p>No policy would have a significant negative effect on this objective because of the vacuum in support.</p> <p>Home-working may have a positive effect by helping productivity.</p> <p>The rural economy will make a significant positive on this objective in Lichfield District, especially in that area.</p>

<p>To manage water availability and reduce water and air pollution</p>	<p>-</p>	<p>N</p>	<p>-</p>	<p>+</p>	<p>-</p>	<p>-</p>	<p>No policy would miss the opportunity to improve current conditions.</p> <p>Home-working would only displace any effects and these would currently be relatively minimal.</p> <p>Growth in the rural economy could potentially increase negative effects in that area and in an area more likely to have effects due to reduced infrastructure.</p> <p>Brownfield areas are more likely to have existing infrastructure and be adaptable. Greenfield areas would be converse, requiring infrastructure and in areas of new susceptibility.</p> <p>No housing would negate the opportunity to reduce water and air pollution.</p> <p>Additional employment growth adds to the risk against this objective including through expansion into new areas. This may be mitigated by the opportunity to develop more efficient operations.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will not result in water or air pollution. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the employment and economic development options.</p>
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To minimise waste and increase the recycling and reuse of waste materials	N	+	+	+	+	+	<p>No policy would maintain the status quo on this objective.</p> <p>Specific measures relating to the minimisation of waste and recycling have been considered in the Lichfield District Local Plan Review: Core Policy 3. This is an important consideration as waste arisings will inevitably increase due to the increase in the District's economic activity under the growth options, which it is hoped CP3 will mitigate.</p> <p>Home-working would just displace the issue.</p> <p>The geographic spread of options will have no effects.</p> <p>Additional employment growth will further increase waste but it is considered that the mitigation for the other policy options will accommodate this.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development will provide facilities to allow the recycling of materials. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the policy options represent a positive effect on this sustainability objective.</p>
To reduce and manage flood	N	N	N	N	N	N	<p>Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change.</p>

risk and surface water run off							<p>No policy will not change effects, although employment and economic development is likely as a continuation of history without policy support.</p> <p>Home-working maintains the status quo.</p> <p>The future stages of the Sustainability Appraisal of the Local Plan Review will assess flood risk in detail. Development under all growth options will inevitably increase impermeable surfaces resulting in increased water run-off and potential pollution of water courses.</p> <p>Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development is accompanied by initiatives to reduce run off. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the growth options. Based on the above, all the policy options represent a neutral effect on this sustainability objective.</p>
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	-	N	N	N	N	N	<p>Strategic Objective 3 seeks to minimise the effect of new development, required to meet the needs of the District, on the environment and help the District mitigate and adapt to the adverse effects of climate change.</p> <p>No policy would miss the opportunity for regeneration and to reduce the impacts of</p>

							<p>climate change and the Districts contribution to the causes of.</p> <p>Mitigating the effects of climate change is a 'cross discipline' issue and existing policies in the Lichfield Local Plan Strategy, including Core Policy 3, seek to address this sustainability objective in the context of promoting sustainable development. These policies will be taken forward into the Local Plan Review and thus the implementation of the existing policies will apply to all the policy options. Based on the above, all the growth options represent a neutral effect on this sustainability objective.</p>
To promote biodiversity protection enhancement and management of species and habitats	N	N	N	N	N	N	<p>No policy would maintain the status quo, although employment and economic development is likely as a continuation of history even without policy support.</p> <p>Home-working maintains the status quo.</p> <p>All development options have the potential to impact negatively on the District's biodiversity assets in both the urban and countryside areas but also offer the opportunity for significant ecological enhancement and habitat creation. Ultimately impacts on the biodiversity will depend on quantum of new land take together with the location and design of the proposed growth areas.</p> <p>Existing Policy NR3 in the Lichfield Local Plan Strategy seeks to ensure that new</p>

							development does not result in an adverse effect on biodiversity, protected species or their habitats. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the growth options. Based on the above, all the options represent a neutral effect on this sustainability objective.
To ensure the protection and enhancement of the historic environment and its setting	N	N	N	N	N	N	<p>No policy would maintain the status quo, although employment and economic development is likely as a continuation of history even without policy support.</p> <p>Home-working is unlikely to affect this objective unless there are adaptations to a listed building.</p> <p>All growth options have the potential to result in negative impacts on the historic environment, including archaeological remains, and their settings.</p> <p>Existing Core Policy 14 in the Lichfield Local Plan Strategy seeks to ensure that new development does not result in an adverse impact on the built or historic environment. This policy will be taken forward into the Local Plan Review and thus the implementation of the policy will apply to all the employment and economic development policy options. Based on the above, all the growth</p>

							options represent a neutral effect on this sustainability objective.
Protect, enhance and manage the character and quality of the landscape and townscape	N	N	N	N	N	N	<p>No policy would maintain the environment for this objective, although employment and economic development is likely as a continuation of history even without policy support.</p> <p>Home-working would maintain the status quo.</p> <p>All growth options have the potential to impact negatively or positively on the District's landscape and townscape. Ultimately impacts on the landscape and townscape will depend on quantum of new land take together with the location and design of the proposed housing mix developments.</p> <p>Strategic Objective 12 seeks to protect and enhance the quality and character of the District's landscape character including the openness of the Green Belt. Existing policies in the Lichfield Local Plan Strategy seek to ensure that new development does not result in an adverse effect on the landscape and townscape of the District. These policies will be taken forward into the Local Plan Review and thus the implementation of the policies will apply to all the policy</p>

							<p>options. Based on the above, the growth options represent a neutral effect on this sustainability objective.</p>
<p>To increase opportunities for non-car travel and reduce the need for travel</p>	<p>N</p>	<p>+</p>	<p>-</p>	<p>+</p>	<p>-</p>	<p>?</p>	<p>It is accepted that existing policies in the Lichfield Local Plan Strategy seek to promote sustainable transport which, if implemented, will improve the assessment for growth options by the provision/investment in new or enhanced public transport in conjunction with the proposed development. Specific measures have been considered in the Lichfield District Local Plan Review: Preferred Options document under Core Policy 5.</p> <p>No policy would be neutral in maintaining the status quo, although employment and economic development is likely as a continuation of history even without policy support.</p> <p>Home-working reduces the need for travel.</p> <p>Boosting the rural economy would lead to increased travel due to reduced non-car travel options and the need for travel.</p> <p>Brownfield development is more likely to be in areas with opportunities for non-car travel and reduce the need for travel. Conversely, greenfield development is less likely to be in areas with</p>

							<p>opportunities for non-car travel and increase the need for travel.</p> <p>The effect of additional employment growth will depend upon precise location but will be mitigated by the steer to the most sustainable locations.</p>
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Overall Summary – Preferred Policy Direction: Our Employment and economic development

The scope assessments are repeated here as the preferred option of employment growth will be focused on our current employment areas, particularly in Lichfield City, Burntwood and at Fradley Park, which was one of the two options in the Scope consultation now selected. The conclusion to the Scope assessment, paragraph 5.10.1, was that Employment Growth Option 1 assessed best overall as it reduces the geographic spread of development, represents the efficient use of land, contributes to economic growth, as well as reducing the need to travel by using and enhancing existing public transport links. It is therefore logical from the sustainability perspective to present it as the preferred option.

This latest appraisal assesses the details of the policy which support the locational direction.

Having no policy generally has neutral or negative effects, significant in respect of previously developed land use and economic growth objectives.

Home-working is generally positive across objectives but its significance is limited by its current limited scale relative to all employment and economic development.

Supporting the rural economy is marginally more positive than detrimental to sustainability, but significantly beneficial to economic growth objective. The minor negatives result from remoteness reducing accessibility.

Promoting brownfield development is significantly more beneficial than greenfield development, especially, of course, on use of previously developed land, with no negatives; whilst use of greenfield land would be marked by negative effects.

Additional economic growth has some negative effects but none significant, balanced by positive effects on economic related objectives.

Preferred strategic policy: Our centres

Sustainability Objective	No policy	securing sustainable development	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	N	No direct link to this objective.
To promote safe communities and reduce fear of crime	N	N	<p>Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Strategic Objective 11 seeks to ensure a high standard of community safety.</p> <p>No direct link to this objective but centres have distinctive crime characteristics and would benefit from consideration in locations, design and community safety provision.</p>
Improve access to health facilities and promote wellbeing	-	?	<p>Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities.</p> <p>No policy would fail to deliver this objective through planning, although health facilities may be delivered by other means.</p> <p>Health facilities may be part of the uses in our centres.</p>
Maximise the use of previously developed land/buildings and encourage the	--	+	<p>No policy would fail to deliver this objective as the Council could not ensure efficient use of land.</p> <p>Managing development in our centres is likely to meet this objective because of the locations.</p>

Preferred strategic policy: Our centres

Sustainability Objective	No policy	securing sustainable development	Appraisal Comments
efficient use of land			
To improve educational attainment of the working age population	-	+	No policy would fail to benefit this objective, however, education could be provided irrespectively. The policy would support education as part of centres economies but is beyond the total control of planning.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	--	++	No policy would fail to deliver this objective due to lack of management. The policy is designed to meet this objective.
To manage water availability and reduce water and air pollution	N	N	No direct link to this objective but implementation may impact upon it depending upon locations and construction methods, especially air pollution in high density areas.
To minimise waste and increase the recycling and	N	N	No direct link to this objective so long as the service can absorb the commercial provision.

Preferred strategic policy: Our centres

Sustainability Objective	No policy	securing sustainable development	Appraisal Comments
reuse of waste materials			
To reduce and manage flood risk and surface water run off	N	N	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No direct link to this objective subject to site locations and the inevitable run off from the built environment.
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	N	N	No direct link to this objective but implementation should consider any incidental impacts on this objective. Concentration in centres could maintain the existing situation.

To promote biodiversity protection enhancement and management of species and habitats	N	N	No direct link to this objective but urban wildlife could be temporarily impacted by development.
To ensure the protection and enhancement of the historic environment and its setting	--	+	Because the historic environment is prevalent in our centres, no policy would significantly fail to deliver on this objective. The policy will contribute to positive management of our centres for this objective but there may be conflict with other objectives for the centres.
Protect, enhance and manage the character and quality of the landscape and townscape	-	+	No policy would fail to deliver on this objective due to a lack of management of our centres. The policy will contribute to this objective by managing our centres in terms of townscape but subject to high design quality.
To increase opportunities for non-car travel and reduce the need for travel	--	++	No policy would miss the Council's opportunity to manage for this objective. The policy would contribute to this objective by concentrating on our centres with existing infrastructure and through supporting improvements to the accessibility of centres, especially sustainable means of transport.

Summary

Generally, having no policy would have negative effects on sustainability objectives, significantly upon efficient use of land, economic growth, the historic environment and travel; with no positives. The policy would have generally positive effects and significant benefits on the economic growth and travel objectives; and no negatives; therefore having the policy is better than not.

Preferred policy: Lichfield economy

Sustainability Objective	Lichfield economy	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	No direct link to this policy but the need for homes in the area will be linked to the Lichfield economy.
To promote safe communities and reduce fear of crime	N	Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Strategic Objective 11 seeks to ensure a high standard of community safety. No direct link to this objective but Lichfield has distinctive crime characteristics and would benefit from consideration in design and community safety provision.
Improve access to health facilities and promote wellbeing	N	No direct link to this policy but the leisure facilities would promote wellbeing.
Maximise the use of previously developed land/buildings and encourage the efficient use of land	++	The policy will be a significant contributor to delivering this objective through exploiting redevelopment opportunities, and encouraging the efficient use of land.
To improve educational attainment of the	+	Education facilities are included in the policy.

Preferred policy: Lichfield economy

Sustainability Objective	Lichfield economy	Appraisal Comments
working age population		
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	++	A policy on the Lichfield economy is designed to deliver this objective locally.
To manage water availability and reduce water and air pollution	?	No direct link to this objective but implementation may affect it subject to design and construction methodology.
To minimise waste and increase the recycling and reuse of waste materials	?	No direct link to this objective but the use of sustainable construction method will support it and so long as the service can absorb the commercial input.
To reduce and manage flood risk and surface water run off	?	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No direct link to this objective but the use of sustainable urban drainage systems will support it.
To reduce and manage the impacts of	+	Concentrating development in this centre supports this objective but some projects will lead to consequential negative effects on this objective through development processes.

Preferred policy: Lichfield economy

Sustainability Objective	Lichfield economy	Appraisal Comments
climate change and the Districts contribution to the causes of.		
To promote biodiversity protection enhancement and management of species and habitats	?	No direct link to this objective but local urban wildlife could be temporarily impacted by development.
To ensure the protection and enhancement of the historic environment and its setting	++	The policy explicitly supports this objective by sustaining and enhancing the significance of its historic environment and heritage assets and their setting.
Protect, enhance and manage the character and quality of the landscape and townscape	?	Depends upon project locations and if the landscape and townscape can absorb constructions.

To increase opportunities for non-car travel and reduce the need for travel	+	By definition the policy should meet this objective but the road linked projects negate some positive effect.
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Summary

Generally this policy is positively sustainable, especially to the economic growth objective, with no negative effects.

Preferred policy: Burntwood economy		
Sustainability Objective	Burntwood economy	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	No direct link to this policy but the need for homes in the area will be linked to the Burntwood economy.
To promote safe communities and reduce fear of crime	N	Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Strategic Objective 11 seeks to ensure a high standard of community safety. No direct link to this objective but Burntwood town centre has distinctive crime characteristics and would benefit from consideration in design and community safety provision.
Improve access to health facilities and promote wellbeing	+	The policy explicitly references new health, leisure and recreational resources, although other partner agencies are needed to help deliver this objective.

Preferred policy: Burntwood economy

Sustainability Objective	Burntwood economy	Appraisal Comments
Maximise the use of previously developed land/buildings and encourage the efficient use of land	++	The policy will be a significant contributor to delivering this objective through regeneration and specific projects in the IDP, and encouraging the efficient use of land in a town centre where previously developed land is available.
To improve educational attainment of the working age population	++	Education resources are included in the policy and there is reference to 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, significantly, aspirations.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	++	A policy on the Burntwood economy is designed to deliver this objective locally.
To manage water availability and reduce water and air pollution	?	No direct link to this objective but implementation may affect it subject to design and construction methodology.
To minimise waste and increase the recycling and	?	No direct link to this objective but the use of sustainable construction method will support it, and so long as the service can absorb the commercial input.

Preferred policy: Burntwood economy

Sustainability Objective	Burntwood economy	Appraisal Comments
reuse of waste materials		
To reduce and manage flood risk and surface water run off	?	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No direct link to this objective but the use of sustainable urban drainage systems will support it.
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	+	Concentrating development in this centre supports this objective but some projects will lead to consequential negative effects on this objective through development processes.
To promote biodiversity protection enhancement and management of species and habitats	?	No direct link to this objective but local urban wildlife could be temporarily impacted by development.
To ensure the protection and enhancement of the historic	N	The historic environment is relatively insignificant in Burntwood.

Preferred policy: Burntwood economy

Sustainability Objective	Burntwood economy	Appraisal Comments
environment and its setting		
Protect, enhance and manage the character and quality of the landscape and townscape	?	No reference is made to townscape management in the policy.
To increase opportunities for non-car travel and reduce the need for travel	++	As a town centre in Lichfield District, Burntwood is already an accessible location for development. The policy also includes references to enhancements to pedestrian linkages and public transport facilities.

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Summary

Generally this policy is positively sustainable, significantly to the efficient use of land, educational attainment, economic growth and travel objectives, with no negative effects.

Preferred Policy Direction: Tourism

Sustainability Objective	No policy	Tourism	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	N	No direct link to this objective but this objective if met would support the policy.
To promote safe communities and reduce fear of crime	N	N	No direct impact on this objective.
Improve access to health facilities and promote wellbeing	N	N	No direct impact on this objective.
Maximise the use of previously developed land/buildings and encourage the efficient use of land	N	?	The impact on this objective is uncertain.
To improve educational attainment of the working age population	N	N	No direct impact on this objective.

Preferred Policy Direction: Tourism

Sustainability Objective	No policy	Tourism	Appraisal Comments
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	++	Tourism offer economic benefits to the District
To manage water availability and reduce water and air pollution	N	N	No direct impact on this objective.
To minimise waste and increase the recycling and reuse of waste materials	N	N	No direct link to this objective so long as the service can absorb the provision.
To reduce and manage flood risk and surface water run off	N	N	No direct impact on this objective.
To reduce and manage the impacts of climate change and the Districts	N	N	No direct impact on this objective.

Preferred Policy Direction: Tourism

Sustainability Objective	No policy	Tourism	Appraisal Comments
contribution to the causes of.			
To promote biodiversity protection enhancement and management of species and habitats	N	N	No direct impact on this objective.
To ensure the protection and enhancement of the historic environment and its setting	N	+	Tourism offer indirect benefits to this objective
Protect, enhance and manage the character and quality of the landscape and townscape	N	N	No direct impact on this objective.
To increase opportunities for non-car travel	N	?	No direct impact on this objective.

Preferred Policy Direction: Tourism			
Sustainability Objective	No policy	Tourism	Appraisal Comments
and reduce the need for travel			

Summary

This Policy has no direct effect on the majority of SA objectives.

The policy will have significant positive effects on the economic development and conservation and protection of the historic environment.

Preferred Policy Direction: Healthy & Safe Communities

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Sustainability Objective	No policy	Healthy & Safe Communities	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	N	No direct link to this objective but this objective if met would support the policy, especially affordable homes.
To promote safe communities and reduce fear of crime	N	++	Crime rates in the District are lower than the national average but burglary and theft rates have increased in recent years. Strategic Objective 11 seeks to ensure a high standard of community safety. Policy includes community safety.
Improve access to health facilities and promote wellbeing	--	++	Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities. No policy would fail to deliver this objective through planning, although health facilities may be delivered by other means. Policy is designed to deliver this objective.
Maximise the use of previously developed land/buildings and encourage the efficient use of land	N	?	No policy would maintain the current situation. Policy effects will be determined by locations.
To improve educational	N	N	No direct impact on this objective.

Preferred Policy Direction: Healthy & Safe Communities

Sustainability Objective	No policy	Healthy & Safe Communities	Appraisal Comments
attainment of the working age population			
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	N	No direct effect on this objective but health and safety contribute to the economy.
To manage water availability and reduce water and air pollution	N	N	No direct link to this objective but implementation may impact upon it depending upon locations and construction methods.
To minimise waste and increase the recycling and reuse of waste materials	N	N	No direct link to this objective so long as the service can absorb the provision.
To reduce and manage flood risk and surface water run off	N	N	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No direct link to this objective subject to site locations and the inevitable run off from the built environment.

Preferred Policy Direction: Healthy & Safe Communities

Sustainability Objective	No policy	Healthy & Safe Communities	Appraisal Comments
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	N	N	No direct link to this objective but implementation should consider any incidental impacts on this objective. Delivery of the objective will support the policy.
To promote biodiversity protection enhancement and management of species and habitats	N	N	No direct link to this objective subject to infrastructure locations.
To ensure the protection and enhancement of the historic environment and its setting	N	N	No direct link subject to infrastructure locations.
Protect, enhance and manage the character and quality of the landscape and townscape	N	N	No direct link subject to infrastructure locations, although any development will affect the objective.

Preferred Policy Direction: Healthy & Safe Communities

Sustainability Objective	No policy	Healthy & Safe Communities	Appraisal Comments
To increase opportunities for non-car travel and reduce the need for travel	N	?	No policy would miss the Council's opportunity to manage for this objective. Effects of the policy will depend upon infrastructure locations.

Summary

No policy will have a significant negative effect on the health objective.

The policy will have significant positive effects on the health and community safety objectives.

Preferred Policy Direction: Open Space and Recreation

Sustainability Objective	No policy	Open Space and Recreation	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	N	No direct link to this objective.
To promote safe communities and reduce fear of crime	N	N	No direct link to this objective but such policy may support an acknowledged diversionary activity for some communities.
Improve access to health facilities and promote wellbeing	-	+	<p>Strategic Objective 11 seeks to promote and ensure healthy choices and healthier living. New development has the potential to offer the opportunity to 'design-in' new indoor and outdoor leisure facilities and bring forward new or expanded health facilities.</p> <p>No policy would fail to deliver this objective through planning, although health facilities may be delivered by other means.</p> <p>The policy will support appropriate improvements to community infrastructure which increase the opportunities to access activities that increase health and wellbeing in our communities; and shared facilities which increase the opportunities to access activities that increase health and wellbeing in our communities including provision within schools and colleges.</p>
Maximise the use of previously developed land/buildings and encourage the efficient use of land	-	N	<p>No policy would fail to deliver this objective as the Council could not ensure efficient use of land and previously developed land is not explicitly mentioned.</p> <p>The policy does not explicitly support use of previously developed land but the protection of buildings and land encourages the efficient use of land.</p>

To improve educational attainment of the working age population	N	N	There is no explicit link to this objective but shared facilities provision within schools and colleges and initiatives that influence attitudes and behaviours to inspire demand for sport and physical activity will be supported including those that aim to address obesity, work with our schools and colleges implies that there may be a link.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	N	There is no direct link to this objective.
To manage water availability and reduce water and air pollution	N	N	No direct link to this objective but implementation of building may impact upon it depending upon locations and construction methods.
To minimise waste and increase the recycling and reuse of waste materials	N	N	No direct link to this objective.
To reduce and manage flood risk and surface water run off	N	N	Areas of Lichfield District lie within areas of flood risk, which may expand due to climate change. No direct link to this objective subject to facilities locations and the inevitable run off from built environment but this is in the control of providers, but open space is a potential contributor to flood risk management and surface water runoff, especially if protected land is in relevant flood zones.

To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	-	+	<p>The loss of open space in the absence of a protective policy could impact upon this objective.</p> <p>The protection of open space will counter the negative effect of loss to potentially damaging uses including hard surfaces.</p>
To promote biodiversity protection enhancement and management of species and habitats	N	N	No direct link to this objective but the loss of open space may be detrimental to biodiversity which has benefit from its presence, and, to the contrary, the protection of open space is more likely to have incidental benefit to biodiversity, especially in wildlife corridors.
To ensure the protection and enhancement of the historic environment and its setting	-	?	<p>No policy would fail to deliver on this objective by not managing land uses which are usually beneficial to the historic environment and its setting.</p> <p>Depends upon the locations of open space and recreation, but open space is generally beneficial to the historic environment and its setting.</p>
Protect, enhance and manage the character and quality of the landscape and townscape	-	+	<p>No policy would fail to deliver on this objective due to a lack of management of development.</p> <p>Open space is usually integral to management which is of benefit to this objective, especially in townscape and the arrangement of spaces.</p>
To increase opportunities for non-car travel	-	++	No policy would miss the Council's opportunity to manage for this objective, especially if users have to travel to alternative provision due to loss of local provision.

and reduce the need for travel			<p>The policy would contribute to this objective by managing accessibility. The protection of existing buildings and land ensures local accessibility.</p> <p>The policy's point that sustainable places that make easy for our communities to become active including open space infrastructure that provides a connective active travel routes (walking and cycling) between existing open space, sports and recreational infrastructure will be supported; and support the development and growth of annual or one off sporting events that are accessible to our communities, will both contribute to this objective.</p>
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Summary

Generally, having no policy would have negative effects on sustainability objectives; with no positives. The policy would have generally positive effects and significant benefit on the travel objective; and no negatives; therefore having the policy is better than not.

Preferred policy direction: Our natural resources

Sustainability Objective	No policy	Our natural resources	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	-	Currently no direct link to this objective. The policy will be a constraint on homes provision.
To promote safe communities and reduce fear of crime	N	N	No direct link to this objective.
Improve access to health facilities and promote wellbeing	N	+	No direct link to this objective for no policy. Interaction with natural resources is proven to help wellbeing.
Maximise the use of previously developed land/ buildings and encourage the efficient use of land	N	+	No policy would maintain the current circumstances. Natural resources as a constraint would tend to promote previously developed land.

To improve educational attainment of the working age population	N	N	There is no direct link to this objective.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	-	Currently no direct link to this objective. The policy will be a potential constraint on economic activity.
To manage water availability and reduce water and air pollution	N	N	There is no direct link to this objective, although natural resources could reduce pollution.
To minimise waste and increase the recycling and reuse of waste materials	N	N	No direct link to this objective.
To reduce and manage flood risk and surface water run off	N	N	No direct link to this objective.
To reduce and manage the impacts of	--	++	No policy will fail to deliver on this objective. Management of natural resources is a key way to help this objective.

climate change and the Districts contribution to the causes of.			
To promote biodiversity protection enhancement and management of species and habitats	--	++	No policy will fail to deliver on this objective. The policy promotes this objective.
To ensure the protection and enhancement of the historic environment and its setting	-	+	No policy fails this objective. The historic landscapes part of this policy partially delivers this objective.
Protect, enhance and manage the character and quality of the landscape and townscape	-	++	No policy fails this objective. The policy delivers this objective, covering Natural and historic landscapes.
To increase opportunities for non-car travel and reduce the need for travel	N	N	There is no direct link to this objective.

Summary

Generally, having no policy would have negative effects on sustainability objectives, significantly upon the climate change and biodiversity objectives; with no positives. The policy would have mostly positive effects and significantly for the climate change, biodiversity, and landscape and townscape objectives; therefore having the policy is better than not.

