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Monday, 1 July 2019

Dear Sir/Madam

CABINET

A meeting of the Cabinet has been arranged to take place on **TUESDAY, 9TH JULY, 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 Pullen (Chairman), Eadie (Vice-Chair), E Little, Lax, Smith, Strachan and A Yeates



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AGENDA

1. Apologies for Absence
2. Declarations of Interest
3. New Strategic Plan Process and Timeline 3 - 14
4. Local Plan Allocations Adoption 15 - 302
5. HS2 Draft Planning Memorandum - Decision on Qualifying Authority Status 303 - 308
6. Jigsaw Funding Agreement 309 - 318
7. Contract for the Provision of Garden Waste Stickers & Supporting Services 319 - 322
8. To Receive the Minutes of the Parish Forum held on 25 June 2019 323 - 332
9. **Exclusion of Press and Public**

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"

10. **Friary Grange Leisure Centre** 333 - 342

This report is to be considered in private since it contains exempt information (as defined by Paragraphs 3 and 4 of Part 1 of Schedule 12A of the Local Government Act 1972) relating to the financial and business affairs of the authority and other organisations, and information relating to consultations/negotiations in connection with employment matters.



NEW STRATEGIC PLAN PROCESS & TIMELINE

CLr Doug Pullen, Leader of Lichfield District Council, and CLr Andrew Smith, Cabinet Member for Customer Services and Innovation



Date:	9 July 2019
Agenda Item:	3
Contact Officer:	Elizabeth Barton
Tel Number:	01543 308100
Email:	elizabeth.barton@lichfielddc.gov.uk
Key Decision?	NO

Cabinet

1. Executive Summary

- 1.1 The council’s current strategic plan period ends in April 2020.
- 1.2 A new strategic plan for 2020 – 2024, that sets out what the council wants to achieve over the next four year period and why, needs to be created in advance of the end of the current plan period, and considered in line with the medium term financial strategy (MTFS) to ensure its viability and deliverability.
- 1.3 This report outlines the suggested timeframe and process for the compilation of the council’s new strategic plan. Once approved, the strategic plan will then be translated into a series of key actions by council officers through a revised delivery plan from April 2020.
- 1.4 This report does not set out any recommendations for content that should be included in the new plan.

2. Recommendations

- 2.1 To endorse the creation of a cross-party O&S Member Task Group to assist in the creation of the new plan (see 3.6), including nominating members.
- 2.2 To support the principle of a public consultation exercise on the new plan in November - December 2019 (see 3.8).
- 2.3 To support the proposed timeline and process for the creation of the new strategic plan 2020 – 2024 (see 3.9).

3. Background

- 3.1 The council’s strategic plan will need to be outcome focused in addressing the priorities for the council which are informed by a number of key elements:
 - The aspirations of the council.
 - The views of local residents.
 - Existing commitments, such as the Local Plan and existing strategies that extend beyond the current plan period.
 - The current and future financial situation of the council – the Medium Term Financial Strategy.
 - Local statistics that highlight areas of concern/focus – including the council’s latest corporate indicator set (see **Appendix A**).
 - The views of partners.
 - The views of staff.

- 3.2 To kick start the process of gathering the above information, resident workshops took place in autumn 2018. Participants were asked to consider the current strategic plan, give their views on which priorities they feel should be carried forward into a new plan, and propose new projects and priorities for the new plan.
- 3.3 Staff workshops, that adopted the same format as the resident workshops, also took place in winter 2018.
- 3.4 The council's corporate indicators, (identified as the indicators/statistics that reflect the outcomes of the services/activities the council delivers), are being collected and will provide vital information to inform decisions in relation to the new plan.
- 3.5 District statistics published by the county council (in the form of a district profile) will also be used to provide a baseline to help shape decisions in relation to the plan.
- 3.6 A cross party O&S Member Task Group has been created and will be overseen by the council's Strategic O&S Committee, to lead the creation of the plan, in partnership with Cabinet.
- 3.7 An officer working group will also be established to support the drafting of the new plan, in partnership with the council's Leadership Team. The group will be chaired by the communications & policy team and will include key officers from each service area, including finance.
- 3.8 It is proposed that a formal public consultation is carried out online between November and December 2019. The format of the consultation will be developed by the O&S Member Task Group in partnership with Cabinet.
- 3.9 It is proposed the following timeline be adopted:

Date	Meeting	Notes
9 July 2019	Cabinet review process for creating new strategic plan.	/
Early July (date TBC)	First meeting of O&S Member Task Group (with Cabinet members invited to attend) to scope out the process for creating the new plan in detail, consider various formats of plans, and set future meeting dates.	/
11 July 2019, 5.30pm – 7.30pm 16 July 2019, 2pm – 4pm	Councillor strategic plan workshops, open to all councillors, which will follow the format of the resident/staff/Cabinet workshops.	First draft of Strategic Plan prepared.
July/August 2019 (date TBC)	Meetings of the O&S Member Task Group (with Cabinet members invited to attend) to consider reports from the workshops/data sets/start to refine priorities and agree consultation plan/approach.	
22 October 2019 12 November 2019	First draft of new strategic plan taken to Strategic O&S (22 October 2019) and Cabinet (12 November 2019).	
13 November – 13 December 2019	Councillors, residents, staff, business community and partners consultation on the draft strategic plan 2020 – 2024.	LDC news published November
W/c 16 December 2019	Meetings of the O&S Member Task Group (with Cabinet members invited to attend) to review feedback from public consultation.	Second draft of the Strategic Plan prepared.
January/February 2020	Final draft of new strategic plan considered by Strategic O&S (28 January 2020) and Cabinet (11 February), with approval sought from Full Council (18 February 2020) alongside the MTFs.	

Alternative options	1. Adopt an alternative process and timeline.
Consultation	1. Residents and staff have been consulted on the new strategic plan. 2. Further consultation will take place with Cabinet, members, residents, partners and staff.
Financial implications	1. There are no financial implications arising from the timeline/process of the creation of the strategic plan. 2. Costs including consultation, design and print that will be associated with the production of the plan can be met from existing corporate services budgets. 3. The strategic plan will be reviewed against the Medium Term Financial Strategy, as part of the drafting process, to ensure any financial implications are captured and addressed.
Contribution to the delivery of the strategic plan	1. The process will support the delivery of the new Strategic Plan 2020 – 2024.
Equality, diversity and human rights implications	1. There are no equality, diversity or human rights implications arising from the production of the strategic plan. 2. An equality/community impact assessment of the new strategic plan will be carried out as part of the drafting process to ensure any issues are identified and addressed/mitigated.
Crime & safety issues	1. There are no crime and safety issues arising from the production of the strategic plan.
GDPR/privacy impact assessment	1. There are no GDPR/privacy issues arising from the production process of the strategic plan.

	Risk description	How we manage it	Severity of risk (Red, yellow or green)
A	The timescale is relatively tight and resources to deliver the plan are limited.	We are creating a dedicated officer working group with a project manager and project director.	Green
B	The process does not reflect the full spectrum of political views.	Cross party O&S working group and the councillor consultation will enable cross party views to be collected.	Green
C	The plan is not evidence led	We are feeding a local evidence base into the process through corporate indicators the district profiles – see 3.4	Green
D	The plan does not reflect local views	We are feeding local views from resident workshops into the process and conducting a public consultation.	Green
E	The plan is not financially deliverable	We are working closely with the team developing the MTFS (officer working group) and the cabinet member responsible for finance (O&S Member Task Group)	Green
F	The plan does not take account of existing plans/commitments	An overview of existing plans/commitments will be shared with the working groups (Members and officers) to enable them to consider existing commitments. Existing commitments are already reflected in the MTFS.	Green

Relevant web links www.lichfielddc.gov.uk/strategicplan
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Briefing note

Corporate indicators end of year position 2018/19

Date: 19 June 2019

Presented by: Lizzie Barton and Colin Cooke

Director: Neil Turner

1. Introduction

The purpose of this briefing note is to provide the 2018/19 end of year position for the council's corporate indicators and corporate health indicators (see Appendix A), as well as the direction of travel over the plan period so far (2016 – 2020). The indicators are separated as follows:

- Corporate indicators provide an indication of the health of Lichfield District across the council's key strategic themes.
- Corporate health indicators that provide an indication of the health of Lichfield District Council.

2. Background

In 2018 we carried out a review of our performance management framework and created a new delivery plan that outlines the key activities and projects the council will deliver to achieve its strategic objectives, as set out in the Strategic Plan 2016 - 2020.

As part of the review, we commissioned the Staffordshire Intelligence Hub to carry out an analytical review of the council's existing performance indicators, and to provide a new robust set of indicators to measure the impact of the council's work/health of the district and council.

Following work with the Intelligence Hub and Leadership Team, a new set of corporate indicators were approved by Cabinet in September 2018 (see Appendix A).

The corporate indicators are generated from a variety of internal and external data sources including council data sets, NOMIS (National Office for Statistics), Staffordshire County Council, Census figures and Staffordshire Police.

Because the data comes from a variety of sources and updates are provided at different frequencies, not all of the indicators included in the report hold data relating to the same years – some are financial and some are calendar years.

Since creating the corporate indicator set, we have been notified that a few of the statistics that are sourced from the 'Feeling the Difference survey' carried out by Staffordshire Police are not available within this reporting timeframe, as the police are conducting a review of their data/insight analysis arrangements. Where this is the case the latest available figures have been included.

Moving forward, and in line with the creation of the new strategic plan, there is room to incorporate/remove indicators as and when necessary to support and measure the council's strategic aims and outcomes.

3. What the figures tell us in brief

Strategic theme	Overview
Vibrant and prosperous economy	<p>The overall trend within this group of indicators suggests the economy of the district has become more vibrant and prosperous over the plan period – high street vacancy rates are down, tourism numbers are increasing year on year, and there has been a growth in business numbers overall.</p> <p>The number of jobs in the district grew between 2015/16 and 2016/17, and is higher than Staffordshire average (56,000 vs 51,125), however there is no district level job data available for the past two years. Comparison data from the West Midlands suggests that jobs in the region dipped slightly in 2018/19, which could indicate a correlating dip in district jobs. We will keep this under review as and when local data becomes available.</p> <p>Whilst the overall number of jobs is not available, the figures show that the number of people employed in more professional occupations has increased as percentage of overall jobs over the plan period. That said, the percentage of working age people with NVQ 3 level or above has dropped over the past year, but this is still higher than the Staffordshire average.</p> <p>There has been a drop in vacancy rates in both Lichfield city centre and Burntwood town centre, although the rate of reduction in Burntwood is slower.</p> <p>Visitor numbers and visitor spending has also increased year on year, which underpins the importance of tourism to the district’s economy (figures for 2018/19 are expected to be available in the autumn of 2019).</p> <p>The percentage of working age people in employment dipped slightly in 2018/19 (from 76.9% - 76.4%) and it is below the Staffordshire average (78.7%), however the number of working age people claiming work related benefits remains lower than the Staffordshire average (995 vs 1009)*.</p> <p><i>*It is difficult to make a judgment on number of people claiming work related benefits due to a change to the way the figures were recorded that came into force in April 2018. This resulted in more people being included in the figures. This will be monitored over the coming year for a like on like comparison.</i></p>

Healthy and safe communities

The have been marginal changes across this group of indicators. The data suggests overall people feel happy living in the district (81%), however some residents are finding affordable living an issue and rough sleeping has increased. Whilst crime figures have increased over the plan period, nearly all residents feel safe living here (98%), and residents' concerns about anti-social behaviour have nearly halved over the plan period. People living here do not do as much exercise as people elsewhere in Staffordshire or the UK.

A higher number of households are in fuel poverty (1.3 percentage point increase since 2015/16), the rough sleeping rate has nearly doubled since the beginning of the plan period (0.7 vs 1.2 per 1,000 households), and the rate of recorded crime has risen from 42.56 cases per 1000 households in 2015/16 to 55.89 cases per 1000 households in 2018/19.

This increase may correlate with the slight drop in the percentage of residents who feel safe in their local area (dropped from 99% - 98% in the same period). That said, the percentage of residents who feel safe after dark has steadily increased from 83% (2015/16) to 98% (2018/19), and residents who feel there is a problem with anti-social behaviour (ASB) has dropped from 12% (2015/16) to 7% (2018/19). The actual rate of reported ASB dropped from 2,382 in 2015/16 to 2,179 in 2017/18 (2018/2019 figures not yet available).

There has also been a slight drop (0.4%) in the number of adults who take part in the recommended level of exercise each week (57.6% in 2018/19). The number of people who exercise is lower than the Staffordshire average (58.7%) and the national average (62.30%).

There has also been a slight drop in the number of people who volunteer (4% drop to 10% in 2018/19) and this is below the Staffordshire average (12%).

The number of households in council tax arrears has reduced over the plan period, despite there being a slight increase in 2018/19 (up 53 households).

The percentage of people who struggle to cope on their income has changed from 23% to 7.4%, however the figures for 2018/19 year are based on households, rather than population, due to a change in the way the figures are calculated, so are not be directly comparable. That said, the percentage of households in fuel poverty increased from 9.5% to 10.8% between 2015/16 and 2017/18, which indicates some people are facing financial challenges.

The percentage of people who are happy living in the district dropped very slightly (from 83% in 2017/18 - 81% in 2018/19), however this is still higher than the Staffordshire average (73%).

Strategic theme	Overview
<p>Clean, green and welcoming places to live</p>	<p>Indicators within this group show that overall residents are more satisfied with the local area as a place to live (94%), however they also show that house prices are rising and becoming less affordable for the average person/family.</p> <p>In 2015/16 the housing affordability ratio, which compares the average house price to average wages, was 7.78. This increased to 8.89 in 2017/18 (data for 2018/19 is not available). The correlates to the average house price which has increased by £32,275 over the plan period, which is slightly lower than the national average, but £46,500 higher than the Staffordshire average.</p> <p>The number of both new and affordable houses built has increased over the plan period (448 affordable homes in total), the amount built in 2018/19 almost doubled on the previous year (235 vs 135).</p> <p>Only a handful of residents feel the quality of local parks needs improving (10%), however increasing numbers of residents feel the cleanliness of local streets (30% in 2018/19) and the maintenance of local roads needs to be improved (47% in 2018/19).</p> <p>The amount of waste recycled has remained relatively static over the plan period.</p>
<p>A council that's fit for the future</p>	<p>The indicators in this set suggest the council is achieving its aim to become fit for the future. Over the plan period, the percentage of residents satisfied with the services provided by the council has increased by 5% to 68%, compared to the Staffordshire average of 66%</p> <p>The number of complaints the council has received fluctuated significantly over the plan period. The council's complaints policy states that a request for a service, or where there has been an operational failure (e.g. a report of litter in a park, or a missed bin collection) that it is not considered a complaint if it is easily rectified, however between 2016/17 and 2017/18 all such contacts from waste customers were recorded as complaints. This has now been rectified and only complaints that reach stage 1 of the complaints procedure are now recorded. As a result, the number of complaints the council received has dropped back down to a similar level as at the start of the plan period (113 in 2015/16 vs 119 in 2018/19).</p> <p>The percentage of council tax and business rates collected by the council (in year) has remained high across the plan period, with some slight fluctuations (around 97%/98% each year).</p> <p>The council's drive to digitise its services has increased pace in the past year. The council now has over 22,627 customers with a MyAccount account on its website. Customers made 36,560 self-service requests online in 2018/19, which were supported by 23 integrated online processes that use the council's new customer relationship management system and online forms to kick start back office processes, with reduced officer intervention – for example adding a replacement bin or new bin to a vehicle round sheet. In addition 1,319 customers were signed up to the council's online council tax/business rates services in 2018/19, again reducing pressure on the back office.</p> <p>2019/2020 garden waste subscriptions (measured in calendar years) are also on target to meet or exceed 2018/19's figures, with the majority of customers choosing to sign-up online.</p>

Strategic theme	Overview
<p>Corporate health indicators</p>	<p>Within the fit for the future indicators, there is a sub set of indicators that reflect the health of the council itself – these are referred to as the council’s corporate health indicators. Overall the indicators suggest that staff at the council are happier, safer and well informed about key issues, such as commercialisation, and the council has strong financial processes and procedures in place.</p> <p>Within the organisation the percentage of employees who enjoy their job (82%), feel well informed (78%) and valued has increased – that said the percentage of staff who feel valued is relatively low (39%) but this has increased from 28% in 2015/2016.</p> <p>The average number of days lost to sickness has reduced from 8.99 in 2015/16 to 2.63 in 2018/19. Staff accidents have also dropped significantly, which also reflects the outsourcing of the leisure services.</p> <p>A high percentage of staff (72%) also feel they have a good understanding about commercialisation.</p> <p>The number of apprentices has increased slightly over the plan period. The number of staff who are having performance reviews has improved significantly (64% in 2015/16 to 88.9% in 2018/2019), and the number of training days staff have attended has also increased slightly over the plan period.</p> <p>Financially the council has increased its general reserves over the plan period, remained within its revenue outturn targets (+/- £250,000 of approved budget), with the exception of 2016/2017. It has also delivered its financial reporting requirements, including value for money and unqualified accounts each year of the plan period.</p>

ENDS

Lichfield District Council corporate indicators

2018/2019 end of year position

Community Outcomes	Success will be measured by	Corporate Indicators	Source	2015/16	2016/17	2017/18	2018/19	Short term direction of travel (last two years)	Overall direction of travel (4 year period)	Staffordshire 2018/2019 average where available	England 2018/19 average where available	Comments
Vibrant and prosperous economy	More local jobs and more people in employment	Number of jobs (total employment)	ONS	48,000	56,000	Not yet available - see WM comparator	Not yet available - see WM comparator	■	↑	51,125	N/A	Lastest district level figures are not yet avialable form the ONS and the West Midlands data has been reorded as a comparator - see below.
		Number of jobs (total employment) West Midlands	ONS	2,850,389	2,914,352	2,957,488	2,957,166	↓	↑	N/A	N/A	
		Percentage increase in occupational sector (major groups 1 - 3)	ONS	11.01%	-10.70%	4%	21.37%	↑	↓	N/A	N/A	('Managers, directors and senior officials', 'Professional occupations' and 'Associate profession and technical'). Figure for 2018/19 is as at Dec 2018.
		% of the working age population (16-64) in employment	ONS	79.10%	76.50%	77.00%	76.40%	↓	↓	78.60%	75.10%	
		Number of working age population claimants of Job Seekers Allowance including Universal Credit	ONS	284	275	229	995	↑	↑	1,009	N/A	Prior to April 2018 this was only the number of JSA claimants. More people are required to seek work under UC than JSA which is why figures have increased
		The percentage of adults 16-64 with NVQ level 3 or above	ONS	55.10%	55.90%	60.40%	57.70%	↓	↑	56.40%	57.70%	
	More new businesses locate in our district	Total value of RV	LDC	£82,594,000	£88,145,000	£89,859,000	£90,105,038	↑	↑	£90,718,250	N/A	
		New measure of retail/office floorspace	LDC	229 m ²	229 m ²	0 m ²	1645 m ²	↑	↑	N/A	N/A	2018/19 figures have not yet been published.
		Number of business start-ups	ONS	760	585	Not yet available	Not yet available	N/A	N/A	N/A	N/A	
	More businesses succeed	Vacancy rates - Lichfield city centre	LDC	9.15%	6.29%	6%	6.21%	↑	↓	N/A	N/A	
		Vacancy rates - Burntwood town centre	LDC	4.55%	4.47%	6%	4.50%	↓	↓	N/A	N/A	
	More visitors and greater visitor spend in our district	Number of visitors to the district	LDC	2,500,900	2,551,800	2,601,200	Not yet available	↑	↑	N/A	N/A	Figures are for calendar years, not financial years
		Visitor spending	LDC	£119,118,000	£121,551,000	£123,332,000	Not yet available	↑	↑	N/A	N/A	Figures are for calendar years, not financial years
	Newoffices, retail and manufacturing space will be built	Number of non domestic premises/ properties	LDC	2,890	3,010	3,011	3,038	↑	↑	3,306	1,932,620	
	Healthy and safe communities	More people will be active and healthy	Percentage of adults (aged 19+) that meet the Chief Medical Officer's recommendations for physical activity (150+ moderate intensity equivalent minutes per week)	Active Lives Survey	N/A	N/A	58%	57.60%	↓	N/A	58.70%	62.30%
Percentage of respondents in Lichfield District who feel happy			Feeling the difference survey (Staffs Police)	N/A	N/A	83%	81%	↓	N/A	73%	N/A	
More people involved in volunteering & community activity		% of respondents who have given unpaid help to groups, clubs or organisations	Feeling the difference survey (Staffs Police)	N/A	N/A	14%	10%	↓	N/A	12%	N/A	
Fewer people & families will be homeless		% of the population who find it difficult or very difficult to cope on current income	Experian Data	N/A	23%	23%	7%	■	■	N/A	N/A	Latest figure is for percentage of households (3,038 in number), previous figures were for percentage of population, so are not comparable.
		Percentage of households in fuel poverty	Department for Business, Energy & Industrial Statistics	9.5%	9.5%	10.8%	Awaiting data	↑	↑		11.1% (17/18)	
		Rough sleeping rate per 10,000 households	LDC	0.7	0.23	0.07	1.2	↑	↑	N/A	2.0	
		Proportion of households in council tax arrears	LDC	2,895	2,723	2,440	2,493	↑	↓	N/A	N/A	
More people will feel safer & less worried about crime and anti-social behaviour		% of respondents who feel fairly/very safe in their local area during the day	Feeling the difference survey (Staffs Police)	99%	99%	99%	98%	↓	↓	99%	N/A	
		% of respondents who feel fairly/very safe in their local area after dark	Feeling the difference survey (Staffs Police)	83%	88%	87%	98%	↑	↑	87%	N/A	
		% of residents who feel that there is a fairly/very big problem with ASB in their local area	Feeling the difference survey (Staffs Police)	12%	10%	10%	7%	↓	↓	12%	N/A	
		Overall rate of reported anti-social behaviour	Staffs Police	2,382	2,294	2,179	Awaiting data	↓	↓	N/A	N/A	
		Rate of recorded crime per 1,000 population	Staffs Police	42.56 (4345)	49.18 (5051)	55.89 (5760)	Awaiting data	↑	↑	N/A	N/A	
More people will be living independently at home		Number of SCC supported people living in residential or nursing care	Staffs County Council	305	320	322	314	↓	↑	389	N/A	
		Number of SCC supported people newly admitted to residential or nursing care	Staffs County Council	113	123	122	90	↓	↓	134	N/A	
		Number of people receiving short term support to maximise independence	Staffs County Council	455	385	321	317	↓	↓	256	N/A	

Community Outcomes	Success will be measured by	Corporate Indicators	Source	2015/16	2016/17	2017/18	2018/19	Short term direction of travel (last two years)	Overall direction of travel (4 year period)	Staffordshire 2018/2019 average where available	England 2018/19 average where available	Comments
Clean, green and welcoming places to live	More affordable homes in the district	Housing affordability ratio (house price in relation to average salary)	ONS	7.78	8.46	8.89	Awaiting data	↑	↑	6.45	7.7	
		Number of new affordable houses built	LDC	50	28	135	235	↑	↑	N/A	43,498 (2017/18)	
		Net change in the number of houses	LDC	200	322	552	Awaiting data	↑	↑	N/A	N/A	
		Median house prices	ONS	£199,975	£220,000	£227,500	£232,250	↑	↑	£185,750	£239,000	
	Our heritage & open spaces will be well maintained or enhanced	% residents who are satisfied with their area as a place to live	Feeling the difference survey (Staffs Police)	89%	94%	93%	94%	↑	↑	95%	N/A	
	Our streets will be clean and well maintained	% of respondents who identify clean streets as a factor that most needs improving	Feeling the difference survey (Staffs Police)	N/A	N/A	28%	30%	↑	↑	25%	N/A	
		% of respondents who identify well maintained roads and pavements as a factor that most needs improving	Feeling the difference survey (Staffs Police)	N/A	N/A	36%	47%	↑	↑	44%	N/A	
		% waste recycled	LDC	28.20%	27.30%	27.50%	27.80%	↑	↑	N/A	N/A	
	More people will use parks and open spaces	% of respondents who identify parks and open spaces as a factor in making somewhere a good place to live	Feeling the difference survey (Staffs Police)	N/A	N/A	N/A	30%	N/A	N/A	29%	N/A	
		% of respondents who identify parks and open spaces as a factor that most needs improving	Feeling the difference survey (Staffs Police)	N/A	N/A	N/A	10%	N/A	N/A	10%	N/A	
A council that is fit for the future/Corporate health Indicators	Our customers will be more satisfied	Number of complaints	LDC	113	449	362	119	↓	↑	N/A	N/A	A change in the way complaints regarding the Joint Waste Service are recorded has resulted in a reduction in
		% residents satisfied with overall level of service provided by LDC	Feeling the difference survey (Staffs Police)	63%	63%	65%	68%	↑	↑	66%	N/A	
	We will continue to be financially responsible	% of council tax collected (in year - does not include arrears payments)	LDC	98.76%	97.49%	98.50%	98.72%	↑	↓	N/A	N/A	
		% of business rates collected (in year - does not include arrears payments)	LDC	97.31%	97.22%	99.00%	98.81%	↓	↑	N/A	N/A	
		Level of General Reserves	LDC	£4.279m	£4.971m	£4.521m	£5.310m	↑	↑	N/A	N/A	
		Efficiency of financial monitoring – quarterly financial monitoring reports to Cabinet and Strategic (Overview and Scrutiny) Committee and three Treasury Management reports annually to Audit and Member Standards Committee.	LDC	Yes	Yes	Yes	Yes	■	■	N/A	N/A	
		Revenue outturn - does not vary by more than +/- £250,000 of the approved budget.	LDC	Yes	No	Yes	Yes	↑	↓	N/A	N/A	
		Payments to suppliers – at least 90% of undisputed invoices have been paid within 30 days	LDC	81.45%	82.85%	81.81%	81.78%	↓	↑	N/A	N/A	
		Efficiency of financial reporting – Draft Statement of Accounts produced, authorised and published by 31 May.	LDC	Yes	Yes	Yes	Yes	■	■	N/A	N/A	2015/16 and 2016/17 by 30 June
		Efficiency of financial reporting – Audited Statement of Accounts produced and authorised for issue by 31 July with an unqualified External Audit Opinion.	LDC	Yes	Yes	Yes	Available 31 July	■	■	N/A	N/A	2015/16 and 2016/17 by 30 September
		Value for money – the External Auditors' unqualified Value for Money Judgement.	LDC	Yes	Yes	Yes	Available 31 July	■	■	N/A	N/A	
		Number of LDC garden waste subscriptions	LDC	N/A	N/A	N/A	40,135	■	■	N/A	N/A	Garden waste is sold in calendar years. On target to achieve similar figures in 2018/2019
	Our organisation will have clear corporate values and be committed to openness and transparency	% of employees who enjoy their job	LDC	67%	N/A	N/A	82%	N/A	↑	N/A	N/A	
		% of employees who feel well informed	LDC	73%	N/A	N/A	78%	N/A	↑	N/A	N/A	
		% of employees who feel valued by the organisation	LDC	28%	N/A	N/A	39%	N/A	↑	N/A	N/A	
	More people will interact with us through our website and digital channels/we'll be more innovative in how we delivery services	Number of customer accounts (Jadu)	LDC	System not in place	System not in place	System not in place	22627	↑	↑	N/A	N/A	
		Number of self-serve transactions carried out by customers (Jadu)	LDC	0	0	0	36560	↑	↑	N/A	N/A	
		Number of self-serve transactions carried out by customers (revenues & benefits)	LDC	System not in place	System not in place	System not in place	1319	N/A	N/A	N/A	N/A	
		Number of digital 'self-serve' services offered via the council's website	LDC	Not recorded	Not recorded	9	23	↑	↑	N/A	N/A	
		% employees who feel fit for the future is helping to positively shape the council.	LDC	31%	N/A	N/A	38%	N/A	N/A	N/A	N/A	
% employees who know what being a commercial council means		LDC	Not recorded	Not recorded	Not recorded	72%	N/A	N/A	N/A	N/A		
Our staff workforce will be healthy, efficient and well trained	Average number of days lost to sickness	LDC	8.99	3.14	2.84	2.63	↓	↓	N/A	N/A		
	Number of staff accidents	LDC	27	27	15	11	↓	↓	N/A	N/A	Reduction in numbers due to the outsourcing of leisure. Figures vary slightly from source data due to late reporting and corrections.	
	Number of training days	LDC	N/A	639	650	Awaiting data	↑	↑	N/A	N/A		
	% staff turnover	LDC	12.12%	14.21%	12.95%	13%	↑	↑	N/A	N/A		
	Number of full time equivalent (FTE) staff	LDC	330	326	310	278	↓	↓	N/A	N/A		
	Number of staff in 1-3 groups ('Managers, directors and senior officials', 'Professional occupations' and 'Associate profession and technical')	LDC	N/A	N/A	N/A	4%	N/A	N/A	N/A	N/A		
	Number of council apprentices	LDC	2	2	4	3	↓	↑	N/A	N/A		
% of annual Performance Development Reviews (PDRs) completed.	LDC	64%	52%	88%	88.9%	↑	↑	N/A	N/A			

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Local Plan Allocations adoption

Report of the Cabinet Member for Investment, Economic Growth & Tourism

Councillor I. Eadie

Date: 9th July 2019

Agenda Item: 4

Contact Officer: Ashley Baldwin

Tel Number: 01543 308147

Email: ashley.baldwin@lichfielddc.gov.uk

Key Decision? Yes

Local Ward ALL

Members



Cabinet

1. Executive Summary

- 1.1 The Council is now in receipt of the Local Plan Allocations final Inspector's Report. The Council now has to determine whether they wish to progress to adoption of the Local Plan Allocations. This will require the Council to accept the Inspectors Main Modifications. This will mean the Council have a complete Local Plan in place consisting of the Local Plan Strategy (2015) and the Local Plan Allocations (2019).
- 1.2 Subject to adoption of the Local Plan Allocations the Council's saved policies from the 1998 Local Plan will be deleted.
- 1.3 The Council is subject to a six week period of legal challenge following the Local Plan Allocations adoption.

2. Recommendations

- 2.1 That Cabinet note the content of the Lichfield Local Plan Allocations Inspector's Report (**APPENDIX A**) and Schedule of Main Modifications (**APPENDIX B**).
- 2.2 That Cabinet recommend to Council the adoption of the Local Plan Allocations (**APPENDIX C**) as submitted and subsequently amended by the main and minor modifications.
- 2.3 That Cabinet recommend to Council the adoption Local Plan policy map (**APPENDIX D**) which was submitted alongside the submission version of the Local Plan Allocations and subsequently amended by the main and minor modifications.
- 2.4 That Cabinet note the final versions of the Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) and Habitat Regulations Assessments (HRA) (**APPENDIX E and F** respectively) which accompany the final version of the Local Plan Allocations.
- 2.5 That Cabinet note the accompanying Local Plan adoption statement (**APPENDIX G**) and Sustainability Appraisal adoption statement (**APPENDIX H**).
- 2.6 That Cabinet note the list of polices being deleted from the 1998 Local Plan (**APPENDIX I**)
- 2.7 That Cabinet delegate to the Cabinet Member for Investment, Economic Growth & Tourism in consultation with the Head of Economic Growth authority to make any minor changes to the presentation of the final Local Plan Allocation documents.

3. Background

Local Plan Allocations overview of purpose and key strategic issues

- 3.1 A primary purpose of the Local Plan Allocations is to assist in encouraging appropriate development in Lichfield district which will contribute to sustainable and economic growth.
- 3.2 In considering the allocation of land to meet the growth requirements the Council had to grapple with issue of whether to release Green Belt land for the purpose of future growth. In early versions of the Plan there were proposals for Green Belt release in Burntwood, Fazeley Bonehill and Mile Oak, Shenstone and Whittington.
- 3.3 However following the Secretary of State's decision in relation to Land at Watery Lane Curborough officers undertook a land supply assessment. This assessment sought to understand the housing supply position within the district following the secretary of state's decision. This resulted in the Council being able to identify a supply sufficient to meet the requirements of plan without the need to identify sites within the Green Belt. The decision of the Secretary of State coupled with the commitment to sweat Brownfield supply where sound (in the context of the test of soundness which the Plan is measured against) resulted in allocations amounting to approximately 11, 515 dwellings (inclusive of the Strategy). The housing allocation distribution is detailed in Figure 1.

Figure 1 – Extract from Appendix C

Settlement	Sub Housing Market Area	Completions 2008 - 2017 (Gross) ⁽ⁱⁱ⁾	Committed supply (1-4 dwellings) 2017-2022 (Gross)	Strategic Development Allocations (SDAs)	Local Plan Allocation sites (LPAs) (Gross)	Totals (Gross)	Overall %
Lichfield City	City of Lichfield	660 (28%)	38 (13%)	2072 (56.5%)	1218 (24%)	3988	35%
Burntwood	Burntwood	389 (17%)	43 (15%)	240 (7%)	382 (7.5%)	1054	9%
East of Rugeley	Lichfield District North	573 (25%)	0 (0%)	49 (1%)	800 (16%)	1,422 ⁽ⁱⁱⁱ⁾	12.5%
North of Tamworth	Lichfield District South & East	36 (1.5%)	0 (0%)	0 (0%)	1129 (22%)	1,165 ^(iv)	10%
Fradley	Lichfield District North	34 (1.5%)	5 (2%)	1302 (35.5%)	80 (1.5%)	1421	12.5%

Settlement	Sub Housing Market Area	Completions 2008 - 2017 (Gross) ⁽ⁱⁱⁱ⁾	Committed supply (1-4 dwellings) 2017-2022 (Gross)	Strategic Development Allocations (SDAs)	Local Plan Allocation sites (LPAs) (Gross)	Totals (Gross)	Overall %
Armitage & Handsacre		84 (4%)	9 (4%)	0 (0%)	200 (4%)	293	3%
Alrewas		46 (2%)	5 (2%)	0 (0%)	142 (3%)	193	2%
Fazeley	Lichfield District South & East	128 (5%)	15 (5%)	0 (0%)	107 (2%)	250	2%
Shenstone		48 (2%)	6 (2%)	0 (0%)	50 (1%)	104	1%
Whittington		19 (1%)	1 (0.5%)	0 (0%)	18 (0.5%)	38	0.5%
Other Rural	Lichfield District North, South & East	314 (13%)	163 (27%)	0 (0%)	945 (19%)	1422	12.5%
Approx. Total:		2331	285	3663	5071	11,350	100%
Windfall allowance (55 dwellings per annum)						660	
Demolitions/loss of residential (2008-2016), annualised demolition rate (5 dwellings per annum) & 5% non-implementation/discount rate applied to committed supply, windfall allowance and Local Plan Allocation sites						-495	
Approx. Total cumulative net dwellings:						11,515	

- 3.4 Figure 1 illustrates the breakdown of supply provided by the ADPD, which amounts to 5,071 dwellings. This helps to illustrate the importance of the ADPD from a housing supply perspective. The table also illustrates the geographical breakdown of supply. This was subject to lengthy discussion during the hearing sessions. Specifically there was challenge regarding the lack of alignment with the adopted Strategy which proposed approximate distributional breakdown compared with the ADPD breakdown. Fundamentally the settlements identified in paragraph 3.2 of this report were not supplying the proposed housing land allocations to meet their respective housing targets indicated within the Strategy. Officers defended to Council's position of protecting the Green Belt. The Inspectors Report (**APPENDIX A**) supports the approach taken by the Council with explicit reference to the Inspectors analysis at paragraphs 34, 36, 75, 78 and 79 finding the approach sound and deliverable.
- 3.5 Another area of focus during the hearing sessions related to the Council's five year land supply position. This is a fundamental area that an Inspector needs to assess, specifically the Council need to demonstrate that by progressing with the Plan they will have a five year supply of housing. This is addressed within the Inspector Report (**APPENDIX A**) at paragraphs 57 – 64 where the Inspector concludes the Council has demonstrated the ADPD is able to provide a five year land supply. At the time of examining the Plan the land supply served to meet 4,449 of the housing target (10,030) which provides the Authority with a supply of 5.62 years.

- 3.6 The above background serves to highlight the most critical areas of debate at the hearing sessions that officers defended. However Cabinet should also be cognisant that the ADPD deals with much more than housing. The length of debate relating to housing is typical at hearing sessions and reflects the area of pressure. It is important to note the wider and equally important components of the Plan that are set out within the ADPD ([APPENDIX C](#)) paragraph 1.3.
- 3.7 One of the other challenges the ADPD deals with relates to economic growth. The ADPD positively supports the Council's neighbouring planning authority, Tamworth Borough Council. The ADPD does this by incorporating 6.5 hectares of employment land need for Tamworth. This demonstrates the Council's positive approach to meeting the Duty to Cooperate requirements which is another test the Authority need to pass to be sound.

Local Plan Allocations adoption process

- 3.8 The Council has undertaken several rounds of public consultation on the Local Plan Allocations (these are set out in **Appendix J**). These consultations have assisted in producing the final version of the ADPD and the accompanying suite of supporting documents.
- 3.9 In addition to the consultation undertaken on the Plan the Planning Inspectorate have independently examined the Plan. This exercise is known as the Examination in Public. In conducting the examination a two week period of public hearings was undertaken during September 2018 (04.09.2018 – 13.09.2018). Following the hearing sessions the Inspector issued the Council with a series of main modifications to consider.
- 3.10 Members will be aware that Cabinet (20.11.2018) approved public consultation on the modifications for the ADPD. Following conclusion of the consultation a summary of the comments received and a set of Council responses was sent to the Planning Inspector.
- 3.11 The Inspector has issued his final report to Lichfield District Council (report dated 25.04.2019), having sent a draft for fact checking to the Authority on the 20th March 2019 (as permitted by the relevant regulations).
- 3.12 The Inspector's report was published soon after receipt in line with Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012¹. It should be noted that the Planning Inspectorate do not publish the report, it is the Local Planning Authority's responsibility to do so. The report is available on the Council's website, the examination website and hard copies are available to view at the Council House. In addition those who responded at the Regulation 19 consultation stage have been notified of the reports publication. This is in line with Regulation 35.
- 3.13 Under the Planning and Compulsory Purchase Act 2004, (as amended) an Inspector, if finding the plan sound and having been prepared in accordance with the relevant regulations, must recommend that the document is adopted, and give their reasons. The Authority can then adopt taking into account the modifications that were recommended. In effect this means the Inspector's report is binding subject to minor changes (which the Authority has already consulted on). Alternatively the Authority can choose not to adopt the Plan.
- 3.14 The option of not adopting the Plan is not recommended. The Plan has been found sound subject to the recommended modifications. Adoption of the Plan provides the District with a comprehensive Local Plan framework. The Allocations and Strategy will then be given full weight in determining

¹ Further reference to Regulations within this report relate to the Town and Country Planning (Local Planning) (England) Regulations 2012 unless otherwise stated.

applications and appeal decisions. If the Plan is not adopted there is uncertainty over the planning framework for the District. In turn this will assist in facilitating unplanned development across the District and would represent poor strategic planning increasing the risk of inappropriate development.

- 3.15 In addition to the written document that has been examined the Council are required to produce a policies map. The policies map illustrates the geographical application of the Policies in the adopted development plan. There were minor changes to the Policies map consulted upon during the modification consultation stage. The final policies map can be viewed at [Appendix D](#).

Habitat Regulations Assessment and Sustainability Appraisal

- 3.16 The Local Plan Allocations needs to be supported by a Habitat Regulations Assessment (HRA) because of the District's proximity to a number of European designated sites. The HRA was updated (**APPENDIX F**) to take account of the main modifications and the minor modifications the Council had already agreed. The HRA concluded that there were no impacts arising from the changes that warranted amendment to the main and minor modifications. The final Inspector's Report did not materially alter the main modifications from those consulted upon previously meaning that there is considered no requirement to further update the HRA. The conclusion of the HRA process is that the Plan will have no significant effects alone or in combination upon European Sites and will have no adverse effect on the integrity of the European Sites.
- 3.17 The Sustainability Appraisal (SA) is a fundamental document for any Local Plan. It assists in ensuring the policies and allocations are appropriately developed when taking into account the agreed sustainability objectives. The final SA (**APPENDIX E**) focused on the main modifications and the minor modifications the Council had already agreed. The SA concluded that there were no impacts arising from the changes that warranted amendment to the main modifications and minor modifications.
- 3.18 The SA is accompanied by an adoption statement (**APPENDIX H**). The purpose of this Post adoption statement is to meet the legislative requirements of European Directive. Specifically the SA adoption statement includes information on:
- How sustainability considerations have been integrated into the Plan;
 - How the SA has been taken into account;
 - How the results of public consultation have been taken into account;
 - The reasons for choosing the Plan as adopted, in light of the other reasonable alternatives considered;
 - How any significant effects of implementation the Plan will be monitored.

1998 Saved Policies

- 3.19 In 2006 the Council decided to save a number of policies within the 1998 Local Plan (**APPENDIX I**). This was undertaken in consultation with the former Government Office for the West Midlands (GOWM). As part of the ADPD process there was a commitment to review the suitability of these saved policies. In doing so the policies that are contained within the 1998 Local Plan will be deleted upon adoption of the ADPD. This will not result in a policy vacuum because the policies have been reviewed and where feasible have been incorporated in the ADPD (where policies have been included in the ADPD they have been reviewed and updated to ensure they are fit for purpose).

Next steps

3.20 If Council adopt the ADPD, the Council are to:

- Make available:
 - The Local Plan (ADPD);
 - An adoption statement;
 - The Sustainability Appraisal and SA / SEA Adoption Statement; and
 - Details of where the ADPD is available for inspection and the places and times at which it can be inspected.
- Send a copy of the adoption statement to:
 - Any person who has asked to be notified of the adoption of the ADPD; and
 - The Secretary of State.

The Challenge period

3.21 Section 113(4) of the 2004 Act allows for an application to quash the development plan document to be made to the High Court within six weeks of adoption (the “legal challenge period”). The six weeks will commence from the 17th July 2019. During this period the full weight of the ADPD can be applied in decision making.

Local Plan Review

3.22 The Local Plan (Strategy and Allocations) is subject to a review which has already commenced. The review was established in the Local Plan Strategy and during the ADPD hearing sessions there was discussion regarding the Council’s review process. While the review process is under way (two rounds of public consultation have been undertaken) adoption of a revised Plan is not expected until 2022. Therefore the adoption of the ADPD is considered important to ensure the Council has a full suite of planning policy documents in place now.

3.23 Members should be aware that the Plan review will need to address the unmet need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). This was another area of length discussions during the hearing sessions. The Inspectors Report (**APPENDIX A**) recognises the efforts of the Authority in demonstrating extensive and ongoing engagement with neighbouring authorities (paragraph 11). However at paragraph 91 the Inspector is clear that the Authority need to address this through the Plan review.

Alternative Options	Cabinet decide not to approve the ADPD for adoption. As set out in paragraph 3.14 this is not recommended. Adoption of the Plan provides the District with a comprehensive Local Plan framework. The Allocations and Strategy will then be given full weight in appeal decisions. If the Plan is not adopted there is uncertainty over the planning framework for the District. In turn this will assist in facilitating unplanned development across the District and would represent poor strategic planning increasing the risk of inappropriate development.
Consultation	1. Consultation has informed the development of the ADPD. The consultation stages are set out in Appendix J .
Financial Implications	1. There are no financial implications from this report.

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 accompanies the ADPD (Appendix K).
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	The ADPD does not progress to adoption and the Council are left with an incomplete Development Plan.	The Council would need to operate with a part complete Local Plan.	Yellow
B	Following adoption the ADPD is legally challenged.	If the Plan is subject to legal challenge officers will review the challenge and if necessary instruct legal representation. As part of the ADPD Giles Cannock QC was instructed to provide the Council with legal support.	Yellow

Background documents:
 Local Plan Strategy 2015
 Statement of Community Involvement
 Local Development Scheme
 Regulation 18 consultation
 Regulation 19 consultation
 Regulation 19 Focused changes consultation

Relevant web links:
[Local Plan Strategy 2015](#)
[Statement of Community Involvement](#)
[Regulation 18 consultation](#)
[Regulation 19 consultation](#)
[Regulation 19 Focused changes consultation](#)

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Report to Lichfield District Council

by Mike Fox BA (Hons) Dip TP MRTPI
an Inspector appointed by the Secretary of State

Date: 25 April 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Lichfield District Local Plan Allocations 2008- 2029 Proposed Submission

The Plan was submitted for examination on 30 May 2018

The examination hearings were held between 4 and 13 September 2018

File Ref: PINS/K3415/429/7

Abbreviations used in this report

AA	Appropriate Assessment
AMR	Authority Monitoring Report
AONB	Area of Outstanding Natural Beauty
BC	Borough Council
BCC	Birmingham City Council
BDP	Birmingham Development Plan
CAJ	Court of Appeal Judgment
CJEU	Court of Judgment of the European Union
CPO	Compulsory Purchase Order
DC	District Council
DCLG	Department of Communities and Local Government (now the Ministry of Housing, Communities and Local Government)
dpa	dwellings per annum
DPD	Development Plan Document
DTC	Duty to Co-operate
ELCA	Council's Employment Land Capacity Assessment
EU	European Union
GBHMA	Greater Birmingham Housing Market Area
ha	hectare
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IR	Inspector's Report
KRS	Key Rural Settlement
LDC	Lichfield District Council
LPEG	Local Plans Examinations Group
LPS	Lichfield Local Plan Strategy
LDS	Local Development Scheme
MM	Main Modification
OAN	Objectively assessed housing needs
ORS	Other Rural Settlement
PPG	National Planning Practice Guidance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCC	Staffordshire County Council
SCG	Statement of Common Ground
SDA	Strategic Development Allocation
SHLAA	Strategic Housing Land Availability Assessment
SPD	Supplementary Planning Document
sq m	square metre
TBC	Tamworth Borough Council
<i>The Framework</i>	The National Planning Policy Framework (2012)

Non-Technical Summary

This report concludes that the Lichfield District Council Local Plan Allocations 2008-2029 Proposed Submission provides an appropriate basis for the planning of the District, provided that a number of main modifications [MMs] are made to it. Lichfield District Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the Examination Hearings. Following the Hearings, the Council prepared schedules of the proposed modifications. The MMs were subject to public consultation over a six-week period. In some cases, I have amended their detailed wording where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

Summary of Main Modifications
A new policy for an early review of the Plan and explanatory text.
An amendment to policy NT1 to include key development principles to the housing land allocation to the North of Tamworth .
An amendment to policy R1 to include key development principles to the housing land allocation to the East of Rugeley .
An amendment to policy OR7 to include key development principles to the housing land allocation at Watery Lane .
An amendment to policy EMP1 regarding protection of employment land including marketing and viability considerations and explanatory text.

Introduction

1. This report contains my assessment of the Lichfield District Local Plan Allocations 2008-2029 Proposed Submission in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate (DTC). It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (*the Framework*) (paragraph 182) makes it clear that, in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised *Framework* was published in July 2018. It includes a transitional arrangement in paragraph 214 whereby, for the purposes of examining this Plan, the policies in the 2012 *Framework* will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised Framework, the previous versions of the PPG apply for the purposes of this Examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 *Framework* and the versions of the PPG which were extant prior to the publication of the 2018 *Framework*.
3. The starting point for the Examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Lichfield District Local Plan Allocations 2008-2029 Proposed Submission, submitted in May 2018, is the basis for my Examination. It is not the same document that was published for consultation in March 2017. In particular, the sites allocated for housing in the earlier consultation plan, on land South of Highfields Road and on land East of Coulter Lane, both at Burntwood, are deleted from this Plan and remain part of the Green Belt.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act, the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the Examination Hearing sessions, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix.
5. Following the Examination Hearings, the Council prepared a schedule of proposed MMs. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

6. The Council must maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission Policies Map showing the changes to the adopted Policies Map that would result from the proposals in the submitted local plan. In this case, the submission Policies Map comprises the set of plans identified as

Schedule of Proposed Modifications Appendix A as set out in Examination Document CD1-3.

7. The Policies Map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, none of the published changes to the Policies Map go to the soundness of any of the policies and none of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map.

Scope of the Plan

8. The Lichfield District Local Plan Allocations 2008-2029 Proposed Submission, which I refer to as the Plan, is Part 2 of the Lichfield District Development Plan. The scope of the Plan is to enable the effective delivery of Part 1 of the Plan, the Lichfield District Local Plan Strategy 2008-2029 (LPS)¹, in particular allocations to meet the housing and employment growth requirements established in the LPS. Anything outside its scope, such as the strategic provisions of the LPS, is therefore not a matter for this Plan to address.
9. Regarding the issue of whether the regional housing need of the Greater Birmingham and Black Country areas was examined appropriately at the LPS Examination, the LPS was found sound and no successful High Court challenges were made to it within the prescribed statutory period. It is therefore unnecessary for me to consider matters addressed by the LPS.

Assessment of Duty to Co-operate

10. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
11. The Council's evidence² shows an extensive and continual process of engagement between the Council and its neighbouring local authorities throughout the local plan process, both in relation to Part 1 – the Lichfield Local Plan Strategy (LPS) – which was adopted on 17 February 2015 and Part 2 (this Plan). This process of engagement has also included other important statutory undertakers. For example, engagement has been active and ongoing in relation to cross-boundary housing needs with Birmingham City Council (BCC) and Tamworth Borough Council (TBC).
12. The LPS is the principal strategic element of the Council's Local Plan. This Plan gives rise to only limited strategic matters with cross-boundary implications (although there is a recognition that the forthcoming Local Plan Review will deal with major regional housing issues amongst other matters). Any future strategic issues are matters for a review of the LPS and therefore not a matter for this Plan³. The Statement of Common Ground (SCG) between BCC and Lichfield District Council (LDC), dated 30 July 2018⁴, commits LDC to address

¹ Lichfield District: Local Plan Strategy 2008-2029 (LPS); adopted 17 February 2015 [Examination Document CD1-32].

² LDC: Local Plan Allocations Duty to Co-operate Statement; May 2018 [Examination Document CD1-10].

³ LDC: Matter 1 Statement, paragraph 1.40 [Examination Document M1/1]

⁴ Examination Document CD6-23.

this regional housing issue through its emerging LPS Review, which is to be submitted in line with Birmingham Development Plan (BDP) policy TP48.

13. Regarding progress in addressing Tamworth's unmet housing needs, it is clear from the SCG between TBC, North Warwickshire BC and LDC (dated 2 and 4 September 2018)⁵, that there has been demonstrable commitment shown to collaborate under the DTC to address Tamworth's unmet housing needs. It is important to understand, however, that DTC is not a duty to agree.
14. Other examples of joint working under the aegis of DTC include delivery of some of TBC's unmet housing growth; cross-boundary employment provision, including the need to assist TBC with land for employment beyond Tamworth's boundaries; addressing the future of the former Rugeley Power Station; managing the Cannock Chase Area of Outstanding Natural Beauty (AONB) on a partnership basis; and addressing cross-boundary transport, water and flood risk issues.
15. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan in accordance with the requirements of paragraphs 178-181 of *the Framework* and that the Duty to Co-operate has therefore been met.

Assessment of Soundness

Main Issues

16. Taking account of all the representations, the written evidence and the discussions that took place at the Examination Hearing sessions, I have identified eight main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Is the Plan justified, effective and consistent with the LPS (Part 1 of the Plan) and national policy, particularly in relation to housing provision?

Sustainability Appraisal and Habitats Regulation Assessment

17. The Sustainability Appraisal (SA) for the Plan was prepared in-house and the submitted SA documents demonstrate that the Plan has been robustly tested both in relation to the SA and Habitats Regulation Assessment (HRA)⁶.
18. It is necessary for the SA to demonstrate clearly that there were no significant flaws in the SA process, and that all the realistic alternatives have been considered, together with the reasons for discounting them in favour of the preferred allocations in the Plan. The selection of reasonable alternatives was carried out in some detail and potential alternatives were considered for both sites and policies⁷; in particular, the SA used a full scoring matrix which is sub-divided by settlements⁸. The SA also explains the reasons for the

⁵ Examination Document EX5.

⁶ See Examination Documents CD1-20 to 28.

⁷ LDC: Note 1: Sustainability Appraisal [Examination Document EX30].

⁸ See Examination Document CD1-26, page 211 onwards.

preferred alternatives for housing, employment and gypsy sites, involving a thorough process of iteration and consultation.