Preferred Policy Direction: historic and built environment

Sustainability Objective	No policy	historic and built environment	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	-	<p>No policy would support the status quo.</p> <p>The policy will be a constraint on homes provision, including in respect of conflict with density and homes in the historic environment trend to be higher value for affordable.</p> <p>This may be mitigated by using residential development as enabling development in the historic environment.</p>
To promote safe communities and reduce fear of crime	N	N	<p>No direct link to this objective but the historic environment may conflict with the community safety objective, for example on security measures.</p>
Improve access to health facilities and promote wellbeing	N	+	<p>No direct link to this objective for no policy.</p> <p>High quality design, tree planting, landscaping and green spaces being required as part of new development throughout the District to improve wellbeing is a benefit of the policy.</p>
Maximise the use of previously developed land/ buildings and encourage the efficient use of land	-	+	<p>No policy would miss an opportunity to support this objective.</p> <p>This environment usually has the most opportunity to support this objective.</p> <p>Policy for the re-use maintenance and repair of listed buildings and other heritage assets being supported, particularly those that have been identified as being at risk, supports this objective.</p>

To improve educational attainment of the working age population	N	N	There is no direct link to this objective.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	+	No policy will maintain the current circumstance. The policy may be seen as a constraint through protectiveness but, as stated, the historic environment contributes to sustainable communities, including economic vitality.
To manage water availability and reduce water and air pollution	N	N	There is no direct link to this objective.

To minimise waste and increase the recycling and reuse of waste materials	N	N	No direct link to this objective.
To reduce and manage flood risk and surface water run off	N	N	No direct link to this objective.
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	-	+	<p>No policy will fail to deliver on this objective where this environment is a key contributor to the causes of climate change.</p> <p>High quality design, tree planting, landscaping and green spaces will be required as part of new development throughout the District to reduce the heat island effect.</p>

To promote biodiversity protection enhancement and management of species and habitats	N	N	No direct link to this objective.
To ensure the protection and enhancement of the historic environment and its setting	--	++	No policy fails this objective. The policy delivers this objective.
Protect, enhance and manage the character and quality of the landscape and townscape	--	++	No policy fails this objective. The policy delivers this objective. In conjunction with the landscape policy, landscapes and views that form the setting to the built and historic environment will also be conserved and enhanced.
To increase opportunities for non-car travel and reduce the need for travel	N	N	There is no direct link to this objective.

Summary

Generally, having no policy would have negative effects on sustainability objectives, significantly upon the historic environment and landscape and townscape objectives; with no positives. The policy would have mostly positive effects and significantly for the historic environment and landscape and townscape objectives as expected; therefore having the policy is better than not.

Preferred Policy Direction: High Quality Design

Sustainability Objective	No policy	Preferred Policy Direction: High Quality Design	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	-	<p>No policy would maintain the current situation.</p> <p>The built vernacular part of the policy may be a constraint on government policy to promotion of density-driven, residential led development within and on the edge of town centres and at key transport nodes, which may provide additional housing and affordable homes as each unit type may be smaller due to the design requirement.</p>
To promote safe communities and reduce fear of crime	--	++	<p>No policy would miss the opportunity to build in this objective.</p> <p>The policy has a part to deliver this objective.</p>
Improve access to health facilities and promote wellbeing	N	N	No direct link to this objective.

Maximise the use of previously developed land/ buildings and encourage the efficient use of land	N	N	No direct link to this policy as it does not guide allocation of land, however, the policy does guide potential developers to consider using built up areas to best advantage.
To improve educational attainment of the working age population	N	N	There is no direct link to this objective.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	+	No policy will maintain the current circumstance. The policy encourages land use that makes land most marketable.
To manage water availability and reduce water and air pollution	N	+	No policy will maintain the current circumstance. Part of the policy proposes control of carbon emissions.
To minimise waste and increase the recycling and reuse of waste materials	N	N	No direct link to this objective.

To reduce and manage flood risk and surface water run off	N	N	No direct link to this objective but the policy could reference guidance to achieve it.
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	-	++	No policy will fail to deliver on this objective where this environment is a key contributor to the causes of climate change. The policy specifically targets carbon emissions, and sustainable travel which would be beneficial to this objective.
To promote biodiversity protection enhancement and management of species and habitats	-	++	No policy would fail on this objective. The policy has a criteria, the natural environment, to support this objective.
To ensure the protection and enhancement of the historic environment and its setting	--	++	No policy fails this objective. The policy delivers this objective, as its first criteria.
Protect, enhance and manage the character and quality of the	--	++	No policy fails this objective. The policy delivers this objective.

landscape and townscape			
To increase opportunities for non-car travel and reduce the need for travel	-	++	No policy would fail this objective. The policy has a part on sustainable travel.

Summary

Generally, having no policy would have negative effects on sustainability objectives, significantly upon the community safety, historic environment and, landscape and townscape objectives; with no positives. The policy would have mostly positive effects and significantly for the community safety, climate change, biodiversity, historic environment, and landscape and townscape, and travel objectives as expected; therefore having the policy is better than not.

Preferred Policy Direction historic and built environment

Preferred Policy Direction: Evidence supporting heritage proposals

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Sustainability Objective	No policy	Preferred Policy Direction: Evidence supporting heritage proposals	Appraisal Comments
To provide housing to meet local need including provision of affordable homes.	N	N	No direct link to this objective.
To promote safe communities and reduce fear of crime	N	N	No direct link to this objective.
Improve access to health facilities and promote wellbeing	N	N	No direct link to this objective.
Maximise the use of previously developed land/ buildings and encourage the	N	N	No direct link to this objective but regeneration of heritage assets could maximise the use of previously developed land/ buildings.

Preferred Policy Direction historic and built environment

Preferred Policy Direction: Evidence supporting heritage proposals

Sustainability Objective	No policy	Preferred Policy Direction: Evidence supporting heritage proposals	Appraisal Comments
efficient use of land			
To improve educational attainment of the working age population	N	N	There is no direct link to this objective.
To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	N	+	No policy will maintain the current circumstance. The use of heritage assets could support this objective.
To manage water availability and reduce water and air pollution	N	N	There is no direct link to this objective.

To minimise waste and increase the recycling and reuse of waste materials	N	N	No direct link to this objective.
To reduce and manage flood risk and surface water run off	N	N	No direct link to this objective.
To reduce and manage the impacts of climate change and the Districts contribution to the causes of.	N	N	No direct link to this objective.
To promote biodiversity protection enhancement and management of species and habitats	N	N	No direct link to this objective.
To ensure the protection and enhancement of the historic environment	--	++	No policy fails this objective. The policy delivers this objective.

Protect, enhance and manage the character and quality of the landscape and townscape	-	+	<p>No policy fails this objective.</p> <p>The policy supports this objective as heritage assets are a contributor to the character and quality of the landscape and townscape.</p>
To increase opportunities for non-car travel and reduce the need for travel	N	N	No direct link to this objective.

Summary

Having no policy would have some negative effects on sustainability objectives, significantly upon the historic environment and its setting objective; with no positives. The policy would have some positive effects and significantly for the historic environment and its setting objective; therefore having the policy is better than not.



Habitats Regulations Assessment of the Lichfield District Local Plan Review; Screening at Preferred Options & Policy Directions.

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Footprint Contract Reference: 518

Date: 21st December 2018

Version: Final; screening at preferred options

Recommended Citation: Hoskin, R., Liley, D. & Panter, C. (2018) Habitats Regulations Assessment of the Lichfield District Local Plan Review: Screening at Preferred Options & Policy Directions. Unpublished report for Lichfield District Council.

Summary

This report is the Habitats Regulations Assessment (HRA) of the Lichfield District Local Plan at Preferred Options and Policy Directions stage. A plan level HRA considers the implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European sites in close proximity to the proposed plan. This HRA report draws on a range of background evidence, understanding of the European sites, and the mitigation strategies currently in place for Cannock Chase and the River Mease SACs.

All aspects of the emerging plan that influence sustainable development for the Lichfield District are checked through this assessment for risks to European sites. Risks need to be identified in order to inform the screening for likely significant effects, which is an initial stage of assessment to establish whether there is any possibility of the implementation of the plan causing significant effects on any European site. Where the potential for significant effects is identified, or there are uncertainties, a more detailed appropriate assessment is made. This report has regard for relevant case law, including a European Court of Justice Judgment that highlights the need for appropriate use of avoidance and mitigation measures at the correct stage of HRA. This HRA includes an initial screening for likely significant effects, has highlighted the European sites at potential risk, and has recommended a number of themes for more detailed appropriate assessment.

The appropriate assessment will be undertaken as the plan progresses through future stages of plan making. It will consider the Cannock Chase SAC, Cannock Extension Canal SAC, River Mease SAC, Pasturefields Salt Marsh SAC and Humber Estuary SAC/SPA/Ramsar site. The themes for appropriate assessment have been explained and any particular issues highlighted. The themes considered are; air quality changes from increased road traffic, recreation pressure, water quality and resources, urbanisation effects in close proximity (fire risk, lighting, noise etc), future consideration of growth options once progressed, and biodiversity net gains.

The recommendations for the appropriate assessment are from a screening of policy options and direction, and in some instances are precautionary. Early consideration of these themes at appropriate assessment will ensure that the Lichfield Local Plan identifies clear mitigation needs and protects the European sites from any project level impacts. The HRA conclusion at this early stage is that there are likely significant effects requiring further assessment. Further iterations of HRA will be undertaken as the plan is developed.

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Acknowledgements

Footprint Ecology is grateful to Heidi Hollins, Ashley Baldwin and Justine Lloyd at Lichfield District Council for their assistance, and Antony Muller of Natural England for helpful discussion in relation to European site sensitivities.

1. Introduction and Background Information

Context

- 1.1 This report is the Habitats Regulations Assessment (HRA) of the Lichfield District Local Plan Review: Preferred Options & Policy Directions. This HRA report has been prepared by Footprint Ecology, on behalf of Lichfield District Council. It has been written with the benefit of discussions with planning officers within the District Council, and forms part of the evidence base for the new Local Plan at 'Regulation 18' stage, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 This section provides the background context for this HRA. This report is a HRA of the emerging Local Plan Review, and is a report that will be updated as the preparation of the Local Plan is progressed. At this current stage, this HRA, includes the initial screening of the emerging plan for likely significant effects, and this will help to inform the refinement of the plan and its policies. This report identifies key topics for further assessment, which will be undertaken after the Regulation 18 consultation.
- 1.3 An HRA considers the implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European sites in close proximity to the proposed plan or project, which could occur as a result of the plan or project being put in place. In this instance, the HRA is undertaken at plan level. HRA will also be required for development projects coming forward in the future in accordance with the Local Plan. An explanation of the HRA assessment process is summarised in this section below, and also described in greater detail in Appendix 1.
- 1.4 Lichfield District lies within south-east Staffordshire and abuts the West Midlands conurbation. The District includes the two main settlements of Lichfield City and Burntwood. A summary of the key aspects of the emerging Lichfield District Local Plan in terms of growth objectives over the plan period is provided in this section below.
- 1.5 When embarking on new HRA work, it is important to take stock and consider how well the measures recommended or put in place to protect European site interest in previous plan iterations have progressed, and what evidence there is available to support the continuation of such measures, or to indicate that they may need modification. This HRA therefore looks at the measures that were recommended by previous and current HRAs of relevance. In order to protect European sites, and any changes in circumstances, evidence, statutory advice or

local understanding of the issues needs to be considered. A summary of previous HRA work is also provided in this section below.

Habitats Regulations Assessment process

- 1.6 A 'Habitats Regulations Assessment,' normally abbreviated to HRA, is the step by step process of ensuring that a plan or project being undertaken by, or permitted by a public body, will not adversely affect the ecological integrity of a European wildlife site. Where it is deemed that adverse effects cannot be ruled out, a plan or project must not proceed, unless exception tests are met. This is because European legislation, which is transposed into domestic legislation and policy, affords European sites the highest levels of protection in the hierarchy of sites designated to protect important features of the natural environment.
- 1.7 The relevant European legislation is the Habitats Directive 1992¹ and the Wild Birds Directive 2009², which are transposed into domestic legislation through the Conservation of Habitats and Species Regulations 2017. These Regulations are normally referred to as the 'Habitats Regulations' and the most recent update consolidates previous versions and corrects some minor errors in transposition. The 2017 Regulations have not changed any of the requirements in relation to European sites.
- 1.8 The legislation sets out a clear step by step approach for decision makers considering any plan or project. In England, those duties are also supplemented by national planning policy through the National Planning Policy Framework (NPPF). This national planning policy also refers to Ramsar sites, which are listed in accordance with the international Ramsar Convention. The NPPF requires decision makers to apply the same protection and process to Ramsar sites as that set out in legislation for European sites. Formally proposed sites, i.e. sites proposed for European designation and going through the designation process, and those providing formal compensation for losses to European sites, are also given the same protection. This report refers to all the above sites as 'European sites' for assessment purposes, as the legislation is applied to all such sites, either directly or as a result of policy.
- 1.9 It should be noted that the European Directives operate on the basis that sites are in place to serve as an ecologically functioning network, and ultimately it is the preservation of that network as a whole that is the overall aim of the

¹ Council Directive 92/43/EEC

² Council Directive 2009/147/EC

European Directives. The network is often referred to as the Natura 2000 Network or 'N2K.'

- 1.10 The duties set out within the Habitats Regulations apply to any public body or individual holding public office with a statutory remit and function, referred to as 'competent authorities.' The requirements are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. A more detailed guide to the step by step process of HRA is provided in this report at Appendix 1.
- 1.11 In assessing the implications of any plan or project, in this case a local plan, for European sites in close proximity, it is essential to fully understand the sites in question, their interest features, current condition, sensitivities and any other on-going matters that are influencing each of the sites. Every European site has a set of 'interest features,' which are the ecological features for which the site is designated or classified, and the features for which Member States should ensure the site is maintained or, where necessary restored. Each European site has a set of 'conservation objectives' that set out the objectives for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance. These objectives are set by Natural England, and published for each European site in high level generic form and then with supplementary advice that relates to the interpretation of these at each individual site.
- 1.12 The site conservation objectives are relevant to any HRA, because they identify what should be achieved for the site, and a HRA may therefore consider whether any plan or project may compromise the achievement of those objectives. A summary of relevant European sites is provided within this section below. Further information on European site interest and links to the conservation objectives can be found at Appendix 2 of this report. The European sites of relevance to this HRA are discussed below and in Appendix 3.

The natural environment considerations within a Local Plan

- 1.13 A Local Plan is produced by a local planning authority to set the quantum and direction of sustainable development for the forthcoming plan period. The National Planning Policy Framework (NPPF) 2018³ states that sustainable development is the achievement of social, economic and environmental aspirations, and these three dimensions of sustainable development are mutually dependant. For the natural environment, the NPPF advises that

³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

sustainable development should include protecting, enhancing and improving biodiversity, and moving from a net loss of biodiversity to achieving net gains. The recently published Defra 25 year plan⁴ sets out an ambitious programme for improving the natural environment, including the achievement of environmental net gains through development, of which biodiversity is an important part.

1.14 The Defra strategy follows on from the review of England's wildlife sites and ecological network, set out in the report to Defra in 2010 entitled 'Making Space for Nature',⁵ which was prepared by a group of national experts chaired by Professor Sir John Lawton. Within this report, it is identified that in order to make our ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected. The future health of designated sites is very much dependant on the future health of wider biodiversity and the ecological networks that sustain them. In planning for the long-term sustainability of designated sites, it is therefore necessary to protect and enhance wider biodiversity through the planning system as well as the designated sites. This HRA recognises this need within the appropriate assessment section in relation to biodiversity gains through planning.

1.15 Local Plans are required by the NPPF to make provision for the protection and enhancement of the natural environment. The new NPPF published in 2018 gives significant weight to the role of spatial planning in not only protecting the natural environment, but also restoring, enhancing and increasing natural capital. There is a clear opportunity for Local Plans to move from a purely protective approach to one where sustainable development is about high quality environmental gains as well as social and economic. Making the links between designated sites and the wider environment that underpins and supports them is critical to the long term maintenance of our most important wildlife sites.

The Lichfield Local Plan

1.16 The Local Plan Review is being undertaken to ensure that the Lichfield Local Plan remains up to date in terms of government policy and guidelines in relation to housing need, and up to date in terms of supporting evidence and assessment. The new Local Plan will review two Lichfield Local Plan documents; the Lichfield Local Plan Strategy and the Lichfield Local Plan Allocations Development Plan

⁴ <https://www.gov.uk/government/publications/25-year-environment-plan>

⁵ <https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today>

Document. The latter is not yet adopted but is in the final stages of plan making and is planned for adoption in 2019. The review will take a number of years and commencing the early work on the review now will ensure that a new Local Plan is adopted towards the end of 2020.

- 1.17 The Lichfield District Local Plan Strategy forms part 1 of the current Lichfield Local Plan. It was adopted in 2015 and includes a vision and strategic objectives for the District, both core and development management policies, along with some allocations that are strategic in nature, referred to as Strategic Development Allocations and also an indication of the anticipated main growth location referred to as a Broad Development Location, which accord with the settlement hierarchy. These allocations account for the delivery of approximately 6,000 new homes. The Strategy recognises the need for a minimum of 10,030 new homes in the District, and the remaining housing need is taken forward in the emerging Lichfield Local Plan Allocations Development Plan Document
- 1.18 The Lichfield Local Plan Allocations Development Plan Document will form the second part of the Lichfield Local Plan alongside the adopted Core Strategy. The Allocations Document is nearing the end of the plan making process, having proceeded through the hearing sessions for Examination in Public and now undertaking a final round of public consultation on the main modifications that have emerged through the hearing sessions. This part of the plan includes additional policies and provides for the necessary site allocations to meet growth needs, including the smaller development sites that add to the strategic sites already adopted in the Local Plan Strategy.
- 1.19 The new Local Plan will review and update both the policies and strategic site allocations elements of the current Local Plan Strategy, and once adopted will also review the Site Allocations Document. The review of the Local Plan to prepare a new Lichfield Local Plan will bring all these aspects into one Local Plan for the District. The preferred policy direction for housing provision is indicating a need to plan for between 9,660 and 11,160 new homes between 2016 and 2036. The preferred policy direction for employment sites states that the District has a good supply of sites to meet employment need. It is therefore anticipated that the employment allocations for the Local Plan review may closely align with those currently proposed in the emerging Allocations Development Plan Document.

Relevant HRA work to date

- 1.20 The following documents are of relevance to this HRA as they are the HRA reports that informed the current Local Plan.

The Local Plan HRAs

- 1.21 The Lichfield Local Plan Strategy and the Lichfield Local Plan Allocations Development Plan Document are both supported by HRA. Each was prepared as an iterative document, with updates at the various stages of plan making.
- 1.22 The HRA for the Lichfield Local Plan Strategy was undertaken as a joint HRA for the Lichfield and Tamworth Local Plans. It draws on the evidence base for both the Cannock Chase SAC and River Mease SAC, and the strategic approach to mitigation that at the time was in the early stages of development and implementation for both sites. The HRA uses the evidence base to enable a conclusion of no likely significant effects. For Cannock Extension Canal, the HRA for the Local Plan Strategy concludes that the plan will not result in increased traffic in close proximity that would exacerbate road run off. It should be noted that since the preparation of this HRA, Natural England have advised on the need to consider air quality for this site in addition to road run off.
- 1.23 The HRA for the Lichfield Local Plan Allocations Development Plan Document concluded that the site allocations within the plan would not lead to significant effects, and the conclusion was based on a review of the development that would come forward through allocations within the strategic mitigation areas for the River Mease and Cannock Chase SACs. The document includes one small development site within the River Mease catchment. For Cannock Chase, the assessment considered the review of evidence undertaken for Cannock Chase SAC. The Planning Evidence Base Review (Hoskin & Liley 2017) checks whether the Cannock Chase strategic approach is still fit for purpose in light of predicted housing delivery as part of the current local plans in the vicinity of the SAC. The report concludes that whilst there are some aspects that should now be focussed on to update the strategy in the near future, it remains fit for purpose for the currently adopted local plans and the local authorities can continue to have confidence that adverse effects from predicted housing growth figures can still be adequately mitigated for. The review included consideration of the large housing allocation at Rugeley.
- 1.24 The HRA for the Allocations Development Plan Document will inform the appropriate assessment of the Local Plan review as the locations for growth begin to be developed.

Sustainability Appraisal

- 1.25 A sustainability appraisal is undertaken by local planning authorities on local planning documents to assess whether the economic, environmental and social needs of the local area are being met. The appraisal runs alongside the preparation of a local plan, appraising the options being taken forward and

whether alternatives might have a greater positive or lesser negative effect on economic, environmental and social objectives. Sustainability appraisal also incorporates the requirements of the European Strategic Environmental Assessment Directive (2001/42/EC).

- 1.26 There are some elements of cross over between HRA and the sustainability appraisal. The appraisal will consider environmental sustainability in terms of natural resources such as air and water, and how they may be affected by the plan. These are similarly important supporting aspects of European site ecological integrity.
- 1.27 At the appropriate assessment stage, it will be necessary for any mitigation measures to be cross referenced in the sustainability appraisal, to confirm that the measures represent the most sustainable option for mitigating any impacts. This is particularly relevant where the mitigation forms part of a strategic approach to European site protection, which has a number of sustainability benefits over a project by project approach.

Evidence documents for the emerging Local Plan

- 1.28 There are a number of documents listed within the Preferred Options and Policy Directions Document that are of relevance to the HRA. These will be important for the appropriate assessment and should be reviewed as they are published (publication dates taken from Appendix A of the plan):
- Biodiversity Mapping (March 2019)
 - Green Infrastructure Study (June 2019)
 - Infrastructure capacity study (June 2019)
 - Strategic Flood Risk Assessment and Water Cycle Study (June 2019)
 - Transport Modelling (to be confirmed).

2. European sites

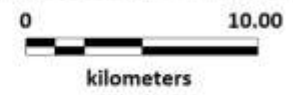
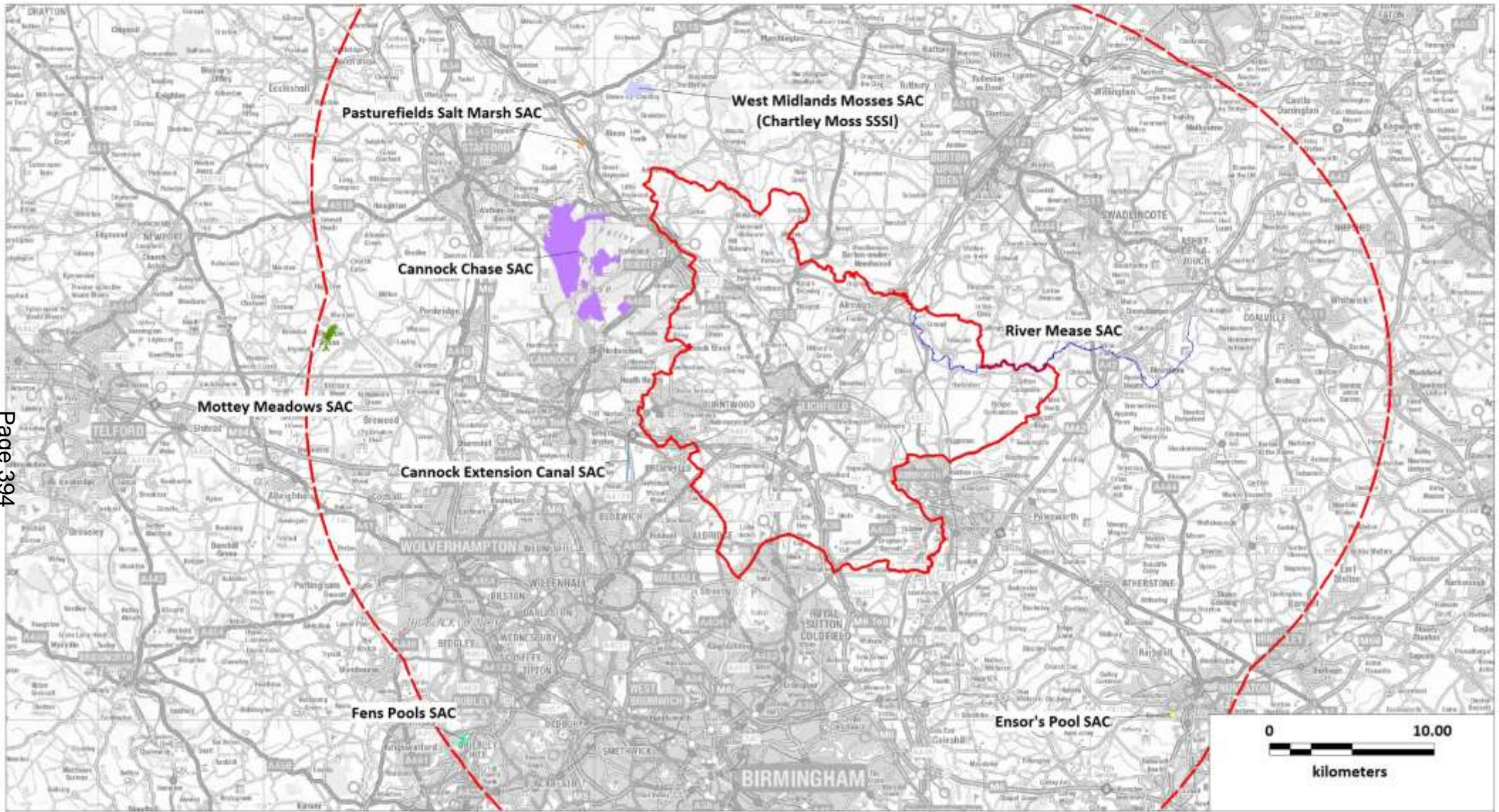
- 2.1 In undertaking an HRA it is necessary to gather information on the European sites that could be potentially affected by the plan or project. A 20km buffer from the edge of the District was used to initially identify sites that may be potentially affected. This buffer is used by Footprint Ecology for local plan HRAs as it is deemed precautionary enough to capture most potential impact pathways (i.e. the means by which a European site may be affected) between plan implementation within a local planning authority's administrative area. The list of European sites within 20km was then evaluated in terms of relevant threats, vulnerabilities and current issues.
- 2.2 European sites within 20km are shown in Map 1. The map just shows SACs as there are no SPA sites within a 20km radius. In addition, it should be noted that Chartley Moss SSSI, which is a component part of the West Midlands Mosses SAC is also part of the Midland Meres and Mosses Phase I Ramsar. Sites are listed in Table 1; there are eight SAC sites that fall within the 20km radius however only one, the River Mease SAC, intersects the District boundary. Full details of the interest features and current pressures/threats for each site are summarised in Appendix 3. It should be noted that the Humber Estuary is outside the 20km zone, but is fed by the River Trent, which does flow through the Lichfield District.