19. However, the key decisions in relation to reasonable alternatives for the distribution of development in Lichfield District, having regard to the SA, were made at the strategic stage, during the preparation of the LPS. This has considerably influenced the scope of the alternatives to be considered for this Plan, given its role as a Part 2 Local Plan.
20. Regarding effects on biodiversity, the Council produced a note addressing the impact of the proposed development at the former Rugeley Power Station on the Cannock Chase Special Area of Conservation (SAC) and whether further mitigation measures were required⁹. An additional note, prepared in consultation with Natural England, confirms that the appropriate assessment (AA) which has already been undertaken by the local planning authority and covered in the Council's HRA document¹⁰, takes account of the Sweetman 2 Court of Judgment of the European Union (CJEU), with specific reference to the potential effects of a substantial new brownfield development on the site of the former Rugeley Power Station¹¹.
21. The HRA document also states that the submitted Plan will have a lesser impact on the Cannock Chase SAC than the earlier Local Plan document consulted on in March 2017¹², as it reduces the cumulative amount of development within the 8-15 kilometres zone of influence¹³ without the need for mitigation.
22. I am therefore satisfied, taking into account the evidence before me, that the Council has taken into account the relevant aspects of EU Directive 2001/42/EC, and the Sweetman 2 CJEU Judgement. It is also clear that the Plan has been robustly tested both in relation to the SA and HRA.

Is the potential of the allocated sites and other opportunities justified and consistent with the overall housing requirement of the LPS and national policy?

23. The LPS makes provision for 10,030 dwellings over the plan period (2008-2029). This figure includes 500 dwellings to meet the needs arising from Rugeley and the same amount in relation to Tamworth. Table 4.1 of the submitted Plan shows that the overall quantum of housing provision over the plan period, arising from completions, commitments, strategic development allocations (SDAs) and additional local plan allocations, amounts to 11,350 dwellings, or an excess of 13.16% over the LPS provision. A total of 5,071 dwellings arises from Local Plan allocations, a figure which addresses the residual needs of the District until 2029.
24. In addition, the windfall allowance, which is estimated at 55 dwellings per annum (dpa), is a conservative estimate based on previous completions as set out in the Authority Monitoring Report (AMR) and I therefore do not consider it to be unreasonable.

⁹ See Examination Document CD3-59.

¹⁰ Examination Document CD1-28.

¹¹ Examination Document EX 40.

¹² Examination Document CD1-13.

¹³ Examination Document CD1-28, HRA Conclusions, page 10.

25. In considering whether the excess ensures sufficient flexibility over the remainder of the plan period, there is no legal requirement for such a buffer. However, paragraph 14 of *the Framework* makes clear that local plans need to have sufficient flexibility to adapt to rapid change and therefore the provision of a buffer is good practice. A buffer of 13.61% exceeds the non-implementation rate which is estimated at 5%. I am also satisfied the buffer is consistent with paragraph 47 of *the Framework*, which expects local planning authorities to boost significantly the supply of housing.
26. No robust calculations for a larger buffer than the Council's 13.61% were submitted during the Examination. The need to respond to the Greater Birmingham Strategic Growth Study should not affect this Plan for reasons I explain later in this report. The figure of 20%, as suggested by the Local Plans Examination Group (LPEG), is not national policy.
27. From the evidence which I have summarised, I conclude that the potential of the allocated sites and other opportunities for housing is justified and consistent with the overall housing requirement in the LPS and accords with national policy.

Is the proposed distribution of new homes consistent with the spatial strategy and principles set out in the LPS?

28. The proposed distribution of new homes in the District of Lichfield over the plan period is set out in Table 4.1 of the submitted Plan. Whether the proposed distribution departs significantly from that shown in the equivalent table (Table 8.1) in the LPS, to the extent that the distribution in the Plan could be viewed as unsustainable and generally inconsistent with the LPS, depends on the significance of the following key considerations:
 - (i) The quantum proposed for the second most sustainable settlement in the District – Burntwood – has been reduced from 1,350 dwellings in the LPS to 1,054 dwellings in the submitted Plan, i.e. a reduction of 296 dwellings, which amounts to Burntwood's provision reducing from 13% to 9% of the District-wide housing provision.
 - (ii) There has also been a reduction – albeit lower than for Burntwood – in the proportion of housing for the most sustainable settlement in the District – Lichfield City – from 38% to 35% of the District-wide housing provision.
 - (iii) There is a corresponding increase in the Plan's housing provision in the Rural Settlements, i.e. in the least sustainable areas of the District, from 28% to 35% of the District-wide housing provision. Also, within this rural total the housing provision for the Key Rural Settlements (KRS), i.e. the least unsustainable of the rural settlements, has fallen from 28% to 21%, whilst the least sustainable of all categories – Other Rural Settlements (ORS), which were included within a broader sub-total within Table 8.1 – has increased to 12.5% of the District-wide housing provision.
29. Does the cumulative impact of these changes fundamentally alter the strategy for the Plan, as set out in the LPS? Does it result in a significantly less

sustainable pattern of development, especially taking into account the impact on the second largest settlement of Burntwood?

30. A key material consideration which has occurred since the adoption of the LPS has been the Secretary of State's determination of a planning appeal, which granted outline planning permission for up to 750 dwellings at Watery Lane, Curborough, located adjacent to the City of Lichfield¹⁴. This scheme, which is technically outside the City boundary, appears in Table 4.1 under the ORS heading, rather than as part of the city's total.
31. It is clear from reading the Secretary of State's decision letter and the Inspector's Report (IR) that the geographical reality is that the proposed development on the site will function as an extension of the urban area of the City, as opposed to functioning as a stand-alone rural settlement. The proposed development will also be connected to and integrated with the City by its proximity to the urban area and by the proposed delivery of sustainable transport measures.
32. The evidence points to the Watery Lane site being an extension of the City for the purpose of considering the distribution of proposed housing across the District. On this basis Table 4.1 could be amended to include Watery Lane as part of the City's housing provision, following the provision of the proposed infrastructure improvements, including sustainable transport links (pedestrian routes, cycleways and bus services), to link the scheme to the rest of the City. This recalculation was discussed at the Hearing sessions.
33. If Site OR7 were included within the Lichfield City housing provision, this would result in the proportion of dwellings provided for in Lichfield City being higher than that shown in the LPS, with the proportion in the two most sustainable settlements in the District, Lichfield and Burntwood, working out at 51%, which is the same as in the LPS. The inclusion of Watery Lane within the Lichfield City total would also reduce the ORS share of housing from 12.7% to 6%, which is comparable to that in the LPS.
34. The reduction in the percentage of new homes apportioned to Burntwood is due principally to the Council's decision to retain the Green Belt around the settlement and not release any of it for development. I address the issue of the Green Belt below (Issue 2). However, it is clear that the Plan still makes significant provision for housing at Burntwood; 15 sites are allocated within the settlement, primarily on brownfield sites which are generally well related to the town's facilities, whilst the overall number of new homes is only 296 less than in the LPS and still 9% of the total provision for the District.
35. I therefore conclude, on the basis of the above considerations, that the focus on urban areas for new growth is generally consistent with the strategic framework as set out in the LPS, with both the LPS and this Plan making provision for 51% in the two most sustainable settlements when their housing totals are combined.

¹⁴ Ref APP/K3415/A/14/2224354 – Secretary of State's decision to allow the appeal for up to 750 dwellings and a range of other facilities, infrastructure and landscaping at Watery Lane, Curborough, Lichfield; dated 13 February 2017.

36. Moreover, the emphasis on building new homes on previously developed land (PDL) in Burntwood, ensures the complete protection of the Green Belt around the settlement, resulting in positive sustainable outcomes. Taking all these considerations together, it is clear that the proposed distribution of new homes within the District accords with the principles set out in the LPS.

Does the Plan provide sufficient evidence to demonstrate that the proposed new homes can be implemented over the plan period?

37. The key considerations include whether the Plan and the supporting evidence shows in sufficient detail that the allocated sites would be deliverable and/or developable over the plan period; whether the track record of housing delivery over recent years supports the rate of delivery required; and whether it is realistic to place such reliance on a limited number of large sites.
38. The Council's Strategic Housing Land Availability Assessment (SHLAA)¹⁵, which has been prepared with the involvement of a panel of local housebuilders, and follows a detailed site selection process, shows, on a site-by-site basis, that the potential exists to deliver the housing requirements of the Plan over the plan period. It is not therefore necessary to require a site-by-site trajectory in addition to the year-by-year trajectory which is included in the Plan¹⁶.
39. In relation to the track record of dwelling completions in the District, the 2018 Authority Monitoring Report (AMR)¹⁷ shows that since the start of the plan period (2008), there have been 2,755 net completions, i.e. at a rate of 275 dpa. However, the last year (2017/18) has shown an acceleration to 552 net completions, which exceeds the LPS requirement of 478 dpa. The AMR also shows that the housing completion rate in the District has increased year-on-year since 2011/12 (with the one exception of 2015/16).
40. The critical consideration is the likelihood of this level of housing provision being maintained for the rest of the plan period, given the reliance of the housing supply on the size of the contribution of the large sites. These include four large sites, at Fradley (80 units plus an employment land allocation); Arkall Farm (1,000 units), the former Rugeley Power Station (800 units) and at Watery Lane (750 units), which together have the potential for 2,550 dwellings. There is also a total of 2,565 units allocated on seven Strategic Development Allocations (SDAs), and one Broad Development Location, ranging in size from 722 down to 49 units¹⁸. Together these 12 sites, totalling 6,417 units, form the bulk of the Council's estimated completions to arise from the largest housing allocations in the Plan.
41. Planning applications have been made in relation to most of these sites, with development now underway on five of them, together with a combination of planning applications, resolutions to grant subject to a Section 106 Agreement and pre-application discussions on the remainder of these sites. The sites at Cricket Lane, south of Lichfield, East of Burntwood Bypass and Deanslade Farm, Lichfield, are expected to deliver in excess of their housing allocation in the Plan. I therefore regard the SDA total as a conservative estimate. I

¹⁵ Examination Documents CD3-28 and CD5-10.

¹⁶ Submitted Plan; Appendix D: Housing Trajectory; page 99.

¹⁷ Examination Document CD6-13.

¹⁸ See Examination Document CD3-36 Housing Supply Update; October 2017.

consider that the proposed rate of delivery of these sites based on the detailed evidence submitted to the Examination is realistic.

42. The largest housing allocation in the Local Plan Strategy is the SDA at Fradley, a KRS, in close proximity to Lichfield, for 1,302 dwellings. Despite slower than expected progress to date, the SDA is already under construction, and a significant proportion of its housing is identified in the SHLAA as likely to come forward within 10 years. Furthermore, no major constraints to its continued development during the plan period were identified, either in the SHLAA, in the written evidence or at the Examination Hearing sessions. In support of the Plan, the SHLAA identifies around 285 dwellings under construction with a further 534 dwellings with outline consent. I therefore consider it is realistic to assume that the entire SDA will be implemented within the plan period.
43. I will now deal with the deliverability of the three largest housing allocations, at Arkall Farm, Former Rugeley Power Station and Watery Lane (with a combined estimated yield of 2,550 dwellings), and whether they are likely to be delivered in their entirety within the plan period.
44. Arkall Farm, North of Tamworth, for 1,000 dwellings: The full implementation of the scheme which has outline planning approval is linked to key trigger points associated with highways improvements. The initial 300 dwellings can be implemented without the need for any major highways improvements. However, the SCG¹⁹ commits to the delivery of the site within the plan period.
45. Additional evidence²⁰ shows that the intention of the Council and the landowners is to progress a 'monitor and manage' regime from the outset, which includes active plans for modal shift. A note from Staffordshire County Council (SCC), the highway authority²¹ states that the authority is working positively and proactively to establish a costed engineering scheme (including land acquisition). Compulsory Purchase Order (CPO) powers may be necessary to ensure a satisfactory highways solution. However, from the evidence submitted by the principal parties, I consider there is no insurmountable reason why the full complement of 1,000 dwellings cannot be completed by the end of the plan period.
46. **MM3** amends policy NT1 by clarifying the expectations of the masterplanning of this allocation in order for the Plan to be positively prepared and effective. In particular, it refers to the range of uses, open spaces and transport routes on the masterplan, and their relationship both to each other and to the existing development in the vicinity of the site. This is necessary for the effectiveness of the Plan and accords with the requirement in the PPG to make clear what is intended to happen in the area, where and when this will happen and how it will be delivered²².
47. Former Rugeley Power Station, for 800 dwellings: The allocation, on the grounds of a former power station, is affected by multiple constraints, including the need to demolish the existing structures and undertake an extensive programme of remediation. Flood risk and ecological impact also

¹⁹ SCG between LDC and Barwood Development Securities in relation to Arkall Farm; 31 July 2018 [Examination Document CD6-17].

²⁰ Note on Arkall Farm by LDC and Barwood Strategic Land; 14 September 2018 [Examination Document EX34].

²¹ SCC Note on Arkall Farm; 20 September 2018 [Examination Document EX54].

²² PPG Ref ID:12-002-20140306: *What should a local plan contain?*

need to be addressed. A commitment to developing the site by 2029 for a minimum of 800 dwellings as part of a mixed development is included in a SCG between the Council and the site owners²³ and in a further note²⁴ submitted during the Examination.

48. The demolition contract, which was validated in July 2018, is structured to enable concurrent remediation activity, and is programmed for completion within three years. The note also advises that the Lichfield portion of the site (which is divided between LDC and Cannock Chase District Council (DC)) is largely outside the demolition zone, enabling early delivery of housing units. Most of the site is located within Flood Zone 1, and ecological mitigation is already underway.
49. Recent market testing shows there is limited competition within the Rugeley housing market and little risk of saturation. A joint Development Brief Supplementary Planning Document (SPD) has been adopted by both LDC and Cannock Chase DC in February 2018²⁵ with a planning application to be submitted following community consultation for a development along the principles of a 'garden community'. The programmed demolition and remediation in parallel means that it is envisaged that up to 200 dwellings could be completed within five years, whilst both the developers and the Council are confident that the site will be capable of exceeding the minimum of 800 dwellings required by the Plan.
50. Based on the above evidence, I am satisfied that it is likely that at least 800 dwellings would be completed within the plan period.
51. **MM4** amends policy R1 by clarifying the expectations of the masterplanning of this allocation. This is necessary for the same reasons which are set out in relation to MM3 above.
52. Watery Lane, for up to 750 dwellings: Planning permission for the development of this site was granted by the Secretary of State in February 2017, following an Inquiry²⁶. Issues of implementation, including whether the site would be completely developed within the plan period, were considered by the Inquiry Inspector in his IR and by the Secretary of State. No significant constraints were identified in these reports, and the IR (paragraph 299) states that the appeal scheme is deliverable, with an estimate of around a quarter of the total being completed within five years.
53. A High Court Challenge to the decision, which was dismissed in October 2017, explains the slow progress on this site since the proposed development was granted planning permission. Since then there has been significant progress on bringing the site forward for development, including monthly stakeholder meetings and commencing formal marketing, based on two outlets (one at the north end of the site with access from Netherstowe Lane and one at the south end with access from Watery Lane). I also note there is considerable developer interest in the site. Infrastructure works are due to start early in 2019,

²³ SCG between LDC and Rugeley Power Ltd in relation to the former Rugeley Power Station; 16 August 2018 [Examination Document EX4].

²⁴ Note on Rugeley Power Station by LDC and ENGIE; 14 September 2018 [Examination Document EX37].

²⁵ Examination Document CD2-1.

²⁶ Ref APP/K3415/A/14/2224354 – Secretary of State's decision to allow the appeal for up to 750 dwellings and a range of other facilities, infrastructure and landscaping at Watery Lane, Lichfield; dated 13 February 2017.

including relevant Section 278 highways submissions, aiming to start housebuilding by mid-2019 with the first residential completions by early 2020. A phasing plan has already been submitted as required by planning condition.

54. On the basis of the evidence, including further detailed statements submitted during the Examination²⁷ and the discussions at the Hearing sessions, it is my view that this site is now "up and running" and the allocation at Watery Lane is likely to be implemented in full within the plan period.
55. Finally, **MM5** amends policy OR7 by clarifying the expectations of the masterplanning of this allocation. This is necessary for the same reasons which are set out in relation to MM3 above.
56. It is my conclusion, based on the above evidence, that the implementation rates envisaged for all three of these large sites are realistic, and that it is therefore reasonable for the Plan to rely on these allocations to contribute significantly towards the total housing provision for the District of Lichfield over the plan period.

Does the Plan demonstrate a deliverable five-year supply of housing sites?

57. Paragraph 47[2] of *the Framework* requires local planning authorities to identify and maintain a five-year supply of deliverable housing sites. The seriousness of this requirement is underlined in paragraph 49 of *the Framework*, which states that the relevant policies (in a local plan) shall not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
58. The Council has produced a five-year housing land supply paper²⁸ which concludes that at April 2018, Lichfield had 5.6 years' housing supply. In brief, the Council's calculation is based on the LPS housing requirement for the plan period of a minimum of 10,030 dwellings and is summarised as follows:
 - (i) The five year housing requirement takes into account a significant shortfall in completions from the start of the plan period until 2018, to be made good over the whole of the remaining plan period (i.e. the 'Liverpool' method), with an addition of a 20% buffer in line with the requirement in paragraph 47 [2] of *the Framework*, as there has been a persistent record of under-delivery. The Council's calculations give an annual requirement on this basis of 792 dwellings²⁹.
 - (ii) The net deliverable capacity of sites within the five year calculation is calculated as 4,449 dwellings³⁰.
 - (iii) The straightforward calculation of Lichfield's five year housing supply is therefore $4,449 \div 792 = 5.62$ years.

²⁷ Barton Willmore: Watery Lane Allocation – Response to the Inspector's Questions; 14 September 2018 [Examination Document EX38].

²⁸ LDC: Five Year Housing Land Supply Paper; July 2018 [Examination Document CD 6-12].

²⁹ Examination Document CD6-12, Figure 2.

³⁰ Examination Document CD6-12, Figure 3.

59. The assumptions used by the Council to calculate a housing land supply in excess of five years were debated at the Examination Hearing sessions. Based on the evidence submitted, I consider that the 20% buffer based on the Council's shortfall in housing completions over the previous 10 years is justified.
60. The adoption of the 'Liverpool' approach, which spreads out the delivery to compensate for the shortfall over the whole of the remainder of the plan period (as opposed to the 'Sedgefield' method which makes good the shortfall over the next five years) was supported by the appeal Inspector for Watery Lane. In my view it is the appropriate method for Lichfield, where a significant proportion of the Plan's housing total is programmed to come from the three large sites which I have addressed above, all of which require substantial investment in infrastructure and in the case of the former Rugeley Power Station, considerable remediation. This will mean that delivery is likely to take place after a few years rather than in the very short term, justifying the use of the 'Liverpool' method to make up the shortfall.
61. Regarding the deliverability of individual sites, evidence shows that completions on some sites, e.g. land at Tuppenhurst Lane, Handsacre and at Spode Avenue, Adjacent Hayes Meadow Primary School, (the latter due to a Lands Tribunal) are likely to be delayed with lower annual completion rates, below the Council's detailed estimates in its five-year supply schedule³¹. However, evidence also shows that other sites, such as St John's Lane and Cricket Lane, both in Lichfield City, are likely to be delivered more quickly than their projected targets, ahead of programme. Moreover, the SHLAA, which sets the basis for the Council's evidence on delivery rates, is endorsed by a Panel which includes a representative cross section of the housebuilding industry³², and the information is generally robust.
62. The Council's estimates for windfall sites, at 55 dpa, is based on a suitably cautious application of both past rates of delivery, as evidenced in the AMR, and its assessment of future urban capacity. I consider on this basis that the Council's evidence complies with the requirement in paragraph 48 of *the Framework*, that local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that such sites have become available in the local area and will continue to provide a reliable source of supply.
63. The assumed non-implementation rate of 5% used by the Council is in line with the high implementation rate of planning permissions, and the Council produced evidence to demonstrate this. The Council's figure for non-implementation therefore appears reasonable and I have no grounds to take a different view.
64. Based on the above considerations, I conclude that the evidence demonstrates that the Plan is able to provide a five-year supply of deliverable housing sites for Lichfield District.

³¹ Examination Document CD6-12, Appendix B.

³² Evidence given on Day 2 of the Hearing sessions by the Council and supported by other parties at the Hearing.

Does the Plan provide for the range and types of housing which accord with the LPS aims and targets?

65. Paragraph 50 of *the Framework* requires local planning authorities to plan for a mix of housing to meet the differing needs of groups within the community. LPS policies H1 and H2 address these matters. The Council's evidence shows that the issue of self-build housing, which was debated at the Hearings, is already being considered at the review issues stage³³. In accordance with legal requirements, the Council has created a register of individuals and groups who are seeking to acquire serviced plots of land, and the evidence shows that 35 individuals were on its register³⁴ and to date had granted 24 self-build exemptions. However, the absence of a bespoke provision within the Plan does not render it unsound. I agree, however, that a self-build policy should be considered for inclusion in the LPS Review.
66. The Council has produced a Gypsy and Traveller Accommodation Assessment. It supports LPS policy H3, which identifies a need for 14 residential and 5 transit pitches within the plan period. LPS Policy H3 provides a criteria-based approach to gypsy and traveller accommodation, and the Council is also engaging with neighbouring authorities under DTC to seek assistance in accommodating its unmet need for gypsy and traveller sites. The explanatory text to policy H3 in the LPS states (paragraph 8.23) that the identification of specific sites will be a matter for the Local Plan Allocations Document, i.e. this Plan. It does not, however, do this, and this is a serious omission in the Plan, both in relation to the requirement set out in the LPS and also in relation to national policy.
67. The Plan therefore is not sound as submitted. However, a modification has been put forward by the Council, committing itself to an early review of the Plan. I consider that it would be disproportionate to hold up the rest of the Plan to resolve the omission of gypsy and traveller sites at this late stage, and that the proposed modification for the early review of the Plan (**MM1 & 2** – see Issue 2 below), which is programmed in its Local Development Scheme (LDS) for submission in 2020, needs to address this important issue.
68. Regarding housing for the elderly, policy H1 of the LPS makes provision for a range of housing needs, including supported housing, care homes and lifetime homes standards. As such there is no need for a separate policy for elderly persons' provision in this Plan.
69. On the basis of the evidence summarised above, subject to the MMs requiring an early review of the Plan, I consider that the Plan makes adequate provision for delivering the range and types of housing in line with the LPS aims and targets within the plan period.

Issue 1 - Conclusion

70. From the evidence before me and from the discussion that took place at the Examination Hearing sessions, I conclude that, subject to the above

³³ Examination Documents EX17 and CD6-21].

³⁴ Examination Document EX17.

modifications, the Plan is justified, effective, consistent with the LPS strategy (Part 1 of the Plan) and with national policy.

Issue 2 – Is the Plan consistent with national policy in respect of the Green Belt?

Do "exceptional circumstances" exist to justify further alterations to the Green Belt boundaries?

71. Paragraph 79 of *the Framework* explains that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open; and that permanence and openness are the essential characteristics of Green Belts. It therefore follows, as paragraph 82 of *the Framework* states, that Green Belt land can only be released for development in "exceptional circumstances".
72. The Green Belt covers about half the area of the District, to the south and west of a line which is drawn from just east of Rugeley to the north, skirting the eastern edge of Lichfield City and extending to Fazeley in the south-east. It constrains the growth of Lichfield City on three sides (north-west, west, south and south-east) and stops the outward growth of Burntwood in all directions.
73. In addition to proposing three SDAs to the south of Lichfield City on land formerly in the Green Belt, at least in part, and which now have planning permission, the LPS set out housing land requirements for Burntwood, including a SDA on land east of Burntwood Bypass, for development up to 375 dwellings (policy Burntwood 5). The 2017 Consultation Version of the Plan, based on the strategic parameters of the LPS, proposed new housing on the edge of Burntwood within the Green Belt, on land South of Highfields Road, for 250 dwellings, and a smaller allocation to the east of Coulter Lane, on the western edge of Burntwood for 80 dwellings (both within the Green Belt)³⁵.
74. In the submitted Plan, however, both of these allocations have been deleted, resulting in an intact Green Belt but reduced overall housing provision for Burntwood.
75. I have already concluded under Issue 1 that the proposed housing distribution in the submitted Plan is justified in relation to Burntwood and that no further housing allocations are therefore necessary. Although some representors would wish that further housing allocations in the Green Belt were made in the Plan, in the light of my conclusions in Issue 1 there is no need. I therefore conclude that the "exceptional circumstances" do not exist to justify the alteration of the Green Belt boundaries to enable new development on the edge of Burntwood in advance of a future review of the LPS.
76. In addition to the above considerations, the Green Belt is an essential component of the spatial distribution of development in the District as set out in the LPS Key Diagram and is also an integral part of the more extensive Birmingham Green Belt. The Green Belt is therefore a key element in the sustainable balance of development in the District.

³⁵ Examination Document CD1-13.

77. The key focus highlighted during the Examination concerns the provision of new homes within the second most sustainable settlement of Burntwood. The proportion of new homes here is reduced in relation to the LPS total. The Plan, however, does make provision for new homes in Burntwood. Its population would still grow by over 1,000 based on the implementation of these new homes, whilst the loss of new dwellings in relation to the 2017 Consultation Plan is only 296. The provision of new homes in the Plan would result in additional (not less) demand for more services and facilities in Burntwood.
78. In view of the overall requirements for housing and other uses both in terms of overall quantum and its sustainable distribution which I consider to be broadly in line with the LPS, I do not consider that any further areas of Green Belt land release for development can be justified at this time.
79. On the basis of these considerations I do not consider that the necessary "exceptional circumstances" have been demonstrated to exist in order to justify deleting parts of the Green Belt, outside the sites to the south of the City of Lichfield which I have explained above, in advance of a review of the LPS.

Should the Plan provide clearer guidance on Green Belt infill boundaries, as provided for in LPS Core Policy 1?

80. LPS policy CP1 allows for limited infill development in Green Belt villages, with appropriate infill boundaries being determined through this Plan. Subsequent to the LPS adoption, however, as part of the preparation of this Plan, the Council undertook two comprehensive Green Belt assessments. The latest of these, the Supplementary Green Belt Report³⁶, explores the policy requirements set out in the LPS and comes to three main conclusions. These are: (i) no infill boundaries should be proposed in the Plan (i.e. this Plan)³⁷; (ii) the principle and identification of any such infill boundaries should be considered through a future comprehensive Green Belt Review; and (iii) support should be given to any communities seeking to identify appropriate infill boundaries through community-led plans.
81. I consider that these recommendations, based on careful consideration in the light of the relevant material considerations, are justified and appropriate for the future planning and management of the Green Belt in the District. The most appropriate time to consider the potential infill development within villages in the Green Belt would be at the time of the comprehensive Green Belt Review, which, subject to **MM1** and **MM2** would be part and parcel of the LPS Review. The above-mentioned Supplementary Green Belt Report also argues that the most appropriate forum for considering infill boundaries is through the neighbourhood plans. I consider that both these approaches are justified.

Issue 2 - Conclusion

82. From the evidence before me and from the discussion at the Examination Hearing sessions, I conclude that the "exceptional circumstances" required in

³⁶ LDC: Local Plan Allocations Supplementary Green Belt Report; November 2016 [Examination Document CD3-56].

³⁷ Ibid, Section 4.4, second paragraph.

the Framework do not exist to justify the need to remove any Green Belt land in addition to the areas already agreed as part of the LPS and identified on the Policies Map in the submitted Plan, (i.e. to the south of Lichfield City). I also conclude that there is no need to provide clearer guidance on Green Belt infill at this time in advance of the LPS Review.

Issue 3 – How should the Plan respond to the housing shortfall in the Greater Birmingham Housing Market Area and also from the neighbouring Borough of Tamworth?

Greater Birmingham's Housing Shortfall

83. The unmet housing needs of Greater Birmingham were considered at the LPS Examination, where a MM required the LPS to recognise the need for collaborative working with Birmingham City Council (BCC) and other affected authorities. Since the LPS Examination the Council has been actively involved in DTC engagement in relation to the Greater Birmingham Housing Market Area (GBHMA) housing shortfall. Paragraph 4.6 of the LPS makes it clear that matters relating to the GBHMA shortfall should be addressed by an early or partial review of the Plan.
84. Since the LPS Examination, the Birmingham Development Plan (BDP) has been examined and adopted. The BDP identifies a housing need for Birmingham of 89,000 dwellings, with a shortfall of 37,900 dwellings over the period 2011-2031. A SCG between BCC and LDC³⁸ represents a joint commitment by the two authorities to deal with this matter through a local plan review, in line with BDP policy TP48.
85. In line with the LPS, **MM1** and **MM2** commit the Council to carry out an early review of the Plan that will be submitted to the Secretary of State for examination by the end of December 2021. I support the Council's commitment to use its best endeavours to submit the review before that date. Although the above-mentioned SCG suggests an earlier date, BCC has not objected to LDC's suggested date in its response to the MMs consultation and I am aware that the date aligns with the adopted South Staffordshire Local Plan, policy SAD1, which also commits that Council to a local plan review by the end of 2021.
86. Overall, I am satisfied that the review date provides an acceptable balance between certainty and flexibility to enable the Council to deliver the required quantum of housing in accordance with the housing needs identified in the GBHMA.
87. It is also necessary, for the effectiveness of the Plan, for **MM1** and **MM2** to refer to the need for an evidence-based assessment of highways infrastructure needs in partnership with the highways authorities.
88. The LPS Review has now formally commenced, with the publication of a Scope, Issues and Options Document³⁹ which underwent public consultation between 30 April and 11 June 2018. It is essential, however, that the momentum already established in the LPS Review should continue in the interests of the

³⁸ Examination Document CD6-23; 30 July 2018.

³⁹ Lichfield District Local Plan Review 2020-2036: Scope, Issues and Options; April 2018.

effectiveness of the Plan and the urgent needs of the GBHMA to meet its unmet housing need. I consider that the proposed timetable for a review is sufficiently realistic to avoid the likelihood of slippage, so that the date in the above-mentioned MMs enables the Plan to be effective.

Tamworth's Housing Shortfall

89. The LPS IR states that the additional unmet housing need arising in Tamworth would be dealt with in an early or partial review of the LPS, or through this Plan⁴⁰. It is clear from the Council's engagement with the GBHMA, and from the discussions at the Examination Hearing sessions, that Tamworth's needs should now be considered within the GBHMA context rather than as a separate one-off arrangement with Lichfield District, and that the most effective way to achieve this is through the LPS Review as set out in **MM1** above.
90. It has already been decided that some of Tamworth's housing needs, around 500 dwellings, will be met by the development of Arkall Farm, immediately to the north of the Borough boundary of Tamworth. This would go some way to address the urgency of Tamworth's needs. However, although land immediately to the north of Tamworth would appear to be the most logical area of search, there are significant infrastructure issues necessitating a new study, and this is best undertaken as part of a comprehensive review of the Plan rather than through a series of uncoordinated planning applications.

Issue 3 - Conclusion

91. From the evidence before me and the discussion at the Examination Hearing sessions, I conclude that the most appropriate way for the Plan to respond to the housing shortfall in the GBHMA is through a review of the LPS, as outlined in **MM1**, and that the review should also address the shortfall from the neighbouring Borough of Tamworth as part of the GBHMA. The Plan is therefore, subject to **MM1** and **MM2**, justified, effective and in line with national policy

Issue 4 – Are the Plan's policies and provisions for the protection and enhancement of its environmental, landscape, biodiversity and heritage assets justified and in accordance with national policy?

92. The LPS sets out policies for the natural environment (core policy 13 and policies NR1- NR9). I am satisfied that the Local Plan contains a comprehensive set of policies to deal with landscape, biodiversity and environmental assets.
93. The LPS also contains a wide-ranging policy – Core Policy 14 – which sets a framework for the protection of the built and historic environment of the District.
94. Policy BE2 deals with the built and historic environment. It is supported by Historic England and is broadly in line with national policy. It also complements LPS policy BE1.

⁴⁰ IR paragraph 11 [Examination Document CD6-3].

95. The protection of local green space is no longer covered by saved policy C9. Whilst a number of requests were made for the designation of LGS, these did not meet the criteria for designation set out in paragraph 77 of *the Framework*. I am satisfied that the natural resources policies of the LPS and this Plan provide for the protection of the important landscapes, greenspaces and habitats in the District. Neighbourhood Plans provide a further opportunity to consider the designation as LGS of other green spaces of value to local communities.

Issue 4 - Conclusion

96. In view of the evidence before me and the discussions at the Examination Hearings, I conclude that the Plan's provisions for the protection and enhancement of its environmental, landscape, biodiversity and heritage assets, are justified and in accordance with national policy.

Issue 5 – Is the Plan effective in delivering economic prosperity, allocating employment land, protecting existing employment areas, setting a realistic framework for achieving a satisfactory housing/ employment balance and promoting retail and office development, in line with the LPS and national policy?

With reference to policy EMP1, are the expectations in the Plan for employment growth soundly based on a coherent framework and consistent with the requirements of the LPS?

97. The LPS spatial strategy includes employment development in accessible and sustainable locations. The Council's Employment Land Capacity Assessment (ELCA)⁴¹ concludes that there is sufficient capacity within the employment areas of Lichfield City, Burntwood and Fradley to meet the District's requirements as set out in the LPS. The document provides a thorough and detailed evidence base to support this conclusion.
98. LPS core policy 7 specifies that a further 10 ha needs to be allocated in this Plan to ensure flexibility in the provision of employment land, and policy EMP1 identifies sufficient land to meet this requirement. There is therefore no requirement to allocate additional land and sites for employment development in the District.
99. Regarding the employment needs of Tamworth, policy SS1 of the adopted Tamworth Local Plan⁴² states that a minimum of 14 ha of employment land will need to be delivered outside the Borough within locations which assist the delivery of Tamworth's strategy and those of its neighbours. The ELCA identifies that approximately 6.5 ha can be accommodated within the District, close to the Tamworth Borough boundary which, when added to 7.5 ha which has been permitted within North Warwickshire, means that there is sufficient employment land to meet Tamworth's requirements on suitable locations.
100. The three employment sites identified in policy EMP1 (Site F2, south of Fradley Park (18.2 ha); Site OR6, on land east of the A38 (5.1 ha); and Site A6, on land at Main Street Alrewas (0.4 ha)) are all in accessible and sustainable

⁴¹ Examination Document CD3-43.

⁴² Examination Document CD6 -19.

locations, and the evidence shows that they are all deliverable within the plan period. In addition, the largest site (Fradley Park) is suitable for a range of employment uses.

101. On the basis of the above evidence, I conclude that the expectations in the Plan for employment growth are soundly based on a coherent framework and are consistent with the requirements of the LPS.

How effective is the Plan in protecting allocated employment sites from other uses, e.g. housing? Should the Plan set out the parameters of an 'independent assessment' in relation to the attractiveness of the market, and over what period of time?

102. A policy framework to provide for consistent decision making in relation to proposals for the change of use or redevelopment of employment land is necessary to prevent its inappropriate loss to other uses. It is acknowledged that the market alone is unable to secure the retention of employment land in the face of competition from higher value uses such as residential. In the context of a vulnerable economy, it is important to provide a safeguard which both protects existing employment land and allocations whilst allowing for flexibility. This is in line with paragraph 19 of *the Framework*, which states that the planning system should do everything it can to support sustainable economic growth, and paragraph 22 which states that policies should avoid the long-term protection of employment sites where there is no prospect of the site being used for that purpose.

103. Modifications **MM6** and **MM7** ensure that the Plan sets out robust marketing criteria in order to achieve consistency of decision making in the implementation of policy EMP1, including its supporting text. **MM7** requires an adequate marketing period, for example through the use of commercial agents, at a price that reflects market value for employment use for at least 12 months prior to the release of employment land. I consider this to be a reasonable period for the effectiveness of the Plan in playing its part to secure sustainable economic growth for Lichfield which would be consistent with national policy.

104. Whilst some land may be developed for retail, **MM6** makes clear that such a use needs to be related in scale to the primary employment focus of the site, so that the vitality and viability of the employment area is not adversely affected; neither am I persuaded from the evidence before me that the modified policy is likely to undermine the existing retail hierarchy or lead to demands for employment land in neighbouring local authority areas to meet Lichfield's needs.

105. Subject to the above modifications there is sufficient flexibility in policy EMP1 to allow for development to take place in employment areas through the planning application process as part of a mix of uses. The ECLA concludes that where sites are unlikely to be delivered for employment use, they have been excluded from the Plan's provision, which is justified and makes the Plan effective.

Does the Plan address the need for a housing/employment balance? Is there a balance between housing provision and maintaining an adequate supply of employment land?

106. Maintaining a sustainable balance between housing and employment is a critical consideration, although it is accepted that measuring this balance in relation to complex parameters is difficult. Nevertheless, the balance between the provision of housing and employment provision is established through the LPS, especially in core policies 1, 6 and 7. This important and strategic consideration was specifically considered at the LPS Examination, where the balance between the level of housing and employment was considered to be consistent and sound⁴³. I am satisfied that the more detailed provisions of the Plan are in accordance with the strategic balance set out in the LPS.

Does policy Lichfield 3 set a sound framework for promoting Lichfield City Centre as a retail and commercial centre? Should the Plan aim for a 'town centres first' approach to office development? Does policy Burntwood 3 set a sound framework for promoting Burntwood as a retail and commercial centre?

107. LPS core policy 8 requires development proposals for retail, office and cultural facilities to be focused within the commercial centres of Burntwood and Lichfield City. LPS policy E1 covers retail assessment, and sets out a threshold of over 1,000 sq m gross for considering schemes in Lichfield City. Policy Lichfield 3 builds on these adopted policies and promotes the city centre as a strategic centre by improving its range of facilities. Regarding office development, policy Lichfield 3 sets out a 'city centre first' stance using a sequential test approach and impact test, which accords with paragraphs 24 and 26 of *the Framework*. I therefore consider that the Plan's approach to promoting Lichfield City centre is consistent with both the LPS and section 2 of *the Framework*, which promotes the vitality and viability of town centres.

108. LPS core policy 8 also sets the retail policy framework for Burntwood, designating it as a town centre within the hierarchy of centres, primarily serving a local catchment providing for convenience shopping. LPS policy E1 sets a correspondingly lower retail threshold at 500 sq m (gross), which accords with both the LPS and section 2 of *the Framework*. Policy Burntwood 3 reinforces this by promoting the centre for a diverse range of uses, including opportunity sites for new retail floorspace. I am satisfied that this is consistent with the LPS and provides a sound policy framework for the centre.

Issue 5 - Conclusion

109. In view of the evidence submitted and the discussions at the Examination Hearing sessions, I conclude that the Plan's provisions for delivering economic prosperity, including the allocation of employment land, protecting existing employment areas, setting a realistic framework for achieving a satisfactory housing/employment balance and setting out retail parameters for Lichfield City Centre and Burntwood, are, subject to above modifications, justified, effective and in line with the LPS and national policy.

⁴³ LPS Inspector's Report, paragraphs 238-242 [Examination Document CD6-3].

Issue 6 – Are the transport, infrastructure, implementation and monitoring provisions of the Plan sound? Does the Plan provide effective policies to cover aspects of development management which are not explicitly covered in the LPS? Are the monitoring arrangements effective?

110. The Infrastructure Delivery Plan (IDP)⁴⁴ sets out the infrastructure required to support the sustainable delivery of the Plan, in line with the requirements in paragraph 157 [1] of *the Framework*. Regarding the development of Arkall Farm, the Secretary of State's decision to grant planning permission for 1,000 dwellings confirms that the development is deliverable from an infrastructure perspective and this site is covered in more detail under Issue 1 above. The Council has also signed a SCG with TBC⁴⁵ which sets out how the two Councils are working together to resolve unmet infrastructure needs, e.g. for sport and recreation. The Plan is positively prepared in this respect.
111. Potential sewerage constraints in relation to two development sites within Lichfield City and Armitage with Handsacre were identified by Severn-Trent Water Authority, where hydraulic modelling for development on these sites was required. This has been resolved through a SCG between Severn Trent and the Council⁴⁶, and therefore I am satisfied that the effects of the Plan on sewerage infrastructure are capable of mitigation.
112. The robustness of the transport evidence has been clarified through a SCG between the Council and Highways England⁴⁷ which refers to improvements to the Strategic Road Network at Muckley Corner; Swinfen; and further junction improvements and safer access to A38 at Hilliards Cross and Fradley South. These and other schemes are likely to be adequate to mitigate the transport impacts of development.
113. The Environment Agency is now satisfied that a sequential test regarding flood risk has been completed, and both parties have signed a SCG to this effect⁴⁸. I have no grounds to come to a different view regarding any of the above infrastructure matters.
114. The Plan contains a number of development management policies which have been prepared internally and with other relevant parties. The case for policies to cover specific sites such as Drayton Park and for roadside service areas are not in my view compelling, and the relevant issues are covered in the generic policies of this Plan and the LPS.
115. Appendix A of the LPS contains a comprehensive monitoring framework, including a set of indicators (linked to the AMR), targets (outcomes), contingency options and data sources. All the key thematic areas of this Plan are covered, and no changes are necessary in the interests of the soundness of the Plan.
116. Uncertainties and risks were assessed through the SA. Key areas of risk relate to housing delivery and economic growth, which are outside the direct control of the local planning authority. Some flexibility has been incorporated into the

⁴⁴ Examination Document CD3-13.

⁴⁵ Examination Document CD6-22.

⁴⁶ Examination Document CD6-34.

⁴⁷ Examination Document CD6-40.

⁴⁸ Examination Document CD6-43.

Plan, such as the housing provision buffer and the protection of employment land subject to market testing, and the policies in the Plan are not overly prescriptive. I therefore consider that the Plan contains sufficient flexibility to effectively address the likelihood of uncertainties and risks.

Issue 6 - Conclusion

117. No outstanding infrastructure issues have been identified which could undermine the effectiveness of the Plan in delivering the quantum of development proposed during the plan period. No changes to the Plan are needed in relation to development management, monitoring or uncertainties and risks. I therefore conclude that the transport, infrastructure, and implementation provisions of the Plan are sound; that the Plan provides sufficient guidance to cover aspects of development management which are not explicitly covered in the LPS; and that the monitoring arrangements are soundly based.

Issue 7 – Are the Plan's provisions for conserving and enhancing the character and appearance of Lichfield City Centre justified and effective and consistent with national policy?

118. In many historic and beautiful cities such as Lichfield there is tension between conservation and growth. Policy Lichfield 3 addresses this tension and draws a balance between promoting the city centre as a retail and business centre whilst at the same time seeking to sustain and enhance its historic environment, heritage assets and their setting. LPS policy Lichfield 1 sets out a strong framework for protecting and enhancing the setting of the city's world-famous cathedral.

119. The framework for sensitive conservation provided by these policies forms a sufficient platform to enable the local planning authority to ensure that development proposals are sympathetic to the distinctive character of the city centre and to assist community involvement in these schemes. This accords with the advice in the PPG⁴⁹ on securing high quality design and paragraph 58 of *the Framework*, which requires developments to respond to local character whilst not preventing or discouraging appropriate innovation.

120. The policy does not specifically address delivery concerns. However, I am not convinced that a more prescriptive policy would necessarily assist; it might be appropriate for detailed planning briefs to be prepared to provide the necessary guidance to secure timely delivery for schemes on key sites such as Friarsgate, Bird Street Car Park and the Quonains Site, off Dam Street. However, this will be a matter for the Council, and the absence of specific reference to them does not affect the soundness of the Plan.

Issue 7 - Conclusion

121. On the basis of the evidence submitted during the Examination and at the Hearing sessions, I consider that policy Lichfield 3, supported by LPS policy Lichfield 1, is set at the appropriate level to act as a strategic basis for more detailed work to address conservation issues affecting the city centre.

⁴⁹ PPG Ref. ID: 26-001-20140306 *Why does good design matter?*

I therefore conclude that the Plan's provisions for Lichfield city centre are justified, effective and are consistent with national policy.

Issue 8 – Are the Site Allocations in the Plan justified, effective, positively prepared and consistent with national policy?

122. The Council stated that all the allocated sites had willing owners and with one exception this was not challenged during the Hearing sessions. I consider from the evidence submitted and from site observation that the prospect of development on several of the site allocations was straightforward and therefore no further comments are necessary in respect of these sites.
123. Several alternative sites have been promoted. However, considering my conclusions on the main issues above and in particular issues 1, 2 and 3, it has not been necessary for me to scrutinise in depth the relative merits of the alternative sites. As such I have generally not referred to them in this report.

Lichfield City

124. I regard all the Lichfield City allocated sites in the Plan to be suitable for the development of housing and/or other uses that are proposed. I note that site L2, for the development of 200 dwellings, is adjacent to the larger East of Lichfield SDA (750 dwellings), which began construction in 2016, and which after initial uncertainties, is now progressing steadily.
125. Site L2 identifies potential environmental impacts which need to be considered and the need to design sympathetically the transition from urban to rural. Site L4, for the development of 194 dwellings at Land off Limburg Avenue and Sainte Foy Avenue, identifies potential environmental impacts which need to be considered.
126. Site L7, for the development of 27 dwellings at Scotch Orchard, requires appropriate investigation to establish whether mitigation works are required for any ground contamination, but there is no evidence to suggest that this will delay the implementation of the site until beyond the plan period.
127. In relation to Site L9 (Land off Burton Road (East), Streethay), proposed for the development of 9 dwellings, the Council stated at the Hearing sessions that vehicular access was no longer an issue and I have no grounds to come to a different view.
128. Site L12, for the development of 36 dwellings at Land at St John's Hospital, requires the significant archaeological potential of the site to be the subject of archaeological assessment and mitigation. However, the first phase of the development is completed and it is expected that the entire site will be developed within the plan period.
129. The access concerns in relation to Site L14 (Former Integra Hepworth, Eastern Avenue), proposed for the development of 99 dwellings, have now been overcome and initial construction works have started.
130. Site L22, for the development of 38 dwellings at Former Regal Cinema, Tamworth Street, requires the significant archaeological potential of the site to

be the subject of archaeological assessment. However, development has now started, and completion is anticipated before the end of the plan period.

131. The Plan acknowledges that several sites could impact on the setting of Lichfield Cathedral. This important consideration is addressed in LPS policy Lichfield 3 (see Issue 7 above) and site allocations L1; L6; L8; L18; L19; L20; L21; L22; L26; L28; and L29 all require that design should consider the setting of Lichfield Cathedral, including historic views or skylines, which is justified and in accordance with national policy.

Burntwood

132. Sites B14 (Land South of Highfields Road) for the development of 250 dwellings and B15 (Land East of Coulter Lane) for the development of 80 dwellings have been deleted from the submitted Plan and these sites retain their Green Belt designation (see Issue 2 above). For the reasons I have already stated, I consider that the continued designation of the Green Belt covering these sites is justified and in accordance with national policy.
133. Site B4, for Land off New Road/ Mount Road for the development of 95 dwellings, requires the completion of appropriate investigation to establish the extent of any ground contamination and whether mitigation works are required; the policy also requires potential noise and odour mitigation to be considered. However, completion is anticipated before the end of the plan period.
134. Site B5 (Land rear of Chase Terrace Primary School) for the development of 12 dwellings has potential ecological impacts which need to be considered, but it is supported by the County Council and completion is anticipated before the end of the plan period.
135. Policy B7, for Land South of Cannock Road for the development of 17 dwellings, requires potential noise and odour mitigation to be considered. However, completion is anticipated before the end of the plan period.
136. Site B10 (Land off Milestone Way, Chasetown) for the development of 150 dwellings, requires the completion of appropriate investigation to establish the extent of any ground contamination and whether mitigation is required. However, the site already has planning permission, reserved matters have already been submitted and completion is anticipated well within the plan period.
137. Site B13 (Bridge Cross Garage, Cannock Road) for the development of 8 dwellings requires the completion of appropriate investigation to establish the extent of any ground contamination and whether mitigation works are required. Although no planning application has yet been submitted, completion is anticipated before the end of the plan period.
138. Site B19 (Chorley Road), for the development of 7 dwellings in a former concrete works, requires the completion of appropriate investigation works to establish the extent of any ground contamination and whether mitigation works are required. Although the existing planning application has expired, completion is anticipated before the end of the plan period.

East of Rugeley

139. Site R1, for the development of at least 800 dwellings on the former Rugeley Power Station, is considered in more detail in Issue 1 above. My conclusion is that the proposed development on this site is developable and can be completed within the plan period.

North of Tamworth

140. Site NT1, for the development of 1,000 dwellings at Arkall Farm, is considered in more detail in Issue 1 above. My conclusion is that the proposed development on this site can be completed within the plan period.

141. Development is already underway on site NT2 (Land North of Brown's Lane, Tamworth) for the development of 165 dwellings, and there is every likelihood that this scheme can be delivered well within the plan period.

Key Rural Settlements

Fradley

142. Site F1 (Bridge Farm, Fradley) for the development of 80 dwellings requires the design and scale of the development to be considered in the context of the site's location adjacent to the Canal Conservation Area. My conclusion is that this site can be completed within the plan period.

Alrewas

143. Site A2 for the development of 121 dwellings at Land North of Dark Lane has potential ecological impacts which need to be considered. My conclusion is that this site can be completed within the plan period.

Armitage with Handsacre

144. Site AH1 (Land adjacent to Hayes Meadow School) for the development of 200 dwellings requires the demolition of one dwelling to gain access. I do not view this as a major constraint and the developer is confident that the rate of progress can exceed the SHLAA estimate.

Fazeley

145. Site FZ2 (Tolsons Mill) for the development of 100 dwellings, requires the completion of appropriate investigation to establish the extent of any ground contamination and whether mitigation works are required. My conclusion is that this site can be completed within the plan period.

Shenstone

146. Site S1 (Land at Lynn Lane) for the development of 50 dwellings as part of a mixed-use development, is supported by the Shenstone Neighbourhood Plan

and the expectation is that this site can be completed within the plan period. I have no grounds to disagree with this conclusion.

Whittington

147. Site W3 for the development of land at Chapel Lane & Blacksmith Lane, Whittington for 10 dwellings is, according to the Council's land agent, available for developer interest, although this was challenged at the Hearing sessions. Even if this site remains undeveloped during the plan period, its impact on the Plan's overall deliverability will be negligible.

Other Rural Settlements

148. Site OR1 for the development of Packington Hall, Tamworth Road for 24 dwellings (with 28 applied for), requires the completion of appropriate investigation to establish the extent of any ground contamination and whether mitigation works are required. My conclusion is that this site can be completed within the plan period.

149. Although the planning permission for 28 dwellings has lapsed on site OR3 at Foothery Hall, Foothery Lane, none of the key development considerations set out in policy OR3 would suggest that the site is not capable of implementation within the plan period.

150. Site OR7, for the development of land at Watery Lane for up to 750 dwellings, is considered in more detail in Issue 1 above. My conclusion is that this site can be completed within the plan period.

Issue 8 - Conclusion

151. In the light of the above considerations and the discussions at the Hearing sessions, I conclude that the individual site allocations proposed are positively prepared, justified, effective, deliverable over the plan period and consistent with national policy in relation to site specific matters, and that the deletions at Burntwood from the earlier consultation version are also justified.

Public Sector Equality Duty

152. In reaching the conclusions above, I have had due regard to the Public Sector Equality Duty contained in the Equality Act 2010. Subject to the provision for gypsy and traveller accommodation in the review of the LPS (**MM1** and **MM2**), I do not consider that my findings will impact negatively on anyone with a relevant protected characteristic in respect of the matters addressed by Section 149 of the Act, neither will any part of the Plan be a barrier to providing for inclusive design and accessible environments as required by *the Framework*, with particular reference to paragraphs 50 and 149.

Assessment of Legal Compliance

153. My examination of the legal compliance of the Plan is summarised below. I conclude that all aspects of legal compliance are met:

- Lichfield District Local Plan Allocations 2008-2029 Proposed Submission has been prepared in accordance with the Council's Local Development Scheme.
- Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
- Sustainability Appraisal has been carried out and is adequate.
- The Habitats Regulation Assessment is supported by an additional note, prepared in consultation with Natural England, which confirms that the AA which has already been undertaken by the local planning authority takes account of the Sweetman 2 CJEU, with specific reference to the potential effects of a substantial new brownfield development on the site of the former Rugeley Power station.
- The LPS, to which this Plan broadly conforms, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. There is no need to duplicate the climate change stance of the LPS.
- The Local Plan complies with all relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

154. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

155. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Lichfield District Local Plan Allocations 2008-2029 Proposed Submission satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Mike Fox

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

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Lichfield District Local Plan Allocations 2008-2029 - Appendix

Recommended Main Modifications (MMs)

Key to Schedule of Modifications

~~Text to be deleted~~ – strikethrough

Text to be added – bold

Text to remain unmodified – plain text

Explanatory text for modification - italics

Ref	Page	Main Modification
MM1	11	<p><i>Add new policy as follows:</i></p> <p>Policy LPR: Local Plan Review</p> <p>Lichfield District Council shall carry out an early review of the Local Plan for Lichfield that will be submitted to the Secretary of State for Examination in accordance with the latest Local Development Scheme or no later than the end of December 2021. This review shall replace the adopted Local Plan Strategy (LPS) 2008-2029 in all aspects and therefore be a comprehensive review. This Plan will extend the existing plan period to at least 5 years beyond the end of the current LPS and it shall review as a minimum the following matters:</p> <ul style="list-style-type: none"> • The housing requirement for Lichfield and the potential for housing land supply to meet this need. • Any unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), inclusive of any unmet housing need arising from Tamworth Borough and the appropriate level of contribution within the District of Lichfield in line with ongoing technical work and the requirements of policy TP48 of the adopted Birmingham Development Plan (BDP). • Employment land requirements for Lichfield as identified through a comprehensive evidence basis. • Lichfield’s potential role in meeting any wider unmet employment needs through the Duty to Co-operate (DTC). • The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing, employment and other service/infrastructure needs. • Gypsy, Traveller and Travelling Showpeople (GTTS) provision. • A comprehensive Green Belt Review either in partnership with relevant neighbouring authorities or in close consultation with these authorities through the DTC, to inform any further Green Belt release to accommodate new development within the District. • An evidence-based assessment of

		highways infrastructure needs, in partnership with the highways authorities.
MM2	11	<p><i>Add supporting text before and after the proposed new policy LPR as follows:</i></p> <p>Introduction: Local Plan Review</p> <p>The Council is aware and is committed to reviewing its Plan in full to assist in addressing strategic issues which cross local authority boundaries. The Council continues to work proactively with partners to identify the appropriate amount of growth to be accommodated within the boundaries of Lichfield District. In addition, as part of this review, the Council will continue to work with other neighbouring authorities through the Duty to Cooperate (DTC), as well as undertaking a comprehensive review of its evidence base.</p> <p>The Local Plan Review has already commenced with the publication of and consultation on a Scope, Issues and Options document in April 2018. Through a Local Plan Review, changes to the spatial strategy, policies and proposals within the current local plan may be required in response to emerging evidence or to reflect strategic issues being dealt with through the DTC. It is through this review process that consideration of such strategic matters, including the spatial strategy, are most appropriately considered.</p> <p>Policy LPR Local Plan Review sets a review mechanism for the Lichfield District Local Plan.</p> <p><i>Insert policy LPR as proposed by MM1</i></p> <p>Explanation</p> <p>The Local Plan Strategy identified that following on from discussions falling under the DTC it had been identified through evidence emerging at that time that indicated that Birmingham would not be able to accommodate its housing requirement within its administrative boundary and that a similar situation applied to Tamworth, although on a much-reduced scale. The Local Plan Strategy recognised that, in the event of further housing provision would be needed within Lichfield District, such issues could be addressed through a review of the Lichfield District Local Plan.</p> <p>It has been established through the Examination and adoption of the Birmingham Development Plan that there is a significant unmet housing need arising from Birmingham and the wider Housing Market Area (HMA) within which it sits. Policy PG1 of the Birmingham Development Plan identifies an unmet need of approximately 37,900 dwellings in the period to 2031. It should be noted that further consideration of this need has been undertaken and it is considered to be a lower need than established within the Birmingham Development Plan. Lichfield District is part of the</p>

Greater Birmingham and Black Country HMA along with Birmingham, the black Country authorities, South Staffordshire, Cannock Chase, Tamworth, North Warwickshire, Stratford-upon-Avon, Solihull, Bromsgrove and Redditch.

Additionally, Tamworth Borough Council's adopted Local Plan notes that it cannot meet its housing requirement within its own administrative area and requires a further 825 dwellings to be accommodated outside the Borough. Tamworth is located within the Greater Birmingham and Black Country HMA and this additional shortfall of 825 dwellings is part of the overall shortfall within the HMA. It is considered most appropriate to consider how to address such shortfall as part of the wider HMA shortfall through the review of the Local Plan. Furthermore, since the above shortfall was identified, the early stages of the Black Country Core Strategy indicate a further shortfall of approximately 22,000 dwellings.

To assist with discussion between the authorities within the HMA, a significant evidence base has been produced by the authorities. This includes the Strategic Housing Needs Study (stage 2 and stage 3) and the Strategic Growth Study (2018). These studies provide a number of strategic recommendations and examine a number of strategic locations for housing growth which could assist in meeting unmet needs. Ultimately the study sets out a range of options which it concludes could be considered through the review of authorities' respective local plans. At this time no decision upon the apportionment of such unmet need have been made. A recommendation of the Strategic Housing Needs Studies was that there needed to be a consistent evidence base across the HMA authorities in relation to the Green Belt. The Strategic Growth Study includes a high level strategic Green Belt review, all of which assists in providing a consistent evidence base for the authorities to consider and upon which future memorandums of understanding (MOU) and/or statements of common ground (SCG) apportioning unmet growth can be based.

Alongside the Strategic Green Belt Review within the Strategic Growth Study, Lichfield District will prepare a comprehensive Green Belt Review to assess, in further detail, the capacity of the Green Belt across the authority as part of the evidence base supporting the review of the Local Plan.

Although unmet housing need remains the largest cross-boundary issue, there are other associated issues which may need consideration, including provision for Gypsy and Travellers and employment land provision.

The Council will continue to work with other neighbouring authorities through the DTC, as well as undertaking a comprehensive review of its evidence base. The District Council is committed to working positively with its partners to address these

		strategic issues and where appropriate, prepare MOU or SCG with respect to the issues above.
MM3	64	<p><i>Add the following text as a second paragraph to policy NT1: North of Tamworth Housing Land Allocation:</i></p> <p>Within the Arkall Farm Housing Land Allocation, as identified in the inset map attached to policy NT1, the approved Masterplan identifies a range of land uses, open spaces and transport routes and their relationship both to each other and to the existing development in the vicinity of the site. Proposals should accord with the approved Masterplan, including the key development considerations.</p>
MM4	66	<p><i>Add the following text as a second paragraph to policy R1: East of Rugeley Housing Land Allocation</i></p> <p>Within the East of Rugeley Housing Land Allocation, as identified in the inset map attached to policy R1, the Masterplan to be approved should identify a range of land uses, open spaces and transport routes and their relationship both to each other and to the existing development in the vicinity of the site. Proposals should accord with the approved Masterplan, including the key development considerations.</p>
MM5	84	<p><i>Add the following text as a second paragraph to policy O R1: Other Rural Housing Land Allocations:</i></p> <p>Within the Watery Lane Housing Land Allocation, as identified in the inset map attached to policy OR7, the approved Masterplan identifies a range of land uses, open spaces and transport routes and their relationship both to each other and to the existing development in the vicinity of the site. Proposals should accord with the approved Masterplan, including the key development considerations.</p>
MM6	18	<p><i>Add the following to policy EMP1: Employment Areas and Allocations:</i></p> <p>Development proposals outside the traditional employment use classes (B1, B2 and B8) will be supported on existing and allocated employment sites, where the development proposals clearly demonstrate the potential for job creation on these sites, and provided that they do not undermine or constrain the main purpose of the employment allocation. Proposals for retail or leisure uses on existing or allocated employment sites will be permitted providing they are related in scale and use to the primary employment focus of the site and would have no adverse impact on the vitality and viability of the employment area.</p> <p>Development proposals outside the traditional employment uses classes (B1, B2 and B8) for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of a site, or its development for employment for employment uses, is not viable, through the provision of:</p>

		<p>(i) details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing market conditions; and</p> <p>(ii) a financial appraisal that demonstrates that the development of any employment generating use is unviable.</p> <p>Such development proposals would also be supported if it can be demonstrated that the continued use of a site, or its development for employment for employment uses causes/or would lead to site-specific, environmental problems, such as noise, pollution of traffic generation, recognising the environmental benefits to be gained by redeveloping these sites for non-employment generating uses.</p>
MM7	19	<p><i>Add the following to the explanatory text after policy EMP1</i></p> <p>Policy EMP1 seeks to ensure that compatible uses are provided on the existing employment sites within the District. The policy provides detail in relation to the level and type of evidence that is required to justify any loss of employment land. The evidence will assist decision makers in coming to an evidence-based decision. The policy should be read alongside other relevant development plan policies.</p>

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LICHFIELD DISTRICT COUNCIL



LOCAL PLAN ALLOCATIONS FOCUSED CHANGES MAIN MODIFICATIONS CONSULTATION SUSTAINABILITY APPRAISAL 2018

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1 Introduction

Background

This document is called a Sustainability Appraisal Report. It is the key output of the Sustainability Appraisal and Strategic Environmental Assessment (SEA) processes. It presents information on the social, environmental and economic effects of implementing Lichfield District Local Plan Part 2, Local Plan Allocations (hereafter referred as the LPA) and the appraisal methodology adopted to identify these effects.

This report has been produced to meet the reporting requirements of both the Strategic Environmental Assessment and the Sustainability Appraisal processes and will be updated should there be any changes to the LPA as it moves towards adoption.

The Draft LPA had been subject to two Regulation 19 consultations. The first took place between 20th March 2017 and the 12th May 2017. Approximately 5000 representations were received in the response to the consultation. This was followed by consultation on the Draft LPA Focused Changes document (Regulation 19) consultation which took place between the 8th January 2018 and the 19th February 2018. Just under 300 representations were received in the response to the consultation.

Between the two Regulation 19 consultations there were two significant factors that altered the planning landscape for Lichfield District and the context of the LPA. The first was receipt of three appeals from the Secretary of State, one of these appeal decisions for 750 dwellings at Land at Watery Lane was approved despite not being in conformity with the Local Plan Strategy. The second factor relates to the Government's consultation on the Housing White Paper which inter alia seeks to clarify the national policy position associated with Green Belt. The consultation documents were both subject to sustainability assessment.

The Local Plan Allocations 2008-2029 Focused Changes document included all required accompanying documentation (including a Sustainability Appraisal) and was submitted to the Planning Inspectorate 31st May 2018. A schedule of proposed Modifications (March 2018, Examination Core Document Reference CD1-3) was part of the submission. Proposed Modifications M3 and M4 was considered within the accompanying Sustainability Appraisal. The subsequent updates to the submitted Sustainability Appraisal have been clearly listed within the submitted schedule of changes to local plan Allocation supporting documents (March 2018, Examination Core Documents Reference CD1-4).

The LPA was subject to Examination in Public (EIP). Hearing sessions opened on the 4th September and took place over a two week period. Following the hearing sessions, the Inspector provided the district council with suggested Main Modifications. The council are now required to consult on these Main Modifications

A total of seven Main Modifications have been developed and they can be found in full on the district council's website. Following assessment of the proposals it is considered that two suggested Main Modifications require inclusion within the Sustainability Appraisal. Proposed amendments to existing policy EMP1 Protection of Employment land (MM7) and the inclusion of a new policy Local Plan Review (MM1) are both considered to require assessment.

Therefore this report considers Main Modifications (MM1 and MM7) in the context of a Sustainability Appraisal. Further it includes such assessments within the submitted Sustainability Appraisal that accompanied the LPA through examination which has resulted in a Main Modification version of the Sustainability Appraisal.

Delivering Sustainable Development

In producing the Local Plan Lichfield District is committed to the promotion of sustainable development. The Bruntland Report released by the World Commission on the Environment and Development defined sustainable development as:

“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

- The key priorities for delivering sustainable development are set out in the UK Government’s Sustainable Development Strategy (securing the Future) published in March 2005. These are:
 - Sustainable Consumption and Production
 - Sustainable Communities
 - Natural Resource Protection and Environmental Enhancement
 - Climate Change and Energy

The concept of sustainability lies at the heart of the Planning Process. The National Planning Policy Framework states that ‘At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking’. In order to ensure that the LPA is ‘sustainable’ we are required to carry out two distinct, but complementary processes. These processes are called Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). These two processes are considered in more detail below.

Strategic Environmental Assessment

The European Directive 2001/42/EC enacted in England under the Environmental Assessment of Plans and Programmes Regulations (2004) requires a Strategic Environmental Assessment (SEA) to be completed on all parts of the LDF with the exception of the Local Development Scheme (LDS), and Statement of Community Involvement (SCI).

The purpose of Strategic Environmental Assessment is to “provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development,” (2001/42/EC Article 1). Put simply the SEA process requires that in preparing the Local Plan we consider its likely effects on a broad range of issues such as *biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape* (2001/42/EC annex 1) and determine whether negative effects of implementing the Local Plan can be improved and positive effects enhanced.

By ensuring that Local Planning Authorities consider these issues the SEA Directive seeks to ensure that environmental considerations are fully integrated into the preparation and adoption of plans and programmes which are likely to have a significant effect on the environment.

Sustainability Appraisal

Whilst SEA focuses upon environmental issues, Sustainability Appraisal (SA) widens the approach to include social and economic issues. The purpose of Sustainability Appraisal is to ensure that the principles of sustainable development are taken fully into account when preparing the Local Development Framework. In preparing all Local Development Documents that will be included within the Local Development Framework Section 19 (5) of the Planning and Compulsory Purchase Act (2004) requires that we:

- Carry out an appraisal of the sustainability of the proposals in each documents
- Prepare a report of the findings of the appraisal

The Combined Process

In England, the requirements for Sustainability Appraisal and Strategic Environmental Assessment have been integrated into a combined 'Sustainability Appraisal'. This combined process is designed to extend the ambit of rigour of the SEA process to include other pillars of sustainability, namely social and economic assessment.

The combined Sustainability Appraisal process seeks to ensure that all relevant Local Development Framework Documents are subject to appraisal before they are adopted in order that the environmental social and economic effects of each plan can be adequately tested and modified prior to adoption.

Habitat Regulations Assessment

The Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna- the Habitats Directive provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance and/or restoration of habitats and species of interest to the EU in a favourable condition. This is implemented through a network of protected areas referred to as Natura 2000 sites.

Articles 6 (3) and 6(4) of the Habitats Directive require an Appropriate Assessment for plans and projects likely to have a significant effect on a European site. The requirement for HRA in the UK is set down in the Conservation (Natural Habitats 7c) Regulations, 1994 in England and Wales, amended in 2007 and is consolidated into the Conservation of Habitats and Species Regulations 2010 (SI No. 201/490).

Purpose of this Report

This report sets out the findings of the Sustainability Appraisal of Lichfield District Council (the LPA). It presents information on the social, environmental and economic effects of implementing the Plan and the appraisal methodology adopted to identify these effects.

Report Structure

This report has been structured in four sections to directly reflect the four SA questions illustrated over in Table 1.

Meeting the requirements of the SEA Directive

The following checklist is designed to signpost the requirements of the SEA Directive through references to specific parts of the SA report, or other documents, thus demonstrating how the SA has incorporated SEA.

Table 1 Questions that must be answered (sequentially) within the SA Report

SA Question	SA Sub - Question	Corresponding Requirement
What is the scope of the SA?	What is the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
	What is the sustainability context?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes The environmental protection objectives, established at international or national level, relevant to the plan.
	What is the baseline at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment. The environmental characteristics of areas likely to be significantly affected.
	How would the baseline evolve without the plan?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan.
	What are the key issues that should be a focus of the SA	<ul style="list-style-type: none"> Any existing environment problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance.
What has the plan-making/Sustainability Appraisal involved up to this point?		<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable'). The Likely significant effects on the environment associated with alternatives/an outline of the reasons for selecting preferred alternatives/a description of how environmental objectives and considerations are reflected in the Plan.
What are the appraisal finding's at this current stage?		<ul style="list-style-type: none"> The likely significant effects on the environment associated with the Plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Plan
What happens next (including monitoring)?		<ul style="list-style-type: none"> A description of the measures envisaged concerning monitoring.

Difficulties in carrying out the SA

There is a general requirement of the SEA/SA that a section is included which sets out the difficulties encountered in undertaking the assessment. The main difficulties identified in this SA are discussed below:

Data: A common problem affecting the SA process is the availability and reliability of data. Although data has been collected to illustrate a number of conditions and trends relevant to the SA of the LPA,

some data sets are more useful than others, and some data sets are known to be old, incomplete. In some cases, no data is available. It is therefore almost impossible to quantify effects with total certainty, but this has been done where possible.

Differing level of detail: This is particularly relevant to the appraisal of sites and housing development options, some of which have secured planning permission and have a greater level of detail available, for example ecology reports. It is therefore possible to predict likely positive or negative impacts at a detailed level. For others sites limited/no detailed information is available and therefore it is not possible completely ascertain if positive or negative effects could result.

Assumptions: It is important to note that a number of assumptions have underpinned all of the SA indicators relating to site assessments. These assumptions introduced an element of uncertainty about the likely effect of these options/scenarios if implemented. In particular the impact on climate change and the type of employment opportunities that might be created both affect the nature of impacts that might result, but are somewhat uncertain.

Significance: There are very few agreed sustainability thresholds or constraints, as little work has been done in the UK on this issue, although the idea of ‘living within environmental limits’ is increasingly being operationalised. Because of this, it is not always possible to assess the significance of any impacts with certainty. However, wherever possible the prediction and evaluation of effects utilises relevant accepted standards, regulations and thresholds e.g. the amount of priority habitat created or the number of Grade II Listed Buildings considered to be at risk. In many cases it is the scale of the impact on these standards, regulations and thresholds and the geographical extent which determine the significance of the effects.

The Sustainability Appraisal which accompanied the Local Plan Strategy required revisiting due to the changed planning landscape and updates in baseline information. This has resulted in an amended set of Sustainability Objectives being developed. To ensure continuity a summary of the historic and current objectives has been created (Appendix A:Amendments to SA Framework) and where possible indicators identified to monitor significant effect(s) will be retained to ensure effective monitoring and coordinated response to the process of identifying and addressing adverse effects.

Despite these limitations and uncertainties, it is still possible to draw conclusions about the overall effects that will result from the implementation of the LPA.

2 What is the sustainability context and the scope of the Sustainability Appraisal?

Introduction

This chapter outlines the context and scope of the SA. The requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 were outlined within Chapter 1. Of the identified requirements, this section seeks to answer the questions below.

SA Question Answered	Corresponding Requirements (The report must include)
What is the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and objectives of the plan.
What is the sustainability context?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes.

SA Question Answered	Corresponding Requirements (The report must include)
	<ul style="list-style-type: none"> The environmental protection objectives, established at international or national level, relevant to the plan.
What is the sustainability baseline?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment. The environmental characteristics of areas likely to be significantly affected.
How would the baseline evolve without the Plan?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan.
What are the key issues that should be a focus of the SA?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance.

Consultation on the scope

In addition to internal consultation and involvement, there is a specific requirement for engagement with statutory consultation bodies and public consultees at certain stages of the combined Sustainability Appraisal and Strategic Environmental Assessment Processes. These requirements are set out in the SEA Regulations.

In determining the ‘scope’ of the Sustainability Appraisal (the level of detail and information to be used to apprise the plan options), the SEA regulations requires that the three statutory environmental consultation bodies should be consulted for a period of five weeks. We consulted the following three organisations on a complete copy of the Scoping Report via e mail for a five week period commencing in August 2016:

- Environment Agency
- Historic England
- Natural England

In addition Government guidance recommends that other community groups and social and economic bodies should be consulted, as the planning authority considers appropriate. As such the authority has alerted a number of additional organisations to the publication of the scoping report through e mail. These were;

- Birmingham City Council
- Walsall Metropolitan Borough Council
- South Derbyshire Borough Council
- Derby City Council
- Derbyshire County Council
- Wolverhampton Metropolitan Borough Council
- Redditch Borough Council
- Bromsgrove Borough Council
- Worcestershire County Council
- Stoke City Council

- South Staffs Borough Council
- Staff Moorlands Council
- Cannock Chase Area of Outstanding Nature Beauty
- Stafford Borough Council
- Newcastle Borough Council
- Stoke and Staffordshire Local Enterprise Partnership
- Greater Birmingham Local Enterprise Partnership
- Solihull Metropolitan Borough Council
- North West Leicestershire District Council
- East Staffordshire District Council
- Tamworth Borough Council
- Wyre Forest District Council
- Dudley Metropolitan Borough Council
- Sandwell Metropolitan Borough Council
- Staffordshire County Council
- Warwickshire County Council
- North Warwickshire Borough Council

Parish Councils were also informed of where and how they could view and comment on the Scoping Report. Whilst a full public consultation was not required at this stage of the Sustainability Appraisal process, we did published the Scoping Report on the Council’s website.

Comments submitted regarding the ‘scope’ of the Sustainability Appraisal and the amendments made to the information set out in the Scoping Report following this stage of consultation are recorded at Appendix B. These amendments were reported to the Council’s Growth Environment & Development Overview and Scrutiny Committee in December 2016.

Who has carried out the Sustainability Appraisal

Lichfield District Council Spatial Policy and Delivery Team has undertaken the Sustainability Appraisal. We have sought to undertake the appraisal ‘in-house’ in order to ensure that the results are fully integrated with the preparation of the LPA. The appraisal has also been informed through liaison with Staffordshire County Council.

What is the plan seeking to achieve?

The SA Report must include

- An outline of the contents and objectives of the plan

The Development Plan Process

The Planning system provides a framework for managing the development and use of land. A key element of this system is the preparation of development plans, which establish where and what type of development might take place, and provides the basis for the consideration of planning applications.

The Local Plan Strategy was adopted by resolution of Full Council on 17th February 2015, the LPA complements the Strategy. The 'Strategy' and 'Allocations' should be read in conjunction and are both Development Plan Document produced under the Planning and Compulsory Purchase Act 2004 (as amended) to help shape the way in which the physical, economic, social and environmental characteristics of Lichfield District will change between 2008 and 2029. The LPA together with the Local Plan Strategy (part 1) will, once adopted, replace the existing Lichfield District Local Plan 1998.

Local Plan Strategy Vision

The vision for Lichfield District is set out in the Local Plan Strategy. As a sister document of the Local Plan Strategy the LPA will also seek to deliver the same vision, this is set out below.

Vision for the District

By 2029, residents of the District will continue to be proud of their community, experiencing a strong sense of local identity, of safety and of belonging. Everyone will take pride in the District's history, its culture, its well cared for built and natural environment, its commitment to addressing issues of climate change, and the range of facilities that it offers. Our residents will have opportunities to keep fit and healthy, and will not be socially isolated. People will be able to access quality homes, local employment, and provision for skills and training which suits their aspirations and personal circumstances. Those who visit the District will experience the range of opportunities and assets in which its residents take pride, will be encouraged to stay for longer and will 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, and improvements to existing communities will have a role in meeting the needs of Lichfield District and will have regard to the needs arising within Rugeley and Tamworth. 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 natural environment within the urban and suburban areas and within the wider countryside and varied landscape areas will be conserved and enhanced, and locally important green spaces and corridors will be secured to meet recreational and health needs. Sustainable development will also 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 adverse effects of climate change.

Local Plan Strategy Objectives

The LPA shares the same Strategic Objectives as the Local Plan Strategy. The following Local Plan strategic priorities outline delivery requirements to achieve the Vision and address the key issues that have been identified in the District. The Strategic Priorities give direction to the emerging LPA.

Strategic Priority 1: Sustainable Communities

To consolidate the sustainability of the existing urban settlements of Lichfield and Burntwood as the District's principal service centres, together with key rural settlements and to ensure that the

development of new homes contribute to the creation of balanced and sustainable communities by being located in appropriate settlements and by containing or contributing towards a mix of land uses, facilities and infrastructure appropriate to their location.

Strategic Priority 2: Rural Communities

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

Strategic Priority 3: Climate Change

To create a District where development meets the needs of our communities whilst minimising its impact on the environment and helps the District to mitigate and adapt to the adverse effects of climate change.

Strategic Priority 4: Infrastructure

To provide the necessary infrastructure to support new and existing communities, including regeneration initiatives in those existing communities where the need for improvements to social, community and environmental infrastructure have been identified, in particular within north Lichfield, Burntwood, Fazeley and Armitage with Handsacre.

Strategic Priority 5: Sustainable Transport

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

Strategic Priority 6: Meeting Housing Needs

To provide an appropriate mix of market, specialist and affordable homes that are well designed and meet the needs of the residents of Lichfield District. Lichfield District Local Plan Strategy 2015. To promote economic prosperity by supporting measures that enable the local economy to adapt to changing economic circumstances and to make the most of newly arising economic opportunities.

Strategic Priority 7: Economic Prosperity

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 of local people.

Strategic Priority 8: Employment Opportunities

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

Strategic Priority 9: Centres

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

Strategic Priority 10: Tourism

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

Strategic Priority 11: Healthy & Safe Lifestyles

To create an environment that promotes and supports healthy choices. To improve outdoor and indoor leisure and cultural facilities available to those that live and work in and visit the District and to ensure a high standard of community safety, promoting healthier living and reducing inequalities in health and well-being.

Strategic Priority 12: Countryside Character

To protect and enhance the quality and character of the countryside, its landscape 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 Priority 13: Natural Resources

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

Strategic Priority 14: Built Environment

To protect and enhance the District's built environment and heritage assets (including Lichfield Cathedral), its 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 quality of and accessibility of open space and semi-natural greenspaces.

Strategic Priority 15: High Quality Development

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

[The Local Plan Allocations](#)

The LPA supplements and provides additional detail concerning how development will be managed in Lichfield District up to 2029

- Land Allocations associated with meeting the growth requirements set out in the Local Plan Strategy (2015) including:
 - Determining remaining housing land requirements to deliver the overall 10,030 homes to 2029 in line with the adopted spatial strategy, including allocations of sites with the Broad Development Location (BDL) to the north of Tamworth , for housing in rural areas and the 'Key Rural' Settlements (including Green Belt release);
 - Consideration of 'infill' boundaries for Green Belt villages (as set out in Core Policy 1);
 - Sites to meet the identified Gypsy and Traveller requirements;

- Land allocations to meet the Employment Land requirements, including the identification of primary and secondary retail areas for Lichfield City Centre;
- A review of any remaining Local Plan (1998) Saved policies;
- Consider Green Belt boundaries including the integration of the developed area of the former St Matthews into Burntwood and development needs beyond the plan period; and
- Consider any issues arising through 'Made' and emerging Neighbourhood Plans where communities have sought the support of Lichfield District Council to progress with matters outside the scope of the Neighbourhood Plan.

What is the plan not trying to achieve?

The LPA supports the Local Plan Strategy and helps to implement its vision and policies. While it is strategic in nature because it will shape the development of areas in the future, it does not set a vision for the District or assess and determine the development needs of the District. This work has already been carried out and established by the adopted Local Plan Strategy. The key purpose of the LPA is therefore to deliver the residual development identified by the Local Plan Strategy. It seeks to do this by allocating sufficient sites which present the most sustainable opportunities for development within the District.

Habitats Regulation Assessment

A full HRA screening analysis was undertaken on the Local Plan Strategy (2015) including considering the effects of the spatial strategy.

There is one international and European statutory nature site within the Lichfield District.

- River Mease SAC.

Two other international and European SAC's are within the vicinity of the District and may need to be taken into consideration. These are

- Cannock Chase SAC
- Cannock Extension Canal SAC

The screening assessment of the Local Plan Strategy identified significant adverse effects on these European sites and an appropriate assessment was completed, mitigation packages have been identified and are currently being implemented. The LPA will be developed in conformity with the Local Plan Strategy (2015). It is therefore considered that accepted mitigation measures are sufficient to support the LPA documents. A Habitat Regulation Assessment accompanies the LPA.

What is the sustainability context?

The SA Report must include

- The relationship of the plan with other relevant plans and programmes.
- The environmental protection objectives established at international or national level relevant to the plan.

A fundamental part of undertaking a sustainability appraisal of the LPA is the identification and assessment of the relationship between the Plan and other relevant plans, and strategies established at international, European Community, National and local levels.

A list of plans, policies and programmes, relevant to the LPA has been compiled and analysed. This list, (originally published in the LPA Scoping Report) has been updated to reflect comments received back during the Scoping Report consultation. In addition Appendix C of this report provides details on the relationship and reflects any additional published plans, policies, strategies and initiatives.

A summary of the plans and programmes reviewed are listed below:

International:

- New York Sustainable Development Summit, 2015
- EC Habitats Directive, 1992
- UN Convention on Biological Diversity, 1992
- EU Air Quality Directive (2008/50/EC)
- EU Water Framework Directive (2000/60/EC)
- EU Nitrates Directive (91/676/EEC)
- Drinking Water Directive (98/83/EC)
- EU Directive on the Conservation of Wild Birds (79/409/EEC)
- EU Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EEC) and subsequent amendments
- EU Directive on Waste (2008/98/EC)
- EU Directive on the Landfill of Waste (99/31/EC)
- EU Packaging and Packaging Waste Directive (2015/720/EC)
- Renewed EU Sustainable Development Strategy, 2006
- UNFCCC (1997) The Kyoto Protocol to the UNFCCC
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- Our Life Insurance, Our Natural Capital: An EU Biodiversity Strategy to 2020, 2011
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- England Biodiversity Strategy Climate Change Adaption Principles Conserving Biodiversity in a Changing world (2008)
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- Low Carbon Transition Plan, 2009
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- Healthy Lives, Healthy People: Our Strategy for public health in England (Department of Health 2010)
- Enabling the Transition to a Green Economy, 2011
- Conservation of Habitats and Species Regulations, 2010
- Localism Act, 2011
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- National Forest Strategy 2014-2024, 2014

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- Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy 2010-2026, 2013
- Safer, Fairer, United Communities for Staffordshire 2013-18
- Sustainable Community Strategy (Staffordshire) 2008-2023
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- Shaping the Future of Staffordshire 2005-2020: The Sustainable Strategy for the County
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- Stoke-on-Trent & Staffordshire Local Enterprise Partnership Strategic Economic Plan Part 1 – Strategy 2014-2030 (2014)
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- Rural Development SPD, 2015
- Sustainable Design SPD, 2015
- Trees, Landscaping & Development SPD, 2016
- Little Aston Neighbourhood Plan, 2016
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- Lichfield District Integrated Transport Strategy 2013-2028
- Strategy for the A5
- Lichfield District Housing Strategy 2013-17
- Lichfield District Council AQMA Updating & Screening Assessment, 2015
- Lichfield District Council Economic Development Strategy 2016-2020, 2016

- Lichfield District Council Community Infrastructure Regulation 123 List, 2016
- Lichfield District Community Safety Delivery Plan 201/18
- Lichfield City Centre Development Strategy & Action Plan 2016-2020
- Lichfield District Council Strategic Plan 2016-2020
- Rural Settlements Sustainability Study, 2016
- River Mease Restoration Plan, 2012
- River Mease Water Quality (Phosphate) Management Plan 2011
- River Mease Diffuse Water Pollution Plan

What is the sustainability baseline?

The SA Report must include?

- The relevant aspects of the current state of the environment
- The environmental characteristic of areas likely to be significantly affected?

The SEA Directive requires the collection of baseline information on social, economic and environmental characteristics of the area in order to provide the basis for predicting and monitoring effects of the policies within Local Planning Documents. The baseline information will also help to identify sustainability issues and potential ways of dealing with them. A review of current environmental, social and economic conditions affecting Lichfield District is set out in Appendix D.

How would the baseline evolve without the plan?

The SA Report must include:

- The likely evolution of the current state of the environment without implementation of the plan

In addition to ensuring that the scope of the SA is informed by an understanding of the current baseline conditions, it is also important to ensure that thought is given to how the baseline conditions may evolve in the future without the LPA.

- A significant amount of development could be delivered in an ad hoc manner. This could have particularly significant implications for housing delivery, resulting in both shortages and an inability to plan for predicted future housing need. Certain housing requirements may not be met in particular affordable housing and those with unique housing requirements (elderly requirements for smaller properties).
- The ad hoc principal could also apply to employment sites, with development resulting in a disconnection between housing and employment sites impacting on accessibility. In addition the impact on infrastructure on transport routes would be unknown.
- The natural environment will be affected by climate change. Species and habitats will be put under strain particularly designated sites within the District would be uncertain resulting in an inability to mitigate for impact which could result in harm.
- River level rises and more extreme rainfall patterns will increase flood hazard, particularly in those areas of the District already designated as Flood Zones.
- Commercial property may come under greater pressures to be redeveloped for alternative purposes.
- The District's distinct rural communities will not be develop sustainably, some will be unable to prosper, struggling to retain local services and community facilities whilst others may experience growth that changes their unique character and landscape setting.
- Opportunities to enhance the Districts rich historic environment will be lost.

- An aging population will also mean that additional strain will be put on certain community infrastructure elements.

What are the key issues that should be a focus of the appraisal?

The SA Report must include

- Any existing environmental problems which are relevant to the plan

Population Trends

The population of Lichfield District has increased by 1.8% between 2011 and 2015 and is expected to increase by a further 8.5% between 2014 and 2039.

The largest population influence is death with a net decrease of 7,800 through natural change which reflects the death rate being markedly higher than the birth rate. This points to the ageing population within the District and as displayed in the age structure breakdown with 22.9% currently aged over 65 which is over 5% more than the national average. The population is projected to see a significant growth in people aged 65 and over and in particular those aged 85 and over.

Life expectancy within the District is similar to the regional and national average with males living to 80 years and females to 84 years. The population is projected to see a significant growth in people aged 65 and over and in particular those aged 85 and over. The rate of increase in the number of older people in Lichfield is faster than both the West Midlands and England and by 2029 equates to a 60% increase in 75-84 year olds and a 115% increase in the amount of residents aged 85. There are however discrepancies within the District with differences in life expectancy between the ward with the lowest life expectancy and the ward with the highest life expectancy which for men means the difference between 76 years and 83 years and for women between 79 and 91.

The 2011 Census found that 18.1% (18,300 people) had a limiting long-term illness in Lichfield. This is higher than the England average of 17.6% and reflects the ageing population within the District.

Between 2014 and 2039 there is a projected fall in household size within Lichfield District from 2.37 to 2.24 persons per household. The projected fall in household size reflects the general ageing of the population evidenced by the projected household growth by age which shows that between 2014 and 2039 there is a large growth in the number of households within the 75+ age category. The age groups for the remaining categories remain largely similar between 2014 and 2039.

The dependency ratio for older people in Lichfield (measures the number of people aged over 65 who depend on people of working age (16-64)) is 38 older people for every 100 people of working age. This is higher than the England average.

Social and Community Issues

Within Lichfield District 86.5% of the dwelling stock is either owned or privately rented with 41.1% or housing being detached, both significantly higher than the county, regional and national average.

Property prices are relatively high with the average house price in Lichfield District being £250, 675 significantly higher than neighbouring districts in which average house prices range from £164, 916 to £204, 361, and the Staffordshire average of £190, 214 (December 2015). Lichfield District is seen as an attractive commuter area for Birmingham and the larger salaries associated with these jobs.

Housing affordability issues are highlighted by the lowest quartile house price being 7.1 times the lowest quartile income.

The majority of working aged (16-64) population in Lichfield District is in work, with economic inactivity being consistently significantly lower than both the national and regional indicator and benefit claimants for Lichfield also below the national and regional averages.

9.3% of Lichfield District residents aged 16 - 64 have no qualifications which is slightly higher than the national average (8.6%) but significantly lower than Staffordshire and the West Midlands figures. Within Staffordshire those achieving 5 GCSE's Grades A*-C is consistent with the national average at 64.9% and 64.2% respectively. In Lichfield District 31% of the population is educated to at least NVQ level 4 which also covers degree level qualifications however the proportion of the working age population qualified to 'NVQ Level 4 and above' is below the national average.

Health Inequalities

In 2012, 23.5% of adults are classified as obese. The rate of smoking related deaths was 229, better than the average for England. This represents 143 deaths per year. Rates of sexually transmitted infections, people killed and seriously injured on roads are better than average. Rates of statutory homelessness, violent crime, long term unemployment, drug misuse, early deaths from cardiovascular diseases and early deaths from cancer are also better than average. The level of early death in men is declining and is below the national average with early death in women declining at a slower rate and reflecting the national average. Levels of infant mortality are also declining and in Lichfield are significantly lower than both the County and National figures.

Deprivation

Lichfield District is ranked as 206 out of 326 local authorities (i.e. in top 40%) where 1 is the most deprived.

There are however pockets of deprivation within Lichfield District. Two lower super output areas fall within IMD's 20% of most deprived areas nationally. These are found within the wards of Chadsmead and Chasetown.

Four wards in Lichfield have high proportions of households with lone pensioners and of these lone pensioners 59.5% (2, 992) have a long term health problem or disability, similar to the national average of 59.6%. The percentage of lone pensioners with a long term health problem or disability is significantly higher than England in two wards; Burntwood Central (67.9%) and Chasetown (72.1%).

Using 2014 mid-year population figures for Lichfield it has been estimated that around 500 residents aged 65+ are at risk of loneliness. This is exacerbated by lack of transport, with around 18% of people aged over 65 having no private transport which increases to 55% of people aged 85 and over. Free bus passes for the over 65s go some way to ameliorating this issue however the bus service needs to be accessible.

Crime

Crime within Lichfield District is relatively low with 36 crimes per 1,000 residents which is significantly lower than the Staffordshire average. The number of crimes recorded in the District decreased from 4, 308 crimes in 2010-11 to 3, 677 in 2014-15. Anti-social behaviour has increased by 6.2% over the last year but overall there has been a reduction over the past 5 years from 2, 262 incidents in 2010-11

to 2015 in 2014-15 although there was an increase in hate crimes during 2014/15, the majority motivated by race.

In terms of road traffic casualties, the proportion of casualties killed or seriously injured in 2014 was the lowest rate for 5 years, and lower than the Staffordshire rate. Staffordshire County recorded the 8th lowest casualty severity ratio of 153 local authorities across England and it can be inferred that the District's roads are some of the safest in the country.

Built and Natural Environment

The setting of the District falls within 3 historic landscape character areas, to the west the land rises towards what was an 11th century royal hunting forest, the central belt covering the city of Lichfield, and to the east the river valleys. Some of the earliest known sites within the District date back to the Palaeolithic with evidence of human activity throughout the Bronze Age, Roman occupation and Anglo Saxon period, with many sites later recorded in the Domesday Book. The evolution of settlements, ecclesiastical and cultural expansion along with agricultural and industrial development continued throughout the 11th to 20th centuries.

The rich tapestry of historic development is reflected in the amount of protected historic landscapes and structures within the District. Virtually every settlement contains a conservation area with 21 throughout the District, with a wide variety of scheduled ancient monuments (16 in total), one registered historic park and garden and around 760 listed buildings. These important historic assets make this attractive rural and historic environment locally distinctive and make a substantial contribution to the local economy through tourism.

Environmental Issues

The number of developments on brownfield land as a percentage of all development has increased from 76% in 2010/ 11 to 88% in 2015/ 16. The percentage profile of homes built on previously developed land will change in future years as greenfield releases will be required to deliver the housing requirements within the Local Plan Strategy 2008-2029.

Lichfield supports a variety of wildlife rich habitats and species which are protected under domestic or European legislation. There are 7 Special Areas of Conservation within a 20km radius of Lichfield District however the Habitats Regulations Assessment of the Local Plan only identified two sites namely the Cannock Chase SAC and the River Mease SAC to which the Local Plan could cause significant harm. As such projects have been put in place to mitigate the effect of the development on these protected sites. There are also 4 Sites of Special Scientific Interest and an Area of Outstanding Natural Beauty along with 78 Sites of Biological Interest. In addition the Staffordshire Biodiversity Action Plan identifies those habitats of importance for the county and includes plans for their conservation and management.

Lichfield District is comprised of a variety of landscapes within a relatively small area, due to significant variations in geology, the presence of two significant river valleys, the Tame and the Trent, and remnants of historic landscapes including extensive forest and heathland. The landscapes, such as the former Forest of Needwood, areas of heathland and historic field patterns. Some Landscape character types and habitats have suffered significant losses or degradation, and all of the District's landscape is affected by change arising from development, mineral working, agricultural and climate change.

Trees and wooded habitats are important for nature conservation and landscape value within the District. There are 392 Tree Preservation Orders within Lichfield District which along with the Conservation Area legislation protect the trees which bring significant amenity benefit to the local area.

The River Tame and River Trent are the main rivers that flow through the Lichfield District Council area. These rivers carry large volumes of water and have wide floodplains. The EA Flood Zone maps for the River Trent and River Tame indicate fluvial risk occurs predominantly into rural agricultural land where there is currently little proposed development. Pluvial flooding poses a risk to the District due to the lack of drainage capacity during high flows. Blockages of drains and watercourses in urban areas have been attributed to the pluvial flooding incidents and have been identified as highways flooding. Fazeley suffers from recurring fluvial and pluvial flood events. There are a number of properties at risk of flooding from sewer flooding but no known problems with groundwater, reservoir or canal flooding.

There are a number of regional initiatives affecting parts of the District that aim to achieve enhancements to existing landscapes and create valuable new habitats that can play a part in increasing biodiversity value within the District. In particular these include the National Forest, the Forest of Mercia and the Central Rivers Initiative.

Energy Usage

The average amount of electricity and gas used per capita in Lichfield District has decreased in line with the British average (2005-2014) however it remains at a high rate. Since 2005 the rate of gas usage in Lichfield District per consumer has reduced by 33% with the reduction in electricity usage of around 20%.

Transport

The District is well served by local routes such the A51, A515 and A5127 and has excellent connections to the national transport network including the M6 Toll, A38 (T), A5148 (T) and A5 (T). However Lichfield has one of the highest levels of car drivers, at 75% with 49.1% of residents commuting out of the District to work.

Lichfield District has four rail stations Lichfield City, Lichfield Trent Valley, Rugeley Trent Valley and Shenstone. 3% of employed residents commute by rail which is the highest level in Staffordshire. Lichfield Trent Valley, Lichfield City, Shenstone, Blake Street and Four Oaks stations are served by the Cross City North line which forms part of the busiest local rail corridors in the West Midlands.

In Lichfield City 71% of households are within 350 metres of a half-hourly or better weekday bus service, achieved through the commercial network. However around 80% of the District's households are within Lichfield and Burntwood and the key rural settlements which therefore intimates that current bus services predominantly serve the main centres and key rural settlements rather than the outlying rural areas.

For the rural north west of the District which have either a less regular or non existent bus service the County Council provide the 'Needwood Forest Connect' bookable bus service where route is plotted on a daily basis from telephone bookings enabling it to only run where there are passengers which require its services. This service is provided between 8am and 6pm Monday to Saturday. There are improvements proposed to the road and rail network for the benefit of the District.

Economy

Lichfield District has two a City Centre, Lichfield, and a Town Centre, Burntwood. Since January 2009 vacancy rates for Lichfield City Centre have fluctuated between a high of 10.5% in August 2009 to a low of 7.0% in July 2014. In December 2015 vacancy rates stood at 9.15% representing 28 of the available 306 retail premises available in the City Centre. In terms of Burntwood vacancy rates were recorded at 9.85 in July 2014 and fall to 4.55% in December 2015, representing 3 vacancy premises of the total 66 available. Lichfield Direct maintains a large portfolio of sites which are available for employment development, 64.42 ha of land is under construction and/ or has secured planning permission for employment.

Minerals and Waste

Land to the west of the A38 within Alrewas Parish has been identified as a potential new sand and gravel site. Lichfield District recycles, reuses or composts 54.5% of its waste, which is both above and well in advance of the EU target of 50% of waste being recycled by 2020.

The Sustainability Assessment Framework

Following on from the review of other plans, policies and programmes, the review of baseline data and the identification of key sustainability issues the Council developed a Sustainability Appraisal Framework against which the LPA site and policies options could be tested. The framework sets out a number of sustainability appraisal objectives, site specific questions that the District council has used to identify and predict the effects of implementing LPA. Since its conception in the Scoping report, the SA framework (consisting of 16 objectives) has been consistently used during the SA process.

Detailed decision-making criteria or sub objectives are also included within the SA Framework. The purpose of these sub-objectives is to provide prompts which allows the council to identify whether detailed objectives are being met. In total 57 detailed decision making criteria are included within the Framework. These detailed questions have evolved since first being published against the SA indicators within the Scoping Report, these amendments and additions are captured within Appendix B.

A number of indicators and targets were also identified and these could be used to monitor the implementation of the plan.

A copy of the SA framework is provided over in Table 2.

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Biodiversity, Geodiversity, Flora and Fauna	1 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)?	Proportion of local sites where positive conservation management has been or is being implemented. Number, type of quality of internationally and nationally designated sites. Number of species relevant to the district which have achieved SBAP targets Number of Local Nature Reserves within Lichfield District.
Flora and Fauna, Landscape, Cultural heritage	2 To promote and enhance the rich diversity of the natural archaeological/geological assets and lands character of the district	1 Does it respect and protect existing landscape character? 2 Will it protect sites of geological importance? 3 Does it offer the opportunity to improve and promote landscape connectivity sympathetic to the existing District Landscape character? 4 Will it lead to the sterilisations of mineral resources? 5 Will it improve green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiative? 6 Will it result in the loss of historic landscape features? 7 Will it safeguard sites of archaeological importance (scheduled or unscheduled) and their setting?	The proportion of housing completions sites of 10 or more which have been supported, at the planning application stage by an appropriate and effective landscape character and visual assessment with appropriate landscape proposals. Number and area of RIGS within District. Number of sites subject to development where archaeology is preserved in situ compared with those scientifically recorded. National Forest Coverage within the District. Proportion of Forest of Mercia or Central Initiatives promoted schemes implemented within the District. Loss of historic landscape features erosion of character and distinctiveness (HLC).

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
			Extent and use of detailed characterisation studies informing development proposals (HLC)
Cultural Heritage	3 To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their setting	<p>1. Will it preserve and enhance buildings and structures and their setting and contribute to the Districts heritage?</p> <p>2. Will it improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings?</p> <p>3. Will it preserve and enhance conservation areas including their setting?</p> <p>4. Will it offer opportunities to bring heritage assets back into active use?</p>	<p>Number and Proportion of major planning proposals which improved access to heritage features as part of the scheme.</p> <p>Number of listed buildings or structure in Lichfield District</p> <p>Heritage at risk and number of assets removed from Register.</p> <p>Proportion of Conservation Areas with an up to date character appraisal and management plan</p>
Cultural Heritage Population	4 Create places, spaces and buildings that are well designed, integrated effectively with one another, respect significant views and vistas and enhance the distinctiveness of the local character	<p>1 Will it achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality?</p> <p>2 Does it value and protect diverse and locally distinctive settlement and townscape character?</p> <p>3 Does it safeguard historic views and valuable skylines of settlements?</p> <p>4 Is the site within a main settlement or a key rural settlement?</p> <p>5 Is the site within close proximity to key services (e.g. schools, food shop, public transport, health centres etc.)?</p>	<p>Improvements in the quality of the townscapes e.g. delivery of street/public realm audits, improvements works, de-cluttering works both in urban and rural areas.</p> <p>Development meeting design standards within Supplementary Planning Documents.</p>

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Soil Water and Air	5 Maximise the use of previously developed land/buildings and 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?	Proportion of new development on Brownfield Land. No of redundant buildings bought back into use. Proportion of long term vacant dwellings in the District. Housing Mix of sites with planning permission. Housing Density of sites with planning Permission.
Climatic Factors	6 Reduce the need to travel to jobs and services through sustainable integrated patterns of development, efficient use of existing sustainable modes of transport and increased opportunities for non-car travel	1. Does the site location encourage the use of existing 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?	Traffic Levels (million vehicle kilometres) in the local road network. Access to bus services. Increase opportunities for walking and cycling.
Climatic Factors	7 To reduce, manage and adapt to the impacts of climate change	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?	Carbon Dioxide emissions within the Authority Areas. Renewable Energy Capacity within the District.
Soil Water and Air	8 To minimise waste and increase the reuse and recycling of waste materials.	1 Will it reduce household and commercial waste? 2 Will it increase waste recovery and recycling? 3 Will it reduce the proportion of waste sent to landfill?	Residual Household water per household. Percentage of household waste sent for reuse, recycling or composting. Municipal waste landfilled.

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Soil Water and Air	9 Seek and improve air, soil and water quality	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 to road to an AQMA? 4. Will it result in the loss of quality agricultural land?	Population living within Air Quality Management Areas. Number of planning applications granted contrary to Environment Agency advice on water quality. Proportion of homes built on Greenfield land
Soil Water and Air	10 To reduce and manage flood risk	1. Is the site located outside an area of risk from flooding? 2. Will there be an opportunity for flood risk reduction?	Number of Planning Permissions granted contrary to Environment Agency advice on fluvial flooding. Number of Planning Permissions granted contrary to Lead Local Flood Authority advice on surface water flooding. Number of existing properties within the Environment Agency's flood risk areas. Proportion of new development/dwellings incorporating Sustainable urban drainage techniques.
Population and Human Health	11 To provide affordable homes that meet local need	1. Will it provide sufficient housing to meet existing and future housing need? 2. Will it increase the range and affordability of housing for all social groups? 3. Will it reduce the number of households waiting for accommodation or accepted as homeless? 4. Will it meet the needs of the travelling community and show people?	Number of households on the household register. Number of people accepted as homeless (annually). Net Additional Dwellings. Net affordable housing completions. Housing mix. Net additional Pitches.

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Human Health	12 Improve services and access to services to produce good health and wellbeing and reduce health inequalities.	<p>1 Will it improve accessibility to health care for existing residents (including older residents) and provide additional facilities for new residents?</p> <p>2 Will it support a healthy life style including opportunities for recreational/physical activity?</p> <p>3 Will it provide new accessible green space?</p>	<p>Life expectancy at birth (male and female).</p> <p>Number of new or improved healthcare facilities delivered annually through development.</p> <p>Number of new sports pitches or other leisure facilities delivered annually through development.</p>
Population and Human Health	13 To promote safe communities, reduce crime and fear of crime	<p>1. Will it reduce crime through design measures?</p> <p>2. Will it contribute to a safe built environment?</p>	<p>Reduction in overall British Crime Survey comparator recorded crime – Lichfield District.</p> <p>% of residents who say that they feel very or fairly safe when outside in Staffordshire during the day and after dark.</p>
Material Assets	14 Improve opportunities for prosperity and economic growth	<p>1. Will it encourage higher skilled economic sectors in the District?</p> <p>2. Will it encourage new employment that is consistent with local needs?</p> <p>3. Will it encourage growth of existing businesses?</p> <p>4. Will it encourage small businesses to grow?</p>	<p>Employment Rate.</p> <p>Number of VAT registrations per 1000.</p> <p>Business Births.</p> <p>Unemployment by ward.</p> <p>Proportion of the District Employed in key sectors.</p>
Material Assets	15 To enhance the vitality and viability of existing city, town and village centres within the District	<p>1. Will it improve existing facilities within Lichfield City and Burntwood Town Centre?</p> <p>2. Will it protect and enhance the ability of our key rural settlements to meet the day to day needs arising with these settlements and from the wider rural areas they serve?</p>	<p>Total amount of retail floor space (by type) in Lichfield City Centre and Burntwood Town Centre.</p> <p>New retail spaced developed within villages.</p> <p>Loss of shops and other retail businesses to other uses.</p>

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
		3. Will it support and protect existing neighbourhood centres serving the local needs of our urban communities	Vacancy rates in Lichfield City Centre and Burntwood Town Centre. Loss of local community, leisure and shopping facilities to other uses.
Population and Human Health	16 Increase participation and improve access to education, skills based training knowledge and information and lifelong learning	1 Will it increase educational attainment amongst young people? 2 Will it reduce the number of working age residents who have no, or lower level qualifications?	Proportion of working age population with no, or lower level qualifications. Success rate for Work Based Learning. % of Working Age Population with NVQ level 4 and above. Success rate for further education. % of 18-59 year olds attending Higher Education Institutions.

3 What has the plan/making/SA involved up to this point?

The SA Report must include

- An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are reasonable);
- The likely significant effects of the environmental associated with alternatives/an outline of the reasons for selecting preferred alternatives/a description of how environmental objectives and considerations are reflected in the Plan.

Introduction

The statutory requirements require the SA Report to present (and explain) the alternatives, present their appraisal and tell the story of how this appraisal has informed the development of the plan.

This section seeks to identify where alternatives have been considered and why those selected were reasonable. It also provides signposts to the assessments associated with the reasonable alternatives and tells the story of how alternatives to the sites and polices within the plan were considered.