Table 1: European Sites within a 20km radius

SAC	Ramsar
Cannock Chase	Midland Meres and Mosses Phase I
Cannock Extension Canal	
Ensor's Pool	
Fens Pools	
Mottey Meadows	
Pasturefields Salt Marsh	
River Mease	
West Midlands Mosses	

Map 1: European Sites

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- | | | | | | | | |
|---|--------------------|---|-------------------------|---|--------------------------|---|----------------------|
|  | Lichfield District |  | Cannock Chase |  | Fens Pools |  | River Mease |
|  | 20km radius |  | Cannock Extension Canal |  | Mottey Meadows |  | West Midlands Mosses |
| | |  | Ensur's Pool |  | Pasturefields Salt Marsh | | |

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- 2.3 In assessing the implications of any plan or project for European sites, it is essential to fully understand the ecology and sensitivity of the sites, in order to identify how they may be affected. This section and the accompanying detailed site information within Appendices 2 and 3 identifies those sites that could potentially be affected by the policies and proposals within the Lichfield District Local Plan. Every European site has a set of 'interest features' which are the ecological features for which the site is designated or classified, and the features for which Member States should ensure the site is maintained or, where necessary restored.
- 2.4 Each European site also has a set of 'conservation objectives' for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance. Also relevant to the HRA is the consideration of how a plan or project may affect the achievement of conservation objectives for each European site. The site conservation objectives are relevant to any HRA, because they identify what should be achieved for the site, and a HRA may therefore consider whether any plan or project may compromise the achievement of those objectives. The background to conservation objectives and key considerations are explained in Appendix 2. Appendix 3 sets out the site interest features for each European site.
- 2.5 The Habitats Directive requires competent authorities to 'maintain and restore' European sites. Where sites are meeting their conservation objectives, the requirement is to maintain this position and not allow deterioration. Where a site requires restoration, competent authorities should work to bring site interest features back to a status that enables conservation objectives to be met.
- 2.6 In addition to conservation objectives, Natural England produces Site Improvement Plans (SIPs) for each European site in England as part of a wider programme of work under the 'Improvement Programme for England's Natura 2000 sites.' Each plan includes a set of actions for alleviating issues that are impeding the delivery of conservation objectives, with lead delivery bodies identified and indicative timescales. The SIPs can provide an additional useful reference for HRA work, identifying where there are site sensitivities. These have been reviewed to inform the appropriate assessment set out within this report.

European sites to be considered in the screening of the plan

- 2.7 Once the Local Plan is at a more advanced stage, a more accurate assessment of impacts against interest features for the European sites can be undertaken in an updated screening assessment. At this point in time with the general text within the plan relating to policy directions, it is possible to still identify key issues in relation to growth that may affect the European sites. The SIPs help to inform

what the key threats are and where these may originate from development, having regard for the interest features listed in Appendix 3.

- 2.8 In terms of threats and current issues, it is clear that both Ensor's Pool and Fens Pools SACs will have a localised area of concern in terms of potential impacts and are at a considerable distance from the Lichfield District Boundary. Motte Meadows is a lowland hay meadow SAC in a relatively rural area and again the distance and mainly localised concerns screen this site out from further consideration. The West Midlands Mosses SAC, also part of the Midland Meres and Mosses Phase 1 Ramsar site, is highly sensitive to deterioration in water quality, and is primarily threatened by diffuse pollution from agricultural land, although residential development in close proximity will contribute to the threat where septic tanks are present. These factors, and the small catchment for this site enables it to be ruled out at the screening stage for the Lichfield Local Plan review.
- 2.9 Although the River Mease is the only site within the District boundary, there is established evidence of recreation impacts for Cannock Chase SAC, and there are some concerns relating to water quality and air quality in relation to the Cannock Extension Canal and Pasturefields Salt Marsh SACs, which have been highlighted by Natural England in consultation corresponded on Lichfield planning documents and those for neighbouring local planning authorities. Initial inclusion of the Humber Estuary will allow for more in-depth consideration of this site in the appropriate assessment as the Local Plan is developed and any input to the River Trent can be checked. The inclusion of this site is on a precautionary basis and is specifically in relation to the need to check site allocations in close proximity to the River Trent once they are being developed within the plan. Water run off and urbanisation impacts in close proximity may present potential risks.
- 2.10 It is therefore concluded that the following sites should be screened in for consideration when screening the Lichfield Local Plan for likely significant effects. The inclusion of Cannock Chase, the River Mease and Cannock Extension Canal is consistent with previous HRA work for current and emerging Lichfield planning documents:
- Cannock Chase SAC
 - Cannock Extension Canal SAC
 - Pasturefields Salt Marsh SAC
 - River Mease SAC
 - Humber Estuary SAC and SPA.

3. Screening for likely significant effects

- 3.1 HRA is a step by step process, with the competent authority required to undertake screening for likely significant effects on European sites, after determining that the plan or project in question is not one that is entirely necessary for site management. Once relevant background information and potential impact pathways are understood, the HRA can progress to the screening for likely significant effects stage, fully informed by the background research undertaken. The screening for likely significant effects is undertaken on all policies within the plan. It is an initial check, made on a precautionary basis, to determine whether any part of the plan poses a risk to European sites in terms of its future implementation.
- 3.2 The Lichfield District Local Plan is being prepared to steer sustainable development in the District, and whilst protection and enhancement of the natural environment is an integral part of sustainable development, the plan is not singularly focussed on European site management. The screening for likely significant effects is therefore undertaken.
- 3.3 When a HRA is being undertaken on a plan or project that is initiated by the competent authority themselves, there is greater opportunity to identify potential issues arising from the plan or project in the initial stages of design or preparation. Where a competent authority is approving a project being proposed by another party, the application for permission is usually made when the proposal has already been designed and all details finalised, thus the opportunity to identify issues early on is more limited unless an applicant chooses to hold early discussions with the competent authority.
- 3.4 For the Lichfield District Local Plan, the Council is both the plan proposer and the competent authority, thus allowing the HRA to influence the plan in its earlier stages, at later refining stages and up to submission for Examination.

What constitutes a likely significant effect?

- 3.5 At the screening stage of HRA, there is the opportunity to identify changes to the plan that could be made to avoid risks to European sites. Any requirement for assessing the effectiveness of changes should be made at the appropriate assessment stage. The screening for likely significant effects is an initial check to identify risks or uncertainties in policy wording and recommend any obvious changes that can avoid those risks with clarifications, corrections or instructions for development project level HRA. Any recommendations that need to be justified in terms of effectiveness and applicability should be considered within the appropriate assessment stage of HRA. As described in Appendix 1,

screening for likely significant effect is an initial check to identify risks and uncertainties that could potentially be significant for the European sites, and to recommend any obvious changes that can avoid those risks. Where risks cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.

- 3.6 The screening check of each aspect of the plan is essentially looking for two things to enable a conclusion of no likely significant effect;
- Whether it is possible to say with certainty that there are no possible impacts on European sites, or
 - Whether, in light of a potential risk, simple clarifications can be built into the policy and/or its supporting text, which serve to avoid any likely impacts.
- 3.7 If one of these can be met, it enables a competent authority to screen out from further stages of assessment. Where there is the potential for European sites to be affected, or mitigation measures need to be checked to ensure they are effective and appropriate, more detailed consideration is required and this then screens those aspects of the plan in to the appropriate assessment.
- 3.8 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is a precautionary approach, which is one of the foundations of the high-level of protection pursued by EU policy on the environment, in accordance with the EU Treaty.⁶ The precautionary principle should be applied at all stages in the HRA process and follows the principles established in case law relating to the use of such a principle in applying the European Directives and domestic Habitats Regulations. In particular, the European Court in the 'Waddensee' case⁷ refers to "*no reasonable scientific doubt*" and the 'Sweetman' case⁸ the Advocate General identified that a positive conclusion on screening for likely significant effects relates to where there "*is a possibility of there being a significant effect*".
- 3.9 An additional recent European Court of Justice Judgment in 2018 (Case C-323/17) clarified that the need to carefully explain actions taken at each HRA stage,

⁶ Article 191 of the Treaty on the Functioning of the EU. Previously Article 174 of the Treaty of the EC.

⁷ European Court of Justice case C - 127/02

⁸ European Court of Justice case C - 258/11

particularly at the screening for likely significant effects stage. The Judgment is a timely reminder of the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage, to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.

- 3.10 Table 3 below records the conclusions drawn and recommendations made on a policy by policy check for likely significant effects of the Lichfield District Local Plan at Preferred Strategy Options and Policy Directions. Potential risks are highlighted for a number of emerging policy areas, particularly those related to housing growth.
- 3.11 The plan is in a relatively early stage of development, with policy options still to be refined. The direction for policy development remains very open, to be informed by consultation. At this stage the screening can only take a precautionary approach and highlight areas for further assessment. The screening table identifies potential impact pathways for further assessment, which should be an exploration of these impact these to establish if there is the potential for adverse effects on European sites, rather than the impact themes being clearly identified as adverse effects requiring mitigation.
- 3.12 The screening table below provides a record of screening of the entire plan at preferred options and policy directions, which will be the subject of public consultation at Regulation 18 stage. The table checks for potential risks relating to the European sites established as having potential impact pathways:
- Cannock Chase SAC
 - Cannock Extension Canal SAC
 - Pasturefields Salt Marsh SAC
 - River Mease SAC
 - Humber Estuary SAC and SPA.
- 3.13 The Habitats Regulations require the screening for likely significant effects to consider potential risks alone or in-combination. European sites are often affected by development over a wide area or 'zone of influence.' The European sites screened in to this assessment have identified sensitivities and impact pathways that can originate from development of considerable distance away, particularly in relation to traffic emissions and water enrichment as a result of discharges from waste water treatment works. These impact pathways are indirect, i.e. they arise as a result of actions relating to the 'operation' of the

development by end users rather than directly as a result of the development being in place. They are relevant for the River Mease, Pasturefields Saltmarsh and Cannock Extension Canal. Similarly, recreation pressure on Cannock Chase stems from a large zone of influence that encompasses several local planning authority areas. The combined effect of development over multiple Local Plans is therefore of relevance to this HRA.

- 3.14 The screening table identifies where likely significant effects are as a result of a combined effect of growth across the Lichfield District, because the policies for individual site allocations, locations or development types are not yet formulated, rather the policy direction described relates to growth needs as a whole over the plan period. Where identified likely significant effects may also be amplified by similar growth in neighbouring local planning authorities, this is also highlighted within the table.

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Table 3: Screening for likely significant effects – at Preferred Options and Policy Directions (Regulation 18)

Policy direction	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version
Introductory chapters 1 to 6	No LSE Context and background	N/A	N/A
7. Vision	No LSE Includes importance of the natural environment	N/A	N/A
8 and 9. Strategic objectives and policy themes	No LSE Natural Environment objective included.	N/A	N/A
10 Spatial strategy	No LSE High level strategic focus areas for the development of policy, includes the natural environment	N/A	N/A
11. Securing sustainable development	No LSE Sets out a presumption in favour of sustainable development, but includes a caveat for where material considerations indicate otherwise, including where adverse impacts outweigh the benefits	N/A	The material considerations caveat is important for a conclusion of No LSE and should be retained as policy develops
11. Sustainable development principles	No LSE A strong protective policy covering all aspects of sustainable development, including biodiversity. Incorporates both protection and enhancement.	N/A	Development of policy should have regard for emerging guidance and government focus on biodiversity net gain
11. Renewable energy	No LSE Renewable energy projects are likely to be low risk for the European sites, but project level HRA may be required where in close proximity with potential for hydrological risks during construction	N/A	Development of areas of opportunity should have regard for designated sites as well as sensitive landscapes.
11. Flood risk	LSE Policy needs to be protective of European sites	River Mease SAC, Cannock Extension Canal SAC – water quality deterioration from run off/flooding	Consideration of the <u>Strategic Flood risk Assessment and Water Cycle Study</u> should form part of the <u>appropriate assessment</u> (in-

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Policy direction	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version
			combination across the District and neighbouring plans)
11. Air Quality	LSE Further evidence gathering required in relation to risks from air pollution.	Deterioration in air quality from traffic and industrial emissions poses a potential risk that is cumulative across neighbouring authorities. Natural England has identified a risk to Pasturefields SAC, and there are also potential sensitivities relating to Cannock Extension Canal, due to proximity to the A5. There should also be a check of air quality issues in relation to Cannock Chase.	Appropriate assessment should collate available information and identify data gaps. Early consideration of <u>traffic modelling</u> being undertaken to inform the local plan review will provide an opportunity for targeted data gathering to inform the <u>appropriate assessment</u> (in-combination across the District and neighbouring plans).
12. Delivering our infrastructure	No LSE Policy direction is currently qualitative and commits to working with partners	N/A	Will require further assessment if the policy is developed to include specific infrastructure requirements for the District.
13. Sustainable transport	LSE Policy direction will be developed with evidence but will include transport improvements	Risks to all sites from traffic related impacts (air pollution, run off)	<u>Appropriate assessment of transport improvements</u> once developed further. Appropriate assessment to have regard for available evidence re transport (in-combination across the District and neighbouring plans).
14. Our homes for the future	LSE Explanation of how housing need will be calculated. The quantum of new housing will need to be considered once established	Risks to all sites from impacts generated by new housing growth – recreation pressure, urbanisation, water resources and quality, air quality. Existing strategic mitigation schemes are in place for housing growth, supporting current growth figures in Lichfield and neighbouring Districts, but additional capacity needs to be checked	<u>Existing strategic mitigation strategies</u> will need to be checked for capacity to accommodate additional housing growth, as part of the <u>appropriate assessment</u> (in-combination across the District and neighbouring plans).
14. Housing provision	LSE Explanation of the evidence that will be used to calculate housing need. The quantum of new housing will need to be considered once established. Potential for the review to plan for between 9,660	Risks to all sites from impacts generated by new housing growth – recreation pressure, urbanisation, water resources and quality, air quality. Existing strategic mitigation schemes are in place for housing growth, supporting current growth figures in Lichfield and	<u>Existing strategic mitigation strategies</u> will need to be checked for capacity to accommodate additional housing growth, as part of the <u>appropriate assessment</u> . LSE screening is for any new residential development, noting the figures may change, but the quantum is relevant in the appropriate

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Policy direction	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version
	and 11, 160 new homes. These figures may change as the plan is developed	neighbouring Districts, but additional capacity needs to be checked	assessment in relation to strategic mitigation scheme capacity (in-combination across the District and neighbouring plans).
14. Housing mix	No LSE Whilst new housing growth poses a risk, the policy direction in relation to housing mix does not alter this conclusion as all housing needs to be considered and where necessary mitigated for.	Potential for mis-understanding of the need for all housing types to be included in strategic mitigation schemes	Re-check as policy emerges as to whether more specific wording poses additional risks
14. Density of housing development	No LSE Whilst new housing growth poses a risk, the policy direction in relation to housing density does not alter this conclusion as all housing needs to be considered and where necessary mitigated for.	Potential for mis-understanding of the need for all housing types to be included in strategic mitigation schemes	Re-check as policy emerges as to whether more specific wording poses additional risks
14. Self-build and custom build housing	No LSE Whilst new housing growth poses a risk, the policy direction in relation to housing type does not alter this conclusion as all housing needs to be considered and where necessary mitigated for.	Potential for mis-understanding of the need for all housing types to be included in strategic mitigation schemes	Re-check as policy emerges as to whether more specific wording poses additional risks
14. Provision for gypsies and travellers	No LSE Whilst new housing growth poses a risk, the policy direction in relation to housing type does not alter this conclusion as all housing needs to be considered and where necessary mitigated for. Traveller pitches should be considered to be residential development for mitigation purposes.	Potential for mis-understanding of the need for all housing types to be included in strategic mitigation schemes	Policy wording may need to give specific reference to the need for the application of the housing growth related strategic mitigation schemes, if provision of pitches is included in policy. Pitches should equate to one house. It is understood that there will be further evidence gathering work for the Local Plan in relation to gypsy and traveller needs.
15. Employment and Economic development	LSE Explanation of the evidence that will be used to calculate employment need. The	Risks to all sites from impacts generated by new employment growth – urbanisation, water resources and quality, air quality.	<u>Employment allocations</u> may need to be checked, as part of the <u>appropriate assessment</u> .

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Policy direction	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version
	location of new employment sites will need to be considered once developed		
15. Our centres	No LSE Hierarchy of retail focus towards town centres, therefore impact pathways unlikely	N/A	N/A
15. Lichfield economy	No LSE Focus on Lichfield city centre for shopping, leisure and culture, therefore impact pathways unlikely	N/A	N/A
16. Burntwood economy	No LSE Focus on Burntwood town centre for shopping, leisure and culture, therefore impact pathways unlikely	N/A	N/A
15. Tourism	No LSE Development of tourism policy is likely to focus on existing tourism assets and historic built environment	N/A	Re-check as policy emerges as to whether more specific wording poses additional risks
16. Healthy and safe communities	No LSE Focus on community safety and healthy lifestyles is unlikely to generate impact pathways	N/A	N/A
16. Open space and recreation	No LSE Policy will focus on protection of existing open space assets	N/A	N/A
17. Our natural resources	LSE As this policy develops it will be a critical part of securing the necessary measures to mitigate for potential impacts on European sites. The policy needs to be developed with clarity on the requirements applicants need to meet for strategic mitigation schemes, for any	Lack of clarity in policy wording can lead to applications that do not fully provide mitigation requirements, or opportunities for biodiversity enhancements	Development of the <u>natural resources and biodiversity policy</u> wording to be considered within the <u>appropriate assessment</u> , alongside the impact themes. Appropriate assessment to have regard for emerging evidence such as the GI strategy (consideration of existing and new recreation opportunities outside designated sites within GI

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Policy direction	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version
	supporting habitats and wider biodiversity		network should ideally form part of the GI strategy scope).
18. Historic and built environment	No LSE Qualitative and protective policy for the historic environment, therefore no impact pathways	N/A	N/A
18. High quality design	No LSE Qualitative policy that will establish criteria to ensure high quality development, therefore no impact pathways	N/A	N/A
18. Evidence supporting heritage proposals	No LSE Qualitative and protective policy for heritage assets, therefore no impact pathways	N/A	N/A
19. Growth needs options	No LSE Not an emerging policy option. Sets out how the growth options have been appraised against criteria that includes ecological sensitivities	N/A	N/A
20. Residential growth options	LSE The high-level analysis suggests that all options could potentially impact upon areas of ecological sensitivity to some degree.	Risks to all sites from impacts generated by new housing growth – recreation pressure, urbanisation, water resources and quality, air quality.	<u>Appropriate assessment</u> should be undertaken alongside <u>refinement of housing growth options</u> . Impacts will predominantly relate to quantum of housing growth (in-combination across the District and neighbouring plans), but with some location specific risks in addition, particularly with a more dispersed development option. A new settlement option has the potential to pose the greatest risks, depending on location.
21. Employment growth options	LSE Whilst the high-level options analysis does not raise any significant ecological sensitivity issues, the location of new	Potential risks from employment sites adding pressure to waste water treatment for the River Mease, which will require consideration of strategic mitigation scheme capacity.	<u>Employment allocations</u> may need to be checked, as part of the <u>appropriate assessment</u> .

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Policy direction	LSE screening	Potential risks	Recommendations and actions taken for Reg 18 consultation version
	employment sites will need to be considered once developed	Employment allocations in the west of the District will need to consider the Cannock Extension Canal.	
22. Preferred strategic options for growth	<p>LSE</p> <p>A preferred option for growth is explained that follows the settlement hierarchy for preferred direction for housing growth. Whilst this includes a focus on Lichfield city, it also includes housing growth in areas that may bring additional pressure on European sites.</p>	<p>Potential risks of increased housing growth adding pressure to waste water treatment for the River Mease and recreation pressure to Cannock Chase, which will require consideration of strategic mitigation scheme capacity. Growth in the west of the District will need to consider the Cannock Extension Canal.</p>	<p><u>Appropriate assessment</u> should be undertaken alongside <u>refinement of the preferred housing growth option</u>. Impacts will predominantly relate to quantum of housing growth (in-combination across the District and neighbouring plans), but with some location specific risks.</p>

4. Key themes for the HRA

- 4.1 There is now a strong body of evidence showing how increasing levels of development, even when well outside the boundary of protected wildlife sites, can have negative impacts on the sites and their wildlife interest. The research particularly includes work on heathlands (Mallord 2005; Underhill-Day 2005; Liley & Clarke 2006; Clarke, Sharp & Liley 2008; Sharp *et al.* 2008; Clarke & Liley 2013; Clarke *et al.* 2013) and coastal sites (Saunders *et al.* 2000; Randall 2004; Liley & Sutherland 2007; Clarke, Sharp & Liley 2008; Liley 2008; Stillman *et al.* 2009) where links between housing, development and nature conservation impacts are demonstrated.
- 4.2 This section follows the screening of the Preferred Options and Policy Directions for likely significant effects, recognising that the growth proposed within the plan will need further detailed assessment in terms of key impact pathway themes. This section is not the appropriate assessment, but rather it is provided to explain the themes that will be the subject of further assessment and highlight any particular issues that will need to be covered once the appropriate assessment is underway.

The purpose of appropriate assessment

- 4.3 Once a likely significant effect has been identified, the purpose of the appropriate assessment is to examine evidence and information in more detail to establish the nature and extent of the predicted impacts, in order to answer the question as to whether such impacts could lead to adverse effects on European site integrity.
- 4.4 An appropriate assessment should be based on evidence, and that can take different forms (direct evidence, comparable evidence, modelling, expert opinion, Natural England's advice etc). In reality however, appropriate assessments at the plan stage are often undertaken with enough evidence to give confidence in potential mitigation options, but that project level HRAs remain critical in determining the detail of such mitigation. The assessment at plan level is therefore often drawing on the knowledge and experience of the assessors, to make scientifically justified decisions about eliminating risk whilst recognising the need for further detailed considerations.
- 4.5 The 'precautionary principle' is described in the screening section. It is equally relevant for the appropriate assessment as it is for screening likely significant effects. It is an accepted principle that is embedded within the wording of the legislation, and latterly within case decisions, both European and domestic.

Essentially, the appropriate assessment stage is, in accordance with the Habitats Regulations, an assessment that enables a competent authority to only give effect to a plan or authorise/undertake a project after having ascertained that it will not adversely affect the integrity of the European site.

- 4.6 It is for the competent authority to gather the information and evidence necessary for the appropriate assessment to give them certainty that adverse effects will not occur. Fundamentally that therefore means that in the absence of certainty, the plan or project should not normally proceed (subject to the further exceptional tests explained in Appendix 1). Hence the precaution is in the competent authority's duty to only allow plans or projects to proceed whether there is certainty and to apply a precautionary approach where uncertainties remain. Competent authorities should have enough evidence to satisfy themselves that there are feasible measures to prevent adverse effects. These should be feasible in terms of cost, practical implementation, timeliness and attributing responsibility.

Impact pathway themes from the Preferred Options and Policy Directions

- 4.7 The screening for likely significant effects of the Preferred Options and Policy Directions cannot at this early stage identify specific wording requirements for policy or supporting text as the emerging policy direction is an early stage of policy development. The screening for likely significant effects can be revisited and refined as the policy wording is developed.
- 4.8 The screening table has flagged key topics for more in-depth consideration within an appropriate assessment. European sites are at risk if there are possible means by which any aspect of a plan can, when being taken forward for implementation, pose a potential threat to the wildlife interest of the sites. This is often referred to as the 'impact pathway' as it is an identifiable means by which the plan or project could potentially affect the European site.
- 4.9 The impact pathways identified within this HRA at this early stage of plan making are precautionary, but the opportunity to undertake further assessment on these themes can be taken relatively early in the plan making process in order to beneficially inform policy development. Early recognition of potential issues can prevent policies being pursued that pose potential risks to European sites and can help to establish the necessary policy wording to protect and enhance the natural environment as an integral part of the plan with relevant links across policies. When protective measures are developed at a late stage in plan making, they can often be difficult to fully integrate.

4.10 Using evidence and professional expertise, the following appropriate assessment chapters cover the following potential impact pathways identified by the screening for likely significant effects:

- Air Quality – consideration of traffic increases in close proximity to European sites as a result of site allocations and growth
- Recreation– checking that the local plan does not give rise to additional recreation impacts as a result of housing growth Other urbanisation effects – checking development in close proximity for any urbanisation risks other than recreation.
- Water – a re-check of previous conclusions from earlier HRA work and review of any new evidence
- Direction of growth and emerging site allocations for both housing and employment – initially informing growth options and then a detailed consideration of all allocations
- Biodiversity net gain – ensuring that wider biodiversity is adequately protected, and contribution are made through spatial planning to biodiversity restoration. This underpins European site protection and long term maintenance.

Air quality

4.11 Reductions in air quality associated with increased traffic are primarily as a result of increased nitrogen deposition, but are also related to increases in both sulphur and ammonia. Traffic generated air quality reductions can impact on vegetation communities (Bobbink, Hornung & Roelofs 1998; Stevens *et al.* 2011). The Design Manual for Roads and Bridges (DMRB) currently advises that the effect of traffic emissions is focussed on the first 200m to the side of a road. There is a declining effect out to 200m and beyond this it is currently agreed that the effects are *de minimis*, i.e. of no consequence against background levels. Following a recent case decision from Ashdown Forest (Wealden v SSCLG 2017) it is essential that air quality considerations have appropriate regard for any impacts that may act in-combination in HRA work. An appropriate assessment of air quality should be undertaken with regard for the principles of this recent case.