General Methodology Housing Sites

- **Policy Context**, Lichfield District Council adopted its Local Plan Strategy in February 2015. Within that Strategy, Core Policy 1 'The Spatial Strategy' and Core Policy 6 'Housing Delivery' provides the policy context for the selection of alternatives and preferred options. These policies are supported through the following localised policies; Policy Lichfield 4: 'Lichfield Housing', Policy Burntwood 4: 'Burntwood Housing', Policy: 'North of Tamworth', Policy: 'East of Rugeley', Policy Frad4: 'Fradley Housing', Policy ALr4: 'Alrewas Housing', Policy Arm4: 'Armitage with Handsacre Housing', Policy Faz4: 'Fazeley, Mile Oak & Bonehill Housing', Policy Shen4: 'Shenstone Housing', Policy Whit4: 'Whittington Housing', Policy Rural 2: 'Other Rural Settlements'.
- **Regulation 18**, Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as 'showstoppers'. The scope of this consultation was directly informed by the Local Plan Strategy which had already been subject to SA.
- **Stage 1**: All sites within the Strategic Housing Land Availability Assessment (SHLAA) 2016 which were located within or adjacent to settlements identified within the settlement hierarchy were identified and subject to the SA process along with any additional sites which were submitted/ promoted through the Regulation 18 consultation. Such an approach was taken so that sites which could be considered to be potentially aligned to the adopted spatial strategy were considered. Any sites which were noted as being complete or under-construction (having had the benefit of planning permission), or sites assessed as capable of delivering less than 5 dwellings were removed from the schedule of sites prior to being assessed. This was because it was considered that these were already moving through the planning process and for sites of 5 or less dwellings were not taken through the SA process because the LPA was not allocating sites below this threshold.
- Concurrently and in isolation an Urban Capacity Assessment was produced which assessed the deliverability of all sites identified within the SHLAA located within the existing built up areas of settlements. Where this assessment determined that an urban capacity site was deliverable, consideration was given to other evidence, including their assessment within the SA (SA outputs), to conclude on whether the site should be proposed for allocation.

- **Stage 2:** The Urban Capacity Assessment assesses each settlement within the settlement hierarchy in terms of its delivery against the requirements of the Local Plan Strategy. Where the assessment indicated that insufficient sites had been found including those found through stage 1, consideration to sites beyond the settlement boundary was given. This consideration was based on a range of evidence e.g. green belt review, including the SA outputs.
- An SA assessment was completed for each of the identified reasonable alternatives and full results are contained and a summary of allocated sites produced.
- **Stage 3: Changes to Site Selection post Regulation 19 consultation.**
- Since preparing the Regulation 19 consultation (undertaken March – May 2017) there were two significant factors that altered the planning landscape for Lichfield District. The first was receipt of three appeals from the Secretary of State, one of these appeal decisions for 750 dwellings at Land at Watery Lane was approved despite not being in conformity with the Plan. The second factor relates to the Government’s consultation on the Housing White Paper which inter alia seeks to clarify the national policy position associated with Green Belt. In light of these factors, along with significant public objection to the release of Green Belt land, a review of the housing supply was undertaken. The Housing Supply Update 2017 concluded that there was a supply of 11,259 dwellings, which is 1229 dwellings above the 10,030 dwellings. This enables the release of Green Belt sites to be excluded from the LPA whilst still meeting the overall housing requirements.
- In addition, a number sites with small yields have secured planning permission within the period between the completion of the original SA and the publication of this version. These additional sites have been included with the preferred options.
- Consultation response received during Regulation 19 consultation identified additional information which further informed site assessments. Where appropriate, amendments were made to site assessments.
- A number of new reasonable alternatives were identified within the period between the completion of the original SA and the publication of this version. These additional alternatives have been included within the SA.
- A completed assessment for all reasonable alternatives and full results are contained within Appendix E a summary of the effects of the preferred options are contained within Appendix F.
- Table 3 below identifies the preferred options for the housing sites. Those sites which have been identified and included post Regulation 19 consultation are denoted by a *.
- It should be noted that those sites deemed under construction pre the Regulation 19 are not identified within Table 3 or Appendix F. However those sites deemed under construction in the period between Regulation 19 and this publication of the SA are included.

Table 3 Preferred Options Housing Sites

Settlement	Allocations	SA reference
Alrewas	A2	28
	A3	751
	A4	974
	A5	36
Armitage	AH1	91
Burntwood	B1	1005
	B2	156
	B3	7
	B4	119

Settlement	Allocations	SA reference
	B5	4
	B7	496
	B8	429
	B10	ELAA 47
	B13	478
	B16	1037
	B17	1054
	B20*	167
	B21*	146
East of Rugeley	R1	1031
Fazeley	FZ2	115
	FZ3	140
Fradley	F1	138
Lichfield	L1	418
	L2	1032
	L3	ELAA 58
	L4	1057
	L5	1065
	L5	89-90
	L5	19
	L6	44
	L7	428
	L8	648
	L9	East of Streethay
	L10	103
	L12	31
	L13	1040
	L14	39
	L16	61
	L17	63
	L18	836
	L19	60
	L20	813
	L21	425
	L22	54
	L23	164
	L24	415
	L25	64
	L26	144
	L27	856
	L28	1070
	L29	52
	L31*	ADD1
North of Tamworth	NT1	104
	NT2	43
Other Rural	HR1	255
	HR1	135
	OR1	51
	OR3	935

Settlement	Allocations	SA reference
	OR4	1046
	OR5	1022
	OR7*	837
	OR8*	1109
	H1*	85
	HR2*	ADD2
Shenstone	S1	30
Whittington	W2	8
	W3	754

General Methodology Employment Sites

- **Policy Context** Lichfield District Council adopted its Local Plan Strategy on February 2015. Within that Strategy Core Policy 7 Employment and Economic Development provides the policy context for the selection of alternatives and preferred options.
- **Regulation 18** Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as 'showstoppers'.
- **Stage 1** Potential employment sites that feature within the District Council Employment land Review (ELR), Employment Land Availability Assessment (ELAA) 2016 and Regulation 18 consultation were identified as reasonable alternatives on the basis that these sites may be in conformity with the Local Plan Strategy.
- **Stage 2** Of those sites the following were removed, sites under construction and site that had been completed in previous years because it was considered that these were already moving through the Plan process.
- **Stage 3** An SA assessment was completed for each of the identified reasonable alternatives full results are contained within Appendix E.
- **Stage 4** Summary of scores undertaken, the summary sheets for allocated sites are contained within Appendix F.
- **Stage 5** Taken into consideration the effects identified within the SA, the policy context, wider evidence base including Employment Land Capacity Assessment and factors identified within the general methodology the following employment sites were identified as preferred options to fulfil the remaining development quantum.

Note there has been not further amendments or additions to the Employment Sites methodology following Regulation 19 consultation.

Table 4 Preferred Options Employment Sites

Settlement	Allocations	SA ref
Employment	F2	ELAA 97
	F2	ELAA 105
	F2	ELAA 113
	OR6	ELAA 96
	A6	ELAA 77
	L30	ELAA 52

General Methodology Gypsy and Traveller Sites

- Lichfield District Council adopted its Local Plan Strategy on February 2015. Within that Strategy Core Policy 6 Housing Delivery provides the policy context for the selection of alternatives and preferred options.
- Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as ‘showstoppers’.
- Gypsy and Traveller Site identification work: The process of site identification was completed using the criteria outlined within Local Plan Strategy Policy H3: Gypsies, Travellers & Travelling Showpeople. A number of sites feature within the SHLAA others identified solely as part of the implementation of policy H3. Gypsy and Traveller Site Methodology Appendix A includes an assessment which considered sites at initial filter stage.
- An SA assessment was completed for each of the identified reasonable alternatives which are considered reasonable on the basis of their broad compliance with policy H3, full results are contained within Appendix E.
- Summary of effects completed, the summary sheets for allocated sites are contained within Appendix F.
- Taken into consideration the effects identified within the SA, the policy context, and factors identified within the general methodology the following Gypsy and Traveller Site was identified as a preferred option.

Note there has been no further amendments or additions Gypsy and Traveller methodology following Regulation 19 consultation.

Table 5 Preferred Options Gypsy and Traveller Sites

Settlement	Allocations	SA ref
Gypsy & Traveller	GT21	GT

General Methodology Saved Policies

- Lichfield District Council adopted its Local Plan Strategy on February 2015.
- In total there are currently 54 saved policies carried over from the 1998 Local Plan. The Council has committed to a review of these saved policies. Appendix J of the Local Plan Strategy identifies policies that have been replaced by the Local Plan Strategy and those that will be replaced by the LPA.
- Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as ‘showstoppers’.

SA assessment has been completed for each policy. In terms of reasonable alternatives the following have been considered:

- Proposed Policy (the policy the LPA is proposing)
- Policy absent – (the impact without the policy in place)
- Alternative if suggested – (alternative policy options suggested by others)
- Saved Policy – (existing policies within the Local Plan)

These alternatives were considered reasonable on the basis that not taking a policy forward or taking a differently worded policy would be realistic if a preferable outcome was delivered.

Regulation 19 consultation responses have led to a number of wording amendments to a number of Proposed Policy options. Those amendments were appropriate and have been accommodated within the policy wording. An assessment of amended policies has been completed. These new policy options are referred to as Amended Proposed Policy.

As outlined within the introductory section of this report, Main Modifications proposals have resulted in two further policies assessments being completed.

The introduction of new policy MM1: Local Plan Review has resulted in the creation of a separate assessment. MM6 Protection of Employment Land has been included within the existing matrix and summary table for EMP1. These policy options are referred to as Main Modification within the Appendix E

Appendix G contained the scoring for each of the proposed policies and Supporting Commentary and Recommendations if appropriate.

Reasons for selecting preferred alternatives.

To provide a link between Appendix E: Full SA Scoring Matrix and Appendix F: Allocated Sites Summary Impact, Table 6 Reasons for Preferred Alternatives in relation to housing and employment selection has been included within this updated version of the SA. A separate table, Table 7 Reasons for Preferred Alternatives Gypsy and Traveller sites has also been included. The tables will ensure the narrative behind preferred alternatives is easily and succinctly available. Table 6 and Table 7 can be found within Appendix G.

4 What were the appraisal findings at Publication stage?

The SA Report must include

- The likely significant effects on the environment associated with the Publication Plan.
- The measure envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Plan.

This section of the SA report relates to the Publication Plan stage of the SA process. The first part provides a brief overview of the methodology used to undertake the appraisal. A review of the findings and the envisaged cumulative, synergistic and indirect effects of the LPA is provided. Conclusions for each stage of the assessment are also presented.

Methodology

The purpose of the SA is to identify likely significant effects on the baseline /likely future baseline of the Plan. This has been achieved by assessing the plan against 16 Sustainable Indicators supported through a number of Site Specific Questions identified through the scoping process and which are collectively referred to as the SA Framework.

Due to the many uncertainties, there is a need to exercise caution when identifying effects. The appraisal findings contained within Appendix E (sites) and Appendix H (policies) have therefore been notably cautious. All likely significant effects are identified within the headings for each of the sites and polices, and commentary is provided in respect of all of the individual site assessments and remaining significant effects. The commentary should be read in conjunction with Appendix I (assumptions) which provides greater detail of assumptions made and includes context for significant effects.

The SA scoring is not a quantitative process but a qualitative one, it is also based on the professional judgement of officers. A single negative score against an objective could be so significant that even if other scores are positive an option may be rejected, or policy amended. Alternatively a negative score could be justifiable and not require any changes to be made.

In many instances, it has not been possible to predict whether significant effects are likely to occur, as opposed to only possibly occurring. This is most notable in respect to SA 7 (To reduce, manage and adapt to climate change). In these cases, the appraisal has undertaken a precautionary approach, recording any information which may result within the assumptions and commentary and recording a neutral or uncertain effect where it was not possible to conclude the nature of the effect. Despite these uncertainties, the appraisal has sought to focus on the merits or implications of the LPA.

It should be noted that in predicting the likely significant effects of the LPA, regard has been given to the criteria presented within the Environmental Assessment of Plan and Programmes Regulations 2004, Schedule 1. Where possible, the duration, frequency and reversibility of effects have been taken into account. Cumulative, synergistic and indirect effects have also been considered.

Table 8 below provides a key for the scoring mechanism.

Table 8 Scoring Mechanism

Scoring	Explanation
++	Significant positive effect on sustainability objective
+	Minor positive effect on sustainability objective
N	Neutral effect on sustainability objective
-	Minor negative effect on sustainability objective
--	Significant negative effect on sustainability objective
?	Uncertain effect on sustainability objective

The full results of the SA are provided in tables as the one below in Table 9

Table 9 Example Scoring Table

SA Objective	Site Specific Question	Score	Comment
To promote biodiversity protection enhancement and management of species and habitats	Will it conserve protected/priority species	Double -	There are protected species present on site and on land adjacent to the site 2016 survey data

Summary of Findings

SA assessment was completed for each of the identified reasonable alternatives and full results are contained within Appendix E. Allocated sites summary impact are contained within Appendix F Sites and Appendix H policies.

Assessment of Secondary, Cumulative and Synergistic Effects

In addition to the appraisal of individual policies and sites which may arise direct from policy and site implementation, the SEA Regulation (Annex 1f) requires consideration of the overall effect of the plan including secondary, cumulative and synergistic effects of the plan policies.

The SA Guidance (ODPM 2005) defines secondary, cumulative and synergistic effects as:

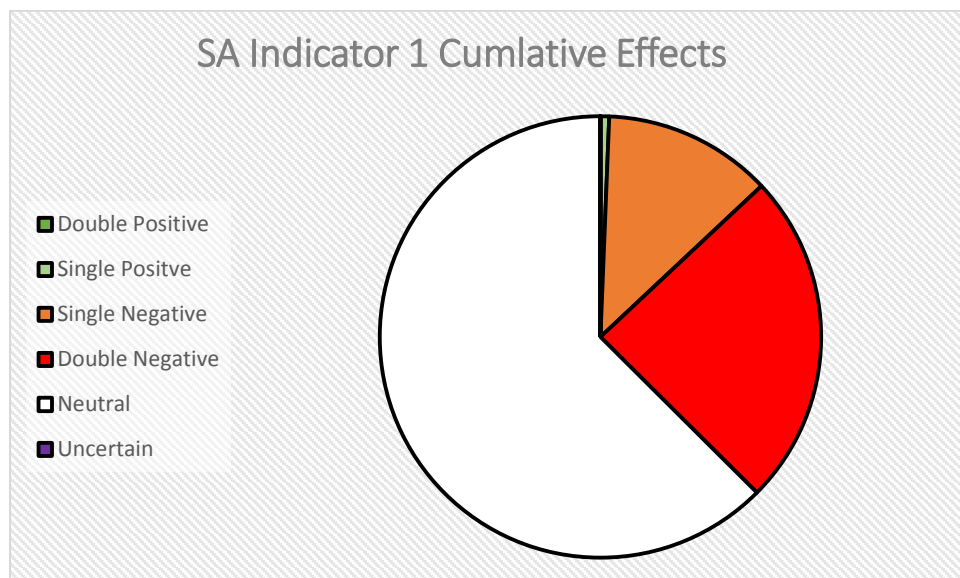
- Secondary (Indirect) effects are those that are not a direct result of the Development Plan, but occur away from the original effect or as a result of a complex pathway. These effects can be both positive and negative. Examples of secondary effects are a development that changes a water table and which, as a result, may affect the ecology of a wetland; or construction of one project that facilities or attracts other development.
- Cumulative effects may arise where several developments each have insignificant effects but together have a significant effect, or where several individual effects of the plan have a combined effect result in noise disturbance or visual impact.
- Synergistic effects interact to produce a total effect greater than the sum of the individual effects. These can often occur as habitats, resources or communities get close to capacity. For example a wildlife habitat can become progressively fragmented to such an extent that there is insufficient space to support the species which have used the space in the past. On the other hand, beneficial synergistic effects may occur when a series of major transport, housing and employment developments in a sub-region, each with their own effects, collectively reach a critical threshold so that the developments as a whole and the community benefiting from them become more sustainable.

These terms are not mutually exclusive and in undertaking this assessment the term cumulative effects is taken to include secondary and synergistic effects

Summary of Cumulative Effects

The detailed site specific questions included within the SA scoring matrix has enabled the identification of trends which identified a broad range of Cumulative effects. The significant positive and negative effects, uncertain effects have been summarised below using charts and commentary. In addition charts summarising of all the SA Objectives can be viewed in Appendix J.

Chart 1: To promote biodiversity protection, enhancements and management of species and habitats.

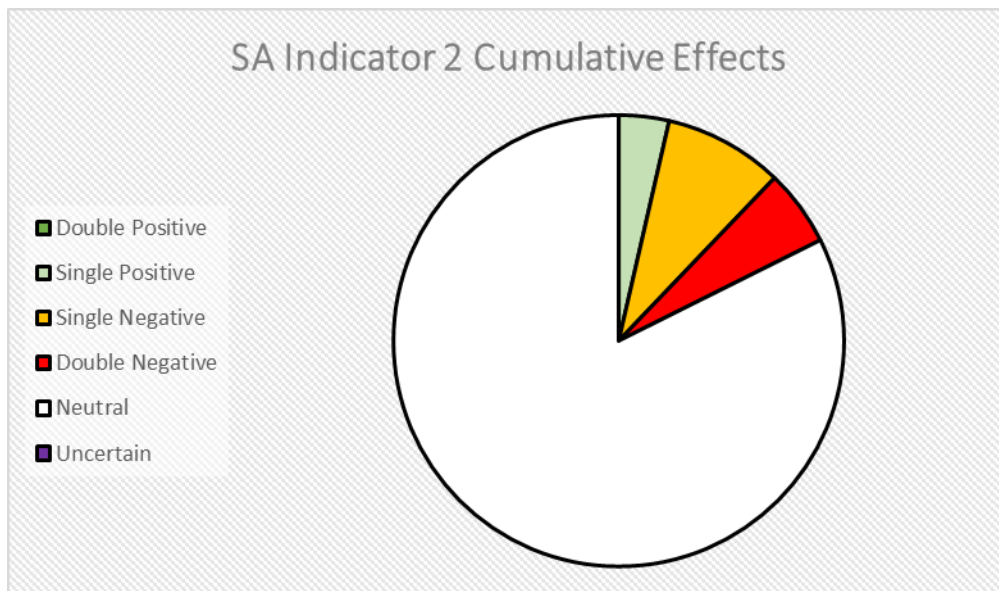


- The significant proportion of Double Negative effects can be accounted for by the identification of sites within the 0-15km zone of influence attached to the Cannock Chase SAC.

The level of development proposed through the LPA is in line with the adopted Local Plan Strategy. This level of residential growth is mitigated through the approved Strategic Access Management and Monitoring Measures approved by the Cannock Chase partnership. The District Councils adopted Community Infrastructure Levy Regulation 123 ensure obligations are secured to enable the implementation of identified mitigation measures. It is necessary for development to mitigate their impact on the Cannock Chase SAC.

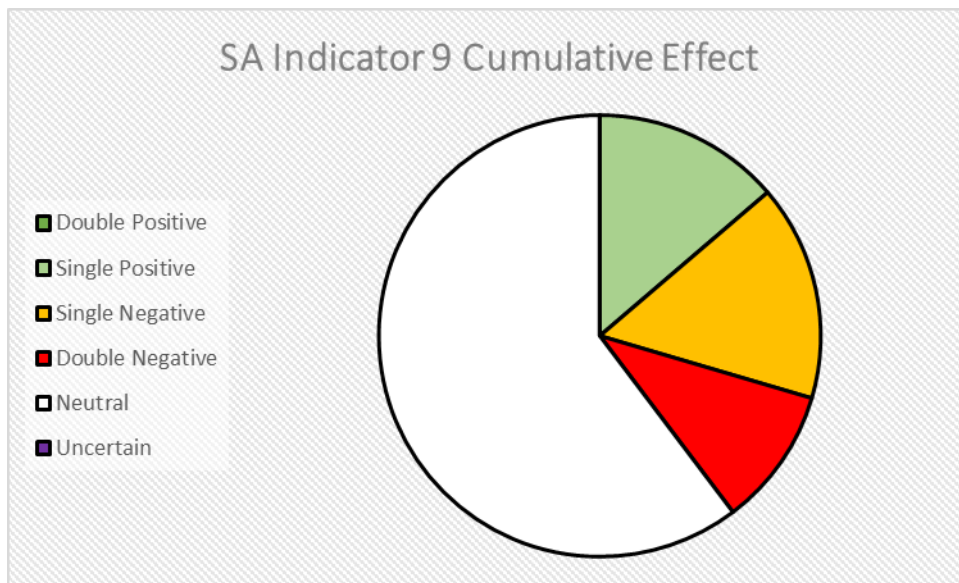
- Further negative scores have been recorded against the loss of ecological connectivity, what is difficult to record at this point within the process is if at detailed design stage through the interpretation of adopted policy and support included within the adopted Supplementary Planning Documents mitigation could be identified.
- It is clear that the plan will have a negative impact on biodiversity and habitats and it should be noted that detailed survey work to confirm site detail at time of delivery and measures identified within Appendix I (assumptions) would to a large extent mitigate these effects.

Chart 2: To promote and enhance the rich diversity of the natural archaeological/geological assets and landscape character of the district.



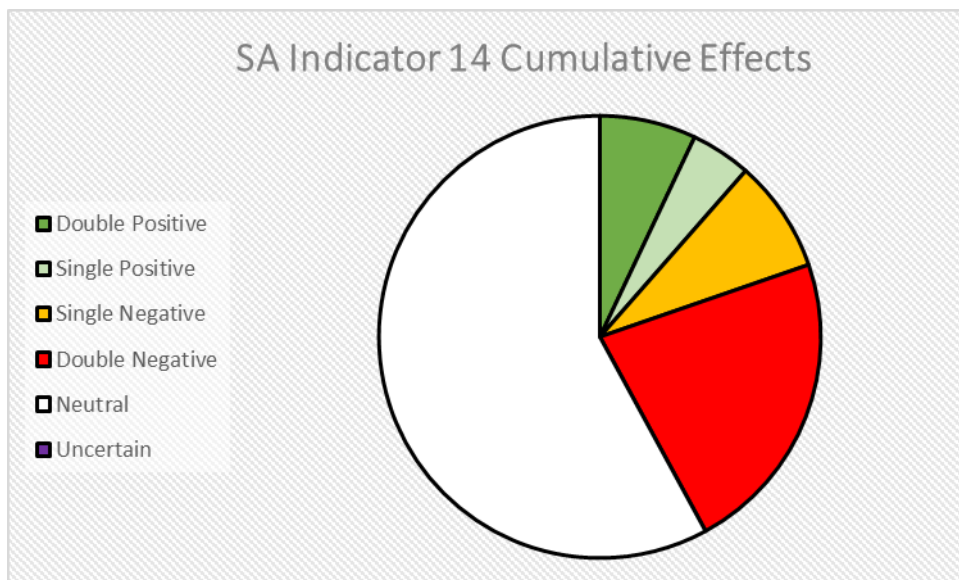
- The negative cumulative effects against this indicator result in large from the impact on landscape character. What was unclear at assessment is the opportunities that sites offer to improve and promote landscape character and connectivity providing mitigation for such impacts.
- In addition it is also unclear as the positive overall impact that the proposed amendments to the saved policies could have on delivering mitigation in term of cumulative effect in this regard most notably National Forest and AONB Policy.
- Comments received as part of the Regulation 19 consultation attached to the Focused Changes LPA lead to a small number (four) of preferred option sites receiving amended scores relating to Site Specific Question 7. These accounts for the small increase in single negative effects relating this indicator. Of those effects identified all can be mitigated through existing policies within the adopted Local Plan Strategy.

Chart 3: Seek and improve air soil and water quality



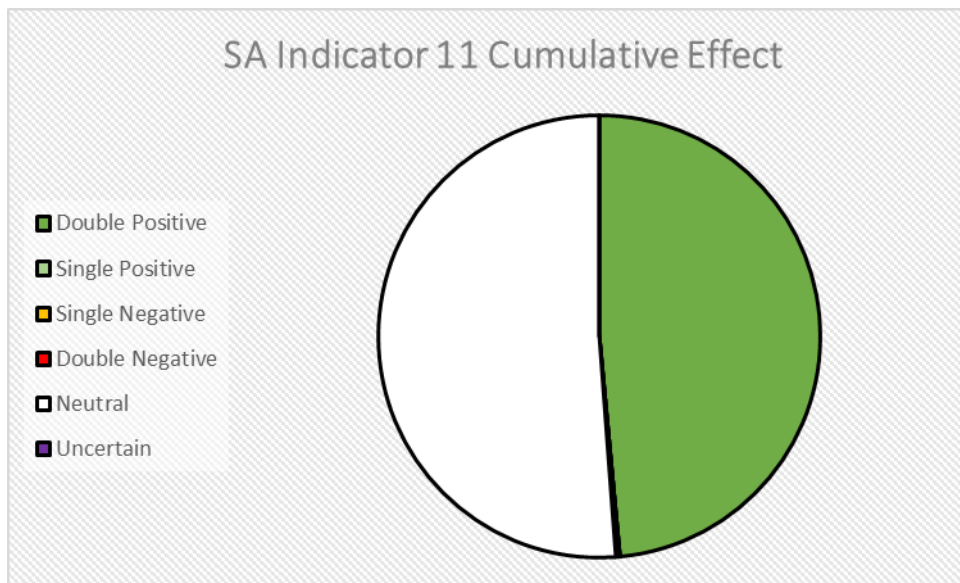
- The negative effects against this indicator result in large part from the impact of soils in terms of the loss of agricultural land. Whilst the LPA focused on delivering development on previously developed land there still remains an impact. What is uncertain is if any cumulative negative impact will result from the loss of individual areas. This uncertainty will need to be monitored to enable the mitigation measures if required.

Chart 4: Improve opportunities for prosperity and economic growth



- The significant negative effect against this indicator results in the loss of employment land for housing development. This could result in the cumulative effect of the District being unable to provide adequate employment provision and opportunities for economic growth. However placed within a broad policy context, the District Council Employment Land Review 2012 concludes that the District has an excess of employment land particularly B8, therefore this effect may not require mitigation, only appropriate monitoring.

Chart 5: To provide affordable homes that meet local need.



- In relation to its cumulative effects the LPA is largely positive and this should not be overlooked. In particular the LPA by its nature provides homes for the District SA Objective 11 and to a greater extent identifies a positive impact in terms of using existing resource well, SA Objective 5. As illustrated in Chart 4 and 5 respectively.

Chart 6: To maximise the use of previously developed land/buildings and the efficient use of land.

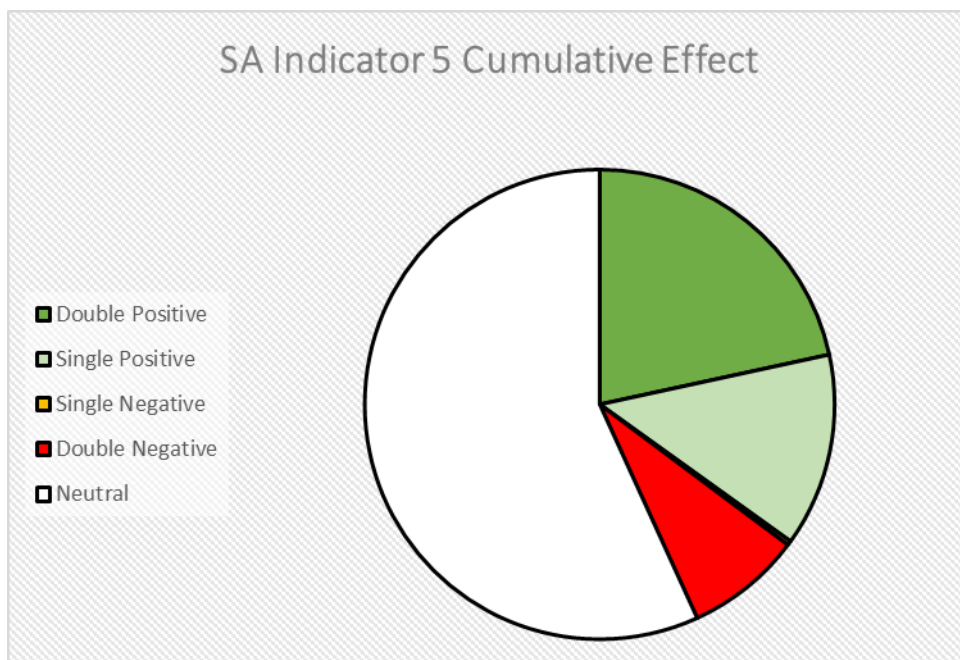
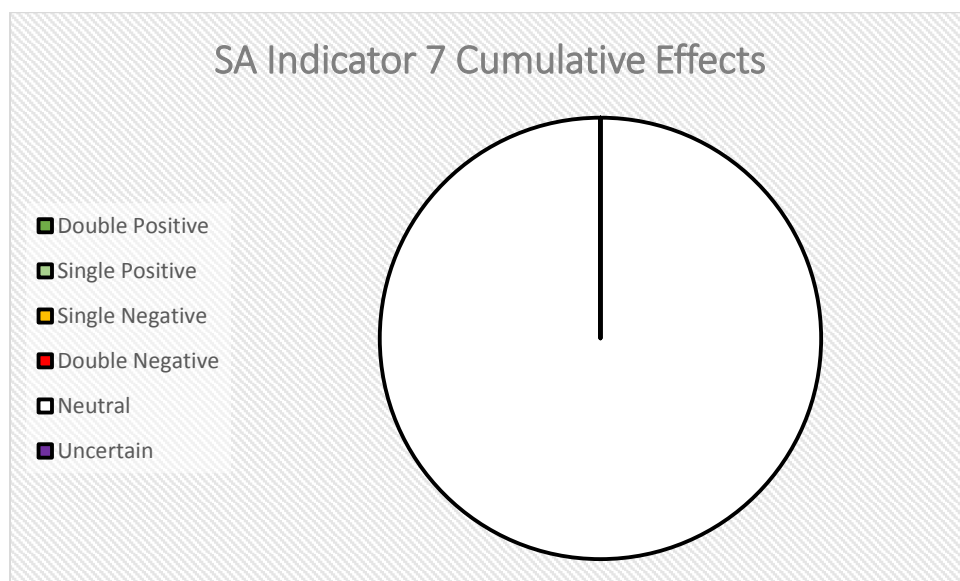


Chart 7: To reduce, manage and adapt to the impacts of climate change.



- The site specific question should result in the identification of effects. However due to the nature of the LPA being predominately a site based document it was unclear as to the extent each site would have on the questions posed therefore a precautionary approach was taken and all sites scored neutral.
- An increase in the District contribution to greenhouse gas production (or exported production) is an almost inevitable consequence of the quantum of proposed development and includes factors such as increasing mobility, embedded energy in construction material and increased energy use from new housing and employment development. It is clear that the delivery of the LPA will have an impact on climate change. While the negative effect that may result are likely to be generational, none the less spatial planning has some influence over the manner in which places evolve and operate. Every effort should be made through the implementation of policy, supported by Supplementary Planning Documents and in combination with other external plans to mitigate these effects and to ensure adaption measures are put in place in a timely manner. The monitoring of this cumulative effect and mitigation will be reported through the Authorities Monitoring Report.

Summary of Cumulative Effects

Negative

- Pressures on biodiversity and Landscape in both urban and undeveloped areas
- A reduction in landscape quality
- Loss of agricultural grade land
- Loss of existing employment land

Positive

- Provision of affordable homes
- Use of brownfield land.

Uncertain

- There remains uncertainty in terms of cumulative impact of the plan in relation to SA objective 7 To reduce, manage, adapt to climate change.

Interaction with other relevant plans and programmes

The analysis of cumulative effects should also consider the significant effects of the plan in combination with the effects of additional plans, policies and programmes. Appendix C of the SA report assesses the way in which these plans and programmes affect the LPA and identify the way in which the LPA can be strengthened or supported by such documents. It is recognised that some mitigation measures are more appropriately dealt with through partner documents at lower tiers of plan making, such as in Supplementary Planning Documents.

Inter relationships

A compatibility assessment has been developed to enable an understanding of the inter relationship between each SA objective. Table 10 below illustrates a range of effects from no links, probably compatible to potential incompatibility. SA Indicator 11, 14 and 15 and their interrelationship with other Indicators are where incompatibility occurs.

- SA Indicator 11: To provide affordable homes to meet local need.
- SA indicator 14: Improve opportunities for prosperity and economic growth.
- SA indicator 15: To enhance the vitality and viability of existing city, town and villages centres within the District.

These indicators identify positively against Material Assets and it is therefore not surprising that at this strategic level of review it is difficult for them to illustrate compatibility with those indicators dedicated to measuring SA Objectives focused on Biodiversity, Geodiversity, Flora and Fauna and Soil, Water and Air. That noted these inter relationships have been assessed without the detailed design information from each site and the individual intricacies each one of those will have. Further no measure of potential mitigation has been reflected within the assessment matrix. Mitigation would enable the extent of such conflicts to be addressed.

Table 10 Compatibility matrix of sustainability appraisal objectives

		-	No links
		+	Potential incompatible
		-	Probably compatible

1																			
2	+																		
3	-	+																	
4	+	+	+																
5	+	+	+	+															
6	-	-	-	+	+														
7	+	-	+	+	+	+													
8	-	-	+	+	+	+	+												
9	+	-	+	+	+	+	+	+											
10	+	-	-	+	+	-	+	-	+										
11	+	+	+	+	+	+	+	+	+	+									
12	-	-	-	+	+	+	-	-	+	-	+								
13	-	-	-	+	+	+	-	-	-	-	+	+							
14	+	+	+	+	+	+	+	+	+	+	+	+	+						
15	+	-	+	+	+	+	+	+	+	+	+	+	+	+					
16	-	-	-	-	+	+	-	-	-	-	+	+	+	+	+				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16			

In summary the vast majority of the objectives either sit comfortably alongside each other or have no effects. However a number have been identified as being potentially incompatible.

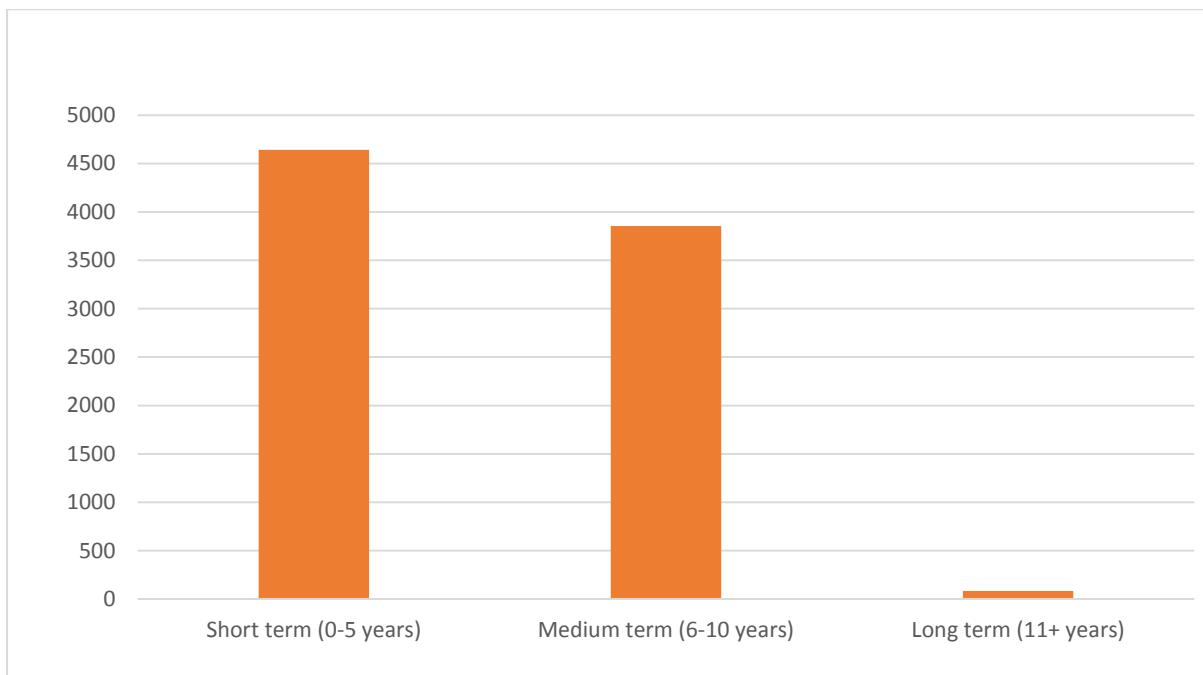
Duration

As part of the Scoping Report that proceeded this assessment timescales for durational effects were identified as follows:

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

Table 11 below plots the preferred sites in regarding to rate of development over the plan period.

Table 11 Durational Effects



It is clear that in combination the plans effect in regard to housing will peak during the Short term, drop in volume but remain high in the Medium term, with effects falling dramatically at the point at the Long term is reached. However, within each 'term' there is very likely to be sites that have greater positive or negative effects than their counterparts. These individual peaks and troughs are best illustrated in Appendix F.

In regard to policy effects the majority will be consistent across the plan period with the peaks and trough identified above against housing and employment delivery. Effects positive or negative associated with Policy IP2: Lichfield Canal will have a far greater link to the timescales attached to the completion of the Lichfield Canal. Further Policy NR11 National Forest and Policy NR10 have defined restricted geographical areas and as such will only have effect when development in those areas is brought forward.

In regard to impact generated from Main Modifications on durational impacts, MM1: Local Plan Review states the following;

“Lichfield District Council shall carry out an early review of the Local Plan for Lichfield that will be submitted to the Secretary of State for Examination in accordance with the latest Local Development Scheme or no later than the end of December 2021.”

Whilst the policy will not impact on the likely significant impacts associated with the delivery of sites, impacts associated with certain policies will, to some extent, be curtailed after 2021. The significant impacts generated from the following policies will cease following the implementation of MM1, which will see policies reviewed and replaced.

Impacts from these policies occur directly at the point of implementation, there will not be any ongoing impacts and therefore all impacts being experienced within the Short Term period of the plan.

- Policy ST3: Road Line Safeguarding
- Policy E2: Services Access to our Centres
- Policy E3: Shop fronts and advertisements

These impacts (summarised in Appendix H) are overwhelmingly positive. There are however benefits associated with the duration restriction, most notably relating to significant negative impacts on Sustainability Objective 2 relating to Policy ST3.

The following policies will also fall within the requirements of MM1 (their impacts are identified in Appendix H). Implementation of these policies in the Short term period will result in impacts being experienced into the future. As such resulting in impacts continuing through to the Medium term period of the plan.

- Policy IP2: Lichfield Canal
- Policy EMP1: Employment Areas & Allocations
- Policy NR10: Cannock Chase Area of Outstanding Natural Beauty
- Policy NR11: National Forest
- Policy BE2: Heritage Assets
- Policy Lichfield 3: Lichfield Economy

Due to the transport nature of the following policies it is considered that the impacts will continue through to the Long term period of the plan.

- Policy ST4: Road and Junction Improvements - Lichfield City
- Policy ST5: Road and Junction Improvements – Fradley

Mitigation

The LPA follows the adoption of the Local Plan Strategy and a wide range of Supplementary Planning Documents. Local Plan Strategy was adopted in 2015. As well as providing a spatial strategy for the district it also contains a number of relevant Core Policies and Development Management Policies which will facilitate mitigation in response to significant negative effects identified as part of the LPA. Main Modification MM1 will after 2021 lead to the delivery of a set of replacement policies both Strategic and Non-Strategic in nature in line with the requirements of the National Planning Policy Framework 2018.

In addition the district has adopted a number of Supplementary Planning Documents covering the following areas:

- Biodiversity and Development
- Developer Contributions

- Trees, Landscaping and Development
- Historic Environment
- Rural Development
- Sustainable Design

They build upon and provide more detailed advice and guidance on the policies within the Local Plan Strategy.

Within the LPA each allocation has a number of Key Development Considerations whilst not all encompassing they identify potential mitigation measures that may arise during the planning application process that applicants will need to address.

Lichfield District Council adopted its Community Infrastructure Levy (CIL) charging Schedule in April 2016. The District Councils Regulation 123 list sets out infrastructure requirements within may in whole or in part be funded through CIL. It is likely to mitigating actions will be supported by CIL.

It is also considered that additional measures contained within other plans, policies and programmes will also support mitigation e.g. Cannock Chase SAMM.

All five routes of mitigation have been designed to complement and reinforce one another and will enable a raft of mitigation responses to bring the plans impacts down to an acceptable level.

Overall Conclusions

Overall, the level of development proposed by the publication version of the LPA accords with the identified needs of the District. The range of sites allocated by the LPA strike a balance between the need to protect the Districts valuable environmental assets, promote economic growth and deliver the spatial strategy for the District. Most importantly the LPA sits within the policy context of the Local Plan Strategy which has identified and outlined within policy the mitigation measures which are required to make development acceptable. Whilst the additional of MM1 will have an impact on the detail of these policies it is considered that the overarching requirements contained within the NPPF 2018 through Strategic and Non –Strategic policy will ensure the Development Plan for the District will continue to provide the ability to make development acceptable. It is therefore considered that these measures are sufficient to guard against adverse environmental effects. The SA is legally compliant, and provides robust basis in which to base decision making in terms of site and policy selection.

5 What are the next steps (including monitoring)?

The SA Report must include:

- A description of measures envisaged concerning monitoring

Developing a Monitoring Framework

The SEA Directive requires the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects and to be able to take appropriate action where necessary.

The monitoring undertaken on the LPA will help to:

- Monitor the significant effects of the Plan
- Track whether the plan has had any unforeseen effects
- Ensure that action can be taken to reduce/offset the significant effects of the plan
- Provide baseline data for future sustainability appraisals, and
- Provide evidence of how the environment / sustainability criteria of the area is evolving.

The requirements of the SEA Directive focus on monitoring the effects of the Plan. This equates to both the plan's significant effects and also unforeseen effects. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to the implementation of the Plan when they occur as often other plans, projects or programmes could all effect the quality of environment, economic performances or the social aspects of the Plan.

It is good practice for the monitoring of significant sustainability effects to be integrated with other monitoring of the Local Plan Strategy and LPA. For this reason, the Council will report significant effects as part of its existing monitoring regime. Proposed significant sustainability effects indicators are included in the Sustainability Appraisal Framework. These have been drawn from the baseline information and key sustainability issues identified within the Sustainability Appraisal Scoping report and are identified to monitor potential significant adverse effects highlighted in the main report.

A complete monitoring framework will be established prior to the Adoption of the Site Allocations Plan and the Authority Monitoring report updated to reflect the proposed framework.

What happens next

Following the Examination of the LPA in September 2018 seven main modifications have been put forward. This documents has taken such modifications into consideration. Approval will be sort from the appropriate Council groups to undertake a seven week public consultation. Comments will be processed and consideration by the the inspector for consideration.

Local Plan Allocations Sustainability Appraisal Appendices Contents

Please use the links below to view each appendix.

Appendix A – Amendments to SA Framework (LPS – LPA)

Appendix B – SA Scoping Report consultation responses

Appendix C – Review of published Plans, Policies, Strategies and Initiatives

Appendix D – Baseline, current state of the environment

Appendix E – Full SA Scoring Matrix

- Appendix E – Alrewas
- Appendix E – Armitage with Handsacre
- Appendix E – Burntwood
- Appendix E – East of Rugeley
- Appendix E – Employment
- Appendix E – Fazeley, Mile Oak & Bonehill
- Appendix E – Fradley
- Appendix E – North of Tamworth
- Appendix E – Other Rural
- Appendix E – Gypsy & Traveller
- Appendix E – Lichfield
- Appendix E – Shenstone
- Appendix E - Whittington
- Appendix E – Post Regulation 19

Appendix F – Allocated sites summary impacts

Appendix G – Table 6 Reasons for Preferred Alternatives Housing and Employment and Table 7 Reasons for Preferred Alternatives Gypsy and Travellers. _

Appendix H – Saved policy summary

Appendix I - Assumptions

Appendix J – Cumulative effects summary

Lichfield District Council



Local Plan Allocations (Focused Changes) Habitat Regulations Assessment

January 2018

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Summary

A Habitats Regulations Assessment (HRA) of spatial development plans is a requirement of the Habitats Directive (92/43/EEC) as set out in the Conservation of Habitats and Species Regulations 2017 (as amended). This report details the HRA for Lichfield District Council's Local Plan Focused Changes document (the revised Regulation 19 consultation). The Focused Changes document includes:

- Reviewed local plan policies from the 1998 Local Plan;
- Non-strategic housing allocations;
- Nonstrategic employment allocations;
- Non-strategic gypsy traveler and travelling show people allocation;
- Revised policy framework for Lichfield City and Burntwood Town Centre; and
- Policy as regards development at/near Burntwood.

This report sets out the method, findings and conclusions of the HRA undertaken by the Council.

The findings of the HRA work for the Local Plan Strategy was a key consideration and helped to inform this Appropriate Assessment for the Focused Changes document. In the HRA of the Local Plan Strategy, the authority concluded that an adverse effect on the integrity of Cannock Chase and the River Mease SACs would arise from residential development within the zone of influence of Cannock Chase SAC and the catchment of the River Mease SAC in the absence of mitigation.

A previous assessment was undertaken of a Part 2 document to the Local Plan Strategy called the Local Plan Allocations document (March 2017). However following a review of the housing supply and in response to the consultation to the Local Plan Allocations document the opportunity is being taken to consider a Local Plan Part 2 which removes the Green Belt housing allocations and incorporates other suggested changes. These are being presented within a Focused Changes document which is the subject of this HRA, the policies it contains are listed in Appendix B of this assessment.

This document forms part 2 of the Habitats Regulation Assessment (HRA) process setting out the outcomes from the Appropriate Assessment stage of HRA and provides a record of Lichfield District Council's conclusion that the policies and non-strategic allocations proposed through the Focused Changes document, will have no adverse effects on the integrity of the Cannock Chase and River Mease SACs through the implementation of Policies NR7 and NR8 of the Local Plan Strategy and/or a developer contribution scheme utilising both the Community Infrastructure Levy and S106 funding. The Cannock Chase SAC Strategic Access Management and Monitoring Measures (SAMMM) and the River Mease Developer Contributions Scheme (DCS1 and 2) enable mitigation thus ruling out adverse effects on the integrity of these European sites. In addition there will be no adverse effects on the integrity of the Cannock Extension Canal SAC through the implementation of the revised Lichfield Canal policy.

Background

In October 2005, a judgment of the European Court of Justice required the UK to extend the requirements of Article 6(3) and (4) of the Habitats Directive to include the assessment of the potential effects of spatial and land use plans on European sites.

The Lichfield District Local Plan Strategy 2008-2029 was adopted on 17th February 2015 and provides the planning framework and spatial strategy that guides development within the District over the plan period to 2029. The Local Plan Strategy was subject to its own Habitats Regulations Screening Assessment.

Lichfield District Council is currently preparing the second part of its Local Plan. Within the adopted Local Plan Strategy this is referred to as the Local Plan Allocations document. The Local Plan Allocations will inter alia (set out above) allocate non-strategic housing sites, employment sites and a site for gypsy and travellers to meet the requirements as set out in the Local Plan Strategy 2008-2029 and a review of the remaining 1998 Local Plan Policies and review the retail and office policies within the Local Plan Strategy (Lichfield 3 & Burntwood 3). Following a review of the housing supply and in response to the consultation on the Local Plan Allocations Document it was decided to re-consider the potential housing supply available and review the projections associated with delivering the 10,030 dwelling figure to establish whether Green Belt release was required. Subsequently a focused changes document has been prepared which proposes removing the sites allocated for housing which lay in the adopted Green Belt and identifies other suggested changes detailed below in Section 4 and in Appendix B.

The Local Plan Strategy

The Lichfield District Local Plan Strategy sets out the overall level of future growth including strategic development allocations and broad locations for development, providing the broad policy framework and establishing a long-term strategy to manage development, provide services, deliver infrastructure and create sustainable communities. The Strategy consists of a vision and strategic objectives, a spatial development strategy, core policies and development management policies and sets out how the strategy will be implemented and monitored.

The Spatial Strategy concentrates growth in and around Lichfield District's most sustainable settlements and makes best use of existing infrastructure. The Strategic Development Allocations (SDAs) and Broad Development Location (BDL) are located in accordance with the settlement hierarchy and in and around sustainable settlements, namely Lichfield, Burntwood, Fradley, to the East of Rugeley and to the North of Tamworth. Together these sites will deliver almost 6,000 homes within the District within the plan period.

With regard to employment and economic development, the District Council aims to build on the strengths of the existing local economy by allocating land for employment and supporting the redevelopment and modernisation of existing employment sites as well as supporting new and more sustainable working practices.

Other policies within the Local Plan Strategy cover other thematic areas of sustainable transport, homes for the future, economic development, healthy and safe communities, natural resources and the built and historic environment.

The Local Plan Strategy sets out a requirement to deliver a minimum of 10, 030 homes to be delivered across strategic and non-strategic sites.

The HRA screening report on the Local Plan Strategy was consulted upon in March 2014. This assessed the potential for the Plan to affect a number of European sites as follows:

- River Mease (within District)
- Cannock Extension Canal
- Cannock Chase SAC
- Pasturefields Salt Marsh
- West Midlands Mosses and Chartley Moss SAC
- Ensors Pool SAC
- Fens Pool SAC
- Humber Estuary

The HRA of the Local Plan summarised that for the majority of the Natura 2000 sites the Lichfield District Local Plan Strategy would result in no significant effects and no in-combination effects. However potential effects were identified on Cannock Chase SAC and the River Mease SAC as a result of the proposed additional planned housing growth. The HRA Screening Reports for the Local Plan Strategy can be viewed on the Council's [website](#).

Part 2 to the Local Plan Strategy – The Local Plan Allocations (Focused Changes document)

A key element of the Part 2 to the Local Plan Strategy is to add detail to the development strategy set out in the Local Plan Strategy by allocating sites as necessary to meet development needs. Furthermore, the Part 2 to the Strategy also provides the opportunity to review development management policies required to assess and determine planning proposals and applications, particularly where these are not already covered by the general policies set out in the Local Plan Strategy.

The Part 2 to the Strategy sets out detailed development management policies and allocations to meet the needs of the District, which includes retail, housing, employment and provision for a gypsy site. The housing sites which have been allocated comprise sites of 5 dwellings or more, with sites of less than 5 considered as windfall, urban capacity sites within the District's built up areas and further non-strategic allocations beyond existing urban areas. It has been assumed that around 55 windfall dwellings per annum will come forward based on previous delivery rates.

As a Part 2 to the Strategy the Focused Changes document updates the housing supply by removing completed sites and adding these to the completed supply and allocating new sites many of which have received planning permission. The focused changes document still seeks to provide the same overall housing requirement as the adopted Local Plan Strategy which is 10, 030 homes up to 2029, however it includes a greater flexibility in achieving this requirement. The Local Plan Strategy made provision for 10, 244 homes to 2029 and therefore

included an allowance for some flexibility and the Focused Changes document proposes 11,515 homes, this represents an increase in flexibility of 1,271 homes, however it represents an approximate increase of only around 100 dwellings within the 0-15km zone of influence for the Cannock Chase SAC. These modifications within the Local Plan (Focused Changes document) have been considered and are unlikely to have any effect on European sites identified within the scope of this HRA other than Cannock Chase SAC and the River Mease SAC as concluded in the Local Plan Strategy HRA.

The Council has also updated non-Green Belt settlement boundaries where necessary to accommodate sites which have been allocated.

Other detailed development management policies have been included following a review of the saved policies of the 1998 Local Plan and the responses to the consultation. This includes a policy to safeguard a route for the Lichfield Canal. A potential to impact upon the Cannock Extension Canal SAC was identified and this is included within the scope of this assessment.

Purpose of this Report

The findings of the HRA for the Local Plan Strategy was a key consideration and helped to inform the assessment for this Part 2 to the Strategy the Focused Changes document. The HRA of the Local Plan Strategy concluded that the development within the Local Plan Strategy would only have an adverse effect on the integrity of Cannock Chase and the River Mease SACs with effects on other European sites screened out. The Focused Changes document does not propose any additional growth over and above the minimum requirement in the adopted Local Plan Strategy, although it does increase the flexibility in achieving this requirement; and includes a revised policy in relation to the Lichfield Canal which links to the wider canal network and thus Cannock Extension Canal SAC. On this basis the Authority has concluded that it would be sufficient to limit the scope of this screening exercise to potential effects on the Cannock Chase, River Mease and Cannock Extension Canal SACs only.

This report reviews the potential for the Part 2 to the Strategy the Focused Changes document (including the proposed site allocations) to affect the Cannock Chase, River Mease SAC and Cannock Extension Canal SACs and provides a proportionate assessment of this Plan in order to satisfy the Habitats Regulations.

Detailed descriptions of Cannock Chase SAC, River Mease SAC and Cannock Extension Canal SAC are at Appendix A.