4.12 The DMRB highlights the need for further assessment where changes to the road network or traffic volumes might increase daily traffic flows by 1,000 Average Annual Daily Traffic (AADT) or more where the road stretch has sensitive habitats within 200m of the road. This is a simple measurement of change, using the total volume of traffic on a road and dividing it by 365 days to give a daily average.

- 4.13 Air pollution (risk of atmospheric nitrogen deposition) is currently recognised as a threat or pressure in the Site Improvement Plans for the following sites: Cannock Chase SAC, Cannock Extension Canal SAC and West Midlands Mosses SAC. Map 2 shows where roads are within 200m of European sites, focussing on those European sites close to the District.
- 4.14 At the time of undertaking the initial screening for likely significant effects, evidence relating to changes in traffic is not yet available. The appropriate assessment will need to consider the potential impact of increased traffic once the traffic modelling has been undertaken. However, by highlighting the road stretches on Map 2 within 200m of the sites screened into this assessment, it is anticipated that the modelling can be tailored to ensure that these stretches are specifically considered in the modelling undertaken.
- 4.15 Air quality impacts have been raised by Natural England in their response to the Issues and Options consultation. Natural England has been working with Lichfield development management officers to ensure that traffic increases from new development proposals are assessed through traffic plans submitted as part of the planning application to ensure that heavy good vehicles are not increasing in close proximity to the site. Additional discussion with Natural England has highlighted an initial concern in relation to Pasturefields Salt Marsh, Cannock Extension Canal and the River Mease SACs. This initial discussion has been to agree where further consideration of potential impacts is necessary as part of the appropriate assessment and does not necessarily mean that there are air quality impacts from new growth in the Lichfield District. Whilst not initially raised as an issue, the appropriate assessment should check and confirm that there are no air quality concerns in relation to Cannock Chase SAC.
- 4.16 Consideration of pollutant deposition on aquatic habitat types is difficult as there are very little evidence sources to draw on. It is an issue that Natural England recognise, and this section of the appropriate assessment will need close liaison with Natural England in order to come to an agreed view. Neighbouring local planning authorities have considered this impact pathway, with North Warwickshire for example recently adopting its Local Plan with a HRA conclusion of no adverse effects from traffic emission on the Cannock Extension Canal SAC.
- 4.17 There is currently a live planning application for a gas fired power station at Rugeley, and the site is partially located within the Lichfield District. The Preliminary Ecological Appraisal for the application rules out any impacts on designated sites due to distance. The appropriate assessment should ensure that this conclusion is valid with regard to air quality impacts.

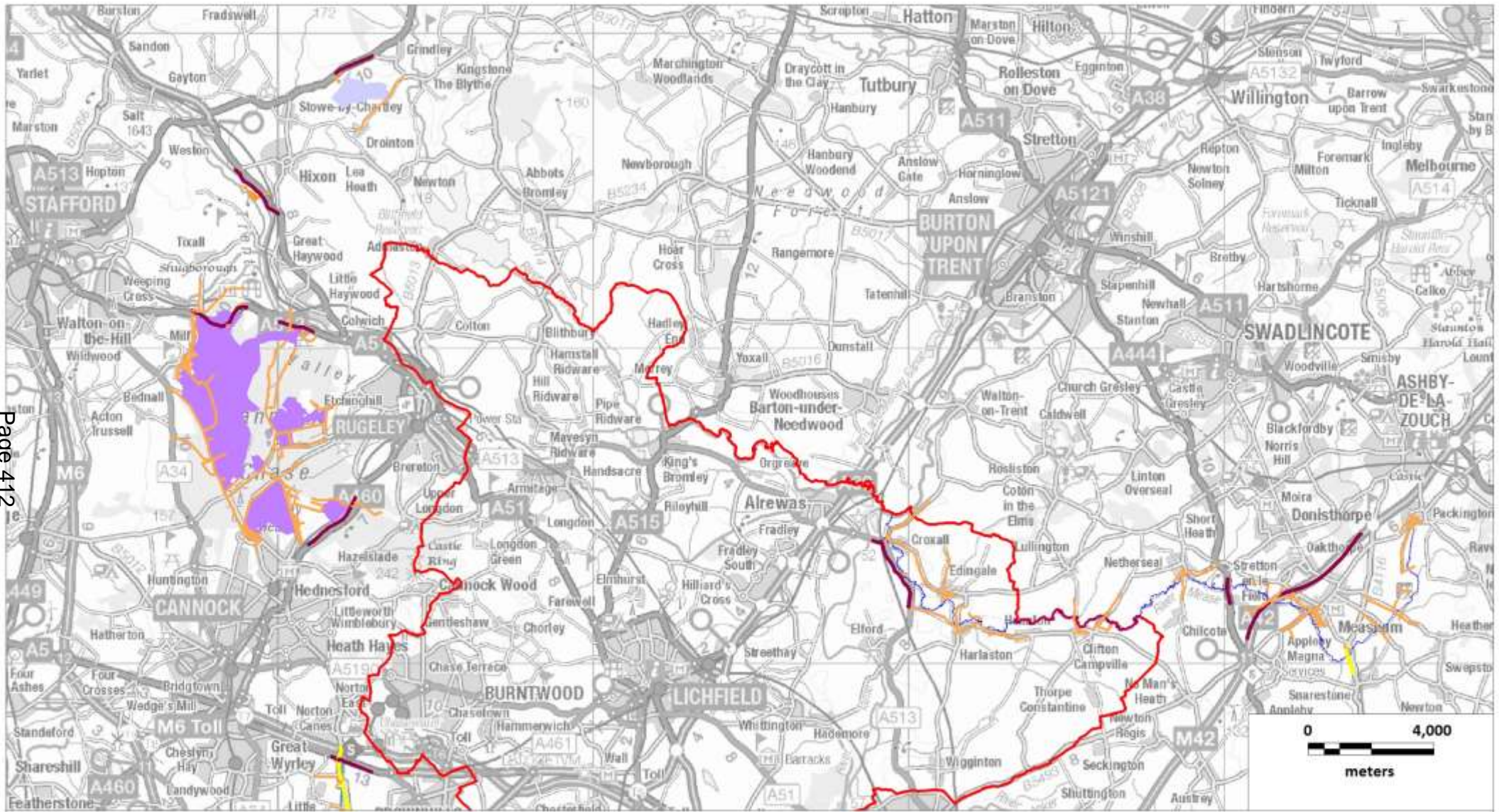
- 4.18 A number of Natural England operational guidance documents and research reports have recently been produced in relation to the assessment of air quality on designated sites. These should be reviewed as part of the appropriate assessment. Key documents include the Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)⁹ and Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance (NECR210).¹⁰

⁹ <http://publications.naturalengland.org.uk/publication/4720542048845824>

¹⁰ <http://publications.naturalengland.org.uk/publication/5354697970941952>

Map 2: Roads within 200m of relevant European Sites

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SAC sites		Roads within 200m of European sites	
 Lichfield District	 Cannock Chase	 Pasturefields Salt Marsh	 A Road
 Cannock Extension Canal	 West Midlands Mosses	 River Mease	 B Road
			 Others

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Recreation

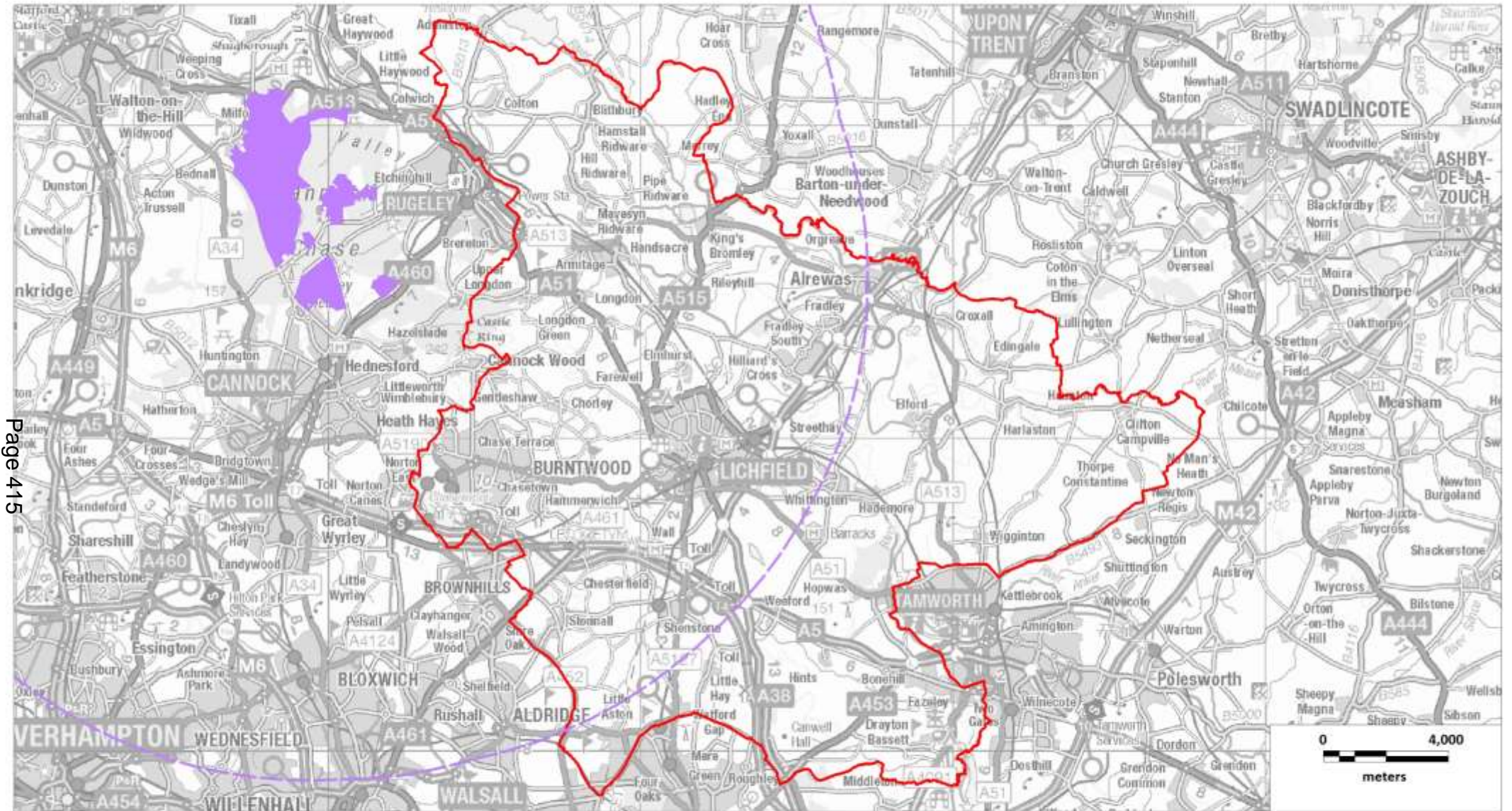
- 4.19 With a rising human population, areas that are important for nature conservation are often important for a range of other services, including providing space for recreation ranging from the daily dog walk to extreme sports. A challenging issue for UK nature conservation is how to accommodate increasing demand for access without compromising the integrity of protected wildlife sites.
- 4.20 There is now a strong body of evidence showing how increasing levels of access can have negative impacts on wildlife. Issues are varied and include disturbance, increased fire risk, contamination and damage (for general reviews see Underhill-Day 2005; Lowen *et al.* 2008; Liley *et al.* 2010; Ross *et al.* 2014)
- 4.21 The issues are not however straightforward. It is now increasingly recognised that access to the countryside is crucial to the long term success of nature conservation projects and has wider benefits such as increasing public awareness of the natural world, as well as health benefits (Alessa, Bennett & Kliskey 2003; Pretty *et al.* 2005; Moss 2012) and economic benefits (e.g. Bennett, Tranter & Blaney 2003; Downward & Lumsdon 2004). Nature conservation bodies are trying to encourage people to spend more time outside and government policy (for example through extending coastal paths) is promoting access. Furthermore, access to many sites is a legal right, with an extensive Public Rights of Way network and open access to many sites through the Countryside and Rights of Way Act (2000). Therefore, a difficult balancing act is required to resolve impacts associated with recreation, complying with legislation without compromising the ability of people to be outside enjoying sites for recreation.
- 4.22 Recreation impacts are relevant to Cannock Chase in particular. Here various studies have demonstrated the impacts associated with access and the links with housing (Liley, D *et al.* 2009; White, Underhill-Day & Liley 2009; Liley 2012; Liley & Lake 2012; Underhill-Day & Liley 2012; Hoskin *et al.* 2017; Hoskin & Liley 2017; Panter *et al.* 2018). Particular concerns relate to trampling, erosion, spreading of pathogens (e.g. phytophthora), increased fire risk and nutrient enrichment (from dog fouling). Visitor studies have shown the site has a wide draw, with 75% of visitors coming from within a 15km radius (Liley 2012), as such there is a cumulative impact of development over a broad area. The area is growing in popularity and in particular has a strong draw for mountain bikers. The 15km radius is shown on Map 3 and sets out a zone of influence within which additional housing is deemed to have an adverse impact upon the Cannock Chase SAC unless or until satisfactory avoidance and/or mitigation

measures have been secured. As Map 3 shows, the zone encompasses a significant proportion of the Lichfield District.

Strategic approach to mitigation for Cannock Chase SAC

- 4.23 Working with other local authorities, Lichfield District Council has introduced a strategic approach to mitigation, which includes a simple regime of financial contributions as an alternative to developers providing Habitats Regulations Assessment information to inform mitigation so as to prevent harm to the SAC. This approach is being taken forward by all the Cannock Chase SAC Partnership authorities with housing within 8km of the SAC.
- 4.24 Mitigation is set out in a joint guidance note and includes a delivery manager and full-time visitor engagement officer and the production of various strategies that set out detailed mitigation approaches for site users (path management, interpretation, signage etc.) and management of car-parking. Monitoring is also included as part of the mitigation approach and a new visitor survey has taken place in 2018 (results to be published in early 2019).
- 4.25 The approach is currently progressing well, and a number of key actions are now being implemented, funded by the developer contributions. It will be important for the momentum to continue and for reviews to continue to have regard for new growth coming forward and put in place a rolling programme of mitigation measures. There is confidence that the approach can accommodate additional housing growth in the new Local Plans coming forward, but the appropriate assessment should undertake a more detailed check to confirm that this can be concluded.

Map 3: Cannock Chase and 15km radius



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Water Issues

- 4.26 Water issues include water quality and water quantity (i.e. water availability), and flood management. Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. Abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. Such impacts particularly relate to aquatic and wetland habitats.
- 4.27 As site allocations are brought forward into the plan, further work will be necessary to check hydrological links between the locations and the European sites screened in to appropriate assessment that have interest features associated with water. The River Mease catchment area is defined on Map 4 and is used for the strategic approach discussed below. Hydrological links will be in the localised area for the Cannock Extension Canal, but as discussed above, traffic increases could lead to additional run off from the A5.
- 4.28 The appropriate assessment will also need to be informed by the water cycle study and strategic flood risk assessment, which are evidence documents for the Local Plan review and due to be published in 2019.
- 4.29 As noted in the screening of potential European sites, the Humber Estuary SAC/SPA/Ramsar site included so that any emerging allocations can be checked for proximity to the River Trent and any potential impacts. This is on a precautionary basis and for the purposes of checking site allocations as part of the updated HRA as the plan is developed, and is not likely to be an issue of a strategic nature.

Strategic approach to mitigation for the River Mease SAC

- 4.30 The River Mease SAC is the subject of a cross boundary strategic approach to ensuring that new development does not lead to adverse effects on the site in terms of water quality. The strategic approach is overseen by a Partnership Board, and the approach has been in place for a number of years. The purpose of the approach is to ensure that new growth does not add to the phosphorous load within the river, as a result of discharges from waste water treatment works. There are a number of works that discharge to the river, and increased growth risks increasing the phosphorous levels within the discharges. A Water Quality Management Plan is in place for the SAC alongside the Developer Contributions Scheme. Currently these documents have an objective of ensuring that phosphate does not exceed 0.06mg/l (soluble reactive phosphorous). Natural England is working with partners to move the target towards a slightly

lower threshold to meet the long term conservation objectives for the site. Further details can be found in the Water Quality Management Plan and the Developer Contributions Scheme, both of which are available on the North West Leicestershire District Council website.¹¹

- 4.31 The Developer contributions scheme sets out a financial contribution from development within the River Mease catchment, as shown on Map 4, to fund mitigation measures that lead to phosphorous reductions in the river. As part of the appropriate assessment, it will be necessary to check the current status and functioning of the scheme, to ensure that it continues to provide a viable solution to mitigate for new growth within the catchment. The partnership have recently ringfenced some of the funding to resource a project officer, which will ensure that the approach is effectively project managed on behalf of the Board.

Urbanisation

- 4.32 Urban effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as cat predation, fly tipping, increased fire risk and vandalism (see Underhill-Day 2005 for review). Urban effects are closely linked to recreation, which we have treated separately; some authors treat recreation as part of the general urban effects.
- 4.33 Where strategic mitigation schemes are in place elsewhere, a number European sites¹² have a 400m zone around the boundary where there is a presumption of no further development (net increase in residential properties). This primarily relates to heathland sites and this presumption reflects the issues with urbanisation and the lack of suitable mitigation and avoidance measures. For example, for development so close to the European sites the options to divert access or provide suitable alternatives are very limited. The choice of 400m is based on the literature (summarised in Underhill-Day 2005) and to some extent is a pragmatic choice. Studies of cat roaming behaviour have shown 400m to be an appropriate buffer width to limit cats in very urban environments (Thomas, Baker & Fellowes 2014), however in more rural areas cats can roam considerably further and some studies have suggested ranges over 2km for more rural situations (Metsers, Seddon & van Heezik 2010; Hall *et al.* 2016). Studies of fire incidence have shown that heathland sites with high levels of housing within 500m of the site boundary have a higher fire incidence (Kirby & Tantram 1999).

¹¹

https://www.nwleics.gov.uk/pages/developments_within_the_catchment_area_of_the_river_mease_special_area_of_conservation

¹² E.g. the Thames Basin Heaths, the Dorset Heaths, the East Devon Pebblebed Heaths

Fires can start in a range of ways, including deliberate arson, children playing, campfires, barbeques, sparks from vehicles, discarded cigarettes etc.

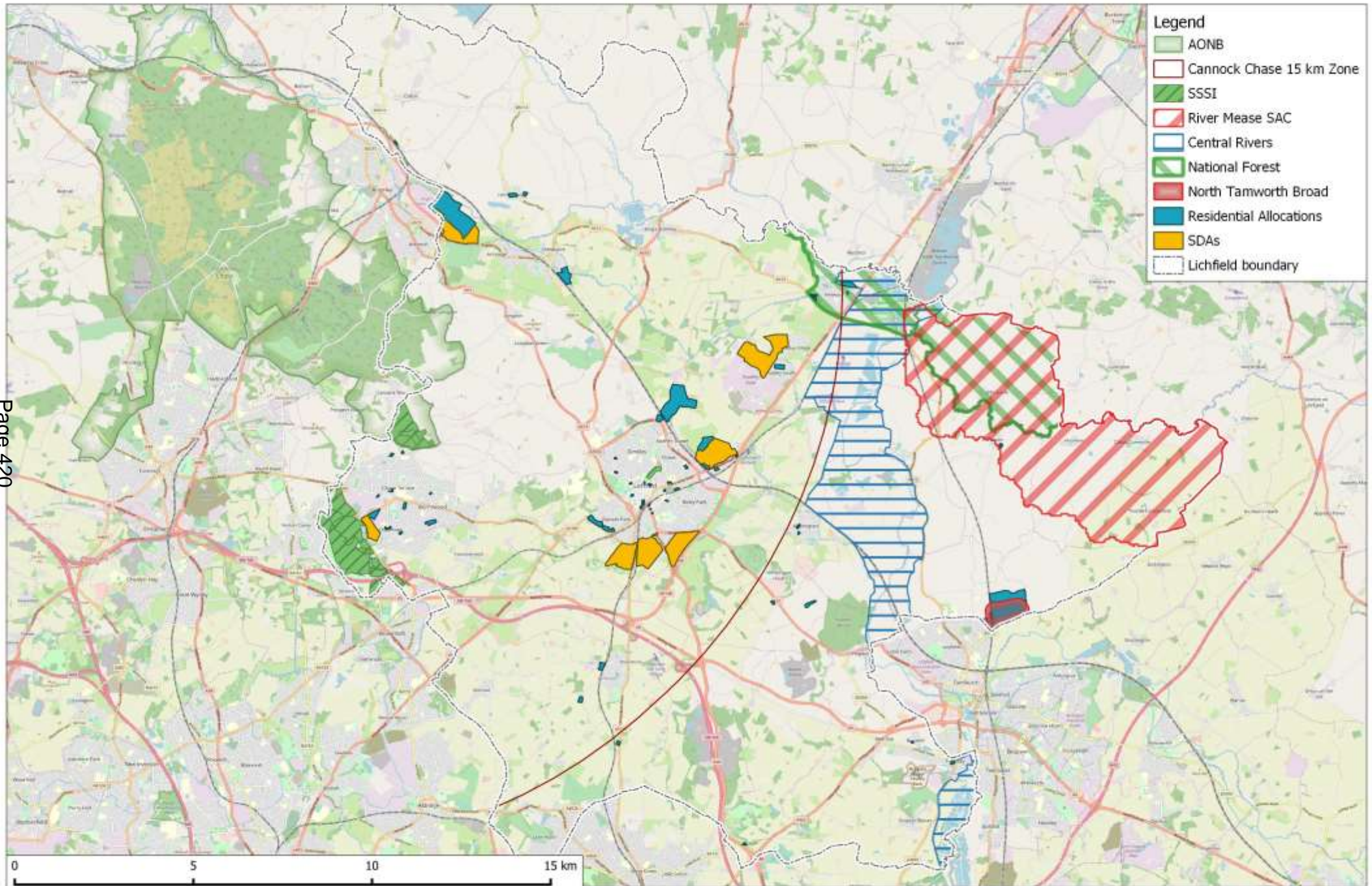
- 4.34 Where housing is directly adjacent to sites, access can occur directly from gardens and informal access points. Parking areas can be used as residential parking and access can include short-cuts and a range of other uses that are not necessarily compatible with nature conservation. Fly-tipping and dumping of garden waste can be more common. As such managing and looking after such sites can be more challenging.
- 4.35 Urban issues are perhaps most relevant to sites that are vulnerable to fire, nutrient enrichment and have sensitive ground-nesting birds. Urban effects are however relevant to other habitats, and similar issues may be seen with urbanisation in close proximity to other habitat types. Proximity to the River Mease for example could still result in increased dumping, run off and the introduction of invasive species from gardens or purposeful introduction of aquatic species if moved from garden ponds.
- 4.36 A small residential allocation in the emerging Land Allocations Development Plan Document is within the River Mease catchment at Harlaston (Site H1), but is located on the edge of an existing village and is the redevelopment of a site containing agricultural buildings to approximately 24 dwellings. It is beyond 400m from the River Mease SAC.
- 4.37 The Local Plan review will need to give similar individual consideration to any proposed allocations close to European sites. This impact pathway is only relevant where development is in very close proximity and should therefore be revisited as part of the appropriate assessment once work commences on establishing new site allocations for the Local Plan review.

Progressing the growth options

- 4.38 As explained in the screening of the plan at Preferred Options and Policy Directions stage, there is yet to be any defined options for site allocations for growth. However, as the Land Allocations Development Plan Document will be a very recently adopted document when it is reviewed, it is anticipated that the work undertaken to identify the most sustainable options for growth for the Land Allocations Development Plan Document will remain valid, and the District Council will be considering how those sites may fit with a new growth option once established. Map 4 shows the site allocations from the emerging Land Allocations Development Plan Document, identifying the strategic areas for growth as being primarily focussed around Lichfield and then at Burntwood and on the outskirts of towns that on the edge of the District; Rugeley and Tamworth. Fradley is also an area with a strategic development allocation to

potentially expand the employment focus in this location, along with some housing. As noted in the screening table, a growth pattern that follows the settlement hierarchy and retains the majority of growth around Lichfield may present a better option in terms of European site protection, but a more dispersed pattern is not necessarily going to lead to impacts, but rather a careful consideration of sites in closer proximity to European sites will be necessary as part of the appropriate assessment before site allocations are finalised.

Map 4: Site allocations.



Biodiversity net gain

- 4.39 With a growing momentum for biodiversity net gain across the UK there is an opportunity to recognise the fundamental importance of wider biodiversity to the long term integrity of designated sites. The Lawton Review made the critical importance of biodiversity connectivity patently clear. Lichfield District has been a forerunner in embedding biodiversity net gain within its planning function, and is now working on improved targeting of biodiversity net gain towards locally relevant priorities.
- 4.40 Map 4 shows a number of areas of biodiversity interest within the District, including the Central Rivers area where the District Council is working with partners to ensure that there is a co-ordinated approach to securing landscape scale enhancements for wildlife and recreation benefits. A number of quarries in this area will be restored to meet these objectives.
- 4.41 Whilst the Cannock Chase SAC lies outside the District boundary, the Cannock Chase AONB does come into the District in the north west, as shown on Map 4, and includes areas of biodiversity importance that link to the SAC habitats. The AONB management plan is currently being reviewed and Lichfield District Council has encouraged links to be made between the plan and the opportunities for connecting landscapes through biodiversity net gain.
- 4.42 A Staffordshire wide 'joint ecological approach group' has prepared a nature recovery map for Staffordshire, and the review of the Local Plan presents an opportunity to further integrate biodiversity restoration into the heart of sustainable development for the new plan period, making the links between the priorities for growth and the priorities for biodiversity.
- 4.43 It is recommended that the appropriate assessment section pick up the relevant links to the biodiversity net gain work where there may be opportunities to focus gains on improving supporting habitats and ecological functions that are critical to designated sites, in areas that lie outside site boundaries. Development of biodiversity policy should have regard for the linkages between designated and non-designated biodiversity assets.