The report will consider the following:

- The requirement for HRA and the guidance published to inform the process; and
- The need for further assessment

Habitat Regulations Assessment and the Local Plan Allocations

Article 6(3) of the Habitats Directive requires that any plan or project, which is not directly connected with or necessary to the management of a European site, but would be likely to have a significant effect on such a site, either individually or in combination with other plans

or projects, shall be subject to an ‘appropriate assessment’ of its implications for the European site in view of the site’s conservation objectives. In light of the conclusions of that assessment, and subject to the provisions of Article 6(4) of the Habitats Directive, the Competent Authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, having obtained the opinion of the general public. Article 6(4) provides that if, in spite of a negative assessment of the implications for the site, and in the absence of alternative solutions, the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected.

The Conservation of Habitats and Species Regulations 2017 (often referred to as the Habitats Regulations) transpose the Habitats Directive into national law in England and Wales and require that HRA is applied to all statutory land use plans. The aim of the HRA process is to assess the potential effects arising from a plan against the conservation objectives of any European site.

Reference in this report to ‘European sites’ should be taken to include the following:

- Special Areas of Conservation (SACs) for habitats and species designated through the EU Habitats Directive;
- Special Protection Areas (SPAs) for the protection of wild birds and their habitats designated through the EU Birds Directive;
- Ramsar sites, identified through the Convention on Wetlands of International Importance;
- Sites that are being considered for designation, referred to as Sites of Community Interest, candidate SACs or proposed SPAs.

This assessment of the Focused Changes document has been carried out in accordance with guidance set out in ‘Planning for the Protection of European Sites: Appropriate Assessment’ which provides guidance in respect of the Habitat Regulations in preparing land use plans. Section 2.1 of this guidance document summarises the HRA process as comprising of three main tasks:

Stage 1: Identifying whether a Plan is likely to have a significant effects

This stage consists of identifying ‘European’ sites which could be affected by the Plan and reviewing the conservation objectives for each feature of the site. The changes that policies and proposals in the plan may cause are appraised and the likely effects on the interest feature of each site, either indirectly, directly, alone or in combination with other projects and plans is considered. Where no likely significant effects occur as a result of implementation, no further assessment is required.

Stage 2: Appropriate Assessment

Undertake an assessment of the implications of the plan (ie those policies and proposals identified in Stage 1 as requiring further assessment) for each European site likely to be affected, in light of their conservation objectives. Review how the plan in combination with other plans or projects will interact and affect the site when implemented and consider how the effects of the plan on the integrity of the site could be mitigated and consider alternatives. If it can be demonstrated that the plan will not have an adverse effect on the European sites,

the plan can be adopted. If the plan is still likely to have an adverse impact on the site(s) the Authority would be required to progress to stage 3 of the process.

Stage 3: Assessment where no alternatives exist

The competent authority must demonstrate that there are no alternative solutions to the plan which are less damaging. The competent authority must establish whether there are *'imperative reasons of overriding public interest'* making it necessary to proceed with the plan or policy and identify and agree compensation measures and how these will be monitored.

This document sets out the Council's findings in respect of Stage 1 of the above process. The following section clarifies the scope of the assessment.

The Habitat Regulations Assessment Process

The Focused Changes document aims to refine the requirements and locations for non-strategic development to meet the level of growth set out in the adopted Local Plan Strategy. The Council previously undertook a Habitat Regulations Screening Assessment on the Local Plan Strategy in 2012 with an addendum in 2014 to take into account modifications arising from its Examination in Public. These HRA's set out in full the scale of growth, its distribution as well as the strategic policies to guide this growth; it also assessed the potential European sites that could be affected in light of their conservation objectives and their specific vulnerabilities. This assessment indicated that the Local Plan Strategy would have likely significant effects on three European sites either alone or in combination with other plans and programmes.

These HRAs produced in 2012 and 2014 assessed the locations of the strategic development allocations and the proposed growth requirements for each of the key rural settlements. There was additional growth required to be accommodated in general within the wider rural area. As the Focused Changes document identifies housing in locations where impacts on the Cannock Chase SAC and River Mease SAC could occur, it is considered appropriate to reconsider the potential for the Focused Changes document to impact on these two European sites.

The third European site is the Cannock Extension Canal SAC, a Heritage Towpath Trail has already been considered as part of the Local Plan Strategy, and the assessment concluded that no significant impacts would arise either alone or in combination with other plans or programmes, the current proposed policy seeks to safeguard a route for the canal associated with the Heritage Towpath Trail, as the route is the same as the Heritage Towpath Trail it is considered appropriate to consider the potential to impact upon the Cannock Extension Canal SAC.

The Local Plan Strategy identified the delivery of 10, 030 houses (Table 8.1) and locations for employment. It should be noted that table 8.1 of the Local Plan Strategy provides slightly in excess of the 10, 030 required at 10, 244. The amount of housing sites identified within the Focused Changes document identifies the delivery of a total number of 11, 515 homes within Lichfield District during the Plan period which is above the housing numbers identified within the Local Plan Strategy, however the 11, 515 provides an appropriate buffer, the provision of such a buffer for flexibility is considered to be good practice in plan making terms. The buffer

proposed within the Focused Changes document is slightly in excess of that shown within the Local Plan Strategy and represents an increase of 1, 271 homes.

Of the total allocations, the Plan has identified a total of 2, 427 homes which remain to be delivered within the 0-15km Zone of Influence of the Cannock Chase SAC ie those without permissions or built. Of this housing, 1,180 homes are to be delivered within the 0-8km Zone of Influence of the Cannock Chase SAC (based on 1,030 allocated sites and a windfall calculation of 150, based as a precautionary measure on the percentage area of Lichfield District covered by the 0-8km zone of influence multiplied by the District's windfall allowance). Evidence commissioned by the Cannock Chase SAC Partnership suggests that the planned level of growth within a 15 kilometre radius of the SAC is likely to have a significant effect on this designated site. The greater part of this effect would arise from development within a 0-8km zone as it has been determined through research that this zone would contribute the most visitors to the SAC¹.

As part of the 2,427 homes required, housing provision has been identified on the recently vacated Rugeley Power Station site with a likely net increase of 350 houses. This site falls within the 0-8km zone of influence of Cannock Chase SAC, however through the Cannock Chase SAC Partnership a [mitigation strategy](#) is in place (Strategic Access Management and Monitoring Measures (SAMMM)) to accommodate the planned growth within the 0-15km Zone of Influence. A charge of £178.60 per dwelling is collected within the 0-8km zone in Lichfield District in order to fund the mitigation and enable housing proposals to meet the requirements of the Habitats Regulations. Evidence in relation the Cannock Chase SAC has been reviewed and considers the mitigation proposed will be effective and there is potential to extend the mitigation package to accommodate future growth within the Zone of Influence should this be necessary within the Plan period. The impacts from new development and the effectiveness of the mitigation strategy are being monitored through the Cannock Chase SAC Partnership. Further evidence is being commissioned which will inform the consideration of the impacts of growth for future Plans. Policy NR7 of the Local Plan Strategy protects the integrity of the Cannock Chase SAC.

A housing allocation for 24 units is proposed in the catchment of the River Mease, and there may be potential for further windfall housing however it is anticipated this will be minimal due to the rural nature of this part of the District. A River Mease SAC Partnership has been formed and a [Developer Contribution Scheme](#) is in place, with charging based on the amount of water and therefore phosphate produced by size of property in order to fund a mitigation strategy to accommodate the planned growth within the River Mease Catchment.

The Appropriate Assessment of the Local Plan Strategy identified that in combination with neighbouring authorities, the housing growth within Lichfield District would have an adverse effect on Cannock Chase SAC and the River Mease SAC. Mitigation for the housing development within the 0-15km Zone of Influence of Cannock Chase SAC and River Mease SAC catchment are currently being delivered through strategic Partnership projects and to ensure that the amount of housing allocated in the Lichfield District Local Plan Strategy will have no adverse impact on the integrity of any European site. The in-combination effect of

¹ Further Analysis of Cannock Visitor Survey Data to Consider Apportioning Costs between Zones – Durwyn Liley, 30th September 2013.

sites within the Focused Changes document has therefore been considered within the context of Local Plan Strategy and the review of the evidence base and therefore need not be repeated in this document.

In respect of the potential for growth to act in combination with other Plans with regard to the River Mease SAC, North West Leicestershire District Council have recently received the Inspectors Report on their Local Plan which once adopted could deliver a further 2,200 homes in the catchment of the Mease with South Derbyshire District Council providing a further 600 within the catchment through their Local Plan Part 2. Both authorities have similar requirements in their Local Plans to those within Lichfield District Council's Local Plan Strategy to ensure developments mitigate for their impact on the River Mease SAC. On this basis development at the level proposed would not lead to likely significant effects in combination with Local Plan Part 2.

A number of saved policies from the Lichfield Local Plan 1998 are still in existence and these have been reviewed as part of the Focused Changes document in response to public consultation. The table in Appendix B lists each policy, with a brief explanation of the policy, and an assessment of whether the policy is likely to have a significant effect upon a European site. Assessment of policies in the Focused Changes document is therefore restricted to assessing each policy alone rather than in combination with others, unless there are specific circumstances suggesting otherwise. The policies included in Focused Changes document are principally for the purpose of guiding development management decisions and due to their non-strategic nature would be unlikely to deliver growth at levels beyond that proposed in the Local Plan Strategy. Any development which may occur will need to accord with the strategic policies in the Local Plan Strategy and the mitigation provided through policies NR7 and NR8 of the Local Plan Strategy will ensure that any proposals for development do not have likely significant effects on any European sites either alone or in combination.

The employment land identified within the Focused Changes document is outside the River Mease catchment and therefore will have no adverse effect on the River Mease SAC. Research has shown that it is only the increase in homes and tourism which affects Cannock Chase SAC through the generation of additional visits and as such, it can be concluded that the employment allocations have no adverse impact on the integrity of Cannock Chase SAC.

The proposed Lichfield Canal policy seeks to safeguard the route for the Lichfield Canal including the Heritage Towpath trail (which has already been safeguarded as part of the Local Plan Strategy). The Lichfield canal will link to the existing canal network which includes the Cannock Extension Canal SAC. As such it needs to demonstrate that there will be no significant impact on the SAC or on the functions of the ecology of the wider canal network. Evidence shows options exist which can enable the scheme to be constructed and operate and further studies will be prepared to ensure the options pursued can be achieved without having any adverse impact upon the SAC and other designated sites as the scheme progresses through the planning application process. The safeguarding of the route will enable this long term restoration project to not be prejudiced. SAC and all designated sites and non-designated priority habitats are safeguarded through the existing policies within the Local Plan Strategy and the proposed Lichfield Canal policy will have no adverse impact on the integrity of the Cannock Extension Canal SAC either alone or in combination.

Timescale

The timescales over which the effects (both alone and in-combination) have been considered are for the period of the Local Plan Strategy 2008-2029.

HRA Conclusions

This report outlines the scope of the Lichfield District Local Plan Allocations Focused Changes document. It has been undertaken in accordance with best practice and guidance and has been informed by the previous Habitat Regulations for the Lichfield District Local Plan Strategy, which considered the potential for the Council's growth strategy to affect European sites.

The HRA for the Focused Changes document has focused on the Cannock Chase, River Mease and Cannock Extension Canal SACs. The other sites as outlined at 2.1 above have previously been considered in the Local Plan Strategy HRA and given the Plan as a whole would have no effect on these European designated sites and as such further appraisal in respect of non-strategic sites and development management policies is not considered necessary.

Further consideration in respect of the River Mease and Cannock Chase SAC was judged appropriate, the Local Plan Strategy identified an amount of growth required within the towns, key rural settlements and 'other rural' and as such the amount of development expected to impact on these designated sites was anticipated and was therefore considered as part of the Local Plan Strategy HRA. The Focused Changes Document does exceed the housing requirement within the adopted Local Plan Strategy and the now known detailed distribution does not increase the amount of growth anticipated within the River Mease SAC water catchment, within the Cannock Chase SAC Zone of influence there will be an increase of approximately 100 dwellings. A review² of the evidence for the Cannock Chase SAC has taken place which has considered revised figures for Lichfield District, mainly proposed at Rugeley Power Station and has considered the in combination effects of the housing numbers with planning permission, in adopted or draft local plans and includes an allowance for windfall permissions across the zone of influence. The study found that the mitigation measures for the Cannock Chase SAC remain 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.

It is also worth noting that the Focused Changes document will have a lesser impact upon the Cannock Chase SAC than the Local Plan Allocations Document consulted upon in March 2017 as it reduces the amount of development within the 0-8km zone of influence and the increase in the amount of development within the 8-15km zone was approved with a bespoke mitigation package which provided a financial contribution to the SAMMM and on site provision. As such it can be concluded that through the continued approach to mitigating for the impacts arising and monitoring the effects of the development and mitigation that no adverse impacts will arise on the Cannock Chase SAC.

² Cannock Chase SAC – Planning Evidence Base Review. September 2017. Footprint Ecology.

The Focused Changes Document will therefore not have any greater impact upon the designated sites than those previously identified in the Local Plan Allocations document (March 2017) or in the Local Plan Strategy.

Where growth not identified in the Local Plan Strategy or the Focused Changes document does come forward, either through allocations in Neighbourhood Plans, or elsewhere (for example as windfalls) where these do not result in a level of growth in excess of that within the MOU for the Cannock Chase SAC and the Guidance to Mitigate the Impacts arising from Residential Development (for the Cannock Chase SAC) and the Developer Contributions Schemes for the River Mease SAC, the environmental effects associated with this growth will be controlled through existing policies included in the Local Plan Strategy including Policies NR7 and NR8 which cover Cannock Chase SAC and River Mease SAC respectively. In complying with these policies and/or contributing to the respective developer contribution schemes, both of which are monitored to ensure the specified levels are not exceeded ensure that any development does not lead to any effect on the integrity of these SACs.

In respect of the potential for growth to act in combination with other Local Plans, with regard to both the Cannock Chase and River Mease SACs, the respective authorities have similar requirements within their Local Plans to those within Lichfield District Council's Local Plan Strategy to ensure development mitigates for its impact on these European Sites. On this basis development at the level proposed would not lead to likely significant effects in combination with the Lichfield District Local Plan Focused Changes document.

Other than the land allocation policies the policies included in Local Plan Focused Changes document are principally for the purpose of guiding development management decisions and have been reviewed and would be unlikely to deliver growth at levels beyond that proposed in the Local Plan Strategy. The Lichfield Canal policy (IP2) in combination with the existing adopted policies within the Local Plan Strategy and those in Walsall Council's Site Allocations document will not lead to any effect on the integrity of the Cannock Extension Canal SAC.

The Focused Changes document does not propose any additional growth on top of what is already able to be mitigated for through the adopted Local Plan Strategy. It is considered that suitable mitigation is provided through strategic policies in the Local Plan Strategy, development management policies in the Focused Changes document and mitigation and monitoring options available at the project level to ensure that there will be no significant in combination effects on European sites.

This assessment concludes that it can be demonstrated that through the mitigation proposed none of the policies/allocations in the Focused Changes document are likely to have a significant effect alone or in combination with the identified European sites.

Appendix A

Details of European Site potentially affected	
European Site Name	Cannock Chase
Designation Status	Special Area of Conservation (SAC)
Site Code	UK0030107
Date of Designation	2005
Qualifying Features	H4030. European dry heaths H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i> ; Wet heathland with cross-leaved heath
Conservation Objectives	<p>European Site Conservation Objectives for Cannock Chase Special Area of Conservation. Site Code: 0030107</p> <p>With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and, • The supporting processes on which the qualifying natural habitats rely <p>This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.</p>
Site condition	Unfavourable recovering
Factors currently influencing the site	The principal impact is visitor pressure leading to loss of the SAC dry heath vegetation to new paths, path expansion, associated erosion and eutrophication. The component of the SAC involved is the dwarf woody shrub community (e.g. heather and bilberry), rather than the extent of bare ground forming the paths and tracks. This means that visitors have an impact on a small proportion of a large habitat component of the site, rather than a large proportion of a

	more restricted feature. Current visitor use of the site is high.
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Details of European Site potentially affected	
European Site Name	River Mease
Designation Status	Special Area of Conservation (SAC)
Site Code	UK0030258
Date of Designation	2005
Qualifying Features	<p>H3260. Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>CallitrichoBatrachion</i> vegetation; Rivers with floating vegetation often dominated by water-crowfoot</p> <p>S1092. <i>Austropotamobius pallipes</i>; White-clawed (or Atlantic stream) crayfish</p> <p>S1149. <i>Cobitis taenia</i>; Spined loach</p> <p>S1163. <i>Cottus gobio</i>; Bullhead</p> <p>S1355. <i>Lutra lutra</i>; Otter</p>
Conservation Objectives	<p>European Site Conservation Objectives for River Mease Special Area of Conservation Site Code: UK0030258</p> <p>With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.

	<p>This document should be read in conjunction with the accompanying <i>Supplementary Advice</i> document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.</p>
Site condition	Unfavourable recovering
Factors currently influencing the site	<ul style="list-style-type: none"> • Excessive phosphate-rich fine sediment is currently being supplied to the River Mease from within its catchment, primarily from diffuse sources from both agricultural and urban use. • The River Mease is not currently meeting flow targets. • Excessive fine sediment supply can lead to the smothering of coarse substrates and the loss of flora and fauna dependent on them. • There is excess water from discharges entering the river system. This is causing the loss of naturalised low flow conditions which are considered necessary for the long term health and integrity of the site. • High impact species have been found in and along the River Mease and include North American signal crayfish, Japanese knotweed and Himalayan balsam.

Details of European Site potentially affected	
European Site Name	Cannock Extension Canal
Designation Status	Special Area of Conservation (SAC)
Site Code	UK0012672
Date of Designation	2005
Qualifying Features	S1831. <i>Luronium natans</i> floating water plantain
Conservation Objectives	<p>European Site Conservation Objectives for Cannock Extension Canal Special Area of Conservation Site Code: UK0012672</p> <p>With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of qualifying species • The structure and function of qualifying species • The supporting processes on the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site. <p>This document should be read in conjunction with the accompanying <i>Supplementary Advice</i> document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.</p>
Site condition	Good conservation status habitat
Factors currently influencing the site	<ul style="list-style-type: none"> • Pollution to ground water • Invasive non-native species • Air pollution, air borne, pollutants • Grazing inside the SAC

Appendix B

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
Policy IP2	Lichfield Canal	Potential as the project can be delivered in a variety of ways and whilst it appears that it can be delivered without harm to the Cannock Extension Canal SAC as the detail is not yet available, as no study has yet identified the impacts and any mitigation necessary at the detail project level upon the Cannock Extension Canal SAC, a precautionary approach still needs to be taken. The adopted policy protects the SAC/SSSI and the proposed policy recognises this. There will be no significant in combination effects	No
Policy ST3	Road line Safeguarding	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Policy ST4	Road and Junction Improvements - Lichfield	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Policy ST5	Road and Junction Improvements - Fradley	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Policy EMP1	Employment Areas and Allocations	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
		will be no significant in combination effects	
Policy E2	Service access to our centres	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Policy E3	Shopfronts and Advertisements	The proposed policy promotes good design and will not result in greater pressures on the factors influencing European Sites.	No
Policy NR10	Cannock Chase Area of Outstanding Natural Beauty	Potential as contiguous with the SAC. The policy safeguards the AONB and does not propose development and will not result in greater pressures on the factors influencing European Sites.	No
Policy NR11	National Forest	Potential as in Mease catchment, the policy does not propose development and seeks delivery of the National Forest through enhanced landscaping, existing adopted policies will ensure the Mease SAC is safeguarded. The policy will not result in greater pressures on the factors influencing European Sites.	No
Policy BE2	Heritage Assets	The proposed policy seeks to safeguard heritage assets and will not result in greater pressures on the factors influencing European Sites.	No
Lichfield 3	Lichfield Economy	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
Policy LC1	Lichfield City Housing Land Allocations	The proposals accords with the latest evidence review and adopted Local Plan Strategy, suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused Changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Policy LC2	Lichfield City Mixed Use Allocations	The proposals accords with the latest evidence review and adopted Local Plan Strategy, suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused Changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Site L1	Beaconsfield House, Sandford Street	The proposals accords with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused Changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Site L2	East of Lichfield (Streethay) SDA extension		No
Site L3	Land at Greenhough Road		No
Site L4	Land at Swan Road, Former Sandford Gate		No
Site L5	Land off Limburg Avenue and Sainte Foy Avenue		No
Site L6	St Chad's House, Cross Keys		No
Site L7	Former Day Nursery, Scotch Orchard		No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
Site L8	Former St Michaels Playing Fields, Deans Croft		No
Site L9	Land off Burton Road (East), Streethay		No
Site L10	Land off Burton Road (West), Streethay		No
Site L12	Land at St Johns Hospital, Birmingham Road		No
Site L13	Lombard Court, Lombard Street		No
Site L14	Former Integra Hepworth, Eastern Avenue		No
Site L16	Former Windmill Public House, Grange Lane		No
Site L17	Land to the rear of The Greyhound Public House, Upper St John Street		No
Site L18	Land at Cross Keys (former What! Store), Cross Keys		No
Site L19	Angel Croft Hotel, Beacon Street		No
Site L20	Land at The Rosaries, Trent Valley Road		No
Site L21	Hawthorn House, Hawthorn Close		No
Site L22	Former Regal Cinema (former Kwik Save), Tamworth Street		No
Site L23	Land off Cherry Orchard		No
Site L24	Trent Valley Buffer Depot, Burton Road, Streethay		No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
Site L25	Land at 41, Cherry Orchard		No
Site L26	Friarsgate, Birmingham Road		No
Site L27	Former Norgren site, Eastern Avenue		No
Site L28	Former Beatrice Court, St John Street		No
Site L29	Land at Quonians Lane (former Auction Centre), Cross Keys		No
Site L30	Lichfield South Business Park	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Site L31	Land at Davidson Road	The proposals accord with the latest evidence review and adopted Local Plan Strategy, suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused Changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Policy Burntwood 3	Burntwood Economy	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Policy B1	Burntwood Housing Land Allocations	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
		Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	
Policy B2	Burntwood Mixed – use Allocations	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	
Site B1	99-101, High Street, Chasetown	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Site B2	82-84, Queen Street		No
Site B3	Land at Maple Close, Sycamore Road		No
Site B4	Land at Mount Road/New Road		No
Site B5	Land at rear of Chase Terrace Primary School		No
Site B7	Land South of Cannock Road		No
Site B8	Cottage of Content Public House, Queen Street		No
Site B10	Land off Milestone Way, Chasetown		No
Site B11	Former Greyhound Public House, Boney Hay Road		No
Site B13	Bridge Cross Garage, Cannock Road		No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
Site B16	Coney Lodge Farm, Rugeley Road		No
Site B18	Land at Baker Street		No
Site B19	Chorley Road, Boney Hay Concrete Works		No
Site B20	Hill Street, 1-3		No
Site B21	High Street, 114		No
Policy NT1	North of Tamworth Housing Land Allocations	The proposal is outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No
Site NT1	Land at Arkall Farm, Ashby Road		No
Site NT2	Land north of Brown's Lane, Tamworth		No
Policy R1	East of Rugeley Housing Land Allocations	The proposals in part accord with the latest evidence and suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies. Mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites. Policy NR7 of the Local Plan Strategy protects the integrity of the Cannock Chase SAC.	No
Site R1	Former Rugeley Power Station	The proposals in part accord with the latest evidence and suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies. Mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites. Policy NR7 of the Local Plan Strategy protects the integrity of the Cannock Chase SAC.	No
Policy F1	Fradley Housing Land Allocations	The proposals accord with the latest evidence review and adopted Local Plan Strategy.	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
		Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	
Site F1	Bridge Farm, Fradley	The proposals accord with the latest evidence review and suitable adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Site F2	Land south of Fradley Park (EMP1)	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Policy A1	Alrewas Housing Land Allocations	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
Site A1	Former Park Road Printers, Park Road, Alrewas	The proposals are outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Site A2	Land north of Dark Lane, Alrewas	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in Focused Changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites. Not all of the site lies within the zone of influence.	No
Site A3	Land at Bagnall Lock, Kings Bromley Road, Alrewas		No
Site A4	The New Lodge, Kings Bromley Road, Alrewas		No
Site A5	Land east of A513/South of Bagnall Lock, Alrewas		No
Site A6 (EMP1)	Land at Main Street, Alrewas		The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects
Policy AH1	Armitage with Handsacre Housing Land Allocations	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
Site AH1	Land adjacent to Hayes Meadow School, Armitage with Handsacre	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Policy FZ1	Fazeley, Mile Oak and Bonehill Housing Land Allocations	The proposals are outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No
Site FZ2	Tolsons Mill, Lichfield Street, Fazeley	The proposals are outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No
Site FZ3	Land at 15, The Green, Bonehill		No
Policy GT1	Gypsy and Traveller Site Allocations		No
GT1	Land at Bonehill Road, Mile Oak		No
Policy S1	Shenstone Housing Land Allocations	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
Site S1	Land at Lynn Lane, Shenstone	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document Local Plan Allocations and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Policy W1	Whittington Housing Land Allocations	The proposals are outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No
Site W2	Former Whittington Youth Centre, Main Street, Whittington	The proposals are outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No
Site W3	Land at Chapel Lane and Blacksmith Lane, Whittington		No
Policy OR1	Other Rural Housing Land Allocations	The proposals when combined with the other allocations accord with the latest evidence and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
H1	Fish Pits Farm, Harlaston	The proposals accord with the adopted Local Plan Strategy, suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in Local Plan Allocations and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Site HR1	Land at Uttoxeter Road, Hill Ridware	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Site HR2	Land at School Lane, Hill Ridware		
Site OR1	Packington Hall, Tamworth Road	The proposal is outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No
Site OR2	Lamb Farm , London Road, Canwell	The proposal is outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No
Site OR3	Footherley Hall, Footherley Lane	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
		Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	
Site OR4	Derry Farm, Birmingham Road	The proposal is outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No
Site OR5	Station Works, Colton Road	The proposals accord with the latest evidence review and adopted Local Plan Strategy. Suitable mitigation is provided through strategic policies in the Local Plan Strategy and development management policies in the Focused changes document and mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	No
Site OR6	Land east of A38 (EMP1)	The proposals do not relate to any European Sites directly and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects	No
Site OR7	Watery Lane, Curborough, Lichfield	The proposals have planning permission and the cumulative total when combined with the other sites in the Focused Changes Document accord with the latest evidence review and suitable mitigation has been secured and is ensured by the strategic policies in the Local Plan	No

Local Plan Allocations Policy Number	Policy Subject	Comments	Likely Significant Effects
		Strategy and development management policies in the Focused changes document. Mitigation options are available at the project level to ensure that there will be no significant in combination effects on European sites.	
OR8	Levett Road, Lichfield	The proposal is outside the areas identified as having the potential to impact upon the SACs and will not result in greater pressures on the factors influencing European Sites. There will be no significant in combination effects.	No

Habitat Regulations Assessment: **Addendum** to the **Appropriate Assessment of the** **Lichfield District Allocations DPD** **Modifications Consultation 2018**



Habitats Regulations Assessment – Addendum to the Appropriate Assessment

Lichfield District Allocations Development Plan Document – Modifications October 2018

Introduction

The Lichfield District Allocations Development Plan Document (ADPD) is part 2 to the Lichfield District Local Plan: Strategy (LPS) which was adopted in 2015. Both the LPS and the ADPD have undertaken Habitat Regulations Assessment which have concluded that alone or in combination it can be demonstrated through the mitigation proposed that none of the policies /allocations are likely to have a significant effect alone or in combination with the identified European Sites. These documents have been submitted to the Inspector as CD 1-28, CD1-27 and CD6-31 and CD6-32.

Following consideration of the ADPD (CD1-1, CD1-2 and CD1-3) at Examination the Inspector has suggested main modifications which should be made in order to assist him in finding the ADPD 'sound'. This addendum to the Appropriate Assessment to the ADPD (CD1-28) considers these main modifications and the modifications proposed through the Examination and those submitted prior to the Examination (CD1-3).

Key Documents/Evidence

Further to the publication of the Appropriate Assessment of the Focused changes version of the ADPD, which was submitted to the Secretary of State, a number of minor modifications were proposed and submitted to the Inspector prior to his consideration of the submission ADPD (CD1-3). These were reviewed by the Council and were considered to not impact upon the conclusions of the Appropriate Assessment for the submission ADPD (CD1-28).

The District council received from the Inspector (via the Programme Officer) 7 suggested main modifications which could be made to the ADPD which would enable him to find the Plan 'sound'. This document considers the proposed main modifications in the context of compliance with the Habitat Regulations.

Methodology

Circular 6/2005 states that 'The scope and content of an appropriate assessment will depend upon the nature, location, duration and scale of the proposed project and the interest features of the relevant site.' This document provides an addendum to the Appropriate Assessment to the ADPD submitted to the Examination (CD1-28) and thus considers the proposed modifications against the evidence base and the conclusions drawn on the interest features of the European Sites considered within (CD1-28).

Description of the Main Modifications

The main modifications are included at Appendix A. There are 7 proposed main modifications.

MM1 is a proposed new policy and **MM2** is the supporting text to MM1. MM1 requires a review of the Local Plan to be submitted to the Secretary of State no later than the end of December 2021.

MM3, MM4, MM5 require the addition to the respective policies for a masterplan for each site.

MM6 is an amendment to Policy EMP1 and **MM7** is an addition to the supporting text to EMP1 which safeguards employment and provides flexibility in bringing forward sites in existing/allocated employment use that have no reasonable prospect of being used for such a use and to be consistent with national policy.

Description of the modifications proposed in CD1-3 and during the examination

M1, M2, M5, M7 and **M8** are typographical changes, modifications **M3, M4** and **M6** relate to Policy BE2: Heritage Assets and seek to align it more to the NPPF.

Modification **M9** proposes a change in the typology of floor space for site L30 to reflect the permitted scheme.

Modification **M10** represents a correction to a mathematical error.

Modification **M11** shows a minor change to the alignment of the route of the Lichfield Canal to ensure the route is drawn around an electricity pylon.

Modification **M12** is a factual change to include the adopted Conservation Area boundaries for a number of settlements.

Assessment Findings

The proposed main modifications do not propose any greater scale of development or new locations for development or changes to policies which would result in any greater impact upon the European Sites than has previously been considered through the Appropriate Assessment of the ADPD (CD6-31, CD6-32 and CD1-28). It is recognised that a review of the Local Plan in accordance with MM1 and MM2 will result in an increase in development across the District however this will be undertaken in a separate plan which will be accompanied by further evidence and Habitat Regulations Assessment as necessary.

Policies MM3-5 are considered to have no significant effects as they will result in no increase in the scale of development proposed within the ADPD and which has already been considered through the HRA for the ADPD (CD1-28).

Main modifications MM6 and MM7 - whilst the policy is to safeguard employment land, the policy modifications could generate windfall sites for housing or leisure use. The potential for adverse effects would be assessed on an individual basis at the project level in accordance with the Habitat Regulations and through the existing adopted policies within Local Plan Strategy, against any lawful fallback position. Policies contained within the Local Plan Strategy ensure that European Sites will be protected. Existing policies accompanied by mitigation strategies also ensure that where the site would form part of the windfall allowance as part of the overall housing requirement of the ADPD and where mitigation for any impacts arising from the development is necessary then mitigation can be delivered through existing measures which are already secured.

The proposed modifications listed in (CD1-3) do not propose any changes to policies or maps which would result in any adverse impacts, either alone or in combination, upon the integrity of European Sites.

The Schedule of proposed modifications (March 2018) CD1-3 lists 12 modifications. Modifications **M1, M2, M5, M7** and **M8** are typographical changes and have no effect upon the policy.

Modifications **M3, M4** and **M6** relate to Policy BE2: Heritage Assets. Policy BE2 seeks to safeguard heritage assets and in the Appropriate Assessment of the policy in CD1-28 was considered that it would not result in greater pressures on the factors influencing European Sites, the proposed modifications do not change this assessment.

Modification **M9** proposes a change in the typology of floorspace for site L30 to reflect the permitted scheme. Site L30 relates to Lichfield South Business Park and was considered that it did not relate to any European Sites directly and would not result in greater pressures on the factors influencing European Sites and that there would be no significant effects. The proposed modifications do not change this assessment.

Modification **M10** represents a correction to a mathematical error and has no effect upon the totals used within the Appropriate Assessment undertaken in CD1-28.

Modification **M11** shows a minor change to the alignment of the route of the Lichfield Canal to ensure the route is drawn around an electricity pylon. The route relates to Policy IP2 which the Appropriate Assessment (CD1-28) concludes the policy will have no significant in combination effects, the proposed modifications do not change this assessment.

Modification **M12** is a factual change to include the adopted Conservation Area boundaries for a number of settlements, these proposed modifications will not result in any greater pressures on the factors influencing European Sites either directly or in combination.

Conclusion

The proposed main modifications and minor modifications already considered by the Inspector will have no significant effects alone or in combination upon European Sites and will have no adverse effects upon the integrity of the European Sites.

Appendix

Modification number	Policy/Paragraph	Summary of modification	Any likely significant effects on European sites?	In-combination effects
MM1	New Policy	Date for review of Local Plan and obligations to meet duty to cooperate	No. The policy does not identify a need for further housing/development to be provided as part of this plan which has not already been considered through Appropriate Assessment and is able to be mitigated for through existing policies and mitigation strategies.	No.
MM2	New policy – supporting text		No. As MM1 above.	No

MM3	Policy NT1 Amendment to policy	Addition of a requirement to produce a masterplan for the site	No. The policy does not identify a need for further housing/development to be provided as part of this plan which has not already been considered through Appropriate Assessment and is able to be mitigated for through existing policies and mitigation strategies.	No
MM4	Policy R1 Amendment to Policy	Addition of a requirement to produce a masterplan for the site	No. The policy does not identify a need for further housing/development to be provided as part of this plan which has not already been considered through Appropriate Assessment and is able to be mitigated for through existing policies and mitigation strategies.	No
MM5	Policy OR7 Amendment to Policy	Addition of a requirement to produce a masterplan for the site	No. The policy does not identify a need for further housing/development to be provided as part of this plan which has not already been considered through Appropriate Assessment and is able to be mitigated for through existing policies and mitigation strategies.	No
MM6	EMP 1		No. No additional sites or housing numbers/uses are proposed which could potentially have an adverse effect upon the integrity of a European Site. Adopted policy exists	No. Mitigation schemes for SAC are monitored and evidence which considers in combination effects has been prepared.

			which protects European Sites. Mitigation schemes with associated delivery mechanisms already exist to prevent harm arising should a proposed alternative use generate any likely significant affects upon the European Sites.	Through implementation of the adopted policies and project level HRA no significant affects will arise.
MM7	EMP1 Protection of Employment Land	Addition to supporting text	No. As MM6 above.	No

Draft Main Modifications

MM1: Local Plan Review – new policy

Suggested new policy as follows:

Lichfield District Council shall carry out an early review of the Local Plan for Lichfield that will be submitted to the Secretary of State for Examination in accordance with the latest Local Development Scheme or no later than the end of December 2021. This review shall replace the adopted Local Plan Strategy (LPS) 2008-2029 in all aspects and therefore be a comprehensive review. This Plan will extend the existing plan period to at least 5 years beyond the end of the current LPS and it shall review as a minimum the following matters:

- The housing requirement for Lichfield and the potential for housing land supply to meet this need.
- Any unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), inclusive of any unmet housing need arising from Tamworth Borough and the appropriate level of contribution within the District of Lichfield in line with ongoing technical work and the requirements of policy TP48 of the adopted Birmingham Development Plan (BDP).
- Employment land requirements for Lichfield as identified through a comprehensive evidence basis.
- Lichfield's potential role in meeting any wider unmet employment needs through the Duty to Co-operate (DTC).
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing, employment and other service/infrastructure needs.
- Gypsy, Traveller and Travelling Showpeople (GTTS) provision.
- A comprehensive Green Belt Review either in partnership with relevant neighbouring authorities or in close consultation with these authorities through the DTC, to inform any further Green Belt release to accommodate new development within the District.

MM2 Local Plan Review - supporting text

Suggested supporting text, which needs to include reference to and a statement regarding the extent of, the unmet housing needs of Greater Birmingham and the Black Country, with the recognition that the needs of Tamworth form part of this consideration. The text should also include a commitment to continued joint working with the GBHMA authorities, with the aim of working positively towards a Memorandum of Understanding or Statement of Common Ground, for housing and employment land provision, GTTS provision and Green Belt Review.

MM3 Key development principles for the Housing Land Allocation to the North of Tamworth – amendment to policy NT1

Suggested policy amendment as follows:

Within the Arkall Farm Housing Land Allocation, as identified in the inset map attached to policy NT1, the approved Masterplan identifies a range of land uses, open spaces and transport routes and their relationship both to each other and to the existing development in the vicinity of the site.

Proposals should accord with the approved Masterplan, including the following key development considerations:

MM4 Key development principles for the Housing Land Allocation to the East of Rugeley – amendment to policy R1.

Suggested policy amendment as follows:

Within the East of Rugeley Housing Land Allocation, as identified in the inset map attached to policy R1, the approved Masterplan identifies a range of land uses, open spaces and transport routes and their relationship both to each other and to the existing development in the vicinity of the site. Proposals should accord with the approved Masterplan, including the following key development considerations:

MM5 Key development principles for the Housing Land Allocation at Watery Lane – amendment to policy OR7.

Suggested policy amendment as follows:

Within the Watery Lane Housing Land Allocation, as identified in the inset map attached to policy OR7, the approved Masterplan identifies a range of land uses, open spaces and transport routes and their relationship both to each other and to the existing development in the vicinity of the site. Proposals should accord with the approved Masterplan, including the following key development considerations:

MM6 Protection of Employment Land – amendment to policy EMP1

Suggested policy amendment as follows: Add the following text to the end of the existing policy (paragraph 5 onwards):

(Para 5) Development proposals outside the traditional employment use classes (B1, B2 and B8) will be supported on existing and allocated employment sites, where the development proposals clearly demonstrate the potential job creation on these sites, and provided that they do not undermine or constrain the main purpose of the employment allocation. Proposals for retail or leisure uses on existing or allocated employment sites will be permitted providing they are related in scale and use to the primary employment focus of the site and would have no adverse impact on the vitality and viability of the employment area.

(Para 6) Development proposals outside the traditional employment uses classes (B1, B2 and B8) for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of a site, or its development for employment for employment uses, is not viable, through the provision of: (i) details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing market conditions; and (ii) a financial appraisal that demonstrates that the development of any employment generating use is unviable,

(Para 7) Development proposals outside the traditional employment uses classes (B1, B2 and B8) for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of a site, or its development for employment for employment uses causes/or would lead to site-specific, environmental problems, such as noise,

pollution of traffic generation, recognising the environmental benefits to be gained by redeveloping these sites for non-employment generating uses.

MM7 Protection of Employment Land – supporting text

Suggesting supporting text which needs to include reference to both the need to safeguard employment in the interests of securing a sustainable balanced between the provision of homes and jobs and the need to provide flexibility in bringing forward sites in existing/allocated employment use that have no reasonable prospect of being used for such a use and to be consistent with national policy. It is therefore clear that the Plan needs to set out the parameters of an independent assessment so that existing and allocated employment sites can be considered for alternative uses, such as housing.

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The District of Lichfield Local Plan – Adoption Statement 16 July 2019

This Adoption Statement has been prepared in accordance with Regulation 17, Regulation 26 and Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Notice is hereby given that Lichfield District Council resolved to adopt the Local Plan Allocations Development Plan Document (Plan) at its Full Council meeting on 16th July 2019.

The Allocations Development Plan Document is the second part of the District's strategic plan and deals with land allocations associated with meeting the growth requirements set out in the Local Plan Strategy (2015).

The Plan was considered at an Examination in Public from 4th September to 13th September 2018 by an Independent Planning Inspector appointed by the Planning Inspectorate. The Inspector's Report was issued on 25th April 2019. The Report concluded that subject to Main Modifications the new Local Plan was Sound and Legally Compliant, and therefore can be adopted by the Council. The Main Modifications were accepted by the Council and are included in the adopted local plan allocations.

Any person aggrieved by the Lichfield District Local Plan may make an application to the High Court under Section 113 of the Planning & Compulsory Purchase Act 2004, on the grounds that (a) the document is not within the appropriate power, and / or (b) a procedural requirement has not been complied with. Any application must be made within 6 weeks from the date of this advertisement.

A copy of the District of Lichfield Local Plan Allocations, the Sustainability Appraisal report, and this Adoption Statement are available to view on the Lichfield District Council website: www.lichfielddc.gov.uk/allocations . Paper copies are available to view at the reception of the District Council House, (Frog Lane, Lichfield, WS13 6YZ) during normal office opening hours.

The documents can be made available in different formats upon request. The Council will also notify any person or body that made a representation or asked to be notified of the adoption. The Council will also notify the Secretary of State.

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Sustainability Appraisal

Local Plan Allocations Focused Changes

Adoption Statement 2019



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Section 1 Adoption Statement

This document is the Sustainability Appraisal Adoption Statement for the Local Plan Allocations Focused Changes Plan (ADPD) which was adopted on the 16th July 2019 by Lichfield District Council. The Lichfield District Local Plan comprises of two documents; the adopted Lichfield District Local Plan Strategy (LPS) 2015 and the ADPD

The ADPD addressed a number of land allocations associated with meeting the growth requirements set out in the LPS these including:

- Determining remaining housing land requirements to deliver the overall 10,030 homes to 2029 in line with the adopted spatial strategy, including allocations of sites with the Broad Development Location (BDL) to the north of Tamworth , for housing in rural areas and the 'Key Rural' Settlements (including Green Belt release);
- Consideration of 'infill' boundaries for Green Belt villages (as set out in Core Policy 1);
- Sites to meet the identified Gypsy and Traveller requirements;
- Land allocations to meet the Employment Land requirements, including the identification of primary and secondary retail areas for Lichfield City Centre;
- A review of any remaining Local Plan (1998) Sustainability Appraisal saved policies;
- Consider Green Belt boundaries including the integration of the developed area of the former St Matthews into Burntwood and development needs beyond the plan period; and
- Consider any issues arising through 'Made' and emerging Neighbourhood Plans where communities have sought the support of Lichfield District Council to progress with matters outside the scope of the Neighbourhood Plan.

The ADPD and all adoption documentation can be viewed at: <https://www.lichfielddc.gov.uk/local-plan/local-plan-allocations/1>

A Sustainability Appraisal was undertaken to accompany the development of the ADPD. The purpose of the Sustainability Appraisal is to ensure that environmental, social and economic issues are considered throughout the preparation of the ADPD with the aim of achieving more sustainable outcomes.

The ADPD has been subject to examination by an independent inspector appointed by the Secretary of State. Hearing sessions were held in September 2018. Following the hearing session the Inspector published a schedule of proposed modifications which he considered were necessary for the ADPD to be found 'sound'. Lichfield District Council consulted on the proposed modifications between December 2018 and February 2019. The Inspector's final report was published in April 2019 which concluded that, subject to the modifications being made, the ADPD was sound, it satisfied the requirements of Section 20(5) of the 2004 Act and it provided an appropriate base for the planning of the District. The report stated that "The Sustainability Appraisal for the Plan was prepared in-house and the submitted Sustainability Appraisal document demonstrate the Plan has been robustly tested both in relation to the Sustainability Appraisal and Habitats Regulation Assessment".

Sustainability Appraisal and Strategic Environmental Assessment (SEA) involve a series of procedural steps that are designed to meet the requirements of the SEA Regulations. The final step in the process involves preparing a statement at the time of a Local Plan adoption. The Sustainability Appraisal/Strategic Environmental Assessment Adoption Statement addresses the requirement to prepare a post-adoption statement.

Adoption Statement Sustainability Appraisal Local Plan Allocations

The purpose of this Post Adoption Statement is to meet the legislative requirements of European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations (2004). European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. It states that a Strategic Environmental Assessment is mandatory for plans prepared for town and country planning and land use purposes. The SEA Directive is transported into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the Sustainability Appraisal of Local Plan documents. The Town and Country Planning (Local Planning regulations (2012) (as amended) states that a Sustainability Appraisal report must be completed for Local Plan Documents in accordance with section 19(5) of the Planning and Compulsory Purchase Act (2004).

Article 9 of the SEA Directive requires that when a plan or programme is adopted, the Council makes available a statement summarising

“how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with.”

This requirement in European law has been transposed into UK law through Regulation 16(4) of the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the responsible authority to produce a statement containing the following information as soon as reasonably practical after the adoption of a plan or programme.

Therefore the Sustainability Appraisal Adoption Statement includes information on:

- How sustainability considerations have been integrated into the Plan
- How the Sustainability Appraisal has been taken into account
- How the results of public consultation have been taken into account
- The reasons for choosing the Plan as adopted, in light of the other reasonable alternatives considered.
- How any significant effects of implementation the Plan will be monitored.

[Section 2 How environmental considerations have been integrated into the ADPD.](#)

A Sustainability Appraisal includes the assessment of the performance of a plan or programme against a series of sustainability objectives to determine whether there are likely to be significant environmental, social or economic effects.

The sustainability objectives were developed as part of the Scoping Stage of the Sustainability Appraisal taking into account the following matters;

- The objectives of other plans and programmes at local national and international scales.
- The environmental, social and economic characteristic of Lichfield District and its context
- The key environmental issues identified relating to Lichfield

It should be noted that whilst the adopted Local Plan Strategy was accompanied a separate, sound Sustainability Appraisal it was concluded at scoping stage ADPD would not be assessed against the same criteria. The Sustainability Appraisal process would be started a-fresh to enable it to fully reflect current considerations.

An important first step in the Sustainability Appraisal process involves establishing the 'scope' i.e. those significant sustainability issues which should be the focus of the Sustainability Appraisal, and those which should not.

A review was undertaken of all relevant plans and programmes at national, regional and local level to identify relationships between these and the Sustainability Appraisal process and the identification of a baseline to provide the basis for predicting and monitoring the effects of the policies and sites in the ADPD. The Sustainability Appraisal Scoping Report (August 2016) provided a detailed review of the sustainability context of baseline conditions in Lichfield. This data was amended/updated slightly following scoping stage consultation. This work can be viewed in full at Appendix C and D of the submitted Sustainability Appraisal.

Key sustainability issues were identified through the Scoping Report – these include social, environmental and economic issues relevant to the ADPD as follows

Social

- Affordable housing
- Access to health care
- Further education
- Aging population

Environment

- Protecting the landscape character
- Biodiversity especially key species and habitats
- Historic Environment
- Townscape
- Reduction in waste
- Energy use
- Air, Water and Soil quality.

Economic

- City, Town and Village viability and vitality
- Skills and further education

A full break down can be viewed in **Appendix A** Baseline Current State of the environment of this report. (To avoid future confusion it should be noted that this data is referred to as Appendix D Baseline Current State of the Environment within the submitted Sustainability Appraisal).

Drawing on the findings of the context/baseline review a Sustainability Appraisal Framework was developed. This identified 16 key sustainability objectives for assessing the ADPD against which was supported by Site Specific Questions to provide a more detailed and measurable assessment of sites and policies in regard to effect. In addition assumptions were drawn up to ensure consistency during assessment. The Sustainability Appraisal framework for the ADPD considered each of the topics set out in Annex 1 of the SEA Directive and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations (2004), ensuring that the full range of considerations are considered as part of the preparation of the ADPD.

Adoption Statement
Sustainability Appraisal Local Plan Allocations

The Environment Agency, Natural England and Historic England (formally English Heritage) were consulted as part of the development of the Sustainability Appraisal Framework through the Scoping report consultation. This ensured that the Sustainability Appraisal framework addressed the key interest of other organisations. The Sustainability Appraisal Framework is set out in below in Table 1.

Table 1: Sustainability Appraisal Framework

Table 1 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Biodiversity, Geodiversity, Flora and Fauna	1 To promote biodiversity protection enhancement and management of species and habitats	<p>1. Will it conserve protected/priority species?</p> <p>2. Will it conserve protected/priority habitats and local nature conservation sites?</p> <p>3. Will it protect statutory designated sites?</p> <p>4. Will it encourage ecological connectivity (including green corridors and water courses)?</p>	<p>Proportion of local sites where positive conservation management has been or is being implemented.</p> <p>Number, type of quality of internationally and nationally designated sites.</p> <p>Number of species relevant to the district which have achieved SBAP targets</p> <p>Number of Local Nature Reserves within Lichfield District.</p>
Flora and Fauna, Landscape, Cultural heritage	2 To promote and enhance the rich diversity of the natural archaeological/geological assets and lands character of the district	<p>1 Does it respect and protect existing landscape character?</p> <p>2 Will it protect sites of geological importance?</p> <p>3 Does it offer the opportunity to improve and promote landscape connectivity sympathetic to the existing District Landscape character?</p> <p>4 Will it lead to the sterilisations of mineral resources?</p> <p>5 Will it improve green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiative?</p> <p>6 Will it result in the loss of historic landscape features?</p> <p>7 Will it safeguard sites of archaeological importance (scheduled or unscheduled) and their setting?</p>	<p>The proportion of housing completions on sites of 10 or more which have been supported, at the planning application stage by an appropriate and effective landscape character and visual assessment with appropriate landscape proposals.</p> <p>Number and area of RIGS within District.</p> <p>Number of sites subject to development where archaeology is preserved in situ compared with those scientifically recorded.</p> <p>National Forest Coverage within the District.</p> <p>Proportion of Forest of Mercia or Central Initiatives promoted schemes implemented within the District.</p>

Table 1 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
			Loss of historic landscape features erosion of character and distinctiveness (HLC). Extent and use of detailed characterisation studies informing development proposals (HLC)
Cultural Heritage	3 To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their setting	<ol style="list-style-type: none"> 1. Will it preserve and enhance buildings and structures and their setting 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? 	<p>Number and Proportion of major planning proposals which improved access to heritage features as part of the scheme.</p> <p>Number of listed buildings or structure in Lichfield District</p> <p>Heritage at risk and number of assets removed from Register.</p> <p>Proportion of Conservation Areas with an up to date character appraisal and management plan</p>
Cultural Heritage Population	4 Create places, spaces and buildings that are well designed, integrated effectively with one another, respect significant views and vistas and enhance the distinctiveness of the local character	<ol style="list-style-type: none"> 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 Safeguard historic views and valuable skylines of settlements? 4 Is the site within a main settlement or a key rural settlement? 	<p>Improvements in the quality of the townscapes e.g. delivery of street/public realm audits, improvements works, de-cluttering works both in urban and rural areas.</p> <p>Development meeting design standards within Supplementary Planning Documents.</p>

Table 1 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
		5 Is the site within close proximity to key services (e.g. schools, food shop, public transport, health centres etc.)?	
Soil Water and Air	5 Maximise the use of previously developed land/buildings and the efficient use of land.	<ol style="list-style-type: none"> 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? 	<p>Proportion of new development on Brownfield Land.</p> <p>No of redundant buildings bought back into use.</p> <p>Proportion of long term vacant dwellings in the District.</p> <p>Housing Mix of sites with planning permission.</p> <p>Housing Density of sites with planning Permission.</p>
Climatic Factors	6 Reduce the need to travel to jobs and services through sustainable integrated patterns of development, efficient use of existing sustainable modes of transport and increased opportunities for non-car travel	<ol style="list-style-type: none"> 1. Does the site location encourage the use of existing 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? 	<p>Traffic Levels (million vehicle kilometres) in the local road network.</p> <p>Access to bus services.</p> <p>Increase opportunities for walking and cycling.</p>
Climatic Factors	7 To reduce, manage and adapt to the impacts of climate change	<ol style="list-style-type: none"> 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? 	<p>Carbon Dioxide emissions within the Authority Areas.</p> <p>Renewable Energy Capacity within the District.</p>
Soil Water and Air	8 To minimise waste and increase the reuse and recycling of waste materials.	1 Will it reduce household and commercial waste?	Residual Household water per household.

Adoption Statement
Sustainability Appraisal Local Plan Allocations

Table 1 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
		<p>2 Will it increase waste recovery and recycling?</p> <p>3 Will it reduce the proportion of waste sent to landfill?</p>	<p>Percentage of household waste sent for reuse, recycling or composting.</p> <p>Municipal waste landfilled.</p>
Soil Water and Air	9 Seek and improve air, soil and water quality	<p>1. Which Source Protection Zone does the development fall within?</p> <p>2. Does the site fall within the River Mease SUSTAINABILITY APPRAISAL C?</p> <p>3. Is the site within or directly connected to road to an AQMA?</p> <p>4. Will it result in the loss of quality agricultural land?</p>	<p>Population living within Air Quality Management Areas.</p> <p>Number of planning applications granted contrary to Environment Agency advice on water quality.</p> <p>Proportion of homes built on Greenfield land</p>
Soil Water and Air	10 To reduce and manage flood risk	<p>1. Is the site located outside an area of risk from flooding?</p> <p>2. Will there be an opportunity for flood risk reduction?</p>	<p>Number of Planning Permissions granted contrary to Environment Agency advice on fluvial flooding.</p> <p>Number of Planning Permissions granted contrary to Lead Local Flood Authority advice on surface water flooding.</p> <p>Number of existing properties within the Environment Agency's flood risk areas.</p> <p>Proportion of new development/dwellings incorporating Sustainable urban drainage techniques.</p>
Population and Human Health	11 To provide affordable homes that meet local need	<p>1. Will it provide sufficient housing to meet existing and future housing need?</p> <p>2. Will it increase the range and affordability of housing for all social groups?</p>	<p>Number of households on the household register.</p> <p>Number of people accepted as homeless (annually).</p> <p>Net Additional Dwellings.</p> <p>Net affordable housing completions.</p>

Table 1 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
		<p>3. Will it reduce the number of households waiting for accommodation or accepted as homeless?</p> <p>4. Will it meet the needs of the travelling community and show people?</p>	<p>Housing mix.</p> <p>Net additional Pitches.</p>
Human Health	12 Improve services and access to services to produce good health and wellbeing and reduce health inequalities.	<p>1 Will it improve accessibility to health care for existing residents (including older residents) and provide additional facilities for new residents?</p> <p>2 Will it support a healthy life style including opportunities for recreational/physical activity?</p> <p>3 Will it provide new accessible green space?</p>	<p>Life expectancy at birth (male and female).</p> <p>Number of new or improved healthcare facilities delivered annually through development.</p> <p>Number of new sports pitches or other leisure facilities delivered annually through development.</p>
Population and Human Health	13 To promote Sustainability Appraisal fe communities, reduce crime and fear of crime	<p>1. Will it reduce crime through design measures?</p> <p>2. Will it contribute to a Sustainability Appraisal fe built environment?</p>	<p>Reduction in overall British Crime Survey comparator recorded crime – Lichfield District.</p> <p>% of residents who Sustainability Appraisal y that they feel very or fairly Sustainability Appraisal fe when outside in Staffordshire during the day and after dark.</p>
Material Assets	14 Improve opportunities for prosperity and economic growth	<p>1. Will it encourage higher skilled economic sectors in the District?</p> <p>2. Will it encourage new employment that is consistent with local needs?</p> <p>3. Will it encourage growth of existing businesses?</p> <p>4 Will it encourage small businesses to grow?</p>	<p>Employment Rate.</p> <p>Number of VAT registrations per 1000.</p> <p>Business Births.</p> <p>Unemployment by ward.</p> <p>Proportion of the District Employed in key sectors.</p>

Table 1 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Material Assets	15 To enhance the vitality and viability of existing city, town and village centres within the District	<p>1. Will it improve existing facilities within Lichfield City and Burntwood Town Centre?</p> <p>2. Will it protect and enhance the ability of our key rural settlements to meet the day to day needs arising with these settlements and from the wider rural areas they serve?</p> <p>3. Will it support and protect existing neighbourhood centres serving the local needs of our urban communities</p>	<p>Total amount of retail floor space (by type) in Lichfield City Centre and Burntwood Town Centre.</p> <p>New retail spaced developed within villages.</p> <p>Loss of shops and other retail businesses to other uses.</p> <p>Vacancy rates in Lichfield City Centre and Burntwood Town Centre.</p> <p>Loss of local community, leisure and shopping facilities to other uses.</p>
Population and Human Health	16 Increase participation and improve access to education, skills based training knowledge and information and lifelong learning	<p>1 Will it increase educational attainment amongst young people?</p> <p>2 Will it reduce the number of working age residents who have no, or lower level qualifications?</p>	<p>Proportion of working age population with no, or lower level qualifications.</p> <p>Success rate for Work Based Learning.</p> <p>% of Working Age Population with NVQ level 4 and above.</p> <p>Success rate for further education.</p> <p>% of 18-59 year olds attending Higher Education Institutions.</p>

Section 3 How the Environment Report has been taken into account

The Sustainability Appraisal of the ADPD influenced the plan through a series of measures to help reduce or avoid potential adverse effects and maximise beneficial effects of the ADPD. At each stage of the preparation of the Plan, the findings of the Sustainability Appraisal were taken into account to inform the development of allocations and policies, Table 2 below provides a summary of this process.

Table 2 How the Sustainability Appraisal influenced the Plan

Table 2 How the Sustainability Appraisal influenced the Plan	
Sustainability Appraisal safe-guards to ensure the Sustainability Appraisal has been taken into account during the development of the ADPD	
Internal Production	<p>Submitted Sustainability Appraisal Page 10 outlines how the documents was completed in house.</p> <p><i>“Lichfield District Council Spatial Policy and Delivery Team has undertaken the Sustainability Appraisal. We have sought to undertake the Sustainability Appraisal ‘in house’ in order to ensure that the results are fully integrated with the preparation of the ADPD. The Sustainability Appraisal has also been through liaison with Staffordshire County Council”</i></p> <p>The iterative process of completing the Sustainability Appraisal did not take place in isolation or remotely, officers within Spatial Policy and Delivery engaged with each other throughout the development of the Sustainability Appraisal and the ADPD.</p> <p>In regard to policy options, this in house approach enabled focused conversations with internal expertise, statutory bodies and other representatives and polices developed particularly post Regulation 19 consultation.</p> <p>In regard to site options, this collaborative approach resulted in robust:</p> <ul style="list-style-type: none"> - Scoping of realistic alternatives - Understanding of how significant effects would be scored - The assumptions behind such scores - The evidence such scores were based on. <p>This ensured that the sustainable implications attached to preferred options including cumulative impacts were not just noted but understood. Enabling the Sustainability Appraisal to form one element of the range of planning considerations to support site selection.</p> <p>This is evidenced via Appendix G of the Submitted Sustainability Appraisal Reasons for Preferred Alternatives and Key Design Considerations with the ADPD.</p>
Shared Timeline	<p>The Sustainability Appraisal has not been completed retrospectively nor at an alternative rate to the ADPD. This alignment of timescales has ensured maximum opportunity for finding to be taken account of. Evidenced in Table 3 of this adoption statement.</p>

Adoption Statement
Sustainability Appraisal Local Plan Allocations

Shared Scrutiny and Consultation.	The Sustainability Appraisal has been considered and scrutinised jointly with the ADPD by elected members. Equally both documents have been subject to joint public consultation. Evidenced in Table 3 Shared evolution of this Adoption Statement
Shared Evidence	The Sustainability Appraisal scores for each site are based on the evidence base prepared for the ADPD and that was available to the Sustainability Appraisal assessor at the time the assessment was undertaken.
Methodology	Section 3 (What has the plan/making/Sustainability Appraisal involved up to this point?), Appendix C of this document provides a detailed methodology illustrating the iterative process of the feeding into the section and refinement of the sites options and policies.
Summary Tables	The Sustainability Appraisal which accompanied the ADAP through its second Regulation 19 consultation included the following tables which can be found in Appendix G of the submitted Sustainability Appraisal and are reproduced in Appendix D of this document: <ul style="list-style-type: none"> - Table 6, reasons for Preferred Alternatives Housing and Employment Sites. - Table 7, reasons for Preferred Alternatives Gypsy and Traveller Site. They are a direct result of the internal collaborative approach which enabled the Sustainability Appraisal to be taken account of during the site selection process, providing narrative between The full Scoring Matrix (Appendix E:of the submitted Sustainability Appraisal) and the summary impact of the allocated sites (Appendix: F of the submitted Sustainability Appraisal). .
Key Design Considerations	Significant Effects identified in Appendix F: Allocated Sites Summary Impact of the submitted Sustainability Appraisal, have been taken account of, featuring within The Key Development Considerations identified within each site policy with the ADPD.

The ADPD and the Sustainability Appraisal had a shared evolution, evidencing further when and how the findings of the Sustainability Appraisal were taken into consideration/account. This is best articulated in Table 3 below.

Table 3 Shared evolution

Date/Meeting	Action/Influence	Additional Context
	Local Plan Strategy	
LPS Inspectors report [CD6-3] - 16th January 2015	Summary: The report concludes that, provided the Council makes the recommended Main Modifications to the submitted Local Plan Strategy (dated July 2012) it can be found Sound. At paragraph 250 the planning inspector concluded that the local plan met all the legal requirements, which he set out in a table, which included compliance with the Statement of Community Involvement 2006, and the legality of the Sustainability Appraisal.	At paragraph 102 of the Inspectors report: "The Sustainability Appraisal is not a simple document. The commonest criticism of it is that it is hard to understand. There is some truth in this. Indeed the Council was itself hard pressed at times to explain the intricacies of the Sustainability Appraisal and only did so by way of additional explanatory notes - although to be

Date/Meeting	Action/Influence	Additional Context
		<p>fair it needed to do so only when the document was subjected to forensic examination. However, a document of this scope is necessarily complex and while parts of it require close reading, its main points are clearly drawn out in the non-technical summary. Having considered the various criticisms made of the Sustainability Appraisal, and mindful of the point that the preparation of such a document is not to be treated as an obstacle course, I am of the opinion that it is a reliable piece of evidence.” (emphasis added)</p>
3rd February 2015 - Cabinet	<p>Summary: Details of the Inspector’s report the Mains Modifications required for the Plan to be judged sound together with other minor modifications required and the reasons for these. Recommendations: That Cabinet agrees to the recommendations of the Inspector, and thus agree to the Main Modifications to the submitted Local Plan Strategy 2012. That Cabinet agrees to the adoption of the Local Plan Strategy under section 23 of the Planning and Compulsory Purchase Act 2004 (as amended) incorporating all Main and Other modifications.</p>	<p>Section 3: Statement of Reason, Inspector’s Report: Summary of main findings, point 13: The Inspector considered the Sustainability Appraisal in detail (paragraphs 61-102), commenting that it is not a simple document and can be hard to understand but is ‘necessarily complex’. He did however conclude that the Sustainability Appraisal is a reliable piece of evidence</p>
17th February 2015 - Full Council	<p>Recommendation: Endorses the recommendations of the Inspector, and thus agrees to the Main Modifications to the submitted Local Plan Strategy 2012 (Appendix A and B);</p>	<p>Para 3.13 Sustainability Appraisal (Sustainability Appraisal/SEA): The Inspector considered the Sustainability Appraisal in detail (paragraphs 61 – 102), commenting that it is not a simple document and can be hard to understand but is ‘necessarily complex’. He did however conclude that the Sustainability Appraisal is a reliable piece of evidence</p>
20th July 2015 - High Court of Justice	<p>Summary: Legal Challenge: Case No: Co/803/2015 - IM Properties Development Limited and Lichfield District Council</p>	<p>Scope of the Local Plan established, Sustainability Appraisal of LPS found sound.</p>

Adoption Statement
Sustainability Appraisal Local Plan Allocations

Date/Meeting	Action/Influence	Additional Context
Queen's Bench Diversion Planning Court	Sustainability Appraisal Grounds: Para 3 (1) the Planning Inspector appointed to conduct the examination in the local plan erred in failing to determine whether the Council's Sustainability approval complied with the relevant legal and procedural requirements; (2) the Sustainability Appraisal and the process of consideration of alternatives by the Council and the Planning Inspector were legally flawed and unfair. Status: Application Refused.	
Local Plan Allocations		
15th June 2016: Economic Growth, Environment and Development (Overview and Scrutiny) Committee	Summary: Recommends and justifies progressing the Local Plan Allocations, with a commitment to a plan review upon completion to deal with the numbers arising from the GBHMA. Recommendation: The Committee note the outstanding issues associated with meeting Birmingham's housing need and support the recommended option associated with the Plan, set out at para 3.13. Section 3 Background Para 3.13, in light of the above advice it is recommended that the District Council continue to proceed with the Local Plan Allocations DPD (Option 1).	Section 3 Background Para 3.14 with all options there is a need to undertake an update of the Local Plan evidence base, the following have been identified as essential: Sustainability Appraisal.
Regulation 18 Open Consultation	Summary: Consultation undertaken on scope of the ADPD which had been established within the adopted LPS and influenced by the LPS Sustainability Appraisal.	
17th August 2016 – Portfolio Holder Approval	Summary: Scoping Report Approval: Portfolio Holder Approval, to undertake statutory five week consultation on Sustainability Appraisal Scoping Report.	
Consultation on SUSTAINABILITY APPRAISAL Scoping Report	Consultation.	
12th December 2016: Economic	Summary: Consideration of responses received as part of Regulation 18 consultation on the Local Plan Allocations documents and requests recommendation	Para 3.32 "Consultation was undertaken in the Scoping Report from August – September 2016. Responses received along with how

Adoption Statement
Sustainability Appraisal Local Plan Allocations

Date/Meeting	Action/Influence	Additional Context
Growth, Environment and Development (Overview and Scrutiny) Committee	to seek approval from Cabinet for Regulation 19 consultation on draft Local Plan Allocations.	we have addressed these are set out in APPENDIX D".
7th March 2017 : Cabinet	Summary: Approval to undertake Public Consultation (Regulation 19) on Local Plan Allocations. Recommendation: To approve Sustainability Appraisal accompanying Local Plan Allocations for the purposes of public consideration.	
11th April 2017: Full Council	Cabinet report read to Full Council, decision ratified.	
ADPD (Regulation 19)	Consultation undertaken on Regulation 19 document, influenced and accompanied by the Sustainability Appraisal.	
19th September 2017 : Economic Growth, Environment and Development (Overview and Scrutiny) Committee	Summary: Approval to undertake Public Consultation (Regulation 19) on Local Plan Allocations (Focused Changes). Recommendation: That the Committee note the commitment to a 'Focused Changes' consultation as a result of major modifications.	Para 3.7 Summary of 29 representations relating to the Sustainability Appraisal received as part of the Regulation 19 consultation. Para 3.10 commitment to undertake an updated Sustainability Appraisal to inform a revised documents
5th December 2017: Cabinet	Summary: Approval to undertake Public Consultation (Regulation 19) on Local Plan Allocations (Focused Changes). Recommendation: Para 2.2 That Cabinet approves the accompanying Sustainability Appraisal and Non-technical summary which accompany the Local Plan Allocations for the purposes of public consultation.	Para 3.11 Sustainability Appraisal Appendix C and Appendix D
19th December 2017: Full Council	Summary: Approval to undertake Public Consultation (Regulation 19) on Local Plan Allocations (Focused Changes). Recommendation: 2 That Cabinet approves the accompanying Sustainability Appraisal I and Non-technical summary which	

Date/Meeting	Action/Influence	Additional Context
	accompany the Local Plan Allocations for the purposes of public consultation.	
Consultation on ADPD (Regulation 19 – Focused Changes)	Consultation undertaken on Regulation 19 (Focused changes) document, influenced and accompanied by the Sustainability Appraisal.	
1st May 2018: Cabinet	<p>Summary: Approval to Submit Local Plan Allocations (Focused Changes) to Planning Inspectorate</p> <p>Recommendation: That Cabinet approves the supporting submission documents which accompany the Local Plan Allocations as set out in Table 4.</p>	<ul style="list-style-type: none"> • Table 4: Supporting Submission Documents, includes reference to the Sustainability Appraisal which included as Appendix N of the report. • Para 3.21, 3.22, 3.23 provides a summary of the representations submitted as part of the Regulation 19 Consultation,
15th May 2018 : Full Council	<p>Summary: Approval to Submit Local Plan Allocations (Focused Changes) to Planning Inspectorate</p> <p>Recommendation: Para 2.4 Approved the supporting submission documents which accompany the Local Plan Allocations as set out in Table 4 of the Cabinet report.</p>	

The Sustainability Appraisal has presented recommendations at the following stages

- Local Plan Allocations Scoping Report August 2016
- Sustainability Appraisal I Local Plan Allocations 2017
- Sustainability Appraisal I Local Plan Allocation – Focused Changes January 2018
- Sustainability Appraisal I Local Plan Allocations Post Regulation 19 Consultation 2018

Section 4 How the opinions raised during consultation have been taken into account

The role of the Sustainability Appraisal is to inform the decision making process during the development of the Plan, by providing information on likely sustainability effects. Whilst there is a statutory requirement to consider the results of the Sustainability Appraisal, there is no legal duty to select the most sustainable option as it is acknowledged that there are other factors to consider.

The stages of consultation have are articulated in table 3 above further Appendix B sets out the points raised by consultees through the ADPD’s development process and includes the response.

Section 5 Reasons for choosing the Plan as adopted, in light of other alternatives dealt with

The effects of the ADPD sites and polices have been assessed against the Sustainability Appraisal objectives, and the results have been recorded in tables showing effect. Assumptions for each of the Sustainability Appraisal Objectives were developed and supported the scoring process.

It should be noted that between the consultation of Sustainable Appraisal Regulation 19 and the Submitted Sustainable Appraisal two significant factors altered the planning landscape for Lichfield District and the context of the ADPD. The first was receipt of three appeals from the Secretary of State, one of these appeals decision 750 dwellings at land at Watery Lane was approved despite not being in conformity with the Local Plan Strategy. The second factor relates to Government's consultation on the Housing White Paper which inter alia seeks to clarify the national policy position associated with Green Belt.

Methodologies for the identification of alternatives and the assessment of preferred options for Housing, Employment, Gypsy and Traveller and Sustainability Appraisal saved policies were systematically utilised through all iterations of the Sustainability Appraisal. These detailed Methodologies can be viewed in full in Appendix C Methodologies.

Table 4, Appendix D, provides a summary of the reasons for the identification of the preferred alternatives in regard to both Housing and Employment. To avoid confusion this information appears as Table 6 Appendix G in the submitted Sustainability Appraisal I.

Table 5, Appendix D, provides a summary of the reasons for the identification of the preferred alternatives in regard to Gypsy & Traveller allocations. To avoid confusion this information appears as Table 7 Appendix G in the submitted Sustainability Appraisal.

In regard to saved policy options replacement, following regulation 19 responses led to a number of wording amendments to a number of Proposed Policy options. Those amendments were appropriate have been accommodated within the policy wordings. The amendments have been assessed against the objectives within the Sustainability Framework.

The evolving, iterative nature of the Sustainability Appraisal has enabled the integration of the core principles of sustainable development into the ADPD. Taken together with the policies in the LPS, SPD and national planning policy, it is considered that the policies and sites identified within the ADPD should help create sustainable communities. Most importantly the ADPD sits within the policy context of the Local Plan Strategy which has identified within policy the mitigation measures which are required to make development acceptable. It is considered that these measures are sufficient to guard against adverse environmental effects.

Section 6 Measures that are to be taken to monitor the likely significant effects of the implementation of the Plan

It is a requirement of the SEA Directive to establish how the significant sustainability effects of implementing the plan, programme or strategy will be monitored, helping to

- Identify the significant effects of the plan
- Isolated unforeseen effects
- Ensure that there is action to offset any undesirable significant effects; and
- Provided a baseline for ongoing monitoring of the plan.

However as former guidance on Sustainability Appraisals of RSS and LDDs noted (ODPM 2005) "It is not necessary to monitor everything, or monitor an effect indefinitely. Instead monitoring needs to be focused on significant sustainability effects"

The predicated significant effects of the policies identified by the Sustainability Appraisal will be monitored to highlight specific performance issues and inform future decision making. Indicators for

Adoption Statement
Sustainability Appraisal Local Plan Allocations

monitoring are identified within the Sustainability Appraisal framework (Table 1) above, and where possible those proposed as part of the Local Plan Strategy Sustainability Appraisal have been included to ensure continuity. The reporting of such monitoring will be through the Authority Monitoring Report.

APPENDIX A – LOCAL PLAN ALLOCATIONS SUSTAINABILITY APPRAISAL

Adoption Statement

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Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source															
Demographics																				
Population growth	100,900 (mid 2011) 102,706 (mid 2015)	Staffordshire 849,500 (mid 2011) 862,562 (mid 2015) West Midlands 5,608,700 (mid 2011) 5,751,000 (mid 2015) England 56,170,900 (mid 2011) 54,786,327 (mid 2015)	1.8% increase in population within the District.	Lichfield District's population has increased by 1.8% compared to increases of 1.5 and 2.5% in Staffordshire and the West Midlands respectively. The population in Lichfield District is growing more than both Staffordshire and England which had a reduction in population.	Mid year population statistics ONS 2011 and 2015															
Population age structure	0-15: 16.9% 16-64: 60.1% 65+: 22.9% Lone Pensioner Households 2011 <table border="1"> <thead> <tr> <th></th> <th>Number</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Lichfield</td> <td>5,032</td> <td>12.2</td> </tr> <tr> <td>Staffordshire</td> <td>44,771</td> <td>12.6</td> </tr> <tr> <td>West Midlands</td> <td>289,571</td> <td>12.6</td> </tr> <tr> <td>England</td> <td>2,725,596</td> <td>12.4</td> </tr> </tbody> </table>		Number	%	Lichfield	5,032	12.2	Staffordshire	44,771	12.6	West Midlands	289,571	12.6	England	2,725,596	12.4	Staffordshire 0-15: 17.3% 16-64: 61.9% 65+: 20.8% West Midlands 0-15: 19.5% 16-64: 62.3% 65+: 18.2% England 0-15: 19%	Four wards in Lichfield have high proportions of households with lone pensioners – Boney Hay (15.1%), Chasetown (16.4%), Leomansley (15.9%) and Stowe (17.6%). Of these lone pensioners 59.5% (2,992) have a long term health	Compared to regional and national statistics, Lichfield District has a higher elderly population with almost one quarter of the population being over the age of 65, 5% higher	Mid year population statistics ONS 2015 Lone pensioner statistics Census 2011.
	Number	%																		
Lichfield	5,032	12.2																		
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Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
		16-64: 63.3% 65+: 17.7%	<p>problem or disability - this is similar to the national average of 59.6%. The percentage of lone pensioners with a long term health problem or disability is significantly higher than England in two wards; Burntwood Central (67.9%) and Chasetown (72.1%).</p> <p>Using 2014 mid-year population figures for Lichfield it has been estimated that around 500 residents aged 65+ are at risk of loneliness.</p>	<p>than the national figure.</p> <p>By comparison the District is similar to Staffordshire as a whole for the 0-15 year age group, however this is lower than the national average.</p> <p>The number of people living in Lichfield aged 65 and over has already exceeded the number of children under the age of 16; projections suggest Lichfield will continue to get older and bigger.</p>	
Components of population change	2011 - 2015 Change due to live births 4.85% Change due to deaths 4.94% Change due to net internal migration 1.46% Change due to net international migration 0.58% Change due to 'Other' factors 0.31%		The largest population influence is death.	The amount of deaths within the District outstrips the number of births. As such the changes to the population numbers is largely through internal and	Mid year population statistics 2014 to 2015

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
				international migration.	
Population ethnicity	White British: 94.6% White Irish/Other: 2.1% Mixed: 1.0% Asian British: 1.6% Black British: 0.5% Arab: 0.0% Traveller: 0.0% Other: 0.1%	Staffordshire White British: 93.6% White Irish/Other: 2.0% Mixed: 1.1% Asian British: 2.4% Black British: 0.6% Arab: 0.1% Traveller: 0.1% Other: 0.1% West Midlands White British: 79.2% White Irish/Other: 3.5% Mixed: 2.4% Asian British: 10.8% Black British: 3.3% Arab: 0.3% Traveller: 0.1% Other: 0.6% England White British: 79.8% White Irish/Other: 5.6% Mixed: 2.3% Asian British: 7.8% Black British: 3.5% Arab: 0.4% Traveller: 0.1% Other: 0.6%		Lichfield and Staffordshire County are relatively similar with regard to ethnic mix, with a high proportion of white British with 94.6% white British compared to 79.2% and 79.8% respectively for the West Midlands and England	2011 census/ONS
Projections	The sub national Population Projections from 2014 to 2039 for Lichfield District show an increase in		The net decrease of 7,800 through natural	There is a net decrease (-7,800) in	ONS population

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	population of 8.5% with an additional 8,700 people predicted to reside within Lichfield District.		change reflects the death rate being markedly higher than the birth rate. This points to the ageing population within the District and as reflected in the age structure breakdown above.	population through natural change i.e. births and deaths, with the increase in population attributable to net internal migration with an increase of around 16,300 people.	Projections Unit.
Housing					
Dwelling stock by tenure	2011 Total dwelling stock: 43,170 LA dwelling stock: 0% Registered Social Landlord: 13.1% Other public: 0.4% Owned & privately rented: 86.5%	2011 England Total dwelling stock: 22,976,000 LA dwelling stock: 7.5% Registered Social Landlord: 10.1% Other public: 0.3% Owned & privately rented: 82.1%	Household projections published by the DCLG can be used as an estimate of overall housing need. Lichfield had 42,300 households in 2014 which is projected to rise to 48,700 by 2035.	Compared to the national average for England, Lichfield District has a 3% higher proportion of Registered Social Landlords than nationally.	ONS and DCLG
Household types	Detached: 41.1% Semi detached: 36.2% Terraced: 14.5% Flats - Purpose built: 6.8% Flat - converted or shared house: 0.6% Flat – commercial building: 0.4% Caravan or other temporary structure: 0.4%	Staffordshire Detached: 36.1% Semi detached: 39.6% Terraced: 17.2% Flats - Purpose built: 5.6% Flat - converted or shared house: 0.6% Flat – commercial building: 0.5% Caravan or other temporary structure: 0.4%		Lichfield District has significantly higher proportion of detached dwellings than Staffordshire and over 15% more than either the West Midlands or England. In comparison, the District has a much	Census 2011

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
		<p>West Midlands Detached: 25.7% Semi detached: 39.6% Terraced: 24.1% Flats - Purpose built: 8.5% Flat - converted or shared house: 1.1% Flat – commercial building: 0.7% Caravan or other temporary structure: 0.3%</p> <p>England Detached: 24.3% Semi detached: 33.6% Terraced: 25.7% Flats - Purpose built: 12.1% Flat - converted or shared house: 2.9% Flat – commercial building: 0.8% Caravan or other temporary structure: 0.3%</p>		<p>lower percentage of terraced properties and flats than the regional or national average.</p>	
House prices	Average property price Lichfield District December 2015: £250,675	Average property price December 2015: East Staffordshire District: £190,214 Stafford District: £204,361 Cannock Chase District: £156,613	Staffordshire and the West Midlands’ average house prices are almost identical with Lichfield District’s average house prices largely mirroring the shape of the graph but	Property values in Lichfield District are higher than most of the neighbouring authorities, and are significantly higher than the West Midlands average.	ONS and Land Registry

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																																																																								
		Tamworth Borough: £164,916. Staffordshire: £191,260 West Midlands: £196,406	being significantly higher.	Lichfield District is seen as an attractive commuter area for Birmingham and the larger salaries associated with these jobs. The house prices in the District are particularly high due to the historic character of the city and attractive nature of its villages and countryside.																																																																																									
	<div style="text-align: center;"> <h3>1995 - 2015 Average House Prices</h3> <table border="1"> <caption>Estimated Average House Prices (1995-2015)</caption> <thead> <tr> <th>Year</th> <th>Lichfield</th> <th>Staffordshire</th> <th>West Midlands</th> </tr> </thead> <tbody> <tr><td>Q4-1995</td><td>80,000</td><td>60,000</td><td>60,000</td></tr> <tr><td>Q4-1996</td><td>85,000</td><td>65,000</td><td>65,000</td></tr> <tr><td>Q4-1997</td><td>90,000</td><td>70,000</td><td>70,000</td></tr> <tr><td>Q4-1998</td><td>95,000</td><td>75,000</td><td>75,000</td></tr> <tr><td>Q4-1999</td><td>100,000</td><td>80,000</td><td>80,000</td></tr> <tr><td>Q4-2000</td><td>110,000</td><td>90,000</td><td>90,000</td></tr> <tr><td>Q4-2001</td><td>120,000</td><td>100,000</td><td>100,000</td></tr> <tr><td>Q4-2002</td><td>140,000</td><td>120,000</td><td>120,000</td></tr> <tr><td>Q4-2003</td><td>170,000</td><td>140,000</td><td>140,000</td></tr> <tr><td>Q4-2004</td><td>190,000</td><td>150,000</td><td>150,000</td></tr> <tr><td>Q4-2005</td><td>200,000</td><td>160,000</td><td>160,000</td></tr> <tr><td>Q4-2006</td><td>210,000</td><td>170,000</td><td>170,000</td></tr> <tr><td>Q4-2007</td><td>220,000</td><td>175,000</td><td>175,000</td></tr> <tr><td>Q4-2008</td><td>210,000</td><td>170,000</td><td>170,000</td></tr> <tr><td>Q4-2009</td><td>200,000</td><td>160,000</td><td>160,000</td></tr> <tr><td>Q4-2010</td><td>220,000</td><td>170,000</td><td>170,000</td></tr> <tr><td>Q4-2011</td><td>210,000</td><td>165,000</td><td>165,000</td></tr> <tr><td>Q4-2012</td><td>210,000</td><td>165,000</td><td>165,000</td></tr> <tr><td>Q4-2013</td><td>210,000</td><td>170,000</td><td>170,000</td></tr> <tr><td>Q4-2014</td><td>230,000</td><td>180,000</td><td>180,000</td></tr> <tr><td>Q4-2015</td><td>240,000</td><td>190,000</td><td>190,000</td></tr> </tbody> </table> </div>					Year	Lichfield	Staffordshire	West Midlands	Q4-1995	80,000	60,000	60,000	Q4-1996	85,000	65,000	65,000	Q4-1997	90,000	70,000	70,000	Q4-1998	95,000	75,000	75,000	Q4-1999	100,000	80,000	80,000	Q4-2000	110,000	90,000	90,000	Q4-2001	120,000	100,000	100,000	Q4-2002	140,000	120,000	120,000	Q4-2003	170,000	140,000	140,000	Q4-2004	190,000	150,000	150,000	Q4-2005	200,000	160,000	160,000	Q4-2006	210,000	170,000	170,000	Q4-2007	220,000	175,000	175,000	Q4-2008	210,000	170,000	170,000	Q4-2009	200,000	160,000	160,000	Q4-2010	220,000	170,000	170,000	Q4-2011	210,000	165,000	165,000	Q4-2012	210,000	165,000	165,000	Q4-2013	210,000	170,000	170,000	Q4-2014	230,000	180,000	180,000	Q4-2015	240,000	190,000	190,000
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Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
Housing affordability	The lowest quartile house price was 7.1 times the lowest quartile income		The lowest quartile house price was 7.1 times the lowest quartile income which is higher than the averages for Staffordshire (6.1), West Midlands (5.4) and England (6.5). These rates highlight possible affordability issues in Lichfield.		ONS
Net Housing completions since 2006	2008/9: 273 2009/10: 102 2010/11: 306 2011/12: 201 2012/13: 239 2013/14: 324 2014/15: 226 2015/16: 200	N/A	The level of house building reached its peak in 2005/6 with 647 being delivered and the supply of housing sites was not constrained. However since the recession the rate of house building has declined.	It is unlikely that until development starts on site for the remaining Strategic Development Allocations that this delivery rate will increase. To date only 2 of the 8 Strategic Development Allocations are on site with only 1 having been partially completed and the other only recently starting with figures	

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																																			
				expected to be included in the 2015/16 monitoring.																																																				
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				between 2014 and 2039.	
Deprivation					
Deprivation	IMD Average Rank – 252 Employment – 202 Education Skills & Training – 243 Health Deprivation & Disability - 206 Crime – 287 Barriers – 160 Living Environment – 248 Income deprivation affecting children – 229 Income deprivation affecting older people - 240	Local authority districts include lower-tier non-metropolitan districts, London boroughs, unitary authorities and metropolitan districts. At the time of publication, there were 326 local authority districts in England with the local authority district with a rank of 1 being the most deprived, and the area ranked 326 the least deprived.	Since 2010 there has been an increase from 1 to 2 LSOAs falling within the bottom 20% of most deprived areas. The average IDM rank for Lichfield District in 2004 was 259 followed by 237 in 2010 and 247 in 2015, showing a dip during and immediately post the recession with recovery now underway.	The Indices of Deprivation 2015 is the relative measure of deprivation published by the government. The data is published for small areas (Lower-layer Super Output Areas, or LSOAs) across England. At a District Level with regard to the IMD average rank, Lichfield is within the top 30% nationally. However there are pockets of deprivation within Lichfield District. Two lower super output areas fall within IMD's 20% of most deprived areas nationally. These are found within the	DCLG English Indices of Deprivation 2015

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
				wards of Chadsmead and Chasetown.	
Crime	Lichfield	36.0 crimes per 1,000 residents, 20.3% lower than the Staffordshire rate (45.2 per 1000).	<p>The number of crimes recorded in the district increased slightly by 1.4% in 2014/15 compared to the previous year but has decreased from 4308 crimes in 2010-11 to 3677 in 2014-15.</p> <p>Anti-social behaviour has increased by 6.2% over the last year but overall there has been a reduction over the past 5 years from 2262 incidents in 2010-11 to 2015 in 2014-15.</p> <p>In 2014/15, there were 46 hate crimes reported to the police in the Lichfield district. Despite this being a low number, it represents an increase</p>	<p>Both recorded crime, and the rate of anti-social behaviour across the district per 1,000 Residents' remains below the county average.</p> <p>Theft offences have declined by 8.2% since 2013/14 and the reduction is largely down to a reduction in the number of 'burglary' offences. In contrast to overall crime trends, there has been an increase in 'violence against the person' offences in the district.</p> <p>However compared to Staffordshire the</p>	Lichfield District Community Safety Delivery Plan 2016-2019

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
			<p>of 48% from the previous year of 15 crimes. The vast majority (91%) were violence and public order offences with 83% of all offences motivated by race. North Lichfield and Fazeley are in the top five areas for hate crime in the Trent Valley division (Lichfield, Tamworth and East Staffs).</p> <p>Road safety was highlighted, in particular speeding vehicles and Parking were cited as a big issues in their area. However, in terms of road traffic casualties, the proportion of casualties killed or seriously injured in 2014 was the lowest rate for 5 years, and lower than the Staffordshire rate. Staffordshire County</p>	<p>rate of violence offences per 1000 residents was 8.8% in Lichfield compared to 12.2%.</p>	

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																															
			<p>recorded the 8th lowest casualty severity ratio of the 153 local authorities across England and it can be inferred that the District's roads are some of the safest in the country.</p>																																																	
Economic																																																				
<p>Unemployment Job seekers allowance claimants</p>	<p style="text-align: center;">DWP benefits claimants % is a proportion of resident population of area aged 16-64</p> <table border="1" style="margin-top: 10px;"> <caption>DWP benefits claimants % (Estimated from Chart)</caption> <thead> <tr> <th>Year</th> <th>Lichfield (%)</th> <th>West Midlands (%)</th> <th>Great Britain (%)</th> </tr> </thead> <tbody> <tr><td>Nov-05</td><td>0.5</td><td>1.8</td><td>1.5</td></tr> <tr><td>Nov-06</td><td>0.6</td><td>2.3</td><td>1.9</td></tr> <tr><td>Nov-07</td><td>1.0</td><td>2.6</td><td>2.0</td></tr> <tr><td>Nov-08</td><td>1.5</td><td>3.5</td><td>2.5</td></tr> <tr><td>Nov-09</td><td>2.8</td><td>4.8</td><td>3.7</td></tr> <tr><td>Nov-10</td><td>2.3</td><td>4.2</td><td>3.4</td></tr> <tr><td>Nov-11</td><td>2.3</td><td>4.5</td><td>3.7</td></tr> <tr><td>Nov-12</td><td>2.0</td><td>4.4</td><td>3.6</td></tr> <tr><td>Nov-13</td><td>1.8</td><td>4.3</td><td>3.5</td></tr> <tr><td>Nov-14</td><td>1.6</td><td>4.2</td><td>3.4</td></tr> <tr><td>Nov-15</td><td>1.3</td><td>4.1</td><td>3.3</td></tr> </tbody> </table>	Year	Lichfield (%)	West Midlands (%)	Great Britain (%)	Nov-05	0.5	1.8	1.5	Nov-06	0.6	2.3	1.9	Nov-07	1.0	2.6	2.0	Nov-08	1.5	3.5	2.5	Nov-09	2.8	4.8	3.7	Nov-10	2.3	4.2	3.4	Nov-11	2.3	4.5	3.7	Nov-12	2.0	4.4	3.6	Nov-13	1.8	4.3	3.5	Nov-14	1.6	4.2	3.4	Nov-15	1.3	4.1	3.3	<p>Benefit claimants for Lichfield remains below the national and regional averages.</p>	<p>Benefit claimants has been variable in Lichfield over the last ten years, however this trend has broadly followed national and regional averages.</p>	<p>Department of Work and Pensions. Benefit claimants - working age client group</p>
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Indicator	Lichfield District			Comparators	Local Trend	Commentary	Data Source
	Apr 10-Mar 11	20.3	25.8	23.9		regional indicator and consistently so.	
	Apr 11-Mar 12	22.1	25.7	23.7			
	Apr 12-Mar 13	15.8	24.9	23.1			
	Apr 13-Mar 14	22.1	24.5	22.8			
	Apr 14-Mar 15	15.8	24.8	22.6			
	Apr 15-Mar 16	19.1	25.2	22.2			
Net additional floorspace provided	Use Class Order	Amount of Floorspace (m²)				<p>In 2016 4,520m² of employment developments have been completed with the District providing an increase in employment floorspace.</p> <p>The Council continues to achieve in locating new employment land on previously developed land, with all the completed employment development being on brownfield sites.</p>	Authority Monitoring report 2016 Lichfield District Council
	B1a	455					
	B1b	830					
	B1c	600					
	B2	367					
	B8	175					
	B8/A1 combined	340					
	Total	4,520					

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
Employment land available	Lichfield District has 64.42 ha of employment land available for employment development. This is available across a range of sites which can provide for all types of employment development.	N/A	The total area of employment land available for this monitoring period is some 30.18 hectares less than in December 2015.	<p>Lichfield District maintains a large portfolio of sites which are available for employment development, 64.42 ha of land is under construction and/or has secured planning permission for employment.</p> <p>The District Council produced its first Employment Land Availability Assessment (ELAA) in 2016</p>	Authority Monitoring Report 2016 Lichfield District Council
Retail performance	<p>Lichfield District has a City Centre, Lichfield and a Town Centre, Burntwood.</p> <p>Since January 2009 vacancy rates for Lichfield City Centre have fluxed between a high of 10.5% in August 2009 to a low of 7.0% in July 2014. In December 2015 vacancy rates stood at 9.15% representing 28 of the available 306 retail premises available in the City Centre.</p> <p>In terms of Burntwood vacancy rates were recorded at 9.85 in July 2014 and fall to 4.55% in December 2015, representing 3 vacancy premises of the total 66 available.</p>	N/A		Very little employment development has occurred with the District's Centres between December 2015 and 2016 AMR totalling 7.5% of this year's employment completions were located in the town centres.	Authority Monitoring Report 2016 Lichfield District Council

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																										
	Only two developments were completed within the Centres between December 2015 and the 2016 AMR, leading to a net new floorspace of 340m ²																																														
Education																																															
Qualification of residents	<p>Level 1: 1-4 O Levels/CSE/GCSEs (any grades), Entry Level, Foundation Diploma, NVQ Level 1, Foundation GNVQ, Basic/Essential Skills;</p> <p>Level 2: 5+ O Level (Passes)/CSEs (Grade 1)/GCSEs (Grades A*-C), School Certificate, 1 A Level/ 2-3 AS Levels/VCEs, Intermediate/Higher Diploma, Welsh Bacallaureate Intermediate Diploma, NVQ level 2, Intermediate GNVQ, City and Guilds Craft, BTEC First/General Diploma, RSA Diploma;</p> <p>Level 3: 2+ A Levels/VCEs, 4+ AS Levels, Higher School Certificate, Progression/Advanced Diploma, Welsh Bacallaureate Advanced Diploma, NVQ Level 3; Advanced GNVQ, City and Guilds Advanced Craft, ONC, OND, BTEC National, RSA Advanced Diploma;</p> <p>Level 4 and above: Degree (for example BA, BSc), Higher Degree (for example MA, PhD, PGCE), NVQ Level 4-5, HNC, HND, RSA Higher Diploma, BTEC Higher level,</p> <p>Adult Qualification Levels – Proportion of the working age population (16-64), Jan-Dec 2014</p> <table border="1"> <thead> <tr> <th></th> <th>% with NVQ4+</th> <th>% with NVQ3+</th> <th>% with NVQ2+</th> <th>% with NVQ1+</th> <th>% with other qualifications</th> <th>% with no qualifications</th> </tr> </thead> <tbody> <tr> <td>Lichfield</td> <td>31.0</td> <td>57.9</td> <td>74.3</td> <td>87.2</td> <td>3.5</td> <td>9.3</td> </tr> <tr> <td>Staffordshire</td> <td>28.4</td> <td>53.3</td> <td>73.3</td> <td>83.5</td> <td>5.0</td> <td>11.5</td> </tr> <tr> <td>Staffordshire and Stoke-on-Trent LEP</td> <td>26.7</td> <td>50.9</td> <td>70.3</td> <td>80.9</td> <td>5.9</td> <td>13.3</td> </tr> <tr> <td>West Midlands</td> <td>29.4</td> <td>50.1</td> <td>67.4</td> <td>79.9</td> <td>7.0</td> <td>13.2</td> </tr> <tr> <td>England</td> <td>35.7</td> <td>56.5</td> <td>73.2</td> <td>85.1</td> <td>6.2</td> <td>8.6</td> </tr> </tbody> </table> <p>Apprenticeship success rates in Lichfield 2012/13 and 2013/14</p>		% with NVQ4+	% with NVQ3+	% with NVQ2+	% with NVQ1+	% with other qualifications	% with no qualifications	Lichfield	31.0	57.9	74.3	87.2	3.5	9.3	Staffordshire	28.4	53.3	73.3	83.5	5.0	11.5	Staffordshire and Stoke-on-Trent LEP	26.7	50.9	70.3	80.9	5.9	13.3	West Midlands	29.4	50.1	67.4	79.9	7.0	13.2	England	35.7	56.5	73.2	85.1	6.2	8.6			<p>Overall the proportion of the working age population (16-64) in Lichfield qualified to NVQ Level 3 compares favourably to the County, LEP, Regional and National averages. However, higher level adult skills are an issue across the SSLEP, including Lichfield, with the proportion of the working age population qualified to 'NVQ Level 4 and above' below the national average.</p> <p>Apprenticeship success rates in Lichfield are higher than the SSLEP area,</p>	<p>ONS Annual Population Survey and Apprenticeship Success Rates www.gov.uk</p>
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GCSE Results	<p>2014-15 Staffordshire: % pupils achieving 5+ GCSE grades A*-C: 64.9% Average A' Level Scores per candidate: 698.4</p>	<p>2014-15: England % pupils achieving 5+ GCSE grades A*-C: 64.2% Average A' Level Scores per candidate: 700.3</p>	<p>Staffordshire's results has decreased with regard to GCSEs from 2009 when 70.4% achieved grades A*-C. This level of achievement was in line with the national figure of 70%. There has also been a slight reduction in the average A Level scores per candidate achieving 707.6 in 2009 with the average for England being 739.1 substantially higher than Staffordshire's results.</p>	Staffordshire's results are similar to the national picture.	Department for Education																													
Health																																		
Life expectancy	<p>Males: 80 years Females: 84 years</p>	<p>West Midlands Males: 78.9 years</p>	<p>Latest ONS population projections are trend-</p>	Overall life expectancy at birth	ONS: Healthy life																													

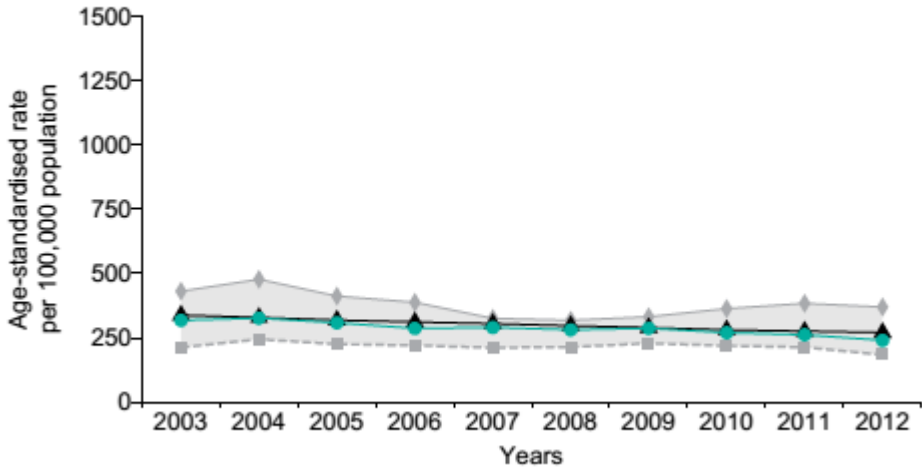
Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
		<p>Females: 82.9 years</p> <p>England</p> <p>Males 79.5 years</p> <p>Females: 83.2 years</p>	<p>based and use the 2014 mid-year population estimates as the base year. They provide an indication of expected levels of population growth over a 25 year period. The population is projected to see a significant growth in people aged 65 and over and in particular those aged 85 and over.</p> <p>The rate of increase in the number of older people in Lichfield is faster than both the West Midlands and England and by 2029 equates to a 60% increase in 75-84 year olds and a 115% increase in the amount of residents aged 85.</p>	<p>continues to increase both nationally and locally. Overall life expectancy at birth in Lichfield is 80 years for men and 84 years for women, both similar to the national average. However men and women living in the most deprived areas of Lichfield live five and 10 years less than those living in less deprived areas.</p> <p>For men the difference in life expectancy between the ward with the lowest life expectancy and the ward with the highest life expectancy in the district is over six years (varying between 76 years in Chadsmead and 83 years in Burntwood</p>	<p>expectancy at birth and age 65 by upper tier local authority and area deprivation: England, 2012 to 2014</p>

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
				<p>Central).</p> <p>For women the difference in life expectancy between the ward with the lowest life expectancy and the ward with the highest life expectancy in the district is over 12 years (varying between 79 years in Chasetown and 91 years in St John's).</p>	
Ageing population	<p style="text-align: center;">Population Projections for Lichfield District 2014 - 2039</p> <p style="text-align: center;">Number of People (,000)</p> <p style="text-align: center;">Year</p> <p style="text-align: center;"> ■ 0-15 ■ 16-24 ■ 25-49 ■ 50-64 ■ 65-74 ■ 75-84 ■ 85+ </p>		<p>Most wards (22 out of 26) have higher proportions of older people aged 65+ than England. Armitage with Handsacre, Boley Park, Chasetown, Fazeley, King's Bromley, Leomansley, Little Aston, Shenstone and Stowe also have higher proportions of people aged 85 or over. Only three</p>	<p>ONS Population Estimates 2014 - 2039</p>	

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																	
	<div data-bbox="427 264 1384 919"> <p>The chart shows projected population changes for Lichfield, West Midlands, and England across seven age groups. The y-axis represents the percentage change from 2014 to 2029, ranging from -20.00 to 140.00. The x-axis lists age groups: 0-15, 16-24, 25-49, 50-64, 65-74, 75-84, and 85+. Lichfield (blue) shows a significant increase in the 85+ group (approx. 115%) and a decrease in the 16-24 group (approx. -10%). West Midlands (orange) and England (grey) show smaller changes across all groups, with notable increases in the 75-84 and 85+ groups.</p> <table border="1"> <caption>Projected population change between 2014 and 2029</caption> <thead> <tr> <th>Age Group</th> <th>Lichfield</th> <th>West Midlands</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>0.00</td> <td>8.00</td> <td>8.00</td> </tr> <tr> <td>16-24</td> <td>-10.00</td> <td>5.00</td> <td>5.00</td> </tr> <tr> <td>25-49</td> <td>-5.00</td> <td>2.00</td> <td>2.00</td> </tr> <tr> <td>50-64</td> <td>5.00</td> <td>5.00</td> <td>10.00</td> </tr> <tr> <td>65-74</td> <td>20.00</td> <td>15.00</td> <td>20.00</td> </tr> <tr> <td>75-84</td> <td>60.00</td> <td>40.00</td> <td>45.00</td> </tr> <tr> <td>85+</td> <td>115.00</td> <td>65.00</td> <td>60.00</td> </tr> </tbody> </table> </div> <p data-bbox="427 962 1738 1066">The dependency ratio for older people in Lichfield (measures the number of people aged over 65 who depend on people of working age (16-64)) is 38 older people for every 100 people of working age. This is higher than the England average.</p>			Age Group	Lichfield	West Midlands	England	0-15	0.00	8.00	8.00	16-24	-10.00	5.00	5.00	25-49	-5.00	2.00	2.00	50-64	5.00	5.00	10.00	65-74	20.00	15.00	20.00	75-84	60.00	40.00	45.00	85+	115.00	65.00	60.00		wards, Alrewas and Fradley, Chadsmead and Summerfield have high proportions of children under 16.	
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	June 2013	June 2014	June 2015	June 2016																																		
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Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
Health deprivation and disability	<p>Lichfield District is ranked as 206 out of 326 local authorities (i.e. in top 40%) where 1 is the most deprived.</p> <p>The Health Deprivation and Disability Domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation.</p>	<p>Staffordshire is ranked 91st out of 152 i.e. in the top 40%.</p>		<p>its claimants' rate is substantially lower than the West Midlands and Great Britain.</p> <p>The 2011 Census found that 18.1% (18,300 people) had a limiting long-term illness (LLTI) in Lichfield. This is higher than the England average of 17.6%. The proportion of people who have a LLTI also increases with age: around 48% (9,400) of people with 65 and over and 67% (5,100) of people aged 75 and over have a LLTI.</p> <p>In Lichfield 12 of 26 wards also have higher proportions of people with LLTI than the England average.</p>	<p>DCLG English Indices of Deprivation 2015</p>

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																																							
Health inequality	<p>The charts provide a comparison of the changes in early death rates (in people under 75) between this area and all of England. Early deaths from all causes also show the differences between the most and least deprived quintile in this area. (Data points are the midpoints of 3 year averages of annual rates, for example 2005 represents the period 2004 to 2006).</p> <div data-bbox="439 453 1352 1008" data-label="Figure"> <p style="text-align: center;">Early deaths from all causes: MEN</p> <table border="1"> <caption>Estimated data for Early deaths from all causes: MEN</caption> <thead> <tr> <th>Year</th> <th>Series 1 (Triangles)</th> <th>Series 2 (Circles)</th> <th>Series 3 (Squares)</th> <th>Series 4 (Diamonds)</th> </tr> </thead> <tbody> <tr><td>2003</td><td>550</td><td>500</td><td>450</td><td>650</td></tr> <tr><td>2004</td><td>520</td><td>480</td><td>420</td><td>620</td></tr> <tr><td>2005</td><td>500</td><td>460</td><td>400</td><td>580</td></tr> <tr><td>2006</td><td>480</td><td>440</td><td>350</td><td>550</td></tr> <tr><td>2007</td><td>470</td><td>430</td><td>280</td><td>540</td></tr> <tr><td>2008</td><td>460</td><td>420</td><td>280</td><td>530</td></tr> <tr><td>2009</td><td>450</td><td>410</td><td>280</td><td>520</td></tr> <tr><td>2010</td><td>440</td><td>400</td><td>270</td><td>480</td></tr> <tr><td>2011</td><td>430</td><td>380</td><td>270</td><td>470</td></tr> <tr><td>2012</td><td>420</td><td>370</td><td>260</td><td>460</td></tr> </tbody> </table> </div>	Year	Series 1 (Triangles)	Series 2 (Circles)	Series 3 (Squares)	Series 4 (Diamonds)	2003	550	500	450	650	2004	520	480	420	620	2005	500	460	400	580	2006	480	440	350	550	2007	470	430	280	540	2008	460	420	280	530	2009	450	410	280	520	2010	440	400	270	480	2011	430	380	270	470	2012	420	370	260	460			<p>Priorities in Lichfield include addressing inequalities in health, addressing the impact of alcohol, and supporting the ageing population.</p> <p>In 2012, 23.5% of adults are classified as obese.</p> <p>The rate of smoking related deaths was 229, better than the average for England. This represents 143 deaths per year. Rates of sexually transmitted infections, people killed and seriously injured on roads and TB are better than average. Rates of statutory homelessness, violent crime, long term unemployment,</p>	Public Health England
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Infant mortality	<p data-bbox="425 949 952 973">2010 – 2012 3.4 deaths per 1000 live births</p> <p data-bbox="425 981 952 1005">2011-2013 3.1 deaths per 1000 live births</p>	<p data-bbox="1086 949 1433 1005">Staffordshire 2011-2013: 4.7 deaths per 1000 live births</p>	<p data-bbox="1467 949 1736 1045">A drop in the IMR for Lichfield accords with a national reduction.</p>	<p data-bbox="1769 949 2016 1189">Infant mortality rates dropped nationally from 11.1 per 1000 live births in 1981 to 4.0 per 1000 live births in 2011.</p>	LGA																																																							

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Health summary for Lichfield

The chart below shows how the health of people in this area compares with the rest of England. This area's result for each indicator is shown as a circle. The average rate for England is shown by the black line, which is always at the centre of the chart. The range of results for all local areas in England is shown as a grey bar. A red circle means that this area is significantly worse than England for that indicator; however, a green circle may still indicate an important public health problem.