5. Conclusions and Next Steps

5.1 This HRA, undertaken at Preferred Options and Policy Directions stage has recommendations from the screening assessment for key topic areas for consideration at appropriate assessment. These topic areas are introduced within this HRA report and will be progressed as the plan is developed.

5.2 The appropriate assessment will consider the following European sites:

- Cannock Chase SAC
- Cannock Extension Canal SAC
- Pasturefields Salt Marsh SAC
- River Mease SAC
- Humber Estuary SAC and SPA.

5.3 The appropriate assessment will consider the following impact pathway themes in relation to the above sites:

- Air Quality – consideration of traffic increases in close proximity to European sites as a result of site allocations and growth
- Recreation– checking that the local plan does not give rise to additional recreation impacts as a result of housing growth Other urbanisation effects – checking development in close proximity for any urbanisation risks other than recreation.
- Water – a re-check of previous conclusions from earlier HRA work and review of any new evidence
- Direction of growth and emerging site allocations for both housing and employment – initially informing growth options and then a detailed consideration of all allocations
- Biodiversity net gain – ensuring that wider biodiversity is adequately protected, and contribution are made through spatial planning to biodiversity restoration. This underpins European site protection and long term maintenance.

5.4 HRA is an iterative process and early identification of potential issues is beneficial in ensuring that the natural environment is an integral part of the Local Plan, in terms of both protection and opportunities for enhancement and expansion. As this HRA report is updated, it is intended to provide the evidence and justifications necessary to demonstrate that the Lichfield Local Plan will not adversely affect European sites. Where this is not possible, alternative options for the plan may need to be considered. At this point in time the risks are identified to enable this process and do not necessarily mean that adverse effects cannot be ruled out.

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7. Appendix 1 - The Habitats Regulations Assessment Process

- 7.1 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, which are commonly referred to as the 'Habitats Regulations.' The most recent version of the Habitats Regulations does not affect the principles of European site assessment as defined by the previous Regulations, and which forms the focus of this report. Regulation numbers have changed from the 2010 Regulations.
- 7.2 The Habitats Regulations are in place to transpose European legislation set out within the Habitats Directive (Council Directive 92/43/EEC), which affords protection to plants, animals and habitats that are rare or vulnerable in a European context, and the Birds Directive (Council Directive 2009/147/EC), which originally came into force in 1979, and which protects rare and vulnerable birds and their habitats. These key pieces of European legislation seek to protect, conserve and restore habitats and species that are of utmost conservation importance and concern across Europe. Although the Habitats Regulations transpose the European legislation into domestic legislation, the European legislation still directly applies, and in some instances, it is better to look to the parent Directives to clarify particular duties and re-affirm the overarching purpose of the legislation.
- 7.3 European sites include Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) classified under the Birds Directive. The suite of European sites includes those in the marine environment as well as terrestrial, freshwater and coastal sites. European sites have the benefit of the highest level of legislative protection for biodiversity. Member states have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted, with a precautionary approach embedded in the legislation, i.e. it is necessary to demonstrate that impacts will not occur, rather than they will. The overarching objective is to maintain sites and their interest features in an ecologically robust and viable state, able to sustain and thrive into the long term, with adequate resilience against natural influences. Where sites are not achieving their potential, the focus should be on restoration.
- 7.4 The UK is also a contracting party to the Ramsar Convention, which is a global convention to protect wetlands of international importance, especially those wetlands utilised as waterfowl habitat. In order to ensure compliance with the requirements of the Convention, the UK Government expects all competent

authorities to treat listed Ramsar sites as if they are part of the suite of designated European sites, as a matter of government policy, as set out in Section 118 of the National Planning Policy Framework. Most Ramsar sites are also a SPA or SAC, but the Ramsar features and boundary lines may vary from those for which the site is designated as a SPA or SAC.

7.5 It should be noted that in addition to Ramsar sites, the National Planning Policy Framework also requires the legislation to be applied to potential SPAs and possible SACs, and areas identified or required for compensatory measures where previous plans or projects have not been able to rule out adverse effects on site integrity, yet their implementation needs meet the exceptional tests of Regulation 64 of the Habitats Regulations, as described below.

7.6 The step by step process of HRA is summarised in the diagram below. Within the Habitats Regulations, local planning authorities, as public bodies, are given specific duties as 'competent authorities' with regard to the protection of sites designated or classified for their species and habitats of European importance. Competent authorities are any public body individual holding public office with a statutory remit and function, and the requirements of the legislation apply where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. Regulation 63 of the Habitats Regulations sets out the HRA process for plans and projects, which includes development proposals for which planning permission is sought. Additionally, Regulation 105 specifically sets out the process for assessing emerging land use plans.

7.7 The step by step approach to HRA is the process by which a competent authority considers any potential impacts on European sites that may arise from a plan or project that they are either undertaking themselves, or permitting an applicant to undertake. The step by step process of assessment can be broken down into the following stages, which should be undertaken in sequence:

- Check that the plan or project is not directly connected with or necessary for the management of the European site
- Check whether the plan or project is likely to have a significant effect on any European site, from the plan or project alone
- Check whether the plan or project is likely to have a significant effect on any European site, from the plan or project in-combination with other plans or projects
- Carry out an Appropriate Assessment
- Ascertain whether an adverse effect on site integrity can be ruled out

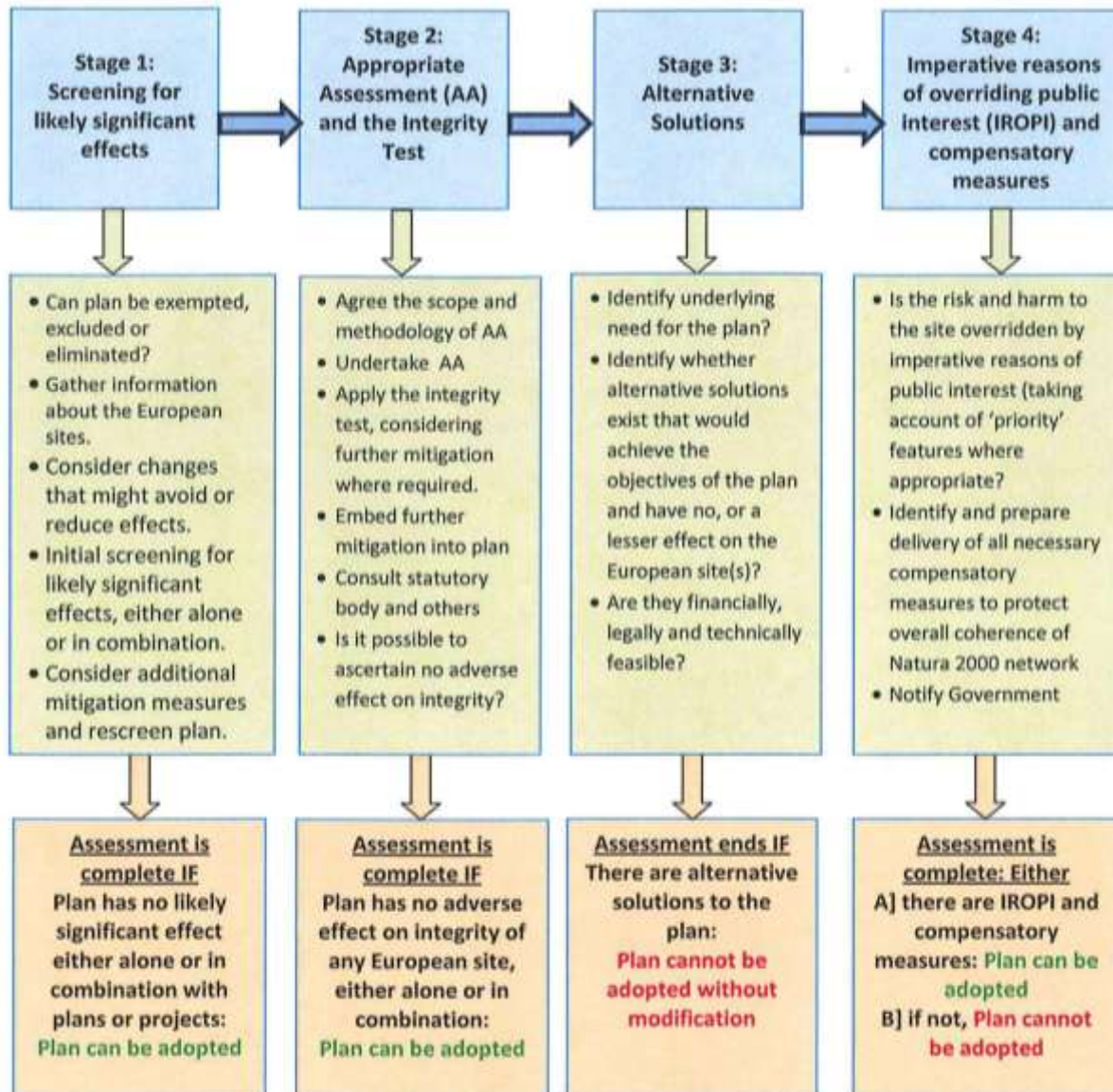
7.8 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and assessment in order to have certainty, and this is the Appropriate

Assessment stage. At this point the competent authority may identify the need to add to or modify the project in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.

- 7.9 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to European sites have been successfully dealt with.
- 7.10 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.
- 7.11 After completing an assessment, a competent authority should only approve a project or give effect to a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.
- 7.12 Where adverse effects cannot be ruled out, there are further exceptional tests set out in Regulation 64 for plans and projects and in Regulation 107 specifically for land use plans. Exceptionally, a plan or project could be taken forward for imperative reasons of overriding public interest where adverse effects cannot be ruled out and there are no alternative solutions. It should be noted that meeting these tests is a rare occurrence and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.
- 7.13 In such circumstances where a competent authority considers that a plan or project should proceed under Regulations 64 or 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed 'overriding reasons' for which a plan or project should proceed despite being unable to rule out adverse effects on European site interest features, and ensure that those reasons are in the public interest and are such that they override the

potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the European site network if such a plan or project is allowed to proceed.

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
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Figure 1: Outline of the assessment of plans under the Habitat Regulations

8. Appendix 2 –Conservation Objectives

- 8.1 As required by the Directives, 'Conservation Objectives' have been established by Natural England, which should define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives. When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.
- 8.2 Natural England has embarked on a project to renew all European site Conservation Objectives, in order to ensure that they are up to date, comprehensive and easier for developers and consultants to use to inform project level HRAs in a consistent way. In 2012, Natural England issued now a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site. These generic objectives are the first stage in the project to renew conservation objectives, and the second stage, which is to provide more detailed and site-specific information for each site to support the generic objectives, is now underway.
- 8.3 The new list of generic Conservation Objectives for each European site includes an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives currently issued are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependant on the nature and characteristics of the site. The second stage, provision of the more supplementary information to underpin these generic objectives, will provide much more site-specific information, and this detail will play a fundamental role in informing HRAs, and importantly will give greater clarity to what might constitute an adverse effect on a site interest feature.
- 8.4 In the interim, Natural England advises that HRAs should use the generic objectives and apply them to the site-specific situation. This should be supported by comprehensive and up to date background information relating to the site.
- 8.5 For SPAs, the overarching objective is to:
- 8.6 'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is

maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'

8.7 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the habitats of the qualifying features.
- The structure and function of the habitats of the qualifying features.
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of the qualifying features.
- The distribution of the qualifying features within the site.

8.8 For SACs, the overarching objective is to:

'Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.'

8.9 This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the qualifying natural habitats and habitats of qualifying species.
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely.
- The populations of qualifying species.
- The distribution of qualifying species within the site.

8.10 Conservation objectives inform any HRA of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives.

9. Appendix 3 – The Nature Conservation Interest of the European Sites

- 9.1 The relevant European sites are summarised in Table 4 below, where the interest features, threats and pressures and links to the relevant conservation objectives are listed.

Table 4: Summary of relevant European sites, their interest features and relevant pressures/threats. Pressures/threats are taken from the [site improvement plans](#) (SIP) and are listed in priority order. Hyperlinks in the first column link to the relevant site page on the Natural England website, providing details of the site’s conservation objectives, citation etc. Pale blue shading indicates marine sites. (B) = breeding, (NB) = non-breeding.

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
Cannock Chase SAC	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> H4030 European dry heaths	Undergrazing, drainage, hydrological changes, disease, air pollution (risk of atmospheric nitrogen deposition), wildfire/arson, invasive species.
Cannock Extension Canal SAC	S1831 <i>Luronium natans</i> : Floating water-plantain	Water pollution, overgrazing, invasive species, air pollution (risk of atmospheric nitrogen deposition).
Ensor’s Pool SAC	S1092 <i>Austropotamobius pallipes</i> : White-clawed (or Atlantic stream) crayfish	Changes in species distributions.
Fens Pools SAC	S1166 <i>Triturus cristatus</i> : Great crested newt	Overgrazing, inappropriate scrub control, disease, water pollution, habitat fragmentation.
Humber Estuary SAC/SPA/Ramsar site	<u>SAC</u> S1364 <i>Halichoerus grypus</i> : Grey seal H1130 Estuaries H2160 Dunes with <i>Hippophae rhamnoides</i> S1099 <i>Lampetra fluviatilis</i> : River lamprey	

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	<p>H2110 Embryonic shifting dunes H1140 Mudflats and sandflats not covered by seawater at low tide H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") H1150# Coastal lagoons H2130# Fixed dunes with herbaceous vegetation ("grey dunes") H1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) H1110 Sandbanks which are slightly covered by sea water all the time H1310 <i>Salicornia</i> and other annuals colonising mud and sand S1095 <i>Petromyzon marinus</i>: Sea lamprey</p> <p><u>SPA</u> A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier A082(NB) <i>Circus cyaneus</i>: Hen harrier A132(B) <i>Recurvirostra avosetta</i>: Pied avocet A132(NB) <i>Recurvirostra avosetta</i>: Pied avocet A156(NB) <i>Limosa limosa islandica</i>: Black-tailed godwit</p> <p>Waterbird assemblage: A157(NB) <i>Limosa lapponica</i>: Bar-tailed godwit A149(NB) <i>Calidris alpina alpina</i>: Dunlin A162(NB) <i>Tringa totanus</i>: Common redshank A151(NB) <i>Philomachus pugnax</i>: Ruff A140(NB) <i>Pluvialis apricaria</i>: European golden plover A143(NB) <i>Calidris canutus</i>: Red knot A195(B) <i>Sterna albifrons</i>: Little tern A021(B) <i>Botaurus stellaris</i>: Great bittern A021(NB) <i>Botaurus stellaris</i>: Great bittern</p>	

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	<p>A048(NB) <i>Tadorna tadorna</i>: Common shelduck</p> <p><u>Ramsar site</u> Ramsar criterion 1 - A representative example of a near-natural estuary with the following component habitats: dune systems and humid dune slacks, estuarine waters, intertidal mud and sand flats, saltmarshes, and coastal brackish/saline lagoons.</p> <p>Ramsar criterion 3 - The Humber Estuary Ramsar site supports a breeding colony of grey seals <i>Halichoerus grypus</i> at Donna Nook</p> <p>Ramsar criterion 5 - Assemblages of international importance: 153,934 waterfowl, non-breeding season</p> <p>Ramsar criterion 6 – species/populations of waterbirds occurring at levels of international importance.</p> <p>Ramsar criterion 8 - The Humber Estuary acts as an important migration route for both river lamprey <i>Lampetra fluviatilis</i> and sea lamprey <i>Petromyzon marinus</i> between coastal waters and their spawning areas.</p>	
Mottey Meadows SAC	H6510 Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>)	Water pollution, hydrological change, water abstraction, change in land management.
Pasturefields Salt Marsh SAC	H1340# Inland salt meadows	None.
River Mease SAC	H3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation	Water pollution, drainage, inappropriate weirs, dams and other structures, invasive species, siltation, water abstraction.

Lichfield Local Plan Review HRA (screening at Preferred Options & Policy Directions)

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)
	S1092 <i>Austropotamobius pallipes</i> : White-clawed (or Atlantic stream) crayfish S1149 <i>Cobitis taenia</i> : Spined loach S1163 <i>Cottus gobio</i> : Bullhead S1355 <i>Lutra lutra</i> : Otter	
West Midlands Mosses SAC (note this SAC is comprised of four SSSIs, of which Chartley Moss SSSI is the only one within 20km of Lichfield District)	H3160 Natural dystrophic lakes and ponds H7140 Transition mires and quaking bogs	Water pollution, hydrological change, air pollution (risk of atmospheric nitrogen deposition), inappropriate scrub control, game management (pheasant rearing), forestry and woodland management, habitat fragmentation.
Chartley Moss also lies within the Midlands Meres and Mosses Phase I Ramsar	<u>Ramsar criterion 1</u> : The site comprises a diverse range of habitats from open water to raised bog; <u>Ramsar criterion 2</u> : Supports a number of rare species of plants associated with wetlands including five nationally scarce species together with an assemblage of rare wetland invertebrates (three endangered insects and five other British Red Data Book species of invertebrates).	

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equality impact assessment stage 1 quick check questionnaire



If you are planning on making a change to an existing service or policy, or launching something new, fill out this quick questionnaire to find out if you need to complete a full equality impact assessment. You can also use this form to check your current services or policies.

To find out more about the legal background to equality impact assessments, or for advice on which of your current services should be assessed, read our equality impact assessment help notes.

Section 1: About you and your service area

Your name:	Martin Rich
Your service area:	Spatial Policy & Delivery
Your director/line manager:	Ashley Baldwin
Your cabinet member:	CLlr. I. Pritchard

Section 2: About your plans

Name of service/policy you are assessing:	Local Plan Review Preferred Options & Policy Directions
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Is it? (please delete as appropriate)
<ul style="list-style-type: none"> ▪ A change to an existing policy/service

Who are the main users of your service/policy? (please delete any that are not appropriate)
<ul style="list-style-type: none"> ▪ Mixture of residents and visitors ▪ Internal (employees) ▪ Disability specific groups ▪ Race specific groups ▪ Gender specific groups ▪ Religious groups ▪ Sexual orientation groups ▪ Marriage and civil partnerships ▪ Older people ▪ Young people ▪ Other (please specify) those working within the District

Please briefly describe why you are creating a new service/changing an existing service or reviewing current policy/service (where appropriate, include sources of evidence such as customer feedback):
There is a statutory requirement to produce a Local Plan. The current Local Plan makes a commitment to an early review to keep it up to date and this is a consultation to inform the review.

¹ For help or guidance contact Colin Cooke on 01543 308121 or Alison Bowen on 01543 308129 or email colin.cooke@lichfielddc.gov.uk or alison.bowen@lichfielddc.gov.uk

Section 3: Will your plans impact on any particular groups?

3a: Please fill in all boxes that apply in the table below. If any boxes don't apply, please leave blank.

Hints & tips Think about who will benefit from or be affected by your plans/policy. Will any particular group be negatively affected, or not able to use the service? For further guidance please see Section 3 of the help notes.

Impact of plans	Will your plans have a positive impact on this group? If so please explain why?	Will your plans have a negative impact? If so please explain why? <input checked="" type="checkbox"/> If there is a negative impact on any group(s), please complete section 4 for each group.
Groups of users		
Age ranges (indicate range/ranges)	Yes. The consultation will include representatives of this group. The housing mix policy will meet the needs of groups such as homes for older people including specialist care provision. The open space and recreation policy will work with our schools and colleges and support our aging population to live and age well.	No
Disability (physical, sensory or learning)	Yes. The consultation will include representatives of this group. The housing mix policy will meet the needs of groups such as people with disabilities.	No
Gender/sex	Neutral. The consultation documents will be available to the general public	No
Transgender/gender reassignment	Neutral. The consultation documents will be available to the general public	No
Race (includes ethnic or national origins, colour or nationality)	Neutral. The consultation documents will be available to the general public	No
Gypsies and travellers	Yes. The consultation will include representatives of this group. There is a policy for provision for gypsies and travellers.	No
Refugees / asylum seekers	Neutral. The consultation documents will be available to the general public	No
Sexual orientation	Neutral. The consultation documents will be available to the general public	No
Marriage and civil partnerships	Neutral. The consultation documents will be available to the general public	No
Religion or belief (includes lack of belief)	Yes. The consultation includes representatives of this group	No
Pregnancy and maternity	Neutral. The consultation documents are available to the general public	No
Carers or the people cared for (dependants)	Neutral. The consultation documents are available to the general public	No
Other (please specify)		

3b: Further details

Please use this space to provide further details if necessary

A Gypsy and Traveller Accommodation Needs Assessment has been jointly contracted with Tamworth and

2 For help or guidance contact Colin Cooke on 01543 308121 or Alison Bowen on 01543 308129 or email colin.cooke@lichfielddc.gov.uk or alison.bowen@lichfielddc.gov.uk

North Warwickshire Councils.

This is a consultation which will include specific groups and use the website and a questionnaire to identify issues which can be addressed through a Local Plan; the document can be made available in large print or different languages upon request.

Section 4: Can you justify and evidence, or lessen any impact?

4a: If you have identified a negative impact(s) on any group(s) please complete the below table for each affected each group. If any boxes don't apply, please leave blank. If you didn't identify any negative impact(s) on the previous page, skip to section 6.

Hints & tips Is there something you can do to reduce or alter any negative impact you have identified? *For example when we changed waste and recycling collections to kerbside collections, we offered disabled/less able people assisted collections.* Please list all the evidence you have gathered to support your decision(s) – this could include customer feedback, statistics, comparable policies, consultation results. If you don't have any evidence, please carry out appropriate studies and research to gather the evidence you need to support your decision(s). If you have no/insufficient evidence or cannot gather any, you will need to complete a full EIA. For further guidance, see Section 4 of the help notes.

Actions you need to take	We will make the following change(s) to the service/policy to reduce the negative impact. Explain the change(s) and the evidence you have to support your decision? <input checked="" type="checkbox"/> Use section 4b below if you want to give more details.	We won't make changes as we can justify our decision and there are sound reasons behind our decision. Justify why and detail the evidence you have gathered to support your decision. <input checked="" type="checkbox"/> Use section 4c below if you want to give more details.	There is a negative impact, and we cannot justify it and/or have no, or insufficient, evidence to support our decision. <input checked="" type="checkbox"/> You will need complete a full equality impact assessment. See the help notes for more details.
Groups of users			
Age ranges (indicate range/ranges)			
Disability (physical, sensory or learning)			
Gender / sex			
Transgender / gender reassignment			
Race (includes ethnic or national origins, colour or nationality)			
Gypsies and travellers			
Refugees / asylum seekers			
Sexual orientation			
Marriage and civil partnerships			
Religion or belief (includes lack of belief)			
Pregnancy and maternity			
Carers or the people cared for (dependants)			
Other (please specify)			

4b: Further details on changes

Please use the space below to give more details on the changes you will make, if necessary:

4c: Further details on justification

Please use the space below to give more details on the justification/evidence you have gathered, if necessary:

⁴ For help or guidance contact Colin Cooke on 01543 308121 or Alison Bowen on 01543 308129 or email colin.cooke@lichfielddc.gov.uk or alison.bowen@lichfielddc.gov.uk

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Section 5: Your action plan

Help notes If, as a result of this assessment, you are going to adapt your plans or policy, please include details below. Please include a quick action plan and key dates that will show how you will review your decisions and when. Please include responsibility and expected outcomes. For full guidance on how to complete this section, please refer to the help notes.

Section 6: Record your actions (delete as appropriate)

I have sent this to Policy and Performance for publication on the intranet and on www.lichfielddc.gov.uk	No
Date completed:	10/12/2018

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Elford Neighbourhood Plan Final Decision Statement

Councillor Ian Pritchard, Cabinet Member for Economic Growth, Environment & Development Services



Date:	15 January 2019
Agenda Item:	4
Contact Officer:	Patrick Jervis
Tel Number:	01543 308196
Email:	Patrick.jervis@lichfielddc.gov.uk
Key Decision?	No
Local Ward Members	All Elford ward members

CABINET

1. Executive Summary

- 1.1 This report relates to the preparation of a Neighbourhood Plan covering Elford which has recently been subject to referendum. The Elford Neighbourhood Plan received a majority Yes vote at its referendum held on 29 November 2018. The District Council now has to formally 'make' the Elford Neighbourhood Plan, following which it will form a part of the Development Plan in Lichfield District.

2. Recommendations

- 2.1 That cabinet notes the results of the referendum for the Elford Neighbourhood Plan as presented at paragraph 3.3 of this report.
- 2.2 That the Cabinet agrees to the making of the Elford Neighbourhood Plan and that this decision is then reported to Full Council.

3. Background

- 3.1 Neighbourhood planning is one of the provisions of the 2011 Localism Act allowing local communities to bring forward detailed policies and plans which can form part of the statutory planning process for an area and its residents.
- 3.2 The Neighbourhood Planning (General) Regulations 2012 require that Neighbourhood Plans are subject to a referendum. The referendum was held in accordance with the Neighbourhood Planning (Referendum) Regulations 2012. All those eligible to vote in the Elford Neighbourhood Area voted Yes or No to the following question, "Do you want Lichfield District Council to use the Neighbourhood Plan for Elford to help it decide planning applications in the Neighbourhood Area?" If the majority (50% +1) of the turnout vote in favour the Local Planning Authority (Lichfield District Council) must make the Neighbourhood Plan.
- 3.3 The referendum for Elford was held on 29 November 2018. The Elford Neighbourhood Plan referendum received a turnout of 31.7%, with 117 (75.9%) votes in favour and 37 (24.1%) votes against the making of the Neighbourhood Plan.
- 3.4 The 2012 Regulations require that upon the completion of the referendum the Local Planning Authority is required to publish a 'Decision Statement' on their website. This Decision Statement will state that the Neighbourhood Plan has been successful at referendum and will now be 'made', and will form a part of the Development Plan for Lichfield District. A proposed Decision Statement in respect of the Elford Neighbourhood Plan is attached at **Appendix A**.

- 3.5 The Cabinet is asked to note the referendum results set out at paragraph 3.3 of this report and the Decision Statement and agree to the making of the Elford Neighbourhood Plan. The Elford Neighbourhood Plan is attached at **Appendix B**. The decision of the Cabinet will then need to be endorsed by Full Council.
- 3.6 Subject to a decision to make the Neighbourhood, the District Council will need to publish the Decision Statement online, and provide the Decision Statement to the Qualifying Body (Elford Parish Council) and any other stakeholder who has requested to be notified of the decision. The Neighbourhood Plan will form a part of the Development Plan for Lichfield District and will be used in determining planning applications. The made Neighbourhood Plan will be published online and the prescribed persons will be notified.

Alternative Options	<ol style="list-style-type: none"> 1. The Lichfield District Council refuses to make the Neighbourhood Plan. The Council can only do this if it considers this would breach, or be incompatible with any EU Obligation or any of the Convention Rights. 2. Following the making of the Neighbourhood Plan, Lichfield District Council can decide to modify or revoke the Neighbourhood Plan, in line with the Regulations.
Consultation	<ol style="list-style-type: none"> 1. In line with the Regulations the Neighbourhood Plan has been through numerous consultation periods. A Consultation Statement detailing the consultation undertaken throughout the Neighbourhood Plan process was provided by the Qualifying Body (Elford Parish Council) as part of their Neighbourhood Plan Submission Documentation. 2. The Neighbourhood Plan Referendum was publicised according to the Neighbourhood Planning (Referendum) Regulations 2012.
Financial Implications	<ol style="list-style-type: none"> 1. The Government has made grant aid available to District Councils in recognition of the level of resourcing required in the administration of Neighbourhood Plans. A grant of £20,000 will be applied for during the next available funding window following the referendum. 2. Communities with Neighbourhood Plans in place will be entitled to 25% of the Community Infrastructure Levy (CIL) receipts generated by eligible development in their area. Communities with no Neighbourhood Plan will be entitled to 15%.
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. The Neighbourhood Plan demonstrates that it is in broad conformity with the Local Plan Strategy (2015) which conforms with the Strategic Plan.
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. The extensive consultation procedures provided for by the Planning and Compulsory Purchase Act 2004 ensure that consultation is undertaken with the wider community and covers human rights matters. 2. The Neighbourhood Planning (Referendum) Regulations 2012 ensure that all those eligible were entitled to vote in the referendums. 3. Equality Impact Assessments (EqIA) have been completed for the Elford Neighbourhood Plan and is attached at Appendix C.
Crime & Safety Issues	<ol style="list-style-type: none"> 1. Crime and community safety issues may be considered as part of the Neighbourhood Plans.
GDPR/Privacy Impact Assessment	<ol style="list-style-type: none"> 1. A Privacy Impact Assessment has been undertaken.

	Risk Description	How We Manage It	Severity of Risk (RYG)
A	Qualifying Body propose the replacement of the Neighbourhood Plan.	Ensure the Qualifying Body produce the replacement Neighbourhood Plan in accordance to the Neighbourhood Planning (General) Regulations 2012.	Green
B	Lichfield District Council decide to modify the made Neighbourhood Plan.	Lichfield District Council in line with the Regulations will seek the permission of Qualifying Body before modifying the Neighbourhood Plan, and will carry out the process in accordance with the Regulations.	Green
C	Lichfield District Council decide to revoke the made Neighbourhood Plan.	Lichfield District Council will gain permission from the Secretary of State before revoking the Neighbourhood Plan, the revocation will be in accordance with the Regulations.	Green
D	Secretary of State revokes the made Neighbourhood Plan.	This would be outside the control of the District Council.	Green

Background documents

1. Neighbourhood Planning (General) Regulations 2012 & Amendments
2. Neighbourhood Planning (Referendum) Regulations 2012 & Amendments
3. [Elford Neighbourhood Plan](#) (Referendum Version)
4. [Lichfield District Local Plan Strategy](#)

Relevant web links

1. Copies of the submitted neighbourhood plans can be found via:
 - www.lichfielddc.gov.uk/Elfordnp

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Elford Neighbourhood Plan Development Plan

Decision Statement published pursuant to the Localism Act 2011 Schedule 38A (9) and Regulations 19 & 20 of the Neighbourhood Planning (General) Regulations 2012

1. Summary:

- 1.1 Lichfield District Council decided by resolution of Cabinet on **15/01/2019** to make the Elford Neighbourhood Development Plan under Section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended). The Elford Neighbourhood Development Plan now forms part of the Development Plan for Lichfield District.

2. Reasons for decision:

- 2.1 The Elford Neighbourhood Plan meets the Basic Conditions and its promotion process is compliant with legal and procedural requirements. Paragraph 38A(4)(a) of the Planning and Compulsory Purchase Act 2004 requires the Council to make the Neighbourhood Plan if more than half of those voting in the referendum have voted in favour of the Plan being used to help decide planning applications in the area. The Plan was endorsed by more than the required threshold in the referendum on 29 November 2018.

3. Background:

- 3.1 On 11 May 2015 Elford Parish Council requested that the Elford Neighbourhood Area be designated for the purposes of producing a Neighbourhood Development Plan for the area. Following a six week consultation Lichfield District Council designated the Elford Neighbourhood Area on 14 August 2015.
- 3.2 In September 2017 Elford Parish Council published the draft Elford Neighbourhood Plan for a minimum six week consultation, in line with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 which closed in October 2017.
- 3.3 The Elford Neighbourhood Plan was submitted by the Parish Council to Lichfield District Council in May 2018 for assessment by an Independent Examiner. The Plan (and associated documents) was publicised for consultation by Lichfield District Council for six weeks between 8 May 2018 and 19 June 2018 (the Local Authority publicity consultation). Mr Andrew Ashcroft BA (Hons) MA DMS MRTPI was appointed as the Independent Examiner and all comments received at the Local Authority publicity consultation were passed on for his consideration.

- 3.4 The Examiner's report concluded that, subject to modifications, the Elford Neighbourhood Plan met the necessary basic conditions (as set out in Schedule 4b (8) of the Town and Country Planning Act 1990, as amended by the Localism Act 2011) and subject to these modifications being made it should proceed to referendum.
- 3.5 A referendum was held on Thursday 29 November 2018, 75.9% of those who voted were in favour of the Neighbourhood Plan, the turnout was 31.7%. Paragraph 38A (4)(a) of the Planning and Compulsory Purchase Act 2004 as amended requires that the Council must make the Neighbourhood Plan if more than half of those voting have voted in favour of the plan.

This decision statement can be viewed online on the Lichfield District Council website at: www.lichfielddc.gov.uk/Elfordnp. It can also be viewed in hard copy at:

Lichfield District Council, District Council House, Frog Lane, Lichfield, WS13 6YY -
Monday to Friday 8.45am to 5.15pm

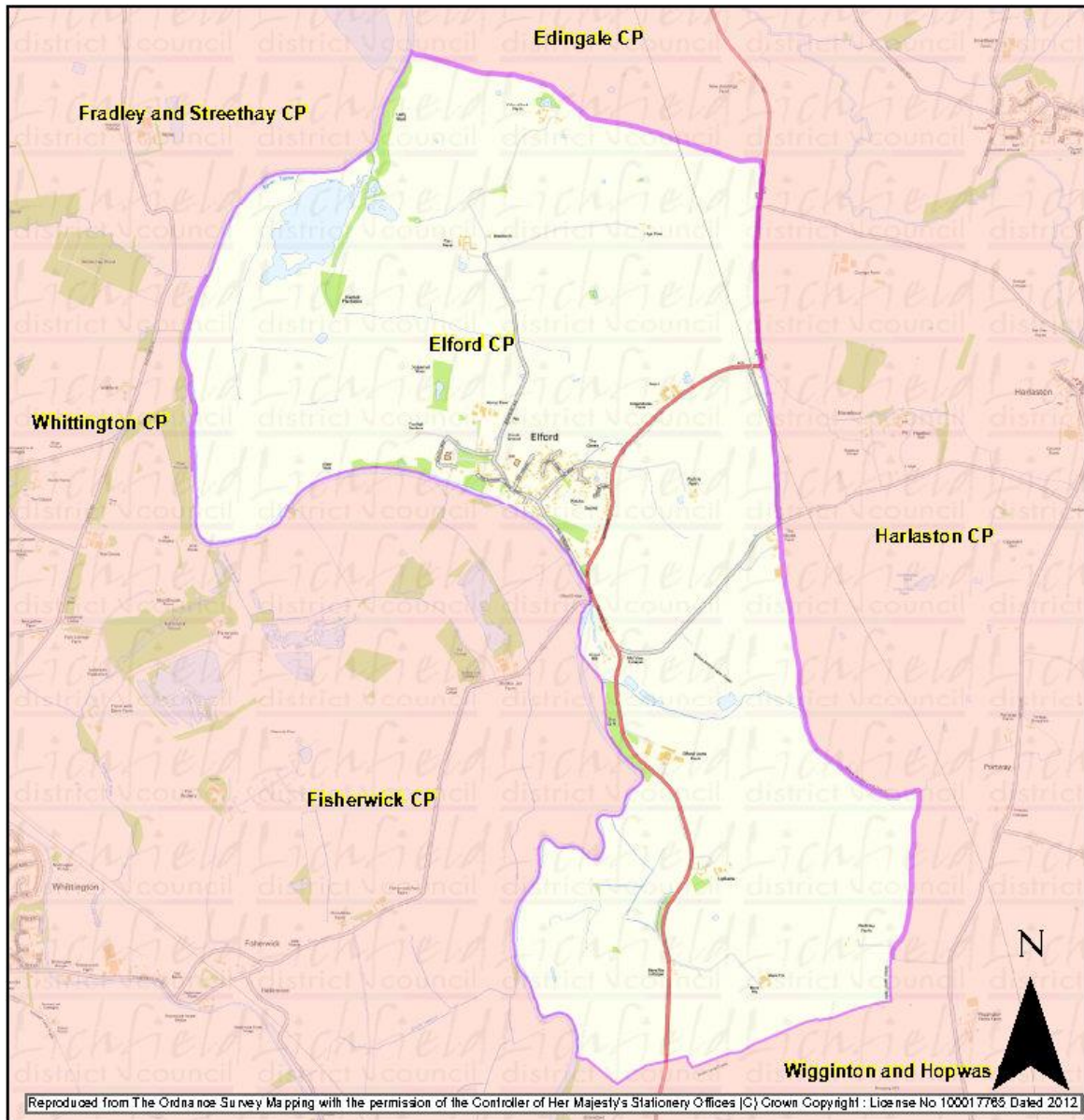
ELFORD PARISH NEIGHBOURHOOD PLAN

Made 15 January 2019

2015 – 2029



Elford Parish



Key
Elford Parish

Map supplied by Lichfield District Council



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1. Introduction

- 1.1. Neighbourhood Planning is a central government initiative introduced by the Localism Act (2011) and is recognised in the National Planning Policy Framework (NPPF). The aim of the legislation is to empower local communities to use the planning system to promote appropriate and sustainable development in their area. Neighbourhood Development Plans (NDP) must be in general conformity with the strategic policies of the Local Development Framework (also known as the Development Plan) and have regard to national policy and advice.
- 1.2. In the case of Elford, the Development Plan consists of Lichfield District Council's (LDC) Adopted Local Plan Strategy (2015). Once submitted to the LDC, the Elford Neighbourhood Plan (ENP) will be subject to public examination and a local referendum before being adopted as a new tier of the Development Plan and become a statutory document in the determination of planning applications within the Parish boundary.
- 1.3. NDPs are to be shaped by and produced for the local community. The role of the Steering Group in the neighbourhood plan process was to act as facilitators in enabling local residents, businesses and community groups to determine the focal points of their NDP and help devise policies to tackle local issues. The Steering Group was formed of Elford residents from various areas of the village.

Developing the Elford Neighbourhood Plan

- 1.4. The ENP (also referred to as 'the Plan') has been prepared for the community by the community. This document is the product of an intensive programme of consultation and community events. Each stage of the project has evolved from the needs and wants of the community, the Neighbourhood Plan Steering Group, and the Parish Council. Most recently this includes detailed consideration and consultation of the approach to be taken on the delivery of housing in the Parish, conducted in early Spring 2017. Our consultant team (Urban Imprint) have then translated this into a formal Planning Policy document and have checked and double-checked their interpretation with the community at each stage along the process.

Consultation

1.5. Throughout the development of the Plan, various consultation events have been undertaken in order to inform the public of the progress of the plan and to gain their opinions on matters, such as the First Draft of the plan. The table below provides a brief outline of the community consultation events held:

<u>Consultation Exercise</u>	<u>Date/Time</u>
Leaflet distributed to homes publicising NP and consultation events	January 2016
Introduction to Neighbourhood Planning/Thinking about Elford	February 2016
Schools Workshop	February 2016
Vision and Objectives workshop	February 2016
Neighbourhood Plan Theme Groups Workshop	March 2016
Community Walkover	March 2016
Resident’s Survey	May 2016
Resident’s Survey - Housing	February 1 st – March 13 th 2017
Regulation 14 Consultation on First Draft of NP	September 5 th – October 17 th 2017

1.6. In late 2017, a planning application for 25 new dwellings was proposed (Ref: 17/01379/OUTM) by a local land owner on land in the core of the village which was designated as a Protected open Space by the Local Plan, was adjacent to the conservation area and was proposed as a Local Green Space by the consultation draft of this Neighbourhood Plan. The scheme was recommended for approval by the Local Planning Authority and subsequently approved by the Council in March 2018 against significant local opposition by residents and the Parish Council.

1.7. As a result of this permission, the development strategies set out in the plan have had to be significantly amended to reflect this decision, which is a matter of fact, and not a result of community consultation. This included removal of the LGS designation, and the reworking of the housing delivery policies which initially proposed new development to the north and east of the settlement in accordance with community consultation, as opposed to the development of this site.

1.8. Throughout the development of the ENP, a Sustainability Appraisal (SA) was undertaken. The SA acts as a crucial ‘check’ to ensure that all work within the project is compliant with the National and Local Policy, as well as ensuring the vision, objectives and policies do not conflict with one another.

1.9. A copy of the Sustainability Appraisal is submitted to the LDC alongside this Plan.

2. Background to the Parish

- 2.1. The Parish of Elford lies within the District of Lichfield in the County of Staffordshire, and contains a village with a population of 632 people (at the time of the 2011 census). The Parish lies in the south east of the County of Staffordshire and near to the eastern edge of the West Midlands region boundary. Aside from Lichfield to the west, and Tamworth to the east, the surrounding area is predominantly rural with a mixture of small towns and villages.
- 2.2. This section of the plan provides a general overview of the Parish – for further details on these matters and others see the 'Technical Baseline' document, submitted alongside the Plan.

Socio-economic Profile

- 2.3. A comparison of the age structure of Elford and England shows that the proportion of people aged 45 years and over is higher than that of England as a whole. This will have implications for the future demographics of the Parish, as 10 years further along, a greater proportion of residents will be of retirement age. The majority of residents are of white British origin with a low representation of other ethnicities.
- 2.4. There is a higher proportion of households that own their homes compared to the District and National averages. Average housing price in the Parish was £374,362 (as of 2015) which is significantly higher than the averages for the District and at National levels. The Parish is categorised by predominantly detached dwellings and has a lower mix of dwellings in general than nationally and in the District.
- 2.5. According to the 2001 and 2011 censuses, the total population of Elford grew from 581 to 632, which represents an increase of 8.8%. Elford has a slightly faster population growth compared to that of Lichfield District (8.0%) and that of England (7.9%).

Landscape

- 2.6. The parish lies within the Trent Valley Washlands character area, which is typically characterised by the linear river and canal features within this area. This includes the River Tame, which is a dominant landscape feature within the Parish of Elford and forms a natural boundary to the south of Elford Village. The Plan area also falls within the River Mease Special Area of Conservation.
- 2.7. The landscape character around Elford is roughly divided into two sections; the floodplain and alluvial plain to the west of Elford Village, adjacent to the River Tame; and the lowland, rolling farmland on the higher land to the east of the village.

- 2.8. There are a number of distinctive landscape features within the Village of Elford, many of them purely as a result of the remnants of the former Elford Hall. To the far west of the village lies the Walled Garden, now managed by the Elford Hall Garden Project (a community led organisation who have restored the Walled Garden itself), and a significant area of landscaped parkland associated with the former hall. Also to the west, a series of paddocks with large mature trees within them are all part of the conservation area, many in the ownership of private land owners and homeowners.
- 2.9. The historical field patterns of the Parish are considered a key cultural and heritage asset and opportunities to restore and enhance this should be taken.

Biodiversity and Wildlife

- 2.10. The Parish of Elford is rich in an abundance of wildlife, including bats, badgers and many reptile species. The Parish is partly situated within the Tame Valley, which is an important wildlife corridor and links to the Trent Valley.

History and Conservation

- 2.11. The landscape of the parish holds many important historical assets which offer links to the cultural heritage and show a number of features that demonstrate the working of the landscape since medieval times.
- 2.12. The historic environment of the Parish is also characterised by evidence for human activity extending back into the prehistoric period as above and below ground archaeological remains. An example of which is the Scheduled Monument 'The Lowe Bowl Barrow' - a Bronze Age burial mound, which is also known as Elford Lowe (Historic England National Historic List Entry no. 1008530). Much of the Village of Elford to the north-east is post-war, whilst the area adjacent to the Tame is the traditional core of the village.
- 2.13. Elford has a Conservation Area which was designated on November 1969 and covers 24.8 ha. It has been proposed by Lichfield District Council to amend the boundary of the conservation area to include more of the village, in particular to include the rest of the historic buildings within the village and some of the important open spaces. This extension was proposed in 2014, yet has still to be enacted but proposals were put forward in 2017. The extended area is shown on a map in the appendix.
- 2.14. The Parish includes a wealth of non-designated heritage assets, as well as designated assets, whose setting will be required to be preserved and enhanced by new development. Scattered farmsteads, mainly from the Georgian and Victorian period, are also important heritage features of the Parish.

Employment and Services

- 2.15. The economically active proportion of the population (those between 16-74 years old) is slightly below that of the District and National levels. Compared to West Midlands and England, Elford has a higher proportion of people working within the brackets 'Manufacturing and Professional' and 'Scientific and Technical Activities', whilst a lower proportion of people working within the brackets 'Wholesale', 'Education' and 'Human Health Activities'.
- 2.16. For a village of its size, Elford is well-served in terms of social and community infrastructure. It is less well served in terms of commercial services, with some basic services missing (including a daily post office, general store, nursery, and GP), which requires residents to travel outside the village to access these services.
- 2.17. The village is serviced by limited public transport connections, with an hourly/two-hourly bus service to Tamworth until early evening. Return services from Tamworth run only until late afternoon. This bus service may not continue, due to the withdrawal of subsidies. There are no direct bus services to Lichfield from the village. Elford was formerly served by its own railway station to the northeast of the village next to the A513, providing direct services to Tamworth and Burton. The station closed in 1952, but the line remains active as part of the mainline between the north-west and Birmingham.

3. Vision and Objectives

- 3.1. Visions serve a crucial role in clarifying objectives and focusing projects. Following the first community workshop held on 3rd February 2016 with Elford residents, the vision below was developed for the Plan. The vision reflects how residents want to see their parish and local area develop for the future.

THE VISION FOR ELFORD

“The residents of Elford Parish want their village to become a place that supports a stronger, safer and more sustainable community.

In achieving this, Elford will become better connected, offer a wider range of services for residents and visitors, and provide the right housing to support the viability of the community.

This will be achieved while protecting Elford’s unique character and distinct qualities. This will include preserving and enhancing the character of the village’s buildings and streets, and protecting the natural features and landscape.”

- 3.2. In order for a vision to be implemented and effective, it must be broken down further into key objectives, all seeking to achieve the fulfilment of its different aspects. The ENP has arrived at six objectives through engagement with the community. Each ENP policy must contribute to at least one of these objectives. These objectives have been tested against the Sustainability Objectives of the Lichfield Local Plan to ensure that they support the wider objectives for sustainable development in the District (see accompanying Sustainability Appraisal for more information).

3.3. The six objectives are set out below. Apart from the Main Objective – which serves as a foundation for all the other objectives – these objectives have no order of priority.

MAIN OBJECTIVE - A SUSTAINABLE FUTURE FOR ELFORD

To achieve a sustainable future for the village of Elford, with a strong, stable and safe community supported by the right services and facilities, living in suitable homes, and enjoying a pleasant and attractive local environment.

OBJECTIVE 2 – LOCAL SERVICES

To preserve the village’s existing services and to provide new ones, in order to improve the quality of life enjoyed by existing and future residents.

OBJECTIVE 3 – HOUSING PROVISION

To ensure that the village’s population is sustainable, by providing the right housing in terms of type and tenure to accommodate all ages, needs and lifestyles.

OBJECTIVE 4 – BUILDING DESIGN, LOCAL CHARACTER AND HERITAGE

To ensure that any new development achieves a high standard of design, respecting Elford’s established character, rural location and heritage assets.

OBJECTIVE 5 – THE NATURAL ENVIRONMENT AND RURAL ECONOMY

To protect the local natural landscape, to manage and, where possible, reduce flood risk, and to support agriculture in the surrounding countryside which does not conflict with the quality of life enjoyed by existing and future residents.

OBJECTIVE 6 – MANAGING DEVELOPMENT

To ensure that the quality of life enjoyed by the residents of Elford, and the character of the village and surrounding countryside, are protected from new development, including in terms of residential amenity and traffic impact.

4. ENP Policy Overview

4.1. The following table demonstrates how all of the policies set out in the ENP meet the objectives set out in Chapter 3. In all cases the policies developed should address at least two of the objectives, however, there are some very specific policies designed to deliver the targeted and specialist elements of the objectives:

	OBJECTIVES TO BE ADDRESSED					
	Main Objective	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6
STRATEGIC POLICY						
SP1 Parish Strategic Policy	✓		✓	✓		✓
LOCAL SERVICES AND THE RURAL ECONOMY						
LS1 Encouraging Appropriate Local Enterprise	✓	✓				
LS2 Community Facilities	✓	✓				
LS3 Support Improvements to Leisure Facilities	✓	✓				
LS4 Agricultural Activities	✓				✓	
HOUSING DEVELOPMENT						
HD1 Housing Types Mix	✓		✓			
HD2 Infill Policy	✓		✓	✓		
HD3 Replacement Dwellings	✓		✓	✓		
BUILDING DESIGN, LOCAL CHARACTER AND HERITAGE						
DH1 Design of New Development	✓			✓		✓
DH2 Heritage Assets	✓			✓		✓
DH3 Design for Streets and Footpaths	✓			✓		✓
THE NATURAL ENVIRONMENT						
E1 Renewable Energy Development	✓			✓	✓	
E2 Local Green Space	✓			✓	✓	
E3 Green Infrastructure and Green Links	✓			✓	✓	
E4 Biodiversity	✓				✓	

MANAGING DEVELOPMENT						
MD1 Parking Standards	✓					✓
MD2 Sustainable Transport	✓	✓				✓
MD3 Sustainable Design and Construction	✓			✓		✓
MD4 Flood Risk Management	✓				✓	✓
MD5 Traffic	✓					✓

5. The Planning Policies

- 5.1. The core component of a Neighbourhood Plan comprises its planning policies. This part of the document has statutory weight, insofar as they will form part of the 'Development Plan' for Elford. This Development Plan is the collection of planning policies used to determine whether a planning application should be approved or refused by the Local Planning Authority (LPA).
- 5.2. This chapter sets out the policies for the Plan, which have been placed under six sections which represent their common theme. These policies have been written so that they can; 1) be used by the local community to understand and support the direction for the development of Elford; 2) guide potential developers looking to bring forward development within Elford as to what will, or will not, be considered appropriate and acceptable; and 3) serve as a technical document for planning officers at Lichfield District Council – who will be using the document to make planning decisions.
- 5.3. The 'Aspirations' for the Plan are also set out in this chapter. Aspirations deal with those concerns or desires by residents in the Parish which cannot be made into policies themselves. While these aspirations do not hold the same planning weight as the policies, they are still important considerations which should be taken into account for future development in the village. These aspirations are shown in a lighter colour underneath the policies which they relate to.

STRATEGIC POLICY

- 5.4. This policy is broad in its scope and represents the Parish's strategy for delivering sustainable development within the Parish. This policy sets the context for Elford Village as being the heart of the community.

SP1 – Parish Strategic Policy

New development in the Parish will be supported within the village settlement boundary as identified on the proposals map, subject to other policies within the Neighbourhood Plan. New development should be of a scale which respects the character and appearance of the village within the settlement boundary, both in terms of quantity and size, and must demonstrate how it meets the local needs of a rural community.