Domain	Indicator	Local No Per Year	Local value	Regional average*		England Worst value	England Best value	England Average	England 75th Percentile	Eng best
				Eng worst	Eng best					
Our communities	1 Deprivation	3,784	3.7	20.4	83.8					0.0
	2 Children in poverty (under 16s)	2,070	12.3	19.2	37.9					5.8
	3 Statutory homelessness	62	1.5	2.3	12.5					0.0
	4 GCSE achieved (5A*-C inc. Eng & Maths)†	681	61.4	56.8	35.4					79.9
	5 Violent crime (violence offences)	755	7.5	11.1	27.8					2.8
	6 Long term unemployment	105	1.7	7.1	23.5					0.9
	7 Smoking status at time of delivery	102	12.9	12.0	27.5					1.9
Children's and young people's health	8 Breastfeeding initiation	n/a	-	73.9						
	9 Obese children (Year 6)	148	15.1	19.1	27.1					9.4
	10 Alcohol-specific hospital stays (under 18)†	6.7	36.6	40.1	105.8					11.2
Adults' health and lifestyle	11 Under 18 conceptions	54	31.5	24.3	44.0					7.6
	12 Smoking prevalence	n/a	15.7	18.4	30.0					9.0
	13 Percentage of physically active adults	269	58.7	56.0	43.5					69.7
	14 Obese adults	n/a	23.5	23.0	35.2					11.2
	15 Excess weight in adults	178	66.7	63.8	75.9					45.9
Disease and poor health	16 Incidence of malignant melanoma†	21.7	22.3	18.4	38.0					4.8
	17 Hospital stays for self-harm	141	147.5	203.2	682.7					60.9
	18 Hospital stays for alcohol related harm†	636	606	645	1231					366
	19 Prevalence of opiate and/or crack use	267	4.2	8.4	25.0					1.4
	20 Recorded diabetes	4,025	6.2	6.2	9.0					3.4
	21 Incidence of TB†	1.3	1.3	14.8	113.7					0.0
	22 New STI (exc Chlamydia aged under 25)	335	530	832	3269					172
	23 Hip fractures in people aged 65 and over	116	520	580	838					354
	24 Excess winter deaths (three year)	53.5	17.4	17.4	34.3					3.9
	25 Life expectancy at birth (Male)	n/a	80.0	79.4	74.3					83.0
Life expectancy and causes of death	26 Life expectancy at birth (Female)	n/a	83.5	83.1	80.0					86.4
	27 Infant mortality	3	3.1	4.0	7.6					1.1
	28 Smoking related deaths	143	228.9	288.7	471.6					167.4
	29 Suicide rate	9	9.3	8.8						
	30 Under 75 mortality rate: cardiovascular	68	66.4	78.2	137.0					37.1
31 Under 75 mortality rate: cancer	132	127.2	144.4	202.9					104.0	
32 Killed and seriously injured on roads	21	20.4	39.7	119.6					7.8	

Indicator notes

- 1 % people in this area living in 20% most deprived areas in England, 2013 2 % children (under 16) in families receiving means-tested benefits & low income, 2012
 3 Crude rate per 1,000 households, 2013/14 4 % key stage 4, 2013/14 5 Recorded violence against the person crimes, crude rate per 1,000 population, 2013/14
 6 Crude rate per 1,000 population aged 16-64, 2014 7 % of women who smoke at time of delivery, 2013/14 8 % of all mothers who breastfeed their babies in the first 48hrs after delivery, 2013/14 9 % school children in Year 6 (age 10-11), 2013/14 10 Persons under 18 admitted to hospital due to alcohol-specific conditions, crude rate per 100,000 population, 2011/12 to 2013/14 (pooled) 11 Under-18 conception rate per 1,000 females aged 15-17 (crude rate) 2013 12 % adults aged 18 and over who smoke, 2013
 13 % adults achieving at least 150 mins physical activity per week, 2013 14 % adults classified as obese, Active People Survey 2012 15 % adults classified as overweight or obese, Active People Survey 2012 16 Directly age standardised rate per 100,000 population, aged under 75, 2010-12 17 Directly age sex standardised rate per 100,000 population, 2013/14 18 The number of admissions involving an alcohol-related primary diagnosis or an alcohol-related external cause, directly age standardised rate per 100,000 population, 2013/14 19 Estimated users of opiate and/or crack cocaine aged 15-64, crude rate per 1,000 population, 2011/12 20 % people on GP registers with a recorded diagnosis of diabetes 2013/14 21 Crude rate per 100,000 population, 2011-13, local number per year figure is the average count 22 All new STI diagnoses (excluding Chlamydia under age 25), crude rate per 100,000 population, 2013 23 Directly age and sex standardised rate of emergency admissions, per 100,000 population aged 65 and over, 2013/14 24 Ratio of excess winter deaths (observed winter deaths minus expected deaths based on non-winter deaths) to average non-winter deaths 01.08.10-31.07.13 25, 26 At birth, 2011-13 27 Rate per 1,000 live births, 2011-13 28 Directly age standardised rate per 100,000 population aged 35 and over, 2011-13 29 Directly age standardised mortality rate from suicide and injury of undetermined intent per 100,000 population, 2011-13 30 Directly age standardised rate per 100,000 population aged under 75, 2011-13 31 Directly age standardised rate per 100,000 population aged under 75, 2011-13 32 Rate per 100,000 population, 2011-13
 † Indicator has had methodological changes so is not directly comparable with previously released values. * "Regional" refers to the former government regions.

More information is available at www.healthprofiles.info and <http://fingertics.pbhe.org.uk/profile/health-profiles> Please send any enquiries to healthprofiles@pbhe.gov.uk
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Indicator	Lichfield District	Comparators		Local Trend		Commentary		Data Source																																				
Environmental Issues																																												
Energy Consumption	Average Domestic Electricity Usage 2005-2014 per consumer					<p>The average amount of electricity and gas usage per capita has decreased in line with the British average, however it remains at a higher rate.</p> <p>The rate of gas usage in Lichfield District per consumer has reduced by 33%, with the reduction in electricity usage by around 20%.</p>					<p>Department for Business, Energy & Industrial Strategy http://tools.ecc.gov.uk/en/content/cms/statistics/local_auth/interactive/domestic/ge/index.html</p>																																	
		2005 (KWh)	2006 (KWh)	2007 (KWh)	2008 (KWh)	2009 (KWh)	2010 (KWh)	2011 (KWh)	2012 (KWh)	2013 (KWh)	2014 (KWh)																																	
	Lichfield	5,320	4,910	4,850	4,630	4,520	4,510	4,410	4,360	4,290	4,310																																	
	GB Mean	4,600	4,460	4,390	4,200	4,150	4,150	4,080	4,020	3,940	3,950																																	
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Homes built on previously developed land	<p>New and Converted Dwellings – On Previously Developed Land</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Brownfield</th> <th colspan="2">Greenfield</th> <th colspan="2">Garden Land (Greenfield)</th> </tr> <tr> <th>Number of Dwellings</th> <th>%</th> <th>Number of Dwellings</th> <th>%</th> <th>Number of Dwellings</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>2010/11</td> <td>249</td> <td>76%</td> <td>80</td> <td>24%</td> <td>-</td> <td>-</td> </tr> <tr> <td>2011/12</td> <td>161</td> <td>77%</td> <td>47</td> <td>23%</td> <td>-</td> <td>-</td> </tr> <tr> <td>2012/13</td> <td>207</td> <td>82%</td> <td>45</td> <td>18%</td> <td>-</td> <td>-</td> </tr> <tr> <td>2013/14</td> <td>215</td> <td>65%</td> <td>21</td> <td>6%</td> <td>93</td> <td>28%</td> </tr> <tr> <td>2014/15</td> <td>330</td> <td>84%</td> <td>25</td> <td>6%</td> <td>36</td> <td>9%</td> </tr> <tr> <td>2015/16</td> <td>180</td> <td>88%</td> <td>10</td> <td>5%</td> <td>14</td> <td>7%</td> </tr> </tbody> </table>				Brownfield		Greenfield		Garden Land (Greenfield)		Number of Dwellings	%	Number of Dwellings	%	Number of Dwellings	%	2010/11	249	76%	80	24%	-	-	2011/12	161	77%	47	23%	-	-	2012/13	207	82%	45	18%	-	-	2013/14	215	65%	21	6%	93	28%	2014/15	330	84%	25	6%	36	9%	2015/16	180	88%	10	5%	14	7%	<p>2013-14 28% Garden Land. Due to Laurel House, Fazeley development which is considered to be garden land</p> <p>The percentage profile of homes</p>	<p>Authority Monitoring Report 2016 Lichfield District Council</p>
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	<p>There has been an increase in the proportion of completions on brownfield sites to that recorded during 2014/15, the majority of development still occurs on brownfield land.</p>			<p>built on previously developed land will change in future years as greenfield releases will be required to deliver the housing requirements over the Local Plan Strategy Plan Period.</p>	
<p>EU Habitats sites</p>	<p>Within 20km of LDC: River Mease SAC – 23.03 ha Cannock Chase SAC – 1244.2 ha Cannock Extension Canal SAC – 5 ha Pasturefields Salt Marsh – 7.8 ha West Midlands Mosses – 184.62 ha Fens Pool – 20 ha Ensor’s Pool – 3.86 ha</p>	<p>N/A</p>		<p>It has been determined by the HRA of the Local Plan that the only 2 European Sites on which the Local Plan could cause significant harm are the Cannock Chase SAC and the River Mease SAC.</p>	<p>HRA, Lichfield District and Tamworth Borough</p>
<p>Nature conservation sites</p>	<p>Cannock Chase SSSI - 1279.1 ha Chasewater and Southern Staffordshire Coalfields Heath SSSI - 530.23 ha Gentleshaw Common SSSI - 80.47 ha Stowe Pool and Walkmill Claypit SSSI - 8.38 ha River Mease SSSI - 21.86 ha</p> <p>78 SBIs (Sites of Biological Importance) within Lichfield District</p>	<p>N/A</p>			

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	Local Nature Reserves: Christian Fields, Lichfield				
Biodiversity	<p>The Staffordshire Biodiversity Action Plan identifies habitats of importance for the county and includes plans for their conservation and management.</p> <p>There are 78 Sites of Boiological Interest within Lichfeild District: Hoever the total number of sites changes periodically. Up to date information on these sites and their boundaries is provided by Staffordshire Ecological Record.</p> <p>Lichfield District contains a wide variety of species which are defined by and received protection under domestic or European Legislation. Particular protected species that have been encountered within Lichfield District include:</p> <ul style="list-style-type: none"> • Bats Birds • Great created newts • White clawed crayfish • Water voles • Otters • Badgers • Invertebrates • Reptiles • Plant species 	N\A			
Landscape Character	<p>Cannock Chase AONB</p> <p>Cannock Chase AONB – 68 sq km (a small proportion falls within the west of the District.</p>	N/A			

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
<p>Fluvial Flood Risk</p>	<p>Lichfield District Council District Council House Frog Lane Lichfield Staffs WS13 9YJ Telephone: 01543 358000 enquiries@lichfieldcc.gov.uk</p> <p>Legend</p> <ul style="list-style-type: none"> District Boundary Flood Zone 3 Flood Zone 2 <p>© Environment Agency copyright and/or database right 2016. All rights reserved.</p> <p>Drawing Details: Scale: 1:33,396 Date: 01/08/2016 Drawing No: Drawing Prepared by: Roberts Whittaker - GIS Officer</p> <p>Coordinates: System: British National Grid Projection: Transverse Mercator Datum: OSGB 1936 False Easting: 490,000.0000 False Northing: -100,000.0000 Central Meridian: -2.0000 Scale Factor: 0.9996 Latitude Of Origin: 49.0000 Units: Meter</p> <p>© Crown Copyright. Database Rights 2016. Lichfield District Council. Licence No: 100017765.</p>			<p>The main rivers located in the Lichfield District are:</p> <ul style="list-style-type: none"> • River Tame. • River Trent. • River Mease. • Moreton Brook. • River Blithe <p>The River Tame and River Trent are the main rivers that flow through the Lichfield District Council area. These rivers carry large volumes of water and have wide floodplains. The EA Flood Zone maps for the River Trent and River Tame indicate fluvial risk occurs predominantly into rural agricultural land where there is currently little proposed development.</p>	<p>Environment Agency Flood Map for Planning (Rivers and Sea)</p>

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
Other Flood Risk	<p>Pluvial Risk - Pluvial flooding poses a risk to the District, due to the lack of drainage capacity during high flows. Blockages of drains and watercourses in urban areas have been attributed to the pluvial flooding incidents in Lichfield District. Throughout Lichfield District there have been a large number of pluvial flooding occurrences which have been identified as highways flooding. Fazeley is the area most at risk of pluvial flooding as detailed in the SWMP Phase 2. Historic records indicate that Fazeley suffers from recurring fluvial and pluvial flood events.</p> <p>Flood Risk from Sewers - Records provided by Severn Trent Water indicate within Lichfield Council area there are 15 postcode areas identified as at risk of flooding from artificial drainage systems and surface water runoff. The number of properties at risk of flooding from sewer flooding. Further detail is contained within the SFRA.</p> <p>Groundwater Flooding - Existing studies (WCS Report, 2010) indicate that there are no known problems with groundwater flooding within the Lichfield District Council area.</p> <p>Other Sources of Flood Risk - Little Aston Pool, Chasewater, Stowe Pool, Shustoke Lower, Blithfield and Chasewater reservoirs pose a risk of flooding. Inundation maps indicating the areas that would be inundated should the reservoir fail are contained within the SFRA 2014. Although the consequence of</p>	N/A	N/A	Should development take place in these areas, further work should be carried out to investigate the nature and scale of the risk posed, so that mitigation can be put in place and the areas can be targeted through appropriate policies for reducing flood risk.	Strategic Flood Risk Assessment (June 2014)

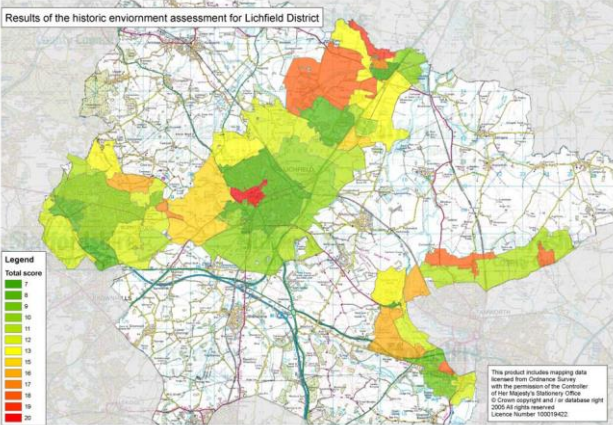
Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	<p>reservoir breach and or failure is high, the probability of breach is considered very low.</p> <p>There are a number of canals located within Lichfield Council area: the Trent and Mersey Canal, Coventry Canal and the Birmingham and Fazeley Canal and part of the Wyrley and Essington Canal Anglesey Branch to the south of Chasewater. Liaison with the Canal and Rivers Trust indicated that there are no recorded incidents of breaches or any other flood risk instances associated with these canals.</p>				
Water Demand and Supply	<p>The Southern Staffordshire Outline Water Cycle Study (WCS) (July 2010) was undertaken in light of the proposed growth requirements relating to the West Midlands Regional Spatial Strategy (WMRSS) Phase 2 revision i.e. 8,000 homes, 99 hectares of general employment land and 30,000m² of office for Lichfield District. Whilst the WMRSS has since been abolished , the message from the WCS is that, in principle , and subject to careful phasing of development, there are no ‘show stoppers’ for the level of growth identified.</p> <p>In response to previous consultation stages of the Local Plan Strategy, South Staffordshire Water (SSW) has advised that there are no problems with supply. However the WCS indicates a need for infrastructure investment and the action which South Staffordshire Water needs to take, working directly with developers, is as follows.</p>				Lichfield District Council Infrastructure Delivery Plan August 2015

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source												
	<p>Water Resource Infrastructure Needs (defined by the Water Cycle Study)</p> <p>Water supply SSW can supply water to all developments, but some may require additional investment, which is achieved by the developer working directly with the supplier.</p> <ul style="list-style-type: none"> • Major upgrades will be required for all sites in Burntwood, and sites which link to the Brownhills network, including supply mains. • Minor infrastructure upgrades will be needed for: <ul style="list-style-type: none"> ○ Fradley Airfield; ○ North Streethay; ○ Fazeley; and ○ South Lichfield. <p>Water abstraction Any developments requiring the abstraction of water should consider the information contained within the Catchment Abstraction Management Strategy (CAMS).</p>																
Air Quality	<p>Mortality attributable to air pollution (adults aged 30 and over)</p> <table border="1" data-bbox="427 1219 1057 1367"> <thead> <tr> <th data-bbox="427 1219 701 1294">Area</th> <th data-bbox="701 1219 808 1294">2011 (%)</th> <th data-bbox="808 1219 918 1294">2012 (%)</th> <th data-bbox="918 1219 1057 1294">2013 (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="427 1294 701 1331">Lichfield</td> <td data-bbox="701 1294 808 1331">5.1</td> <td data-bbox="808 1294 918 1331">5.0</td> <td data-bbox="918 1294 1057 1331">5.1</td> </tr> <tr> <td data-bbox="427 1331 701 1367">Staffordshire</td> <td data-bbox="701 1331 808 1367">4.9</td> <td data-bbox="808 1331 918 1367">4.7</td> <td data-bbox="918 1331 1057 1367">5.0</td> </tr> </tbody> </table>	Area	2011 (%)	2012 (%)	2013 (%)	Lichfield	5.1	5.0	5.1	Staffordshire	4.9	4.7	5.0		The table displays the fraction of annual all-cause adult mortality attributable to anthropogenic (human-made) particulate air	Poor air quality is a significant public health issue. The burden of particulate air pollution in the UK in 2008 was	Public Health Outcomes Framework
Area	2011 (%)	2012 (%)	2013 (%)														
Lichfield	5.1	5.0	5.1														
Staffordshire	4.9	4.7	5.0														

Indicator	Lichfield District				Comparators	Local Trend	Commentary	Data Source
	West Midlands	5.3	5.1	5.4		pollution (measured as fine particulate matter, PM2.5). This suggests that around 5% of Lichfield's mortality is attributable to air pollution which is similar to the regional and national picture.	<p>estimated to be equivalent to nearly 29,000 deaths at typical ages and an associated loss of population life of 340,000 life years lost.</p> <p>Inclusion of this indicator in the Public Health Outcomes Framework (PHOF) will enable local health and wellbeing groups to prioritise action on air quality in their area to help reduce the health burden from air pollution.</p>	
	England	5.4	5.1	5.3				
Per capita emissions in LA Area		Lichfield	Staffordshire	England		13.6% reduction per capita in Lichfield District since 2005.	<p>Lichfield has a lower per capita emissions than its county comparators. However despite an overall reduction it still remains higher than national figures.</p>	Department of Energy and Climate Change
	2005	8.8	9.8	8.5				
	2006	8.9	9.8	8.5				
	2007	8.9	9.6	8.2				
	2008	8.3	9.1	7.9				
	2009	7.5	8.3	7.1				
	2010	7.8	8.7	7.3				
	2011	7.3	8.2	6.7				
	2012	7.6	8.3	7.0				

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																	
				<p>There are currently two Air Quality Management Areas (AQMAs) within Lichfield District Located at Muckley Corner and Wall Island. Wall Island was designated July 2016. The latest report 2016 shows the AQMA at Muckley Corner still exceeds the annual mean NO2 objective set.</p>																																		
<p>Tree Protections Orders</p>	<p>There are 392 Tree Preservation Orders within Lichfield District Council.</p> <table border="1" data-bbox="427 954 1256 1399"> <thead> <tr> <th data-bbox="427 954 598 1011"></th> <th data-bbox="598 954 692 1011">2009/ 10</th> <th data-bbox="692 954 786 1011">2010/ 11</th> <th data-bbox="786 954 880 1011">2011/ 12</th> <th data-bbox="880 954 974 1011">2012/ 13</th> <th data-bbox="974 954 1068 1011">2013/ 14</th> <th data-bbox="1068 954 1162 1011">2014/ 15</th> <th data-bbox="1162 954 1256 1011">2015/ 16</th> </tr> </thead> <tbody> <tr> <td data-bbox="427 1011 598 1131">Number of new tree preservation orders</td> <td data-bbox="598 1011 692 1131">8</td> <td data-bbox="692 1011 786 1131">7</td> <td data-bbox="786 1011 880 1131">10</td> <td data-bbox="880 1011 974 1131">8</td> <td data-bbox="974 1011 1068 1131">10</td> <td data-bbox="1068 1011 1162 1131">10</td> <td data-bbox="1162 1011 1256 1131">3</td> </tr> <tr> <td data-bbox="427 1131 598 1283">Number of existing tree preservation orders deleted</td> <td data-bbox="598 1131 692 1283">0</td> <td data-bbox="692 1131 786 1283">0</td> <td data-bbox="786 1131 880 1283">0</td> <td data-bbox="880 1131 974 1283">0</td> <td data-bbox="974 1131 1068 1283">0</td> <td data-bbox="1068 1131 1162 1283">0</td> <td data-bbox="1162 1131 1256 1283">0</td> </tr> <tr> <td data-bbox="427 1283 598 1399">Number of prosecutions for tree damage</td> <td data-bbox="598 1283 692 1399">2</td> <td data-bbox="692 1283 786 1399">1</td> <td data-bbox="786 1283 880 1399">0</td> <td data-bbox="880 1283 974 1399">0</td> <td data-bbox="974 1283 1068 1399">0</td> <td data-bbox="1068 1283 1162 1399">0</td> <td data-bbox="1162 1283 1256 1399">0</td> </tr> </tbody> </table>				2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	Number of new tree preservation orders	8	7	10	8	10	10	3	Number of existing tree preservation orders deleted	0	0	0	0	0	0	0	Number of prosecutions for tree damage	2	1	0	0	0	0	0			<p>Authority Monitoring Report 2016 Lichfield District Council</p>
	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16																															
Number of new tree preservation orders	8	7	10	8	10	10	3																															
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Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
<p>National Forest, Forest of Mercia and the Central Rivers Initiative</p>	<p>There are a number of regional initiatives affecting parts of the District that aim to achieve enhancements to existing landscapes and create valuable new habitats that can play a part in increasing biodiversity value within the District. In particular these include the National Forest, the Forest of Mercia and the Central Rivers Initiative,</p> <p>The National Forest for the Midlands was originally a Countryside Commission initiative. The Forest area is located principally within Derbyshire, Leicestershire and East Staffordshire District. A small area to the north of the District which includes the National Memorial Arboretum and Alrewas fall within the National Forest. The District Council currently supports the principle of establishment for the National Forest through saved policy EA.16 Lichfield District Local Plan June 1998.</p> <p>The Forest of Mercia, originally sponsored by the Countryside Commission and Forestry Authority, includes part of South Staffordshire, Cannock Chase, Lichfield District and Walsall Metropolitan Borough which are partners in the project. In Lichfield District the Forest areas encircles Burntwood, with its eastern fringes reaching the northern and western edge of Lichfield.</p> <p>The Central Rivers Initiative (CRI) is a broadly based partnership which the District council is part working together to shape and guide the progressive</p>	<p>N/A</p>	<p>N/A</p>	<p>The Forest of Mercia and the National Forest are both landscape ordinated initiatives that seek to fundamentally change the character of parts of the District to redress the major loss of woodland the area has suffered whilst enhancing the District’s biodiversity and playing an important role in providing for recreation and tourism.</p> <p>The National Forest, Forest of Mercia and Central Rivers Initiative are supported through Core Policy 1 & 13 of the Local Plan Strategy 2008-2029.</p> <p>In addition the principle of the National Forest and Forest of Mercia</p>	<p>Lichfield District Local Plan June 1996</p>

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	<p>restoration and revitalisation of the river valley between Burton, Lichfield and Tamworth - an area of central England that covers over 50 square km. The initiative area within the district is focused on a belt that runs from Alrewas southwards to the border with Tamworth.</p>			<p>features as saved policies from the Lichfield District Local Plan June 1998 and will be subject of a review through the development of the Allocations Document.</p>	
Archaeology					
<p>Landscape character</p>	<p>There are three main historic landscapes character areas in the district.</p> <ul style="list-style-type: none"> • Burntwood and the South West • Lichfield and its surroundings • River Valleys <p>The Historic Landscape Character Assessment identifies 13 sub Historic Environmental Character Areas which fall wholly or partly within Lichfield District which were identified by their earliest discoverable landscapes.</p> 		<p>N/A</p>	<p>The location and scale of development will need to take into account the conservation and enhancement of the historic environment assets within the District.</p>	<p>Historic Environment Character Assessment Final report for Lichfield District Council Feb 2009 Lichfield District Council Historic Environment Supplementary Planning Document</p>

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	The areas to the west of Lichfield City and to the north and west of Alrewas scored highly and any developments in these zones would require consideration of this historic environment.				
Historic Farmsteads	High rates of survival with 78.8% of historic farmstead sites retaining some working buildings (36.1% with all or over 50% of their historic footprint).	Between 1980's and 1999 the 2006 study of aerial photographs (University of Gloucestershire study for EH 2009) shows listed working farms buildings with evidence for residential reuse: Lichfield: 33.3% West Midlands: 27% England: 30%	A higher proportion of farmsteads are in residential use than is typical of the region as a whole.	However in 2013 the Government extended permitted development rights and within certain parameters, redundant agricultural buildings can be converted to residential units without having to apply for planning permission if the plans meet the approval of the local authority. This may have increased the rate at which conversions have been brought forwards although no corroborating data is available	Historic Farmsteads & Landscape Character in Staffordshire (SCC and EH) 2012
Historic Environment	The Historic Environment Supplementary Planning Document which was adopted in 2015 captures the range of elements to the Historic Environment via a SWOT, which is summarised below. Historic Environment SWOT Analysis Strategy Elements				Historic Environment Supplementar

Indicator	Lichfield District		Comparators	Local Trend	Commentary	Data Source
	Strengths	Opportunities	Weaknesses	Threats		y Planning Document
	Historic City with medieval street pattern intact and well preserved historic core	Consolidate local character	Loss of industrial heritage	HS2		
	Historic Villages	Channel development pressure positively to regenerate	Some characterless suburbs	Wind Turbine Proposals		
	Varied attractive landscapes	Raise designs of Design	Lack of high quality contemporary architecture: tendency towards a default position of pastiche or "safe" design	Growth pressures favours fast growing urban extensions, making organic growth difficult		
	Area of Outstanding Natural Beauty	Retain character of historic cores whilst regenerating underused sites to attract new investment		Gentrification of villages resulting in a change of character		
	Five spires skyline provides strong city identity	Environmental improvements to key spaces		Out of town retail undermining historic core		
	Strong local distinctiveness	Promote visitor attraction		Recreation and visitor Pressure		
	Trent and Mersey and Coventry Canals and their environs	Heritage base tourism				
	River Trent, Mease and Tame valleys	Continued expansion of the canal network through the Lichfield				

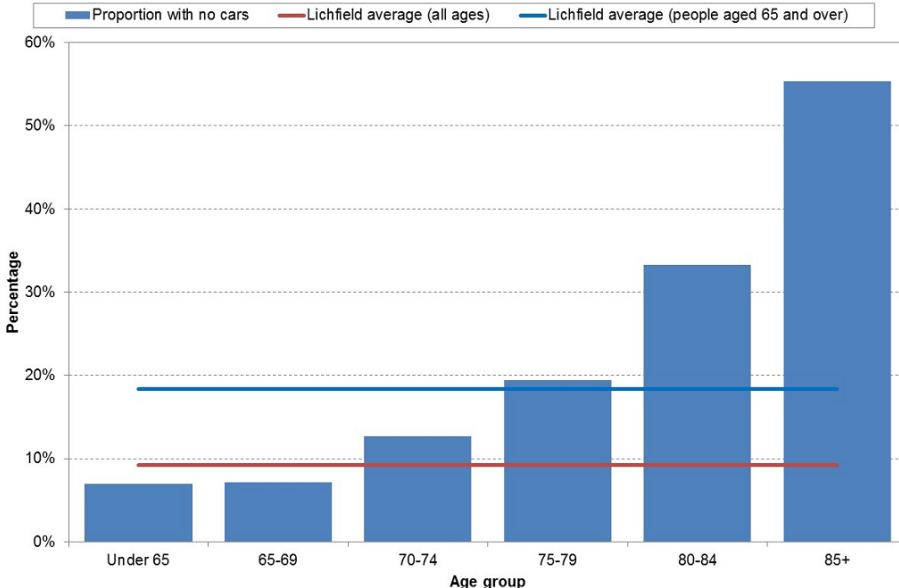
Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	Canal and the Lichfield and Hatherton Canal Restoration Trust				
	Rural Areas in demand.				
Conservation Areas Listed Buildings	<p>The historic environment of the District is significant.</p> <p>Scheduled ancient monuments: 5</p> <p>Listings Grade I 12 Listings Grade II* 63 Listings Grade II 686 Listings Scheduled Monuments: 16 Registered Historic Parks and Garden: 1 Conservation Areas: 21 Over 430 buildings or structures which are recorded on the List of Locally Important Buildings.</p> <p>At Risk Register: Conservation Areas at Risk: 1 Grade II Listed Buildings at Risk: 18 Grade I and Grade II* Listed Buildings at Risk: 2</p>	N/A	N/A	Much of Lichfield District's Character and tourism draw is due to its wealth of historic buildings and conservation areas. The preservation of historic sites remains of paramount importance.	Annual Monitoring Review 2016. https://www.historicengland.org.uk/listing/the-list
Minerals					
Sand and Gravel Resources	<p>The New Minerals Local Plan for Staffordshire (2015-2030). Our Vision and Strategic Objectives 1, recognise the importance of aggregate minerals to support sustainable economic development taking into account the need to achieve an acceptable balance</p>	N/A	N/A	The New Minerals Local Plan for Staffordshire (2015-2030) is currently out for consultation for main modifications.	The New Minerals Local Plan for Staffordshire (2015-2030)

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	<p>with the impact of mineral operations on local communities and the environment.</p> <p>Policy 1: Provision for Sand and Gravel Provision will be made to maintain permitted reserves with production capacity of up to 5.0 million tonnes of sand and gravel per annum. This will be achieved initially from existing permitted reserves and by granting planning permission to extend a number of sites.</p> <p>The following falls within Lichfield District:</p> <ul style="list-style-type: none"> Alrewas <p>In addition Policy 1 Provision of Sand and Gravel goes on to identify proposals for new sand and gravel sites with the area of search and these include to the west of the A38 shown on the Policies and Proposals Map where they accord with Plan policies including Policy 4.</p>			Consideration will need to be given to growth in identified and potential areas as identified with the New Minerals Local Plan for Staffordshire (2015-2030).	
Waste					
Waste and Recycling	Household Waste – 2014/15, 54.5% recycled, composted or reused.	2014/15 England recycling rate 42.9% West Midlands recycling rate: 41.3%		Lichfield District is above and in advance of the EU target of 50% of waster being recycled by 2020.	Data.gov.uk
Transport Issues					
Commuter Trips	In terms of travel to work, 3% of employed residents commute by rail which is the highest level in Staffordshire, but at the same time, Lichfield has one	N/A	N/A	The District sees a considerable proportion of its	Lichfield District Integrated

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	<p>of the highest levels of car drivers, at 75%. Lichfield District has four rail stations Lichfield City, Lichfield Trent Valley, Rugeley Trent Valley and Shenstone. There are also a number of community transport services operating within the District.</p> <p>49.1% of employees which live within the District commute out of the District to work.</p> <p>In Lichfield City 83% of households are within 350 metres of a half-hourly or better weekday bus service, achieved through the commercial network.</p>			higher skilled workers commute to jobs elsewhere in the West Midlands conurbation on a daily basis.	Transport Strategy 2015-2029
Traffic congestion	<p>The District is well served by local routes such the A51, A515 and A5127 and has excellent connections to the national transport network including the M6 Toll, A38 (T), A5148 (T) and A5 (T). However enhanced connectivity in the District will need to focus on these routes to ensure traffic levels are managed.</p> <p>The improvements listed include;</p> <ul style="list-style-type: none"> • Improvements to safety and capacity are required at a number of junctions within Lichfield City Centre to accommodate proposed growth (para 5.15 Lichfield District Integrated Transport Strategy). • Bus/ rail integration will be provided as part of the Friarsgate Development. • Bus access improvements and frequency in Burntwood to support an enhanced town centre and new housing. 	N/A	N/A	Phase 3 of the Lichfield southern Bypass will reduce traffic in the City Centre on A5127 and A51, protecting the historic core.	Lichfield District Integrated Transport Strategy 2015-2029

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	<ul style="list-style-type: none"> • Connectivity improvements between the Strategic Development Allocations (SDA) in south Lichfield and the City Centre. • Completion of final stage (London Road to Birmingham Road) of Lichfield Southern bypass to link A5206 London Road to A461 Walsall Road. • Improvements to mitigate development to the east of Lichfield SDA. • Substandard junction layouts at Hillards Cross and Fradley South located along the A38. • Lichfield Trent Valley rail station disabled access improvements to allow access to London bound platform. • New bus services from Fradley SDA to Lichfield city. • Manage routing of Heavy Commercial Vehicles and consider provision of lorry park at Fradley. 				
Bus and Rail	<p>Bus In Lichfield City 83% of households are within 350 metres of a half-hourly or better weekday bus service, achieved through the commercial network.</p> <p>For the rural north west of the District which have either a less regular or non existent bus service the County Council provide the ‘Needwood Forest Connect’ bookable bus service where the route is plotted on a daily basis from telephone bookings enabling it to only run where there are passengers which require its services. This service is provided between 8am and 6pm Monday to Saturday.</p>		60% of the District’s households are within Lichfield and Burntwood with a further 20% within the key rural settlements. Therefore it intimates that current bus services predominantly serve the main centres and key rural settlements.	The level of demand for rail travel is expected to increase significantly. Network Rail’s Market Study for Regional Urban Centres, published in October 2013, suggests growth of between 8% and 49% for travel into both Birmingham	Lichfield District Integrated Transport Strategy 2015-2029 Staffordshire Rail Strategy May 2015.

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	<p>Rail</p> <p>Lichfield District has four rail stations Lichfield City, Lichfield Trent Valley, Rugeley Trent Valley and Shenstone. 3% of employed residents commute by rail which is the highest level in Staffordshire. Lichfield Trent Valley, Lichfield City, Shenstone, Blake Street and Four Oaks stations are served by the Cross City North line which forms part of the busiest local rail corridors in the West Midlands.</p> <p>In recent years a regular service on the West Coast Mainline between Crewe and London calling at Lichfield Trent Valley and Rugeley Trent Valley has been introduced which has significantly improved connectivity between key locations on this line.</p> <p>Possible rail enhancements which would benefit the District include:</p> <ul style="list-style-type: none"> • Lichfield Trent Valley rail station disabled access improvements are required to allow access to London bound platform. • Reopening the Lichfield Walsall line • Electrification of the Rugeley to Walsall line and Lichfield Trent Valley to Wychnor to improve line speed and allow more frequent services and reduce environmental impacts. • Provision of passenger service from Lichfield to Derby with a new station at Alrewas to serve the village and National Memorial Arboretum. 			<p>and Manchester by 2023, rising to between 24% and 114% by 2043. This confirms the increasingly important role the rail network will play in the future and demonstrates the need for continued investment in rail services and the associated network.</p>	

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source														
	<ul style="list-style-type: none"> Development of a Strategic Freight Corridor from Stourbridge to Lichfield via Walsall to offer capacity relief. <p>HS2 HS2 passes through the District and will impact on communities, however there are no stations proposed.</p>																		
	<p>Access to private transport: proportion of residents who have no car or van by age (2011)</p>  <table border="1"> <caption>Proportion of residents with no cars by age group (2011)</caption> <thead> <tr> <th>Age group</th> <th>Proportion with no cars (%)</th> </tr> </thead> <tbody> <tr> <td>Under 65</td> <td>~7%</td> </tr> <tr> <td>65-69</td> <td>~7%</td> </tr> <tr> <td>70-74</td> <td>~12%</td> </tr> <tr> <td>75-79</td> <td>~19%</td> </tr> <tr> <td>80-84</td> <td>~33%</td> </tr> <tr> <td>85+</td> <td>55%</td> </tr> </tbody> </table>	Age group	Proportion with no cars (%)	Under 65	~7%	65-69	~7%	70-74	~12%	75-79	~19%	80-84	~33%	85+	55%			<p>In Lichfield around 18% of people aged 65 and over have no private transport (i.e. access to a car). This increases to 55% of people aged 85 and over. Using 2014 mid-year population figures for Lichfield it has been estimated that around 500 residents aged 65+ are at risk of loneliness and a lack of transport increases the sense of isolation and loneliness.</p>	<p>Census 2011</p>
Age group	Proportion with no cars (%)																		
Under 65	~7%																		
65-69	~7%																		
70-74	~12%																		
75-79	~19%																		
80-84	~33%																		
85+	55%																		

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
High Quality Design and Sustainability Issues					
Trees, Landscape and Development	<p>The NNPF places great importance to the design of the built environment. Lichfield District Council is committed to good design standards in all development.</p> <p>The final section of the SPD deals with the provision of new trees, hedgerows, woodlands and shrub planting as part of the design of a development and its landscaping scheme.</p>			Lichfield District Council recently adopted a raft of Supplementary Planning Documents (SPD) that support the delivery of the Local Plan Strategy. Each SPD focus on the concept of design in relation to their particular features specialism.	Lichfield District Council Trees, Landscape and Development Supplementary Planning Document
Biodiversity & Development	<p>The NNPF places great importance to the design of the built environment. Lichfield District Council is committed to good design standards in all development.</p> <p>The findings of ecological surveys should be taken into careful consideration at the earliest design stage of a development. Possible conflicts can be addressed by having the information available at the right stage and by taking an imaginative approach to site design to avoid harm.</p>			Lichfield District Council recently adopted a raft of Supplementary Planning Documents (SPD) that support the delivery of the Local Plan Strategy. Each SPD focus on the concept of design in relation to their particular features specialism.	Lichfield District Council Biodiversity & Development Supplementary Planning Document

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
Rural Development	<p>The NNPF places great importance to the design of the built environment. Lichfield District Council is committed to good design standards in all development.</p> <p>Recognises the rural housing residential developments will be expected to incorporate high quality design. Appendix B of the document is dedicated to providing design standards for the reuse of Rural Building.</p>			Lichfield District Council recently adopted a raft of Supplementary Planning Documents (SPD) that support the delivery of the Local Plan Strategy. Each SPD focus on the concept of design in relation to their particular features specialism.	Lichfield District Council Rural Development Supplementary Planning Document
Historic Environment	<p>The NNPF places great importance to the design of the built environment. Lichfield District Council is committed to good design standards in all development.</p> <p>Design should be informed by an understanding of the overall character of an area, particularly the elements that contribute to local distinctiveness, and also an understanding of the significance of heritage assets of all types and the importance of their setting in order to secure good quality , well designed and sustainable places.</p>			Lichfield District Council recently adopted a raft of Supplementary Planning Documents (SPD) that support the delivery of the Local Plan Strategy. Each SPD focus on the concept of design in relation to their particular features specialism.	Lichfield District Council Historic Environment Supplementary Planning Document
Sustainable Design	<p>The NNPF places great importance to the design of the built environment. Lichfield District Council is committed to good design standards in all development.</p>			Lichfield District Council recently adopted a raft of Supplementary Planning Documents	Lichfield District Council Sustainable Design

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	<p>The Sustainable Design Supplementary Planning Document seeks to give guidance on how sustainable development can be achieved through connectivity and integration, in terms of how places are sustainably connected by transport linkages and through patterns of development. It then considers how the layout and density can assist in creating sustainable development, through green infrastructure, standards for parking and spaces around dwellings, utilising sustainable drainage systems, creating walkable communities and energy efficient layouts.</p> <p>Appendix C – of the document is dedicated to providing and explain the objectives of good design.</p>			<p>(SPD) that support the delivery of the Local Plan Strategy. Each SPD focus on the concept of design in relation to their particular features specialism.</p>	<p>Supplementary Planning Document</p>

**APPENDIX B (i) – LOCAL PLAN ALLOCATIONS
SUSTAINABILITY APPRAISAL SCOPING
REPORT: CONSULTATION SHEET**

Local Plan Allocations Sustainability Appraisal Scoping Report: Consultation Sheet

Responses with a green background are the final proposed responses, those with a red background represent previous responses that have now been amended. Table 1 represents the responses that were presented to the 12th December 2016 EGED Overview and Scrutiny.

Table 1:

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

<p>as locally designated heritage assets. The Staffordshire Historic Environment Record (HER) will also offer information to identify areas that have a high potential for archaeology.</p>	<p>Archaeology Sub Headings Landscape Character Historic Farmsteads Historic Environment Conservation Areas Listed Buildings Recommendation None</p>
<p>We also welcome SA objectives 2, 3, and 4 – all of which relate to the historic environment to differing degrees.</p>	<p>Duly noted Recommendation None</p>
<p>In terms of the last two boxes of page 25, it would be helpful to be consistent and insert some text explaining Why the sustainability objective is included. As per the objectives across pages 24-30. Here, this could be along the lines of ‘To ensure new development does not affect the significance of the local historic environment.</p>	<p>Duly noted Recommendation Insert “<i>To ensure new development does not affect the significance of the local historic environment</i>”. In the why sections for Objective 2 and 3 pages 25.</p>
<p>In the last section of page 25 we feel that there is something of a disconnect between the proposed decision making criteria and the suggested indicators. We do not feel that the suggested indicators would be able to clearly demonstrate whether the Local Plan Allocations documents had positively or otherwise addressed the baseline findings. This could be addressed by inserting a new question 5, along the lines of ‘Will it offer opportunities to bring heritage assets back into active use?’</p>	<p>Duly noted Recommendation Against the Detailed Decision Making Criteria relating to SA indicator 3 include the addition of the following question:</p> <ul style="list-style-type: none"> • Will it offer opportunities to bring heritage assets back into active use?
<p>The text against Why in the first box on page 26 could be extended to include the words ‘...jobs and services <i>and to ensure the retention of local distinctiveness and character</i>’.</p>	<p>Duly noted Recommendation Amend the Why sentence relating to SA indicator 4. Why</p>

	To reduce the need to travel through closer integration of housing, jobs and services and to ensure the retention of local distinctiveness and character.
In relation to possible mitigation strategies we would note that the NPPF makes clear that harm should always be avoided in the first instance in relation to mitigation be considered – any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm.	Duly noted Recommendation none
Statutory Organisation: Natural England	
We acknowledge the passage of time since the SA for the LPS took place and have aimed to facilitate the Council achieving the relevant outcomes described in the NPPF with a focus in particular upon maximising opportunities and recognising synergies between the various interests themes.	Duly noted (support for the amendments to the SA Objectives) Recommendation none
NE advises that the council scopes in issues only where there are likely to be significant effects (either positive or negative). We recognise that a balance needs to be struck between a robust review of the evidence base now, as compared with that in 2007. We offer advice below on those themes and issues where we believe SA/SEA can add particular value to the allocations stage of the LPS.	Duly noted Recommendation None
Habitats Regulations Assessment (HRA) “The allocations Document will be developed in conformity with the LPS (2015) spatial strategy. It is therefore considered that accepted mitigation measures are sufficient to support the Allocations Documents.” (p6 HRA). We accept this approach in principle provided that no substantive issues have been pushed down to HRA at the project level (e.g. Hatherton & Lichfield canal restoration project) that might benefit from further consideration on the basis of new information that has been added to the evidence base since the SA for the LPS.	Duly Noted. Confirmation that no additional information has been submitted in regard to the Hatherton & Lichfield Canal Transportation Project. Mindful that during the SA process that the existing mitigation measures remain if amendments are required these are addressed in the SA process. Recommend direct discussions with Natural England. Recommendation None

<p>Sources of info Sources of Good Practice/Information NE has a range of data sources that may be useful in the production of an SA. Our data sets are now all downloadable and responsible authorities should be referred to the website at (weblink). Other data sources include: MAGIC (Defra’s GIS package for environmental assets) Landscape Character Assessment for National Parks and Areas of Outstanding Natural Beauty Management Plans for National Parks and Areas of Outstanding Natural Beauty SSI/European Sites condition assessments National Character Areas</p>	<p>Duly Noted Recommendation none</p>
<p>Comments on the detail 1. Relationship with other relevant plans and programmes Please refer to our comments above regarding the balance to be struck between checking and updating the evidence base and the opportunity, in recognition of the subsidiary nature of site allocations to the overall Local Plan Strategy, to adopt an approach to SA/SEA at the allocations stage which focuses in on a finer grain of detail consistent with the nature of site allocations. We welcome the comprehensive list included in the report and note that the Cannock Chase Strategic Access Management and Monitoring Measures (SAMMM) and the R.Mease SAC related plans have been included in the regional and local plans and programmes evidence base respectively.</p>	<p>Duly Noted Recommendation None</p>
<p>2. The relevant aspects of the current state of the environment and their likely evolution without implementation of the plan or programme.</p>	<p>Duly Noted Recommendation None</p>

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

<p>causes of adverse impacts on ecological receptors from air pollution.</p>	
<p>4. Existing environmental problems which are relevant to the plan or programme We welcome the reports reference to the River Mease SAC and Cannock Chase SAC in relation to environmental pressures on these European designated sites.</p>	<p>Duly Noted Recommendation None</p>
<p>5. The environmental protection objectives relevant to the plan or programme and the way those objectives and environmental considerations have been taken into account during its preparation</p> <p>Biodiversity – “1. To promote biodiversity and through protection, enhancement and management of species and Habitats”.</p> <p>Is this a Typo? Should it read” To promote biodiversity through the protection, enhancement and management of species and habitats?</p> <p>6. To reduce, manage and adopt to the impacts of climate change” – Typo - <u>adapt</u> to...</p> <p>Table 1- Allocations Scoping report Sustainability Objectives – Comments on the “ Detailed decision making questions” and “detailed indicators”</p> <p>Biodiversity – ‘Site specific questions’. We would encourage you to consider the ‘helicopter view’ i.e. district wide, parish, groups of sites. A focus on each specific site (individually) may overlook SA/SEA issues that are relevant at a larger scale and contribute to decision over which individual sites (or groups of sites) should</p>	<p>Duly Noted. Recommendation. Amend Sustainability Objective Number 1 to read: To promote biodiversity through the protection, enhancement and management of species and habitats. Page 23, 24</p> <p>Duly Noted. Recommendation. Amend Sustainability Objective 7 to read: To reduce, manage and adapt to the impacts of climate change. Page 23, 29.</p> <p>Duly Noted. Recommendation. See amended Site Specific Questions and indicators listed against Staffordshire County Council : Ecology rep box three.</p>

<p>proceed. A ‘cascade ‘approach may be needed from the district down to the individual site. This approach reflects the Lawton Review whereby biodiversity is safeguarded for the future by achieving a biodiversity resource which is ‘Bigger, better, more and joined’. Please refer also to our comments below regarding multifunctional green infrastructure.</p>	
<p>“Site specific questions – 3. What affect will there be on green corridors/water courses. Will it reduce/eliminate fragmentation/wildlife connectivity”</p>	<p>Duly Noted. Recommendation. None</p>
<p>We welcome this question as a test to establish the specific site’s contribution to the connectivity and wider context issues we have commented on above.</p>	
<p>Detailed indicators e.g. “Amount of priority habitat created/recreated – lowland/heathland”</p>	
<p>A simpler and more practical approach may be to step back from individual habitat types and simply seek to express the amount of green infrastructure and/or priority habitat created, restored or maintained as part of that site allocation. It is difficult to see how the SA/SEA process can accurately predict a finer grain of detail than this. However reference to biodiversity opportunity maps, the relevant National Character Area profile and Staffordshire County Council’s ‘planning for Landscape Change’ SPD may be helpful in understanding which parts of the district would be most suited to a particular type of semi-natural habitat(s).</p>	<p>Duly Noted. Recommendation. See amended Site Specific Questions and indicators listed against Staffordshire County Council : Ecology rep box three</p>
<p>Detailed indicators: 4. Number of hectares of Local Nature Reserves 5. Number and type of internationally/nationally designated sites</p>	<p>Duly Noted. Recommendation</p>

<p>6. Number of species relevant to the district which have achieved BAP Veteran trees, ancient woodland.</p> <p>It isn't clear from the SA scoping report how these types of indicators would help us understand the SA/SEA performance of the proposed sites.</p>	<p>See amended Site Specific Questions and indicators listed against Staffordshire County Council : Ecology rep box three</p>
<p>Sustainability objective – ‘To protect and enhance the rich diversity of natural archaeological/geological assets, and landscape character of the district’.</p> <p>Site Specific questions:</p> <ol style="list-style-type: none"> 1. Will it promote and maintain an attractive and diverse landscape 2. Will it protect areas of highest landscape quality 3. Will it improve areas of lower landscape quality 4. Will the development create a new landscape character. <p>We refer the Council to the Statements of Environmental Opportunity (SEO) for the relevant NCA profile and the ‘special qualities’ of the Cannock Chase AONB (see AONB Management Plan 2014-19).</p> <p>Where proposals are for over 100 homes and/or 3Ha in extent Natural England consider this may represent a strategic site. Landscape & Visual Impact Assessment should be carried out accordingly. The following NPPF material is relevant:</p> <p>Para 17. Within the overarching roles that the planning system ought to play, a set of core land use planning principles should underpin plan-makingplanning should... take account of the different roles and character of different areas, ... recognising the intrinsic character and beauty of the countryside.</p>	<p>Duly Noted. Recommendation.</p> <p>The following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2</p> <ol style="list-style-type: none"> 1. Proximity to an internationally or nationally designated landscape 2. In terms of Landscape Character Types what is the sites sensitivity rating? 3. Proximity to an internationally or nationally designated geodiversity sites 4. Is it on previously undeveloped land? 5. Does it offer the opportunity to promote landscape connectivity? 6. Does it offer the opportunity to improve or create the landscape character of the District? <p>The following questions will remain.</p> <p>Will it improve existing green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiatives.</p> <p>Will it prevent the sterilisation of mineral resources.</p> <p>In addition the Assumption Appendix will provide further clarity in regard to assessment.</p>

<p>Para 109 The Planning system should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes...</p> <p>Para 170 Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.</p>	
<p>Site Specific questions</p> <p>5. Will it improve existing green infrastructure including national Forest, Forest of Mercia and the Central Rivers Initiative.</p> <p>We welcome this question and refer you to ur comments above regarding the need to consider the context for each site in terms of the adverse impacts or positive opportunities it presents in terms of SA/SEA , from the district level down to the site specific level.</p>	<p>Duly Noted</p> <p>Recommendation None.</p>
<p>Detailed Indicator: 3 The proportion of housing completions on sites of 10 or more which have been supported, at the planning applications stage by an appropriate and effective landscape character and visual assessment with appropriate landscape proposals.</p> <p>AGI led approach would help provide the framework for such mitigation (& enhancement) measures.</p>	<p>Duly Noted. The adopted Local Plan Strategy and Supplementary Planning Document support the delivery of Green Infrastructure holistic approach.</p> <p>Recommendation None</p>
<p>Sustainability Objective: Create places, spaces and buildings that are well designed, integrate effectively with one another, respect significant views and vistas, and enhance the distinctiveness of the local character.</p> <p>NCA profiles and SCC 'Planning for landscape change' SPD contribute to the evidence base and would help to facilitate a GI</p>	<p>Duly Noted</p> <p>The proposed amendments to the Site Specific Questions relating to the Sustainability Objective 2, See above.</p> <p>Recommendation None</p>

<p>led approach. The Site Allocations part of the local plan process provides a platform for the implementation of the strategic approach in the LPS. Clear linkage between the allocated sites' performance in terms of offering opportunities e.g. improvements in <u>Landscape character</u> and <u>creating and linking GI</u> would be desirable and positive.</p>	
<p>Sustainability Objective – “Maximise the use of previously developed land/buildings and the efficient use of Land” Site specific questions –formatting typo to correct. Detailed indicator – “% of permissions granted on previously developed land as a % of previously developed land available within the District”.</p> <p>We refer you to our comments above on landscape character and multifunctional GI. Regarding the wording of the detailed indicator – would <u>numbers of units</u> be valuable too? i.e. to give a sense of the <u>scale</u> as well as the percentage balance being achieved.</p>	<p>Duly Noted Recommendation Table 1 Sustainability Objective 5, Site Specific Questions, amend bullet point 3 to read:</p> <ol style="list-style-type: none"> 1. Would the development of the site involve the loss of greenfield? <p>Bullet point 4 to be removed</p> <ol style="list-style-type: none"> 2. Would the development of the site involve the loss of gardens? <p>Table 1 Sustainability Objective 5, Detailed Indicator, amend to read:</p> <p>% of permissions granted on previously developed land.</p> <p>Table 1 Sustainability Objective 5 Detailed Indicator add.</p> <p>Number of homes granted permission on previously developed land.</p>
<p>Sustainability Objective – “Reduce the need to travel to jobs and services through sustainable integrated patterns of</p>	<p>Duly Noted Recommendation</p>

<p>development, efficient use of existing sustainable modes of travel and increased opportunities for non-car travel”.</p> <p>Our comments about ‘site specific questions’ apply equally here. The performance of individual sites in terms of SA/SEA will reflect their strategic location and relationship with existing infrastructure. Detailed indicators should refer to sustainable transport links (bus routes, cycleway and paths) created or enhanced through the provision of multi-functional GI.</p>	<p>Add the following against Table 1 Sustainability Objective 6 Detail Indicator</p> <ul style="list-style-type: none"> • Access to bus services • Access to cycle ways • Increase in the provision of multi-functional space: cycle and walking networks that include green Infrastructure gain. <p>Remove the following Indicators</p> <ol style="list-style-type: none"> 1. Traffic Counts on selected strategic roads in the District 2. Journey to work by mode 3. Access to bus services <p>In addition see recommended amendments made against SCC highway comments.</p> <p>In addition the assumptions will further link sites to existing sustainable transport infrastructure.</p>
<p>We welcome reference to sustainable transport links under the sustainability objectives for climate change mitigation and adaption.</p>	<p>Duly Noted</p> <p>Recommendation</p> <p>None</p>
<p>6 The likely significant effects on the environment</p> <p>1. Biodiversity – Themes 11, 14, and 15 are recorded as ‘potential incompatibility’. We acknowledge the potential, however this is a matter of perspective as multifunctional GI offers a model whereby these themes (11, 14 and 15) within SA/SEA can positively benefit from multi-functional GI.</p> <p>Similar comments apply in respect of themes 2 (with regard to 11 and 14) and 4 (with regard to 11).</p>	<p>Duly Noted. We are aware of and understand the potential opportunities which could be identified, they feature as key compounds within a number of the Districts SPD’s.</p> <p>Amendments to Site Specific Questions and Detailed Indicators relating to Sustainability Objective 1, 6 and 2 do however further identify the benefits of GI and identify the linkages.</p>

	<p>However, a significant benefits are likely to only become apparent at detailed design stage and secured through application.</p> <p>As such 'potential incompatibility' remains.</p> <p>Recommendation None</p>
<p>7 The measures envisaged to prevent, reduce and offset any significant adverse effects on the environment of implementing the plan and programme.</p> <p><u>Soils</u> The site allocations SA/SEA should consider the scale of impacts arising from the proposed housing and employment site resources across the district and describe what avoidance and mitigation measures may be used to minimise loss of the district's soil resource including 'best and most versatile land'. Site allocations' performance in this respect should form an important criteria for inclusion in the site selection decision-making process.</p>	<p>Duly Noted Sustainability Objective 9: Seek to improve air, soil and water quality.</p> <p>Recommendation Table 1 sustainability Indicator 9, the following Soil related Detailed Indicator to be added.</p> <ul style="list-style-type: none"> • % of permissions granted on previously developed land. <p>No further amendments are recommended see response to comments made by the Environment Agency.</p>
<p><u>Climate Change & green infrastructure (GI)</u> A positive opportunity arises in respect of this site allocations stage in the local plan process. Synergies between climate change mitigation/adaption and multi-functional GI are strong and have recently been expressed as 'nature based solutions'. These address the value of nature for people and what bio diverse, multifunctional green infrastructure can do for us. It has the potential to: Cool buildings, reduce need for air conditioning, reduce 'urban heat island' effect, help reduce flooding and water pollution, provide recreation and green transport routes, store carbon, increase biodiversity, health, climate change adaption.</p>	<p>Duly Noted Amendments have been made to the Sustainability Objective 6 in relation to GI and sustainable transport links. Adopted SPD's clearly outline the role of GI in addressing Climate Change.</p> <p>Recommendation None</p>

<p>SA/SEA criteria might include – location (relative to existing development), proximity to public transport routes/routes that could be reinstated, massing/orientation opportunities (topography/aspect – solar gain) etc.</p>	
<p>Statutory Organisation :Environment Agency</p>	
<p>Environmental Issues From an EA perspective, the River Mease SAC is probably the most important area of protection in the district. The section in Lichfield District however, is relatively rural and is unlikely to be subject to much development, unlike further up the catchment in North West Leicestershire that is more urbanized and has more pressure on it. The most likely threats in Lichfield District are from farming, i.e. pesticides/ammonia/grazing on the banks and non-mains foul drainage systems on small developments not working properly We would not therefore expect significant impacts on this are when applying the SA Framework to the Site Allocation process.</p>	<p>Duly Noted Recommendation None</p>
<p>With reference to the flood risk element, we would concur that the main areas of floodplain are in the rural areas of the River Trent and Tame valleys so would expect very few if any, greenfield sites to be allocated in the floodplains given the extensive areas of Floodplain Zone 1 around our major settlements and elsewhere.</p>	<p>Duly Noted Recommendation None</p>
<p>Sustainability Framework For the Sustainability Framework, we suggest you consider a follow up question for the Sustainability Objective ‘To reduce and manage flood risk’. Following the question Is the site located outside an area at risk from flooding? Does it pass the Sequential Test? This will help to ascertain whether a site is that in in the floodplain is there legitimately form a policy perspective.</p>	<p>Duly Noted Recommendation Table 1 page 24, To reduce and manage flood risk add the following questions.</p> <ul style="list-style-type: none"> • Does the site pass the Sequential Test?