Outside the settlement boundary, development will not be supported unless it meets the following exceptions;

- Appropriate agricultural development, in conformity with those developments outlined in policy LS4 (Agricultural Activities) of this plan
- Development for rural exception sites which accords with Local Plan Policy H2

Explanatory

- 5.5. The community and Parish Council of Elford are in support of limited new development which will support its future vitality and viability and bring forward new housing to meet the needs of the village. The policy addresses development in a wider sense. In the context of the neighbourhood area housing, commercial, community facilities and agricultural developments will generate a significant proportion of planning applications. The Plan includes specific policies on these matters. There is a desire from the residents to ensure that the village remains socially, economically and environmentally sustainable both now and in the future.
- 5.6. The Neighbourhood Plan recognises that the village has a distinct character which would be undermined by disproportionate or inappropriate new development. The NDP also recognises that development should be focussed within the village settlement boundary or adjacent to it where it can make the most of its opportunities and benefits. Where possible, some of the

development within the village will be delivered as infill (see Policy HD2 – Infill Policy for further details).

- 5.7. Development in the countryside, not in accordance with this Plan, is typically seen as unsustainable, both at National and Local level and would be detrimental to the strategic structure of the Parish with the Village being its centre. This type of development therefore is discouraged by the NDP.
- 5.8. Agricultural activities are important to the local economy of the Parish and contribute to its rural characteristics. The NDP therefore supports appropriate agricultural development in the Parish in appropriate locations and which are in conformity with Policy LS4 of this plan.

LOCAL SERVICES AND THE RURAL ECONOMY

- 5.9. The policies in this section of the Plan are designed to complement the wider policies contained within the ENP by ensuring that community infrastructure (the Church, School etc.) are supported and enhanced by the Plan.
- 5.10. The community recognises the requirement for accommodating small businesses in the Parish and the importance that this has in maintaining the wider economic stability of the Parish. These policies encourage new, appropriate enterprise and business in the Parish whilst seeking to protect and promote controlled growth for the existing enterprises and businesses.
- 5.11. Rural activities play a large part in the economic activity of the Parish. The policies in this section and wider throughout the Plan seek to promote the sustainable growth of the rural economy in the Parish through encouraging appropriate rural activities throughout the Parish, which do not have a negative impact on the amenities of its residents, the landscape setting of the Parish, environmental factors or heritage assets.

LS1 - Encouraging Appropriate Local Enterprise

Proposals which reflect the character of the neighbourhood area and would result in new economic development and enterprise will be supported.

Applications for the expansion and diversification of existing businesses and enterprises will be supported, subject to compliance with other Development Plan policies.

In all cases, applications for new or expanded employment and economic development must demonstrate;

- They do not have unacceptable impacts on traffic flows through the village and meet the criteria set out in Policy MD5 (Traffic)
- Parking spaces are provided to development plan standards for the proposal concerned to avoid on street / off-site parking
- They are in keeping with the rural character of established businesses and enterprises in the Parish, both in terms of type, size and scale
- They do not have an unacceptable impact on the natural environment in terms of impact on green infrastructure, green links or loss of biodiversity (in conformity with policies E3, E4 and E5)
- They do not unacceptably impact upon community amenities of the Parish through noise, odour, chemical, or visual effects.

Explanatory

- 5.12. For the economic health of the Parish to remain sustainable, the Plan encourages the growth of business and enterprise, particularly in line with the growth in housing, so that the village does not become solely a commuter village. Having strong business and enterprises within the Parish also makes the village a more attractive and viable place to live.
- 5.13. It is important that economic development does not undermine the objectives and goals of the other policies in the Plan and therefore some criteria within this policy has been developed to ensure that this is not the case.

LS2 - Community Facilities

The Neighbourhood Plan will support the retention of businesses, enterprise and retail units in the village. Where planning permission is required, the Neighbourhood Plan will not support the change of use of these to residential use unless an appropriate alternative community facility is provided as part of the proposed development.

New Development proposals which result in the loss of named facilities (below) in the village will only be supported where they demonstrate that they will provide an equal or better facility within an appropriate location within the village in compensation.

- The Crown Pub
- Howard Primary School
- St Peter's Church and The Avenue
- Village Hall
- Social Club,
- Cricket Ground
- Sports Field
- Playground
- Walled Garden and its associated surroundings

Proposals which will make improvements to the community facilities listed in this policy will be supported.

Explanatory

- 5.14. The community has identified a need to retain certain named facilities within the village and prevent them from being converted to residential, so that the vital functions of these facilities for the village are maintained.
- 5.15. Retaining key community facilities will benefit the long term economic and social sustainability of the village. The third paragraph of the policy offers support for the improvement or enhancement of existing community facilities. In some cases, this may come about wholly or partly as a result of developer contributions. See also list of projects within the Community Infrastructure Levy (CIL) list within the appendix, which relative contributions could also be delivered towards.
- 5.16. These facilities are also important in the value to the character of the village that they provide.

LS3 – Support Improvements to Leisure Facilities

Where planning permission is required, development which provides for improvements to existing sports, recreational and leisure facilities in the Parish will be supported.

Proposals for new sporting and leisure facilities, recreational spaces and footpaths will be supported where they are accessible for all ages by means of walking or cycling.

Explanatory

- 5.17. Presently, the Parish has limited leisure facilities, which is typical of small rural villages where funding is not as great as for towns. However, the community wishes to support the implementation of new facilities within the village where they will benefit both the people of the Parish and the wider community. The Parish Council acknowledges that new leisure facilities may come forward as part of a wider funding mechanism which may involve the Parish's local element of the Lichfield Community Infrastructure Levy (CIL). Appendix D lists a series of facilities which the Parish Council considers may be appropriate for the application of its element of the CIL towards future projects. Plainly the list may change over time.
- 5.18. As there are is a high proportion of elderly residents in the village, access to these facilities is important to consider. Walking and cycling access should be made available so as to promote sustainable means to access the facilities, as well as to reduce parking requirements on the site.

LS4 - Agricultural Activities

Insofar as planning permission is required the Plan will support traditional agricultural activities (such as cultivation of crops, orchards, raising of livestock, and pasture lands) that do not cause excessive environmental nuisances and which are considered appropriate to the character of Elford.

Inappropriate agricultural activities and development will not be supported. These include;

- Those which would unacceptably increase the number of vehicles travelling through the village along roads identified as having transport issues in Policy MD5 (Traffic) of this plan
- Those which cause unacceptable environmental harm
- Those which impact unacceptably on the key views in the Parish (identified on the Proposals Map), or on the visual amenities of Parish residents

Explanatory

5.19. The rural characteristics of the Parish makes the use of the land for agricultural purposes a sustainable and viable option for development. However, residents have expressed that they wish to avoid seeing an intensification of agricultural activities which would negatively impact upon the amenities of their lives in the Parish. Therefore the Neighbourhood Plan resists these forms of agricultural development. Policy LS4 acknowledges that many aspects of agricultural development are permitted development and therefore beyond planning control. On this basis the policy only applies to agricultural development which requires planning permission.

5.20. Certain agricultural activities can bring with them unwanted environmental nuisances such as noise and odour. The community has expressed a desire to discourage activities which cause these nuisances so that the quality of life for its residents remains at a high level. In addition, the community also has expressed a concern over the number and size of vehicles that presently pass through the village from some agricultural sites in the Parish. These can create traffic issues and hazardous situations, particularly along narrower roads.

5.21. Therefore, the Plan seeks to discourage excessive vehicular travel through the village by resisting those agricultural developments which would exacerbate this.

HOUSING DEVELOPMENT

5.22. This section of the ENP provides a localised interpretation of the approach set out by LDC with regard to matters of housing in their Local Plan. The community recognises the importance of accommodating some housing within the Parish over the Plan period which will support the overall vitality, viability and sustainability of the Parish. The policies in this section address housing within and adjacent to the settlement boundary of the village.

5.23. Extensive work has been undertaken in developing a housing strategy for Elford. Following the initial Residents Survey, a Housing Survey was undertaken that specifically targeted how housing should be addressed in the Parish. Policies in this section reflect the analysis from both surveys.

HD1 – Housing Types Mix

The Neighbourhood Plan will support development proposals which deliver housing mixes that meet the needs of the community and contribute to the diversification of the Parish's housing stock, subject to other policies in the Plan.

- Subject to viability and deliverability considerations proposals which deliver some or all of the following house types will be particularly supported: Properties specifically designed for older persons that meet enhanced building regulations Part M, including bungalows
- Properties suitable for first time buyers
- Smaller family homes

Explanatory

5.24. The housing mix in this policy is based on the following factors;

- Demographically, the Parish has an elderly population, many of which live in larger 3-5 bedroom properties and are now looking to downsize into smaller 1-2 bedroom houses and bungalows.
- The housing market demonstrates an under occupancy of the current homes in the village, which indicates a lack of suitably sized homes for the current residents, hence smaller properties are required for residents to downsize.

- There is a desire by the community to see more young families in the village that would help to support a vibrant and sustainable community. There is therefore a need for first-time buyers and for smaller family homes.

HD2 – Infill Policy

In locating new residential schemes, development on infill sites located within the settlement boundary will be supported, providing it does not conflict with other policies within the Plan.

All new development on infill sites (including conversions) should;

- Be an appropriate size and scale to the existing development either side of the infill site
- Be of similar density to the existing development either side of the infill site
- Where appropriate, demonstrate that vehicular traffic generated by the site will not cause negative impacts on the existing road network in the Parish; and
- Not result in the loss of open space within the Parish

Explanatory

5.25. The Plan supports limited infill development within the village settlement boundary, in order to bolster Elford's housing stock and make use of vacant sites within the settlement boundary rather than committing excessive development outside of it in unsustainable locations.

5.26. Infill development within the village is subject to other policies within the Plan in order to ensure that new properties amalgamate themselves appropriately with the existing street scene and character of Elford's built up areas.

HD3 Replacement Dwellings

Proposals for replacement dwellings within the Parish will be supported, subject to the following criteria;

- The proposals respect and reflect existing properties in their immediate locality in terms of scale, size, materials used and their appearance; and
- The proposals do not result in a loss of amenities for other properties in the Parish

Proposals for the replacement of heritage assets in the neighbourhood area with replacement dwellings will not be supported.

Explanatory

- 5.27. The Neighbourhood Plan supports proposals for replacement of dwellings within the Parish. However, proposals must be considerate of the character and setting of the Parish in order to avoid a loss of quality homes. Proposals for modern housing designs will be supported where they reflect the character and appearance of existing properties in their immediate vicinity.
- 5.28. The community has expressed a desire to discourage homes being demolished and replaced by multiple dwellings on the same site, as this could create disproportionate housing densities that impinge on the existing street scenes of the village, as well as reducing amenities for existing residents. This is a matter that can be addressed on a case-by-case basis by Lichfield District Council. The majority of the built-up part of the village is contained within the Elford Conservation Area. The District Council has already prepared a Conservation Area Appraisal and Management Plan and this guidance will assist in the decision-making process. The existing housing density should be respected in the parish as it helps to define its rural character.
- 5.29. Historic buildings in the Parish are an important part of its identity (see list of heritage assets in the Appendix of this Plan), and therefore should be protected from being replaced. This applies across the parish, particularly within the Conservation Area.

BUILDING DESIGN, LOCAL CHARACTER AND HERITAGE

5.30. Elford contains a number of designated heritage assets including 28 listed structures, a conservation area and a scheduled ancient monument as well as a number of non-designated heritage assets. The following policies seek to achieve this through both protecting and preserving existing assets and character but also by promoting high quality design in any new development.

DH1 – Design of New Development

All new developments should be of high quality in design and use of materials and respond positively to the surrounding built character and natural landscape.

The following design features should be taken into account by all new developments;

- New developments must demonstrate that they have considered the locally distinctive character of the built environment and be of appropriate scale, mass, design detail, and use materials that respond sensitively to those used in the local area
- New developments which are situated within or may impact on the Conservation Area in Elford must seek to preserve or enhance its character or appearance
- New developments should incorporate modern energy efficient materials, methods and technologies
- New development must not create excessive additional or unnecessary light pollution in the form of external lighting and flood lighting

Explanatory

5.31. By requiring new development to comply with specific design criteria, it can be ensured that new development or alterations to existing properties add to, rather than detract from, the unique local character of the Parish. The community has considered it important that ensuring high quality design within the Parish should be a key aim of the NDP.

5.32. The NDP will look favourably on new developments and alterations to existing properties which utilise good design and contribute to the protection and enhancement of the local character of the Parish. Lichfield Council's Sustainable Design SPD offers a comprehensive resource to guide in the design of new development and should be considered in all new developments in the parish.

5.33. Elford's Conservation Area was designated in November 1969 and was extended in February 1972 to cover the Cricket Ground. The community regards the Conservation Area and the listed buildings within it as important aspects of the village that promote its attractiveness and historic character, and therefore new developments within and affecting these should follow careful design criteria. The Plan recognises the remarks raised in the Elford Conservation Area and Management Plan (2014). There are current proposals to extend the boundary of the conservation area. In the event that its boundary is amended the relevant policies in this Plan in general, and Policies DH1 and DH2 in particular, will apply to that amended area.

5.34. In order to support the community's commitment to preserving and retaining the dark skies surrounding the village, new development must be respectful of the amount of additional light pollution that they introduce.

DH2 – Heritage Assets

All new development should take account of its impact on identified heritage assets, both designated and non-designated, seeking to protect and where appropriate, enhance them (see Appendix for further details of these assets). Development schemes which demonstrate how they have positively addressed these heritage assets will be supported.

New development should be sensitive to the character, fabric and setting of these identified heritage assets (including the Conservation Area) and listed buildings within the plan area.

New development should also demonstrate where appropriate that it has taken into account the historic landscape pattern and potential below ground archaeology on the proposed site, by provision of a detailed assessment of the site's archaeology

Proposals for development at any farmstead should demonstrate that it has taken account of its historic context and landscape setting.

Explanatory

5.35. Elford's heritage assets, such as the listed buildings within the Conservation Area and those non-designated buildings that have been locally identified, are considered important to defining the distinct local character of the Parish and therefore are protected in this policy.

5.36. The community is supportive of new developments which would seek to preserve or enhance these heritage assets.

5.37. Archaeological assets are a material consideration within the planning system and are referred to in Chapter 12 of the National Planning Policy Framework and therefore have been considered in this policy.

5.38. Farmsteads in the Parish are an important part of its heritage and contribute to the rural character of the Parish. The community therefore wish for these to be offered protection through the Neighbourhood Plan to ensure that inappropriate development doesn't occurs on such sites. The fourth paragraph of Policy DH2 addresses this important matter in the context of the neighbourhood area. Any such planning applications will be expected to take account of the Staffordshire Farmsteads Assessment Framework (produced by Staffordshire County Council and English Heritage) and the associated Character Statement work'. The SCC Farmsteads Guidance sets out guidelines to aid applicants in understanding, respecting and enhancing the character of the site and its place within its wider landscape, and therefore is an important document to consider alongside this policy.

DH3 - Design for Streets and Footpaths

New development schemes that enhance the quality of the public realm beyond the site will be supported, subject to other policies of the Development Plan.

Where appropriate, new development schemes should ensure that the following criteria are met;

- Schemes do not negatively impact on public realm, including footpaths
- The division between public and private realm is clearly demonstrated; and
- The scheme promotes safe and secure key routes to the village

Explanatory

5.39. The Plan supports public realm improvements within the village in order to improve Elford's public space in terms of its accessibility, visual appearance, functionality and safety. Public rights of way can form a key part in promoting health and wellbeing in the parish and the sustainability of the community.

5.40. Pavements within the village are considered unsafe and narrow in places, and improvements to these are sought for by residents of the village to make them more accessible for all users, including children and the disabled, which will also help meet the sustainability aspirations of the vision and objectives of the Pan.

THE NATURAL ENVIRONMENT

- 5.41. The community recognises the importance that the natural environment plays in defining the character of the Parish, due to the close interaction between built areas and the wider countryside. The community values the open and green spaces within the village that provide opportunities for recreation and enjoyment. The ENP seeks to protect and enhance the Parish's natural assets and green space through the following policies, whilst encouraging new development to incorporate green spaces within their sites.
- 5.42. The community recognises the sustainable benefits of renewable energy and wish to encourage appropriate schemes within the Parish.

E1 - Renewable Energy Development

- Proposals for renewable energy schemes will be supported where they respect the character and appearance of the neighbourhood area and where they do not generate unacceptable harm to the following matters: The amenities of neighbouring or nearby properties
- The local landscape and setting of the Parish
- Wildlife considerations
- Heritage considerations

Explanatory

- 5.43. The community support the development of appropriate renewable energy schemes within the village which do not negatively impact on the amenities of its residents.
- 5.44. Renewable energy generation is an important method in improving the self-sustainability of small villages as there is less reliance on connections to the wider power network. Renewable energy also contributes to the village's environmental and economic sustainability objectives.

E2 - Local Green Space

The following areas as shown on the Proposals Map are designated as Local Green Spaces. :

- Giants Garden
- Walled Garden and associated adjacent land
- St Peter's Church grounds
- The Avenue
- Cricket Ground
- Sports Field
- Elford Jubilee Memorial Playground
- Land between the Shrubbery and the river Tame (locally known as the picnic area)
-

New development will not be supported on land designated as local green space except in very special circumstances.

Explanatory

5.46. The community wish to designate certain sites around the village as LGS due to their local importance and contribution to the Parish in a number of ways. The sites in the policy have been chosen based on information in the Elford Conservation Area Appraisal and Management Plan, as well as discussions in Steering Group meetings.

5.47. These LGS sites have been assessed against the criteria for LGS as set out under paragraph 77 of the NPPF. This assessment demonstrated that these proposed LGS sites fulfil the requirements of the criteria in the NPPF, which are as follows;

- Where the green space is in reasonably close proximity to the community it serves
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness in wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land

5.48. The assessment table which details how these sites meet these criteria can be found in Appendix 2 of this document.

5.49. The application for 25 new dwellings approved in March 2018 at land of the Shrubbery, is built on a piece of land that is identified under Policy C9 of the Lichfield Local Plan as Protected open Space. It was intended that this be upgraded to Local Green Space status, however, the granting of planning permission now does not allow this to take place. The outline permission does identify a large area of open space in the core of the scheme which will be of greater public benefit (one of the reasons for approval of the scheme). Once this scheme is developed, the Neighbourhood Plan is intended to be reviewed to include this new spaces an LGS as it will undoubtedly meet all the required tests.

E3 - Green Infrastructure Network and Green Links

New development adjacent to existing footpaths and rights of way should take account of its setting by avoiding negative impacts on safety, visual appearance, surveillance and functionality of these routes. New development which seeks to protect and enhance existing footpaths and green links will supported.

New developments should incorporate new green infrastructure into their designs, such as hedgerows, trees, historic field patterns and green spaces, and where possible ensure that they link to the wider green infrastructure network of the Parish and to key pedestrian routes to create green links.

Explanatory

5.50. The key components of a green infrastructure network are hedgerows, trees, historic field patterns and green spaces. Green infrastructure considerations such as these, allow for the abundance of wildlife that is currently seen in the parish to travel around effectively, as wildlife in the built environment in the village is able to interact with that of the wider parish, and vice versa.

5.51. This policy seeks therefore to protect this network but also enhance it through seeking schemes which link and reinforce the linkages between separate elements of the network.

5.52. This policy also promotes green links around the Parish which support the movement of local wildlife between new and existing wildlife habitats.

E4 - Biodiversity

New development schemes should consider their impacts on the biodiversity of Elford, seeking to maintain or improve current levels through retaining and enhancing existing hedgerows, trees and water bodies within the Parish.

New developments which impact on biodiversity must demonstrate how they have incorporated effective mitigation measures to reduce such impacts.

Where a loss of biodiversity cannot be avoided, schemes must provide means to bolster an equivalent in appropriate locations within the site.

Explanatory

- 5.53. Elford, being a rural Parish, has a strong connectivity between its urban areas and the surrounding countryside in terms the interaction between the two. This policy promotes biodiversity in the Parish and ensures that new developments do not detrimentally impact on the quality and quantity of wildlife in the Parish. New developments can assist by increasing and enhancing features such as bat boxes or appropriate native planted tree and hedgerow boundaries.

MANAGING DEVELOPMENT

- 5.54. The policies in this section seek to ensure that new development is carried out with appropriate considerations for sustainability, including matters such as transport, parking, material use and design.

MD1 - Parking Standards

New residential development should provide on-site car parking facilities to meet the following minimum requirements:

- 1 Bed Dwellings: 1 space
- 2/3 Bed Dwellings: 2 space
- 4+ Bed Dwellings: 3 space

All other new development should provide on-site car parking facilities to meet the minimum requirements in the Lichfield District Council Sustainable Design Supplementary Planning Document December 2015.

Explanatory

- 5.55. Elford is typical of small historic villages within England in that it exhibits a number of narrow rural lanes and many existing properties were constructed without sufficient off-street parking, if any.
- 5.56. It is unreasonable to expect people living and working in Elford not to use private vehicles to access facilities, services and places of work elsewhere beyond the Parish, and therefore new development must recognise the need for parking within the Parish.
- 5.57. By setting clear and sensible on-plot targets for new developments within the Parish, it is hoped that further exacerbation of these issues can be mitigated.

MD2 - Sustainable Transport

New developments will be supported where they:

- encourage accessibility to and from the development and the village and promote a modal shift towards public transport, cycling and walking; and
- include walking and cycling links in their design.

Aspiration

Proposals that support the enhancement of Elford's bus service will be supported subject to careful consideration of the criteria stated in policy MD5 (Traffic).

Explanatory

5.58. The NDP encourages the use of sustainable transport methods in order to reduce the number of vehicles using the road network, promote healthier lifestyles, and improve air quality in the Parish. Policy MD2 also seeks to reduce the reliance on private vehicles. This in turn would reduce the need for additional vehicles on residents' properties. Walking/cycling links will normally be included in the design of all new developments.

5.59. New developments will be supported where they to include means for sustainable transport, such as cycleways and footpaths in order to encourage these travel modes and thus contribute to the Plan's sustainability objectives. This policy has been designed to consolidate and clarify the spatial strategy of the Plan as set out in Policy SP1. In particular it would also relate to Policy HD1 and HD2 insofar as housing development is concerned'.

MD3 - Sustainable Design and Construction

New developments within Elford should embrace modern techniques in their design and construction, whilst respecting the local character.

Schemes that incorporate elements to reduce their carbon footprint (through use of materials or renewable technologies) will be supported, subject to other policies in the Development Plan.

Explanatory

5.60. The community recognises that modern techniques in construction and design promote homes and new development which are better suited to modern day living and energy savings. Sustainable designs are encouraged by the ENP and applications which embrace these concepts into their schemes will be looked on favourably by the Plan.

5.61. Renewable energy and technologies promote healthier lifestyles and reduce the carbon footprint of developments. The Plan supports those proposals which embrace these in their designs.

MD4 - Flood Risk Management

All development, where appropriate, should demonstrate that they do not increase flood risk within and adjacent to the Parish, through utilising best practice design and construction techniques/materials. Schemes which demonstrate an improvement in the overall levels of surface water runoff in the village will be supported.

Proposals for new development should consider future flood risk and, where appropriate, include measures that mitigate and adapt to the anticipated impacts of climate change.

New developments should avoid the removal of hedgerows in the Parish. Where this is unavoidable, a replacement hedgerow of the same length or greater and of native species should be provided on the site.

Where feasible, opportunities to open up culverted watercourses should be sought to reduce the associated flood risk and danger of collapse whilst taking advantage of opportunities to enhance biodiversity and green infrastructure. The culverting of open watercourses will not be supported.

New development will not be supported within Flood Zone 3 areas in accordance with national policy. New developments within Flood Zone 2 areas should demonstrate appropriate flood prevention methods in their schemes, such as the incorporation of Sustainable Urban Drainage Systems (SUDS).

Explanatory

5.62. Flood Zones ranked 1, 2 and 3 are present within the Parish. Most of the village is located in Flood Zone 2. The community do not wish to exacerbate the issue of flooding in the Parish and wish to ensure that new development takes appropriate measures.

5.63. Planning applications for development within the Neighbourhood Plan area must therefore be accompanied by site-specific flood risk assessments in line with the requirements of national planning policy and advice. This includes new development outside of the flood risk zones, as there is potential for increased surface run-off to impact on surrounding areas. In addition, the Plan does not support any development which would be proposed within the highest risk areas (Flood Zone 3), in line with national policy.

5.64. The high risk flood areas are typically close to the River Tame, which borders part of the southern boundary to the Parish. There are a number of residential properties which are situated along this southern boundary in close proximity to the river, which have voiced concerns over possible flooding issues. In line with national policy, all new development should be directed away from those areas at highest flood risk, i.e. towards Flood Zone 1.

5.65. Applications should take account of the latest climate change allowances. Consideration should also be given to the impact of new development on both existing and future flood risk. Where appropriate, development should include measures that mitigate and adapt to climate change.

5.66. Hedgerow removal is a key threat to the wider landscape in the Parish, especially in the floodplain where land drains alongside hedgerows act as important natural drainage systems. Decline in hedgerows due to agricultural intensification and loss of stock control function within the Lowland Village Farmlands character type is also a threat to the landscape of the Parish.

MD5 - Traffic

All new applications, other than householder proposals, should demonstrate that they consider their wider impact on traffic in the Parish, and demonstrate that these impacts will not unacceptably impact on the residents of the Parish. Development proposals which include improvements to road safety and encourage walking, cycling or the use of public transport will be supported.

New developments should not cause unacceptable impacts on traffic levels within the Parish, specifically at key junctions and identified pinch points (such as along Church Road and Brickhouse Lane corner), as identified on the proposals map.

Development proposals should demonstrate safe and convenient access to and from the proposed development.

Proposals that may cause a unacceptable increase to vehicular traffic through the village will be resisted. These roads (listed below) are identified on the Proposals Map. The issues with these roads should be considered equally when considering the impacts that planning proposals may have on them.

- The Beck
- Church Road
- Brickhouse Lane
- The Shrubbery
- The Square

Explanatory

5.67. There is a strong desire by the community to tackle the issue of traffic within the village. Several key problematic junctions and pinch points have been identified, which are the focus of the policy. The ENP does not support development which would significantly exacerbate the issues at these identified infrastructure points.

5.68. Residents do not wish to see excessive vehicle traffic from new developments travelling through the village due to safety and practical aspects of using narrow roads or those roads where roadside parking is common.

5.69. The Plan would support developments which would provide contributions towards improving traffic issues at the identified junctions and pinch points within the Parish, in accordance with other policies in the Plan.

6. Monitoring and Review

Monitoring

- 6.1. The Neighbourhood Plan, once made, will form part of the Development Plan for Lichfield District, and will be subject to the Council's Local Plan Authority Monitoring Report (AMR) regime. The AMR provides many of the monitoring and review mechanisms relevant to Neighbourhood Plan policies, as they sit within the wider Strategic Policies of the Local Plan, including matters of housing and employment delivery.
- 6.2. Consequently, it is considered that the existing monitoring arrangements for the strategic policies of the Local Plan: Part 1 - and any developed as part of Part 2 – will be sufficient for most of the Neighbourhood Plan policies.
- 6.3. It may be necessary to monitor separately a number of other specific indicators, which should be conducted in partnership with the Council and the Parish Council once every 2 years. These indicators will establish whether the policies are having the desired outcomes and will highlight policies requiring immediate or timely review to align them with their original purpose.
- 6.4. Subsequently, key indicators from approved planning applications and relevant policies (although other policies in the plan should also be taken into account) covering applications only within Elford relating to the Neighbourhood Plan are:
 - Development proposals submitted and/or permitted on sites designated as Local Green Spaces and their outcome (Policy E2)
 - The Design of new developments, as per policy DH1
 - Location and placement of heritage assets in the parish (in policy DH2 and the appendix list) and the impact that new development would have on this

Review

- 6.5. The Neighbourhood Plan has been prepared to guide development up to 2029. This is in line with the Local Plan: Part 1 for Lichfield District Council – the document which provides the strategic context for the Neighbourhood Plan. It is unlikely that the Neighbourhood Plan will remain current and completely relevant for the entire Plan period and may, in whole or in part, require some amendments before 2029.
- 6.6. There are a number of circumstances under which a partial review of the Plan may be necessary. These may include revision of the following existing local planning documents or in the event that the monitoring of the policies listed under para 6.4 are not adequately addressing the objectives set for the Plan. In all cases, the Parish Council and its partners

should consider undertaking a partial review of the Neighbourhood Plan in five to six years from adoption (around 2022-23) and then a full review should be no later than 2026.

- 6.7. In addition, it has been highlighted that the development of the site at the Shrubbery will result in a new public open space being created in the heart of the land formerly identified as Protected Open Space. As a result, once complete a review of the LGS policy would need to be undertaken to include this space in accordance with the community's aspiration.

7. Glossary

Term	Definition
Affordable Housing	<p>Affordable housing is sub-divided into three distinct types of housing:</p> <p>Social Rented Affordable Rented; and Intermediate Housing</p> <p>Affordable Housing: Social Rented, Affordable Rented and Intermediate housing which is provided to eligible households whose needs are not met by the market and which will remain affordable unless the subsidy is recycled for alternative affordable housing provision.</p> <p>Affordable Rented Housing: Housing which meets the Housing Corporation's Design and Quality Standards (or replacement standards) and which is let by a Registered Provider of Social Housing to a person allocated that Dwelling in accordance with the Council's Allocation Scheme at a controlled rent of no more than 80% of the local market rent.</p> <p>Intermediate Housing: Discounted Sale housing and Shared Ownership housing.</p> <p>Social Rented Housing: Housing which meets the Housing Corporation's Design and Quality Standards (or replacement standards) and which is let by a Registered Provided of Social Housing to a person allocated that dwelling in accordance with the Council's Allocation Scheme at a rent determined through the national rent regime (Rent Influencing Regime guidance).</p>
Development	<p>Development is defined in planning terms under the 1990 Town and Country Planning Act. Broadly, it is considered to be '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'. Most, but not all, forms of development require planning permission.</p>
Development Plan	<p>A Development Plan is a document which details the overall strategy of the council for the proper planning and sustainable development of an area and generally consists of a written statement and accompanying maps. The Plan usually includes the broad aims of the council for specific topics, e.g. housing, infrastructure, community facilities which are reinforced by more detailed policies and objectives. A Neighbourhood Plan is statutorily part of the Development Plan and is used to determine planning decisions within the relevant area.</p>
Green Infrastructure	<p>Green infrastructure is a phrase used to describe all green and blue spaces in and around our towns and cities. The term allows us to refer to – and consider the collective value of – all of these spaces at once. Component elements of green infrastructure include parks, private gardens, agricultural fields, hedges, trees,</p>

	woodland, green roofs, green walls, rivers and ponds. The term covers all land containing these features, regardless of its ownership, condition or size.
Heritage Assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Infill Development	Use of land located within a built-up area that is currently not developed on for further construction, especially as part of a community redevelopment or growth management program.
Infrastructure	The term infrastructure refers to the basic physical and organization of structures and facilities needed for the operation of a society or community.
Local Green Space	<p>The National Planning Policy Framework (NPPF) introduced a new concept of a Local Green Space designation. This is a discretionary designation to be made by inclusion within a local development framework or neighbourhood development plan.</p> <p>The designation should only be used where the land is not extensive, is local in character and reasonably close to the community; and, where it is demonstrably special, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife (NPPF Paragraph 77).</p> <p>Policies within the local development plan or neighbourhood development plan for managing development within a Local Green Space should be consistent with the policies protecting green belts within the NPPF (NPPF Paragraph 78). (English Heritage)</p>
Local Plan	The Local Plan expresses the vision, objectives, overall planning strategy, and policies for implementing these, for the whole District. It is the policy against which development requiring planning consent in local authorities is determined.
Local Planning Authority (LPA)	A local planning authority is the local authority of council that is empowered by law to exercise statutory town planning functions for a particular area.
Localism Act	The Localism Act (2011) was a feature introduced by central government containing a number of proposals to give local authorities new freedoms and flexibility. Devolving power from local government to the community level.

National Planning Policy Framework (NPPF)	Guidance provided from central government for local planning authorities and decision-takers, on drawing up plans and making decisions about planning applications.
Neighbourhood (Development) Plans	A Plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Act 2044) which sets out specific planning policies for the Parish which are the primary policies for determining planning applications within that Parish.
Public Realm	The space between buildings comprising the highways land, footpaths and verges.
Recreation	Recreation includes a many different activities, as a result a concise definition is difficult to establish. For the purposes of this Neighbourhood Plan, recreation can include but is not restricted to the following types of activity; spending time outdoors, informal games and play, walking and cycling, sporting activities.
Street scene	Elements which comprise the street environment, including roadways, pavements, street furniture etc.
Sustainable Development	The Bruntland Report provides the accepted definition of sustainable development as 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs' (WCED, 1987). The principle of sustainable development may be broadly described as encompassing social, environmental and economic issues, and also entailing concern with intra-generational and inter-generational themes.
Sustainable Urban Drainage (SUDs)	A series of processes and design features to drain away surface water in a sustainable manner.

8. Appendix

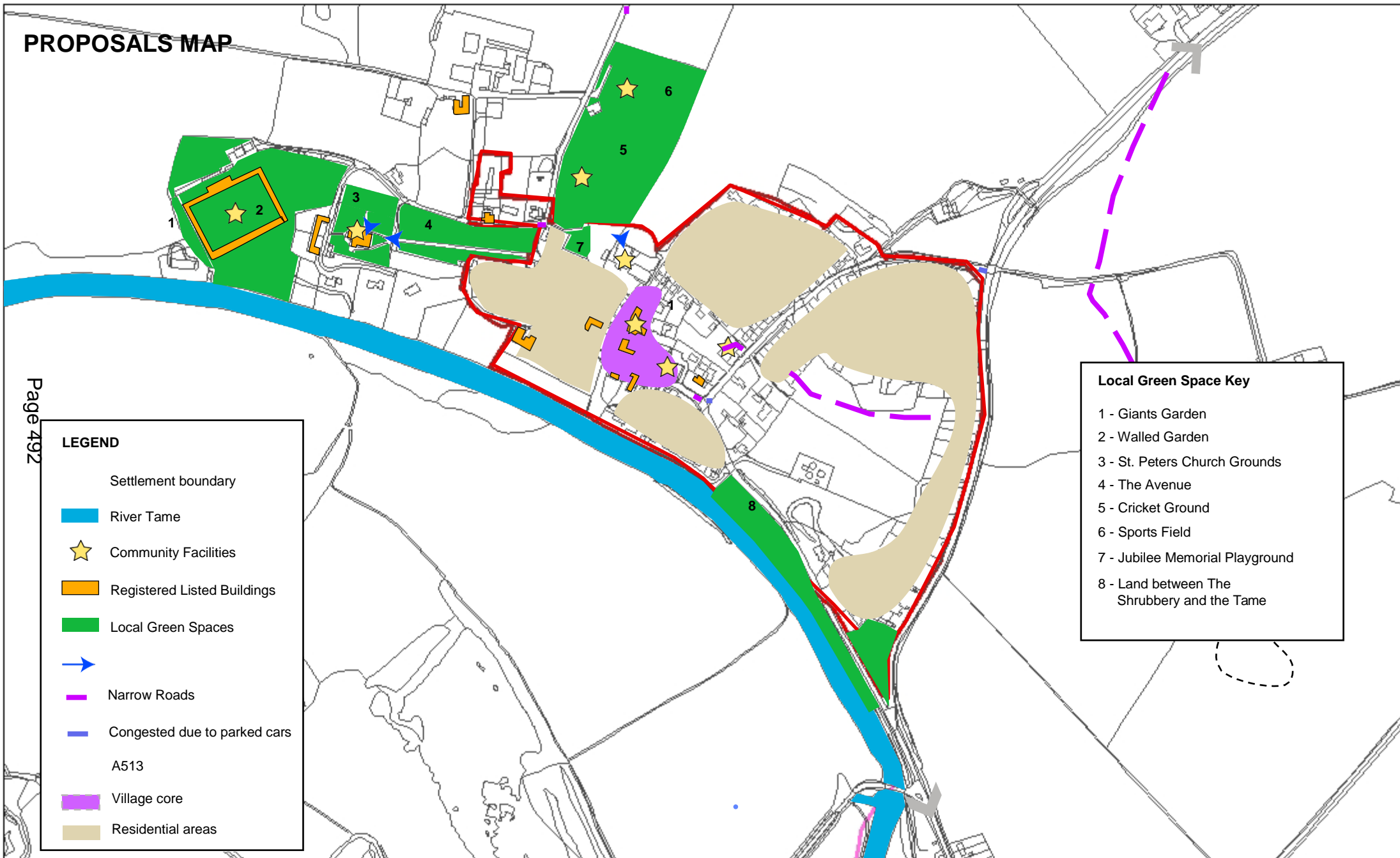
- A. Proposals Map
- B. Local Green Space Assessment Table
- C. Listed Buildings
- D. List of projects for Community Infrastructure Levy
- E. Conservation Area – map of original boundary and proposed new boundary

PROPOSALS MAP

LEGEND

- Settlement boundary
- River Tame
- Community Facilities
- Registered Listed Buildings
- Local Green Spaces
- Congested due to parked cars
- Narrow Roads
- A513
- Village core
- Residential areas

- ### Local Green Space Key
- 1 - Giants Garden
 - 2 - Walled Garden
 - 3 - St. Peters Church Grounds
 - 4 - The Avenue
 - 5 - Cricket Ground
 - 6 - Sports Field
 - 7 - Jubilee Memorial Playground
 - 8 - Land between The Shrubbery and the Tame



Assessment of open spaces in Elford against the criteria for protection as Local Green Spaces

Site Number	Name of site	Criteria 1: Reasonable distance	Criteria 2: Special Character					Criteria 3: Not being extensive tracts of land.	Fulfilling LGS Criteria	
			Beauty	Historic significance	Recreational value	Tranquility	Rich in wildlife			
1	Giants Garden	yes	Yes, this is an attractive public garden which also forms part of the historic Walled Garden	Yes, adjoins forms part of the historic Walled Garden	Yes, the garden is visited and walked through by residents as well as visitors to the village	Yes, the garden is on the edge of the village facing out to the countryside and therefore in a quiet location	Yes, the many plants and flowers attracts insects and animals	Yes	Yes	
2	Walled Garden	Yes	Yes, the Walled Garden contains many attractively planted beds	Yes, the wall around the Walled Garden is Grade II listed	Yes, the Walled Garden is used for a variety of activities by residents and visitors and is walked around	Yes, the garden is on edge of the village and the wall encloses the botanical beds within it, creating a calm environment	Yes, the many plants within the garden provide for insects and in turn benefit the local wildlife	Yes	Yes	
3	St Peter's Church	Yes	Yes, the Church and its surroundings are an attractive asset of the parish	Yes, the Church is a Grade II listed building	-	Yes, the Church is situated on the edge of the village and is in tranquil surroundings	-	Yes	Yes	
Page 493	The Avenue	Yes	Yes, The Avenue consists of a row of attractive mature trees leading up to the church	-	-	Yes, site is lined with trees and shrubs which provide a pleasant and peaceful walking route leading to the church	-	Yes	Yes	
	Cricket Ground	Yes	-	-	Yes, site is used for cricket	-	-	Yes	Yes	
	6	Sports Field	Yes	-	-	Yes, site is used for sports such as football	-	-	Yes	Yes
	7	Elford Jubilee Memorial Playground	yes	-	-	Yes, site is a children's playing area with equipment	-	-	Yes	Yes
	8	Land between the Shrubbery and the river Tame	Yes	Yes, the stretch of trees next to the river creates a picturesque location in the village	-	Yes, people take walks along the river and picnic along the grassed area	Yes, the site is a quiet area next to river	Yes, site is next to the river which is important for the wildlife of the river. In addition, numerous trees and shrubs are present on the site, which benefit local wildlife	Yes	Yes

Appendix C Listed Buildings

Table 1: Listed Buildings

Heritage Asset	Grade
Park Farmhouse	II
Black and White Cottage	II
Former Smithy	II
Avenue House	II
The Coach Houses	II
Church of St Peter	II*
The Cottage	II
Elford Low Farmhouse	II
Merepitts Farmhouse	II
Millhouse	II
Elford Bridge West	II
Elford Park Farmhouse	II
Crown Cottage	II
Home Farmhouse	II
Elford Bridge East	II
Elford Post Office	II
The Crown Inn	II
The Old Rectory	II
Upfields Farmhouse	II
The Forge	II
The Arches	II
The Garden Wall on North Boundary of Garden of The Old Rectory	II
Kitchen Garden Walls to Former Elford Hall	II
Barn and Stables Approximately 10 Yards Southeast of Elford Park Farmhouse	II
Former Stables Approximately 20 Yards Southeast of Elford Park	II

Key Heritage Assets:

The following key considerations are raised in relation to matters of heritage within the Parish of Elford:

- The Parish includes a wealth of heritage assets including those that are designated as listed buildings. These heritage assets and their settings will be required to be preserved or enhanced by new development;
- The Conservation Area Appraisal and Management Plan was adopted on 14 July 2015. It identifies a series of key spaces and views/vistas that are important to the character or appearance of the conservation area.
- The historic environment record and a study of historical mapping shows that much of the village of Elford to the north-east is post-war whilst the area adjacent to the river is the traditional core of the village;
- The landscape is an important historical asset, offering links to the cultural heritage and showing a number of features that demonstrate the working of the landscape since mediaeval times;
- The scattered farmsteads, mainly from the Georgian and Victorian period, are an important heritage feature

Table 2: Non-designated Heritage List - Schedule of locally-listed properties:

Road	Property
Brickhouse Lane	New cottage
Burton Road	The Mount Hill Cottage Elford House (inc. 1,2,3,4 Elford House, East Wing) Elford House and West Wing Elford House Elford Lodge The Stables, Elford House The Cottage, Elford House
Church Road	Elford Hall Community Project Pimlico Cottage The Woodyard Box Cottage Church Gate Cottage Arthur Cottage Elford Lodge The Wickets Bagot House Tithe Barn
Clements Lane	Clements Cottage
Eddies Lane	Webbs Farmhouse
The Beck	Homestead (no. 8) No. 22 No. 41, 43, 45, 47, 51, 53 & 55 Yew Tree (numbers 59-61)
The Gardens	Haycroft Tanglewood Garden Cottage
The Green	Numbers 1, 2 & 3
The Shrubbery	The Warren Beck House
The Square	Howard Primary School The Old School House Drey House Numbers 1, 2, 3 & 4

Appendix D. List of projects which monies from Community Infrastructure Levy (CIL) will be directed towards. Contributions sought within respective sections of this Plan can also go towards these projects

- Howard Primary School
- Sportsfield and Cricket Ground
- Sports, Leisure and Multi Use Games facilities
- Footpaths and Directional Signs
- Improvement of Amenity Areas.

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equality impact assessment

stage 1 quick check

questionnaire



If you are planning on making a change to an existing service or policy, or launching something new, fill out this quick questionnaire to find out if you need to complete a full equality impact assessment. You can also use this form to check your current services or policies.

To find out more about the legal background to equality impact assessments, or for advice on which of your current services should be assessed, read our equality impact assessment help notes.

Section 1: About you and your service area

Your name:	Craig Jordan
Your service area:	Spatial Policy and delivery
Your director/line manager:	Richard King
Your cabinet member:	CLlr Ian Pritchard

Section 2: About your plans

Name of service/policy you are assessing:	Elford Neighbourhood Plan
--	---------------------------

Is it? (please delete as appropriate)
<ul style="list-style-type: none"> ▪ A new policy/planned service

Who are the main users of your service/policy? (please delete any that are not appropriate)
<ul style="list-style-type: none"> ▪ Mixture of residents and visitors ▪ Users of a specific service (e.g. leisure centre customers) ▪ Internal (employees) ▪ Disability specific groups ▪ Race specific groups ▪ Gender specific groups ▪ Religious groups ▪ Sexual orientation groups ▪ Marriage and civil partnerships ▪ Older people ▪ Young people ▪ Other (please specify)

Please briefly describe why you are creating a new service/changing an existing service or reviewing current policy/service (where appropriate, include sources of evidence such as customer feedback):
Elford Parish Council has produced a Neighbourhood Plan to provide specific planning policies for the Elford Neighbourhood Area. The Plan has been independently examined and found to meet the basic conditions. Following examination the Plan has been subject to a referendum within the neighbourhood area and achieved a success 'yes' vote.

1 For help or guidance contact Colin Cooke on 01543 308121 or Alison Bowen on 01543 308129 or email colin.cooke@lichfielddc.gov.uk or alison.bowen@lichfielddc.gov.uk

Section 3: Will your plans impact on any particular groups?

3a: Please fill in all boxes that apply in the table below. If any boxes don't apply, please leave blank.

Hints & tips Think about who will benefit from or be affected by your plans/policy. Will any particular group be negatively affected, or not able to use the service? For further guidance please see Section 3 of the help notes.

Impact of plans Groups of users	Will your plans have a positive impact on this group? If so please explain why?	Will your plans have a negative impact? If so please explain why? <input checked="" type="checkbox"/> If there is a negative impact on any group(s), please complete section 4 for each group.
Age ranges (indicate range/ranges)	Neutral. Whilst the Neighbourhood Plan does not have specific policies relating to defined age groups it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which includes policies which consider all age groups within the District.	No.
Disability (physical, sensory or learning)	Neutral. Whilst the Neighbourhood Plan does not have specific policies relating to people with disabilities it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which includes policies which seek to ensure that the needs of those with disabilities are met.	No.
Gender/sex	Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with gender and sex it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which helps to facilitate the delivery of a range of services and facilities which may deal with issues relating to gender and sex. The Local Plan is underpinned by policies relating to sustainable communities which are underpinned by community cohesion, inclusivity and narrowing the equality gap as such the Neighbourhood Plan conforms to this.	No.
Transgender/gender reassignment	Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with transgender and gender reassignment it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which helps to facilitate the delivery of a range of services and facilities which may deal with issues relating to transgender and gender reassignment. The Local Plan is	No.

2

For help or guidance contact Colin Cooke on 01543 308121 or Alison Bowen on 01543 308129 or email colin.cooke@lichfielddc.gov.uk or alison.bowen@lichfielddc.gov.uk

	underpinned by policies relating to sustainable communities which are underpinned by community cohesion, inclusivity and narrowing the equality gap as such the Neighbourhood Plan conforms to this.	
Race (includes ethnic or national origins, colour or nationality)	Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with race it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which helps to facilitate the delivery of a range of services and facilities which may deal with issues relating to race. The Local Plan is underpinned by policies relating to sustainable communities which are underpinned by community cohesion, inclusivity and narrowing the equality gap as such the Neighbourhood Plan conforms to this.	No.
Gypsies and travellers	Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing Gypsies and Travellers it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which includes policies relating to meeting the needs of Gypsies, Travellers and Travelling Showpeople.	No.
Refugees / asylum seekers	Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with refugees and asylum seekers it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which helps to facilitate the delivery of a range of services and facilities which may deal with issues relating to refugees and asylum seekers. The Local Plan is underpinned by policies relating to sustainable communities which are underpinned by community cohesion, inclusivity and narrowing the equality gap as such the Neighbourhood Plan conforms to this.	No.
Sexual orientation	Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with sexual orientation it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which helps to facilitate the delivery of	No.

	<p>a range of services and facilities which may deal with issues relating to sexual orientation. The Local Plan is underpinned by policies relating to sustainable communities which are underpinned by community cohesion, inclusivity and narrowing the equality gap as such the Neighbourhood Plan conforms to this.</p>	
<p>Marriage and civil partnerships</p>	<p>Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with marriage and civil partnerships it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which helps to facilitate the delivery of a range of services and facilities which may deal with issues relating to marriage and civil partnerships. The Local Plan is underpinned by policies relating to sustainable communities which are underpinned by community cohesion, inclusivity and narrowing the equality gap as such the Neighbourhood Plan conforms to this.</p>	<p>No.</p>
<p>Religion or belief (includes lack of belief)</p>	<p>Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with religion or belief it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which helps to facilitate the delivery of a range of services and facilities which may deal with issues relating to religion or belief. The Local Plan is underpinned by policies relating to sustainable communities which are underpinned by community cohesion, inclusivity and narrowing the equality gap as such the Neighbourhood Plan conforms to this.</p>	<p>No.</p>
<p>Pregnancy and maternity</p>	<p>Neutral. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with pregnancy and maternity it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which helps to facilitate the delivery of a range of services and facilities which may deal with issues relating to pregnancy and maternity. The Local Plan is underpinned by policies relating to sustainable</p>	<p>No.</p>

	communities which are underpinned by community cohesion, inclusivity and narrowing the equality gap as such the Neighbourhood Plan conforms to this.	
Carers or the people cared for (dependants)	Yes. Whilst the Neighbourhood plan does not have specific policies relating to issues dealing with Carers or the people cared for it has been found to be in general conformity with the adopted Lichfield District Local Plan Strategy which includes policies which specifically related to the provision of supported housing, care homes and homes built to Lifetime Homes standards which are applicable to carers and their dependants.	
Other (please specify)		

3b: Further details

Please use this space to provide further details if necessary

Section 4: Can you justify and evidence, or lessen any impact?

4a: If you have identified a negative impact(s) on any group(s) please complete the below table for each affected each group. If any boxes don't apply, please leave blank. If you didn't identify any negative impact(s) on the previous page, skip to section 6.

Hints & tips Is there something you can do to reduce or alter any negative impact you have identified? *For example when we changed waste and recycling collections to kerbside collections, we offered disabled/less able people assisted collections.* Please list all the evidence you have gathered to support your decision(s) – this could include customer feedback, statistics, comparable policies, consultation results. If you don't have any evidence, please carry out appropriate studies and research to gather the evidence you need to support your decision(s). If you have no/insufficient evidence or cannot gather any, you will need to complete a full EIA. For further guidance, see Section 4 of the help notes.

Actions you need to take	We will make the following change(s) to the service/policy to reduce the negative impact. Explain the change(s) and the evidence you have to support your decision? <input checked="" type="checkbox"/> Use section 4b below if you want to give more details.	We won't make changes as we can justify our decision and there are sound reasons behind our decision. Justify why and detail the evidence you have gathered to support your decision. <input checked="" type="checkbox"/> Use section 4c below if you want to give more details.	There is a negative impact, and we cannot justify it and/or have no, or insufficient, evidence to support our decision. <input checked="" type="checkbox"/> You will need complete a full equality impact assessment. See the help notes for more details.
Groups of users			
Age ranges (indicate range/ranges)			
Disability (physical, sensory or learning)			
Gender / sex			
Transgender / gender reassignment			
Race (includes ethnic or national origins, colour or nationality)			
Gypsies and travellers			
Refugees / asylum seekers			
Sexual orientation			
Marriage and civil partnerships			
Religion or belief (includes lack of belief)			
Pregnancy and maternity			
Carers or the people cared for (dependants)			
Other (please specify)			

4b: Further details on changes

Please use the space below to give more details on the changes you will make, if necessary:

4c: Further details on justification

Please use the space below to give more details on the justification/evidence you have gathered, if necessary:

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For help or guidance contact Colin Cooke on 01543 308121 or Alison Bowen on 01543 308129 or email colin.cooke@lichfielddc.gov.uk or alison.bowen@lichfielddc.gov.uk

Section 5: Your action plan

Help notes If, as a result of this assessment, you are going to adapt your plans or policy, please include details below. Please include a quick action plan and key dates that will show how you will review your decisions and when. Please include responsibility and expected outcomes. For full guidance on how to complete this section, please refer to the help notes.

Section 6: Record your actions (delete as appropriate)

I have sent this to Policy and Performance for publication on the intranet and on www.lichfielddc.gov.uk	Yes
Date completed:	19 December 2018

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

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