<p>We suggest Green/blue Corridors to refer to green networks and watercourses together in the objective To promote Biodiversity through protection, enhancement and management of species and habitats.</p>	<p>Duly Noted Recommendation Table 1 Page 24 Sustainability Objective 1, To promote biodiversity and through protection, enhancement and management of species and habitats, Site Specific Question 3 amend from</p> <p>3 What affect will there be on green corridors /water courses?</p> <p>To</p> <p>3 What affect will there be on green networks and watercourses?</p>
<p>The objective Seek to improve air, soil and water quality – Will it reduce water pollution? Is not particularly clear or specific. For example, just off site or in the nearest watercourse? What type of pollution – Foul, runoff from developments as suspended solids such as dirt or oil/petrol? There is probably only one scenario where water quality issues could not be overcome and that would be lack of foul capacity going into the River Mease SAC for example. Depending on what type of water pollution you had in mind, you could ask whether the development would be likely to utilise SuDs or whether there is capacity in the receiving Sewage Treatment works; you may have this information to hand from either a Water Cycle Study or an Infrastructure Delivery Plan.</p>	<p>Duly Noted. Agree that the effect of new development on water quality will depend on factors such as whether there is capacity at the relevant sewage treatment works to accommodate the new development, which cannot be assessed at this stage unless directly related to sites within the River Mease SAC. It is recognised that Development Management Policies (Policy NR9: Water Quality) may require any necessary upgrades to be made before development proceeds.</p> <p>Recommendation Table 1, Sustainability Objective : Seek to improve air, soil and water quality amend as follows;</p> <p>Why To reduce air, water and soil pollution.</p> <p>Site Specific Questions Which Source Protection Zone does the development fall within?</p>

	<p>Does the site fall within River Mease SAC? Is the site within or directly connected by road to an AQMA? Is the site mainly or entirely on brownfield land? If the site is on greenfield land which class of agricultural quality is it?</p>
<p>Document List In this document list, I cannot see the Planning Practice Guide included anywhere. This offers lots of useful advice on Policy Guidance for Water Quality, Sustainability Drainage and Flood Risk amongst much else. Locally, you may also wish to review the Tame Valley Wetlands Landscape Partnership Scheme (TVWLPS) Landscape Conservation action Plan (LCAP) in order to assess any impacts or potential conflict with the Site Allocations.</p>	<p>Duly Noted Recommendation Insert the following under the National Planning Practice Guidance (2014) reference in Appendix A page 56</p> <p>National Planning Practice Guidance (2014) The National Planning Practice Guidance provides technical guidance in topic areas in order to support policies set out within the NPPF. It aims to allow for sustainable development as guided by the NPPF. The allocation documents should seek to ensure that it reflects the objectives</p> <p>Insert the following under CAMS: Staffordshire Trent Valley Abstraction Licensing Strategy, Environment Agency (2013) reference in Appendix A page 70</p> <p>Tame Valley Wetlands Landscape Partnership Scheme Landscape Conservation Action Plan Landscape scale approach to restoring conserving and reconnecting the physical and cultural landscape of the Tame Valley.</p> <p>Allocations within the identified wetland area should consider the key priorities of the vision.</p>
<p>Staffordshire County Council</p>	

Thank you for consulting SCC on the SA scoping report we acknowledge that we are not a statutory consultee and appreciate the opportunity to input in relation to the Duty to Co-operate and joint working. We will seek to engage with you throughout the plan preservation including the SA as it is produced.	Duly Noted Recommendation none
We are content with the general approach set out in the scope and support the incorporation of a Health Impact Assessment in to the SA. We would suggest that you should engage with us on evidence gathering and preparation of the SA moving forward.	Duly Noted Recommendation none
Staffordshire County Council: Highways	
Section 4 Baseline information – transport (page 22) the bus accessibility statistic should be updated to 71% for Lichfield City or 61% for Lichfield District which is accurate to October 2016 bus timetable information	Duly Noted Recommendation Page 22 para 2 change 83% to 71%.
Appendix B p 108, row relating to Traffic Congestion – could the last bullet point be changed to say ‘manage routing of heavy commercial vehicles and consider the provision of lorry park at Fradley.	Duly Noted Recommendation Page 108 Traffic Congestion Bullet 10 Replace with “Manage routing of heavy commercial vehicles and consider the provision of lorry park at Fradley”.
Table 1 Allocation Scoping Report Sustainability Objectives – for the sustainability objective ‘reduce the need to travel to jobs and services through sustainable integrated patterns of development. Efficient use of existing sustainable modes of travel and increased opportunities of non-car travel’ includes the following site specific questions: <ol style="list-style-type: none"> 1. Will it use and enhance existing transport infrastructure 2. Will it help to develop a transport network that minimises the impact on the environment 3. Will it reduce journeys undertaken by car by encouraging alternatives modes of transport. 4. Will it increase accessibility to services and facilities 	Duly Noted Recommendation None

<p>5. Will it reduce the overall impact on traffic sensitive areas.</p>	
<p>It may be useful to separate out walking and cycling from bus and rail to highlight the differences between sites. The most sustainable sites are those where residents can utilise public transport as well as access services and facilities by walking in and cycling. Superfast broadband, home working and car sharing would be ways to reduce trips by car.</p>	<p>Duly noted Recommendation Add the following site specific questions to Sustainability Objective 6 page 29 enable separation and improve the ability to accurately score sites.</p> <p>Will it help to develop walking and cycling networks to enable residents to access to employment, services and facilities?</p> <p>Will it help develop bus and rail transport networks to access employment, services and facilities?</p>
<p>Question 2 may be difficult to score as none of the sites are likely to lead to road schemes apart from site accesses but the delivery of a walk and cycle route can have negative impacts on the environment. For example a cycle route is unacceptable if it crosses an environmentally sensitive area; lighting in walk/cycle bridge is unacceptable for bats; air quality issues due to buses; and the selection of paving; signing; coloured paint on roads requires careful selection in a conservation area.</p>	<p>Duly noted Recommendation Remove Question 2 Sustainability Objective 6 page 29. The question is included as part of amendments proposed in previous recommendations and will enable clear scoring.</p>
<p>Question 3 no development can reduce journeys undertaken by car. We are working to provide development in the most sustainable locations to enable the new residents to undertake as many journeys as possible by non-car modes. The question used in the previous sustainability appraisal is better phrased 'will it provide opportunities to reduce trips by car?'</p>	<p>Duly noted Recommendation Replace Question 3 Sustainability Objective 6 page 29 Will it reduce journeys undertaken by car by encouraging alternative modes of transport? With Will it provide opportunities to reduce trips by car?</p>
<p>Question 4 can relate to increased accessibility to services and facilities by walking, cycling and public transport or to the</p>	<p>Duly noted Recommendation</p>

<p>provision of additional services and facilities by the development itself.</p>	<p>Remove Question 4.</p>
<p>Staffordshire County Council: Ecology</p>	
<p>The statement on page 6 in regard of Habitats Regulations Assessment (HRA) only applies if the site allocations for residential are in accordance with spatial strategy figures within the 15km zone of influence on the Cannock Chase SAC and that windfalls have not meant that the proposed figures will be exceeded. Should housing allocation figures be above the assessed in HRA of the spatial strategy further HRA will be required. The Cannock Chase SAC Partnership is in the process of commissioning assessment of the impacts of increased housing allocations to enable impacts and mitigation requirements to be assessed.</p>	<p>Duly Noted Recommendation None</p>
<p>The Built and Natural Environment section on page 20 fails to mention the natural environment including sites of international and national importance let alone locally important sites and habituates and species of principal importance. Neither is landscape character mentioned. This is a significant omission.</p>	<p>Duly Noted Recommendation See landscape comments</p>
<p>In Table 1 Indicators for designated sites should refer to site condition rather than number of sites as the number of sites or their size is not within Local Plan influence. Sites outside the District but affected by the Plan need to be included – e.g. Cannock Chase SAC and the River Mease SAC outside of the District. We recommend the indicator be percentage of international/national sites in favourable condition. This reflects Natural England condition assessment phraseology. An indicator for Local Wildlife Sites (sites of Biological Importance) should be included.</p>	<p>Duly Noted Recommendation The following text will replace the Detailed Decision Making Criteria and Detailed Indicator information that relates to Sustainability Objective Table 1. Detailed Decisions making Criteria Why Site Specific Questions: 1. What affect will there be on protected/priority species 2. What affect will there be on priority habitats and local nature conservation sites?</p>

	<ol style="list-style-type: none"> 3. What affect will there be on statutory designated sites? 4. What affect will there be on veteran trees? 5. What affect will there be on green corridors and water courses? 6. Will it reduce ecological connectivity? 7. What affect will there be on the RIGS site <p>Detailed Indicator</p> <ol style="list-style-type: none"> 1. Performance SBAP Action Plan Targets 2. Amount of priority habitat created, restored or maintained as part of the site allocation. 3. Amount of green and blue infrastructure restored or maintained as part of the site allocation 4. Increased links between woodland, hedgerows, copes, individual trees – including veteran and aged trees. 5. Number of and area of RIGS within the District.
<p>We also note that the proposed indicators fail to answer most of the questions and recommend a rethink.</p>	<p>Duly Noted Recommendation See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above.</p>
<p>There is no mention of water quality or ecological status despite Water Framework Directive requirements for Local Plans to contribute to objectives.</p>	<p>Duly Noted Recommendation See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above</p>
<p>In Table 1 there appears to be a typo in the biodiversity Detailed Indicator column for item 1 which should read Lowland Heathland (i.e. without the slash). There appears to be a typo in the biodiversity Detailed Indicator column for item 3 which should read either wildflower grassland or species-rich grassland.</p>	<p>Duly Noted Recommendation See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above.</p>

<p>There appears to be a typo in the biodiversity Detailed indicator column for item 6 which makes no sense as worded.</p>	
<p>Appendix A There is missing text under Staffordshire Biodiversity Action Plan (SBAP) On page 66</p>	<p>Duly Noted Recommendation Typo amendment Appendix A page 66 Staffordshire Biodiversity Action Plan in the key messages, targets and indicators relevant to the LDF and sustainability appraisal</p> <p>Amend 4 to 14</p> <p>And also include the following bullet points</p> <p>Cannock Heath Central Farmlands River Gravels</p>
<p>Appendix A In regard of the Cannock Chase SAC Strategic Access Management and Monitoring Measures (SAMM) (should be SAMMM) on page 68 of the text regarding Implications for plan and sustainability appraisal is incorrect. The SAMMM will not shape the assessment of significant effects. Its purpose is to provide mitigation of Local Plan impacts already identified.</p>	<p>Duly Noted Recommendation Typo amendment Appendix A page 68 SAMM to SAMMM.</p> <p>Page 68 Amend text against Implications for plan and sustainability appraisal section of the SAMMM entry to read</p> <p>The SAMMM mitigates for planned housing growth within the 0-15km zone of influence and identified in the Local Plan Strategy.</p>
<p>Appendix B There are errors in the Nature Conservation Sites Section. It is Chasewater and Southern Staffordshire Coalfields Heath SSSI. Local Wildlife Sites are Sites of Biological Importance. Cannock Chase AONB is not a nature conservation site. AONBs are designated for landscape quality. The section of Biodiversity is inadequate and fails to reference species or</p>	<p>Duly Noted Recommendation Appendix B Page 99 Nature Conservation Sites amend typo Chasewater and Southern Staffordshire Coalfields to Chasewater and Southern Staffordshire Coalfields Heath.</p>

<p>Staffordshire Ecological Record which is the data holder for the data that will be essential for monitoring</p>	<p>Appendix B Page 99 Nature Conservation Sites amend typo Sites of Biological Interest to Sites of Biological Importance</p> <p>Remove reference to Cannock Chase AONB and reposition in the additional Landscape Section. See response to SCC Landscape representation for further information.</p> <p>Add the following text: There are 78 SBI's within Lichfield District; however the total number of sites changes periodically. Up to date information on these sites and their boundaries is provided by Staffordshire Ecological Record.</p> <p>Add the following text: Lichfield District contains a wide variety of species which are defined by and received protection under domestic or European Legislation. Particular protected species that have been encountered within Lichfield District include:</p> <ul style="list-style-type: none"> • Bats • Birds • Great crested newts • White clawed crayfish • Water voles • Otters • Badgers • Invertebrates • Reptiles • Plant species
<p>Staffordshire County Council: Landscape</p>	
<p>Section 3 European Landscape convention (Florence 2002)</p>	<p>Duly Noted Recommendation</p>

	Include European Landscape convention (Florence 2002) within list of International documents page 14 and Appendix A
Section 4 Built and Natural Environment perhaps this heading would be better titled Cultural Heritage	Duly Noted Recommendation None
There should be a separate paragraph dealing with Landscape Character, which is not the same as Historic Landscape Characterisation, although an understanding of landscape character is informed by Historic Landscape Characterisation. The National Character Area Profiles published by Natural England provide broad scale characterisation, and Planning For Landscape Change which contains more fine grained county level landscape character descriptions Web link. Although Planning For Landscape Change is under review it remains a useful reference documents for the time being.	Duly Noted Recommendation Agree insert paragraph detailing landscape character between Built and Natural Environment and Environmental Issues page 20. Include Planning for Landscape Change in Other Relevant Plans and Programmes.
Table 1 Sustainability Objective: To protect and enhance the rich diversity of the natural archaeological/geological assets, and landscape character of the District. SCC opinion that these topics are too broad to be dealt with in the same objective, particularly in relation to the decision making criteria given. Suggest a more appropriate objective would be 'To protect and enhance the diverse landscape character of the District', and deal with archaeological /geological assets elsewhere.	Duly Noted Recommendation The Sustainability Objective 2 will remain unchanged the Site Specific question will be amended as follows to include the following. Will it result in the loss of historic landscape features? Will it safeguard sites of archaeological importance (scheduled or unscheduled) and their settings?
Under decision making criteria number 4 "Will the development create a new landscape character? SCC suggest adding – sympathetic with existing character.	Duly Noted Recommendation Sustainability Indicator 2 Site Specific Question4 amend to read

	Will the development create a new landscape character sympathetic with existing character?
Don't understand the relevance of 5 'Will it prevent sterilisation of mineral resources' in this list of criteria.	Duly Noted the Site Specific Question has been included to encourage the prudent use of natural resources. Recommendation None
Extent and use of detailed characterisation studies should include landscape character assessments (e.g. Planning For Landscape Change or its successor, local Landscape Character assessments).	Duly Noted Recommendation Include the following to the list of Other Relevant Plans and Programmes Planning for Landscape Change Local Landscape Character Assessments.
Cannock Chase Council	
While it is more appropriate for the statutory consultees to comment on the technical detail of this documents, it would be helpful if the scoping report also contained details of the assumptions which will be applied when undertaking the assessment of the plan's allocations (and Policies if applicable), especially as there may potentially be cross boundary implications.	Duly Noted Recommendation Assumptions are not required to ensure regulation compliance they are however part of a raft of measures to ensure consistency and proportionate delivery of the SA assessment. As such set of assumptions will be developed prior to Stage B of the SA process being undertaken. The assumptions will form a separate standalone appendix of the SA report.
We would also emphasise the importance of keeping the dialogue going as part of the Duty to Co-operate so that relevant information can be shared in the shaping of our restive plans.	Duly Noted Recommendation None
Cannock Chase AONB	
Satisfied that LDC is taking a sound approach and we have no detailed comments to make in the SA Scoping report.	Duly Noted. Recommendation None
Burntwood Town Council	

<p>The Town Council received the above Scoping Report at a recent meeting. Members agreed to receive and note the Report, adding that it would be retained for future reference.</p>	<p>Duly Noted. Recommendation None</p>
<p>Armitage with Handsacre Parish Council</p>	
<p>The Armitage with Handsacre Parish Council do not have any comments to make on the report, at this time</p>	<p>Duly Noted. Recommendation None</p>
<p>Walsall Council</p>	
<p>Identification of European sites for assessment. The scoping report (page 6) identifies the River Mease SAC and Cannock Chase SAC as the only European sites as being considered to be affected by the implementation of the Local Plan Allocations. It does not include consideration of the Cannock Extension Canal SAC on the basis of the HRA produced in support of the Local Plan Strategy 'Main Modifications of the Lichfield District Local Plan : Strategy Addendum to Habitat Regulations Assessment (January 2014), which concluded: "The modifications propose the safeguarding of a route for a heritage towpath trail utilising the line of the Lichfield Canal and identifies this on the maps contained with the Local Plan. As this is for a path and there is reference to the requirements for further studies to satisfy the requirements for the Habitat Regulations with regard to the construction/reinstatement and watering of a canal which would link to the Cannock Extension Canal, no likely significant effects upon the Cannock Extension Canal will arise from these changes." While impacts to the Cannock Extension Canal SAC were understandably ruled out on the basis, it might be beneficial. Although it is note the Local Plan Allocations document will be developed in conformity with the LPS (2015), that the Cannock Extension Canal SAC be considered as a result of the project</p>	<p>Duly Noted. HRA for the Local Plan Strategy determined that only two European Sites, Cannock Chase SAC and the River Mease SAC could experience significant harm through the delivery of the Local Plan Strategy. Recommendation There is however a typo in relation to the Cannock Extension Canal SAC in Appendix B. Page 99: Change Cannock Extension Canal to Cannock Extension Canal SAC. In addition following comments received from Staffordshire County Council a landscape section has been included in Section 4 Baseline Information. This paragraph will reflect the link between the line of the Lichfield Canal and the Cannock Extension Canal SAC.</p>

<p>potentially featuring in greater detail than in did within the LPS, and /or the emerging documents providing an opportunity to specify the technical/regulatory requirements of the project in order to avoid significant effects to the SAC.</p>	
<p>Compliance with SEA Regulation 12 (the assessment of reasonable alternatives). In respect of the HRA, the scoping report states on page 6 that the SAD "will be developed in conformity with the LPS (2015) spatial strategy. It is therefore considered that accepted migration measures are sufficient to support the Allocations Documents."</p> <p>While, on page 33, the scoping report states: "Policy considerations within the Adopted Local Plan Strategy (2015) and those also include those contained with Neighbourhood Plans may act to restrict alternatives options assessed." It could be interpreted form the above extracts that the LPA plans not to consider what might be reasonable alternatives for some of its allocation options as a result of existing Local Plan policies. While these policies might well have been tested and informed at examination, having been assessed alongside reasonable alternatives, I am unsure as to whether it is appropriate to restrict the identification of new reasonable alternatives options on this basis, particularly as they might offer improved or more appropriate outcomes.</p>	<p>Duly Noted.</p> <p>Recommendation In terms of p6 reference. Natural England (one of the three statutory consultees) within their representation accept this approach in principle – no amendments proposed.</p> <p>In terms of the p33 reference. The intention was not to artificial restricted the options assessed at Stage B (1) by imposing adopted policy requirements before SA assessment. To avoid confusion this sentence will be removed from the text.</p>
<p>Appendix A (page 68) It is stated under the heading 'Cannock Chase SAC Strategic Access Management and Monitoring Measures (SAMM) "A list of priority project are identified to mitigate for a 15% increase in visitors numbers." The most recently produced housing monitoring, within 15km of the SAC, indicates that there are matters to be addressed in</p>	<p>Duly Noted. Lichfield District is a member of the Cannock Chase SAC Partnership.</p> <p>Recommendation None</p>

<p>relation to the above statement. Walsall Council is working with the Cannock Chase SAC Partnership to agree what evidence is relevant to the consideration of housing numbers. This matter is of fundamental importance to additional work that might be commissioned to support Lichfield’s emerging Local Plan Allocations.</p>	
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Local Plan Allocations Sustainability Appraisal Scoping Report: Consultation Sheet

To avoid duplication of objectives a number of the responses in table 1 were amended, the table below provides the updated response.

Table 2:

Comment	Original response	Amended Response
<p>Statutory Consultee: Natural England In terms of wider themes we note that the district’s high level of car use and ‘out commuting’. The Council should consider related air quality impacts on ‘ecological receptors’ (semi natural habitats and their wildlife) in order to understand potential effects arising from site allocations.</p>	<p>Duly Noted Recommendation The following site specific question will be added to Table 1 against Sustainability Objective Seek to improve air, soil and water quality.</p>	<p>Duly noted Recommendation the following site specific questions will appear against Sustainability Objective 9</p> <ol style="list-style-type: none"> 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? 4. Will it result in the loss of quality agricultural land?
<p>Statutory Consultee: Natural England Sustainability objective – ‘To protect and enhance the rich diversity of natural</p>	<p>Duly Noted Recommendation</p>	<p>Duly Noted Recommendation The Following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2</p>

<p>archaeological/geological assets, and landscape character of the district’.</p> <p>Site Specific questions:</p> <ol style="list-style-type: none"> 1. Will it promote and maintain an attractive and diverse landscape. 2. Will it protect areas of highest landscape quality 3. Will it improve areas of lower landscape quality 4. Will the development create a new landscape character? <p>We refer the Council to the Statements of Environmental Opportunity (SEO) for the relevant NCA profile and the ‘special qualities of the Cannock Chase AONB (see AONB Management Plan 2014-19).</p> <p>Where proposals are for over 100 homes and /or 3 Ha in extent Natural England consider this may represent a strategic site Landscape & Visual Impact Assessment should be carried out accordingly. The Following NPPF material is relevant:</p> <p>Para 17. Within the overarching roles that the planning system ought to play, a set of core land use planning principles should underpin plan making ... planning should .. take account of the different roles and character of different areas... recognising the intrinsic character and beauty of the countryside.</p>	<p>The Following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2</p> <ol style="list-style-type: none"> 1. Proximity to an internationally or nationally designated landscape 2. In terms of Landscape Character Types what is the sites sensitive rating? 3. Proximity to an internationally or nationally designated geodiversity sites. 4. Is it on previously undeveloped land? 5. Does it offer the opportunity to promote landscape connectivity? 6. Does it offer the opportunity to improve or create the landscape character of the District? <p>The following questions will remain</p> <p>Will it improve existing green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiatives?</p> <p>Will it prevent the sterilisation of mineral resources</p> <p>In addition the Assumption Appendix will provide further clarity in regard to assessment.</p>	<ol style="list-style-type: none"> 1. Does it respect and protect existing landscape character? 2. Will it protect sites of geological importance? 3. Does it offer the opportunity to improve and promote landscape connectivity sympathetic to the existing District landscape character? 4. Will it lead to the sterilisation of mineral resources? 5. Will it improve existing green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiative? 6. Will it result in the loss of historic landscape features? 7. Will it safeguard sites of archaeological importance and their settings? <p>Note: Question 4, Is it on previously undeveloped land. Has been removed due to duplication. The following questions appears against Sustainability Objective 5.</p> <p>Will it result in the loss of land that has not previously been developed?</p>
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<p>Para 109 The Planning system should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes....</p> <p>Para 170 Where appropriate, Landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of Landscape sensitivity.</p>		
<p>Sustainability Objective - “ Maximise the use of previously developed land/buildings and the efficient use of Land” We refer you to our comments above on landscape character and multifunctional GI. Regarding the wording of the detailed indicator – would number of units be valuable too? I.e. to give a sense of scale as well as the percentage balance being achieved.</p>	<p>Duly Noted Recommendation</p> <p>Table 1 Sustainability Objective 5, Site Specific Questions, amend bullet point to read:</p> <ol style="list-style-type: none"> 1. Would the development of the site involve the loss of greenfield? <p>Bullet point 4 to be removed</p> <ol style="list-style-type: none"> 2. Would the development of the site involve the loss of gardens? <p>Table 1 Sustainability Objective 5, Detailed Indicator, amend to read:</p> <p>% of permissions granted on previously developed land.</p> <p>Table 1 Sustainability Objective 5 Detailed indicator add.</p>	<ol style="list-style-type: none"> 3. Will it result in the loss of land that has not previously been developed? 4. Is the site capable of supporting higher density development and/or a mix of uses? 5. Does the site allow for the re-use of existing buildings? 6. Will it reduce the amount of derelict, degraded and underused land within the District?

	Number of homes granted permission on previously developed land.	
<p>Sustainability Objectives – “Reduce the need to travel to jobs and services through sustainable integrated patterns of development, efficient use of existing sustainability modes of travel and increased opportunities for non- car travel”.</p> <p>Our comments about ‘site specific questions’ apply equally here. The performance of individual sites in terms of SA/SEA will reflect their strategic location and relationship with existing infrastructure. Detailed indicators should refer to sustainable transport links (bus routes, Cycleway and paths) created or enhanced through the provision of multi – functional GI.</p>	<p>Duly Noted Recommendation</p> <p>Add the following against Table 1 Sustainability Objective 6 Detailed Indicator</p> <ul style="list-style-type: none"> • Access to bus services • Access to cycle ways • Increase in the provision of multi-functional space; Cycle and walking networks that include green Infrastructure gain. <p>Remove the following indicators</p> <ol style="list-style-type: none"> 1. Traffic Counts on selected strategic roads in the District 2. Journey to work by mode 3. Access to bus services <p>In addition see recommended amendments made against SCC highway comments.</p> <p>In addition the assumptions will further link sites to existing sustainable transport infrastructure.</p>	<p>Duly Noted Recommendation</p> <p>The following site Specific Questions against Table 1 Sustainability Objective 6 will be used.</p> <ol style="list-style-type: none"> 1. Does the site location encourage the use of existing sustainable modes of travel? 2. Will it reduce the overall impact on traffic sensitive areas? 3. Will it help develop walking, cycling and bus networks to enable residents access to employment, services and facilities? 4. Will it help develop rail transport networks to access employment, services and facilities?
<p>Staffordshire County Council : Ecology</p> <p>In Table 1 Indicators for designated sites should refer to site condition rather than number of sites as the number of sites or their size is not within Local Plan influence. Sites outside the District but affected by the Plan need to be included – e.g.</p>	<p>Duly Noted Recommendation</p> <p>The following text will replace the Detailed Decision Making Criteria and Detailed Indicator Information that relates to Sustainability Objective Table 1.</p>	<p>Duly Noted Recommendation</p> <p>The following site Specific Questions against Table 1 Sustainability Objective 1 will be used.</p> <ol style="list-style-type: none"> 1. Will it conserve protected/priority species?

<p>Cannock Chase SAC and the River Mease SAC outside of the District. WE recommend the indicator be percentage of international/national sites in favourable condition. This reflects Natural England’s Condition assessment phraseology. An indicator for Local Wildlife Sites (sites of Biological Importance) should be included.</p>	<p>Detailed Decision making Criteria</p> <p>Why</p> <p>Site Specific Questions:</p> <ol style="list-style-type: none"> 1. What affect will there be on protected /priority species 2. What affect will there be on priority habitats and local nature conservation sites? 3. What affect will there be on statutory designated sites? 4. What affect will there be on veteran trees? 5. Will it reduce ecological connectivity? 6. What affect will there be on the RIGS sites 	<ol style="list-style-type: none"> 2. Will it conserve protect 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)? <p>Note</p> <p>Impact on RIGS Sites is measured through Sustainability Objective 2 Site Specific Question 2.</p>
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APPENDIX B (ii) – LOCAL PLAN ALLOCATIONS SUSTAINABILITY APPRAISAL

Local Plan Allocations Sustainability Appraisal Scoping Report: Consultation Sheet

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

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

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

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

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

<p>5. The environmental protection objectives relevant to the plan or programme and the way those objectives and environmental considerations have been taken into account during its preparation</p> <p>Biodiversity – “1. To promote biodiversity and through protection, enhancement and management of species and Habitats”.</p> <p>Is this a Typo? Should it read” To promote biodiversity through the protection, enhancement and management of species and habitats?</p> <p>6. To reduce, manage and adopt to the impacts of climate change” – Typo - <u>adapt</u> to...</p> <p>Table 1- Allocations Scoping report Sustainability Objectives – Comments on the “ Detailed decision making questions” and “detailed indicators”</p> <p>Biodiversity – ‘Site specific questions’. We would encourage you to consider the ‘helicopter view’ i.e. district wide, parish, groups of sites. A focus on each specific site (individually) may overlook SA/SEA issues that are relevant at a larger scale and contribute to decision over which individual sites (or groups of sites) should proceed. A ‘cascade ‘approach may be needed from the district down to the individual site. This approach reflects the Lawton Review whereby biodiversity is safeguarded for the future by achieving a biodiversity resource which is ‘Bigger, better, more and joined’. Please refer also to our comments below regarding multifunctional green infrastructure.</p>	<p>Duly Noted. Recommendation. Amend Sustainability Objective Number 1 to read: To promote biodiversity through the protection, enhancement and management of species and habitats. Page 23, 24</p> <p>Duly Noted. Recommendation. Amend Sustainability Objective 7 to read: To reduce, manage and adapt to the impacts of climate change. Page 23, 29.</p> <p>Duly Noted. Recommendation. See amended Site Specific Questions and indicators listed against Staffordshire County Council : Ecology rep box three.</p>
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<p>Sustainability objective – ‘To protect and enhance the rich diversity of natural archaeological/geological assets, and landscape character of the district’.</p> <p>Site Specific questions:</p> <ol style="list-style-type: none"> 1. Will it promote and maintain an attractive and diverse landscape 2. Will it protect areas of highest landscape quality 3. Will it improve areas of lower landscape quality 4. Will the development create a new landscape character. <p>We refer the Council to the Statements of Environmental Opportunity (SEO) for the relevant NCA profile and the ‘special qualities’ of the Cannock Chase AONB (see AONB Management Plan 2014-19).</p> <p>Where proposals are for over 100 homes and/or 3Ha in extent Natural England consider this may represent a strategic site. Landscape & Visual Impact Assessment should be carried out accordingly. The following NPPF material is relevant:</p> <p>Para 17. Within the overarching roles that the planning system ought to play, a set of core land use planning principles should underpin plan-makingplanning should... take account of the different roles and character of different areas, ... recognising the intrinsic character and beauty of the countryside.</p> <p>Para 109 The Planning system should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes...</p> <p>Para 170 Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.</p>	<p>Duly Noted. Recommendation.</p> <p>The following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2</p> <ol style="list-style-type: none"> 1. Proximity to an internationally or nationally designated landscape 2. In terms of Landscape Character Types what is the sites sensitivity rating? 3. Proximity to an internationally or nationally designated geodiversity sites 4. Is it on previously undeveloped land? 5. Does it offer the opportunity to promote landscape connectivity? 6. Does it offer the opportunity to improve or create the landscape character of the District? <p>The following questions will remain.</p> <p>Will it improve existing green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiatives.</p> <p>Will it prevent the sterilisation of mineral resources.</p> <p>In addition the Assumption Appendix will provide further clarity in regard to assessment.</p>
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<p>Site Specific questions</p> <p>5. Will it improve existing green infrastructure including national Forest, Forest of Mercia and the Central Rivers Initiative.</p> <p>We welcome this question and refer you to ur comments above regarding the need to consider the context for each site in terms of the adverse impacts or positive opportunities it presents in terms of SA/SEA , from the district level down to the site specific level.</p>	<p>Duly Noted</p> <p>Recommendation</p> <p>None.</p>
<p>Detailed Indicator: 3 The proportion of housing completions on sites of 10 or more which have been supported, at the planning applications stage by an appropriate and effective landscape character and visual assessment with appropriate landscape proposals.</p> <p>AGI led approach would help provide the framework for such mitigation (& enhancement) measures.</p>	<p>Duly Noted. The adopted Local Plan Strategy and Supplementary Planning Document support the delivery of Green Infrastructure holistic approach.</p> <p>Recommendation</p> <p>None</p>
<p>Sustainability Objective: Create places, spaces and buildings that are well designed, integrate effectively with one another, respect significant views and vistas, and enhance the distinctiveness of the local character.</p> <p>NCA profiles and SCC 'Planning for landscape change' SPD contribute to the evidence base and would help to facilitate a GI led approach. The Site Allocations part of the local plan process provides a platform for the implementation of the strategic approach in the LPS. Clear linkage between the allocated sites' performance in terms of offering opportunities e.g. improvements in <u>Landscape character</u> and <u>creating and linking GI</u> would be desirable and positive.</p>	<p>Duly Noted</p> <p>The proposed amendments to the Site Specific Questions relating to the Sustainability Objective 2, See above.</p> <p>Recommendation</p> <p>None</p>
<p>Sustainability Objective – “Maximise the use of previously developed land/buildings and the efficient use of Land”</p>	<p>Duly Noted</p> <p>Recommendation</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX C – LOCAL PLAN ALLOCATIONS SUSTAINABILITY APPRAISAL

Adoption Statement

General Methodology Housing Sites

- **Policy Context**, Lichfield District Council adopted its Local Plan Strategy in February 2015. Within that Strategy, Core Policy 1 'The Spatial Strategy' and Core Policy 6 'Housing Delivery' provides the policy context for the selection of alternatives and preferred options. These policies are supported through the following localised policies; Policy Lichfield 4: 'Lichfield Housing', Policy Burntwood 4: 'Burntwood Housing', Policy: 'North of Tamworth', Policy: 'East of Rugeley', Policy Frad4: 'Fradley Housing', Policy ALr4: 'Alrewas Housing', Policy Arm4: 'Armitage with Handsacre Housing', Policy Faz4: 'Fazeley, Mile Oak & Bonehill Housing', Policy Shen4: 'Shenstone Housing', Policy Whit4: 'Whittington Housing', Policy Rural 2: 'Other Rural Settlements'.
- **Regulation 18**, Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as 'showstoppers'. The scope of this consultation was directly informed by the Local Plan Strategy which had already been subject to SA.
- **Stage 1:** All sites within the Strategic Housing Land Availability Assessment (SHLAA) 2016 which were located within or adjacent to settlements identified within the settlement hierarchy were identified and subject to the SA process along with any additional sites which were submitted/ promoted through the Regulation 18 consultation. Such an approach was taken so that sites which could be considered to be potentially aligned to the adopted spatial strategy were considered. Any sites which were noted as being complete or under-construction (having had the benefit of planning permission), or sites assessed as capable of delivering less than 5 dwellings were removed from the schedule of sites prior to being assessed. This was because it was considered that these were already moving through the planning process and for sites of 5 or less dwellings were not taken through the SA process because the LPA was not allocating sites below this threshold.
- Concurrently and in isolation an Urban Capacity Assessment was produced which assessed the deliverability of all sites identified within the SHLAA located within the existing built up areas of settlements. Where this assessment determined that an urban capacity site was deliverable, consideration was given to other evidence, including their assessment within the SA (SA outputs), to conclude on whether the site should be proposed for allocation.
- **Stage 2:** The Urban Capacity Assessment assesses each settlement within the settlement hierarchy in terms of its delivery against the requirements of the Local Plan Strategy. Where the assessment indicated that insufficient sites had been found including those found through stage 1, consideration to sites beyond the settlement boundary was given. This consideration was based on a range of evidence including the SA outputs.
- An SA assessment was completed for each of the identified reasonable alternatives and full results are contained and a summary of allocated sites produced.
- **Stage 3: Changes to Site Selection post Regulation 19 consultation.**
- Since preparing the Regulation 19 consultation (undertaken March – May 2017) there were two significant factors that altered the planning landscape for Lichfield District. The first was receipt of three appeals from the Secretary of State, one of these appeal decisions for 750 dwellings at Land at Watery Lane was approved despite not being in conformity with the Plan. The second factor relates to Governments consultation on the Housing White Paper which inter alia seeks to clarify the national policy position associated with Green Belt. In light of these factors along with significant public objection to release of Green Belt land a review of the housing supply was undertaken. The Housing Supply Update 2017 concluded that there

was a supply of 11,259 dwellings, which is 1229 dwellings above the 10,030 dwellings. This enables the release of Green Belt sites to be excluded from the LPA whilst still meeting the overall housing requirements.

- In addition a number of sites with small yields have secured planning permission within the period between the completion of the original SA and the publication of this version. These additional sites have been included with the preferred options.
- Consultation response received during Regulation 19 consultation identified additional information which further informed site assessments. Where appropriate amendments were made to site assessments.
- A number of new alternatives were identified within the period between the completion of the original SA and the publication of this version. These additional alternatives have been included.
- A completed assessment for all reasonable alternatives and full results are contained within Appendix E a summary of the effects of the preferred options are contained within Appendix F.
- Table 3 below identifies the preferred options for the housing sites. Those sites which have been identified included post Regulation 19 consultation are denoted by a *.
- It should be noted that those sites deemed under construction pre the Regulation 19 are not identified within Table 3 or Appendix F. However those sites deemed under construction in the period between Regulation 19 and this publication of the SA are included.

General Methodology Employment Sites

- **Policy Context** Lichfield District Council adopted its Local Plan Strategy on February 2015. Within that Strategy Core Policy 7 Employment and Economic Development provides the policy context for the selection of alternatives and preferred options.
- **Regulation 18** Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as 'showstoppers'.
- **Stage 1** Potential employment sites that feature within the District Council Employment Land Review (ELR), Employment Land Availability Assessment (ELAA) 2016 and Regulation 18 consultation were identified as reasonable alternatives on the basis that these sites may be in conformity with the Local Plan Strategy.
- **Stage 2** Of those sites the following were removed, sites under construction and sites that had been completed in previous years because it was considered that these were already moving through the Plan process.
- **Stage 3** An SA assessment was completed for each of the identified reasonable alternatives full results are contained within Appendix E.
- **Stage 4** Summary of scores undertaken, the summary sheets for allocated sites are contained within Appendix F.
- **Stage 5** Taken into consideration the effects identified within the SA, the policy context, wider evidence base including Employment Land Capacity Assessment and factors identified within the general methodology the following employment sites were identified as preferred options to fulfil the remaining development quantum.

Note there has been no further amendments or additions to the Employment Sites methodology following Regulation 19 consultation.

General Methodology Gypsy and Traveller Sites

- Lichfield District Council adopted its Local Plan Strategy on February 2015. Within that Strategy Core Policy Core Policy 6 Housing Delivery provides the policy context for the selection of alternatives and preferred options.
- Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as 'showstoppers'.
- Gypsy and Traveller Site identification work: The process of site identification was completed using the criteria outlined within Local Plan Strategy Policy H3: Gypsies, Travellers & Travelling Showpeople. A number of sites feature within the SHLAA other identified solely as part of the implementation of policy H3. Gypsy and Traveller Site Methodology Appendix A includes an assessment which considered sites at initial filter stage.
- An SA assessment was completed for each of the identified reasonable alternatives which are considered reasonable on the basis of their broad compliance with policy H3, full results are contained within Appendix E.
- Summary of effects completed, the summary sheets for allocated sites are contained within Appendix F.
- Taken into consideration the effects identified within the SA, the policy context, and factors identified within the general methodology the following Gypsy and Traveller Site was identified as a preferred option.

Note there has been not further amendments or additions to the Employment Sites methodology following Regulation 19 consultation.

General Methodology Saved Policies

- Lichfield District Council adopted its Local Plan Strategy on February 2015.
- In total there are currently 54 saved polices carried over from the 1998 Local Plan. The Council has committed to a review of these saved policies. Appendix J of the Local Plan Strategy identifies policies that have been replaced by the Local Plan Strategy and those that will be replaced by the LPA.
- Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as 'showstoppers'.

SA assessment has been completed for each policy. In terms of reasonable alternatives the following have been considered:

- Proposed Policy
- Policy absent
- Alternative if suggested
- Saved Policy

These alternatives were considered reasonable on the basis that not taking a policy forward or taking a differently worded policy would be realistic if a preferable outcome was delivered.

APPENDIX D – LOCAL PLAN ALLOCATIONS SUSTAINABILITY APPRAISAL

Adoption Statement

Table 6 – Reasons for Preferred Alternatives Housing

				Development Considerations				
Settlement	SA Ref	Allocations	Complete (since AMR 2016)	Under Construction	Planning Permission	Urban Capacity	Local Plan Strategy	Green Belt
Alrewas	974	A4						
	751	A3						
	36	A5						
	842							
Armitage with Handsacre	28	A2						
	91	AH1						
	651							
	379							
	120							
	1030							
	1024							
	1021							
	650							
	92							
Burntwood	747							
	583							
	907, 1123							
	964							
	42							
	404							
	958							
	957							
	102							
	71							
	483							
	653							
	477							
	93							
	494							
	632							
	490							
	482							
	69							
	70							
	654							
	655							

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Table 6 – Reasons for Preferred Alternatives Housing

Settlement	SA Ref	Allocations	Complete (since AMR 2016)	Development Considerations				
				Under Construction	Planning Permission	Urban Capacity	Local Plan Strategy	Green Belt
	659							
	660							
	701							
	1005	B1						
	763							
	478	B13						
	496	B7						
	4	B5						
	119	B4						
	7	B3						
	156	B2						
	429	B8						
	1037	B16						
	1054	B17						
	ELAA 47	B10						
	926	B19						
East of Rugeley	1028							
	833							
	832							
	1031	R1						
	27							
Fazeley	472							
	495							
	94							
	140							
	95							
	440	FZ3						
	115	FZ2						
	97							
	1118							
Fradley	87							
	138	F1						
	369							
	376							
	377							
	437							

APPENDIX D

Table 6 – Reasons for Preferred Alternatives Housing

Settlement	SA Ref	Allocations	Complete (since AMR 2016)	Development Considerations				
				Under Construction	Planning Permission	Urban Capacity	Local Plan Strategy	Green Belt
	130							
	838							
	83							
	436							
	132							
	666							
	412							
	131							
	438							
	1119							
	1120							
Lichfield	6							
	434							
	435							
	16							
	22							
	18							
	956							
	17							
	20							
	416							
	704							
	955							
	126							
	127							
	633							
	856	L27						
	1							
	835							
	1032	L2						
	837	OR7						
	646							
	671							
	1070	L28						
	105							
	21							
	905							

APPENDIX D

**Table 6 – Reasons for Preferred Alternatives
Housing**

				Development Considerations				
Settlement	SA Ref	Allocations	Complete (since AMR 2016)	Under Construction	Planning Permission	Urban Capacity	Local Plan Strategy	Green Belt
	44	L6						
	813	L20						
	103	L10						
	836	L18						
	19	L5						
	31	L12		Part	Part			
	703							
	89-90	L5						
	39	L14						
	61	L16						
	63	L17						
	64	L25						
	415	L24						
	422							
	648	L8						
	52	L29						
	425	L21						
	54	L22						
	418	L1						
	428	L7						
	ELAA 58	L3						
	1040	L13						
	1065	L5						
	1057	L4						
	60	L19						
	1104	L9						
	144	L26						
	681							
	164	L23						
	1114							
	1121							
North of Tamworth	104	NT1						
	43	NT2						
Other Rural	255	HR1						
	135	HR1						
	85	H1						
	1022	OR5						

APPENDIX D

Table 6 – Reasons for Preferred Alternatives Housing

Settlement	SA Ref	Allocations	Complete (since AMR 2016)	Development Considerations				
				Under Construction	Planning Permission	Urban Capacity	Local Plan Strategy	Green Belt
	51	OR1						
	935	OR3						
	1046	OR4						
	107							
	895							
	74							
	543							
	960							
	817							
	826							
	1115							
	727							
	65							
	37							
	50							
	49							
	133							
	489							
	86							
	35							
	899							
	25							
	66							
	954							
	834							
	863							
	373							
	86							
	641							
	488							
	1034							
	380							
	1069							
	574							
	909							
	642							
	14							

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Table 6 – Reasons for Preferred Alternatives Housing

Settlement	SA Ref	Allocations	Complete (since AMR 2016)	Development Considerations				
				Under Construction	Planning Permission	Urban Capacity	Local Plan Strategy	Green Belt
	137							
	665							
	716							
	896							
	898							
	670							
	375							
	481							
	473							
	423							
	475							
	474							
	476							
	370							
	134							
	106							
	45							
	544							
	68							
	374							
	1033							
Shenstone	785							
	480							
	30	S1						
	67							
	684							
	1071							
	500							
	545							
	953							
	241							
	738							
Whittington	154							
	940							
	721							
	431							
	748							

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Table 6 – Reasons for Preferred Alternatives Housing

Settlement	SA Ref	Allocations	Complete (since AMR 2016)	Development Considerations				
				Under Construction	Planning Permission	Urban Capacity	Local Plan Strategy	Green Belt
	754	W3						
	8	W2						
	1035							
Additions	B20 167	B20						
	B21 146	B21						
no SHLAA ref	L31 ADD 1	L31						
no SHLAA ref	HR2 ADD 2	HR2						
	1109	OR8						
	1109	OR8						

Table 6 Key: Housing

	Urban Capacity, has Planning Permission, is Urban Capacity (as assessed in Urban Capacity Assessment), is in line with Local Plan Strategy, or is outside Green Belt
	Local Plan Strategy: Outside existing settlement boundary, however is adjacent to Key Rural Settlement and Local Plan Strategy recognises some growth beyond boundaries will be required. To be yellow site needs to be in line with quantum of development required for settlement having regard to Urban Capacity Assessment
	Not Urban Capacity, Not in line with Local Plan Strategy, in Green Belt
	Not applicable - site Urban Capacity

Table 6: Reasons for Preferred Alternatives Employment

Employment sites								
				Development Considerations				
	SA Ref	Allocations	Complete (since AMR 2016)	Under Construction	Planning Permission	Employment Capacity	Local Plan Strategy	Green Belt
Employment	ELAA 97	F2						
	ELAA 111	F2						
	ELAA 113							
	ELAA 1							
	ELAA 2							
	ELAA3							
	ELAA5							
	ELAA 6							
	ELAA 8							
	ELAA 9							
	ELAA 10							
	ELAA 11							
	ELAA 72							
	ELAA 112							
	ELAA 12							
	ELAA 13							
	ELAA 14							
	ELAA 15							
	ELAA 16							
	ELAA 17							
	ELAA 18							
	ELAA 19							
	ELAA 20							
	ELAA 23							
	ELAA 26							
	ELAA 30							
	ELAA 32							
	ELAA 37							
	ELAA 41							
	ELAA 46							
	ELAA 47							
	ELAA 58							
	ELAA 67							
	ELAA 77	A6						
	ELAA 80							
	ELAA 81							

Employment sites								
				Development Considerations				
	SA Ref	Allocations	Complete (since AMR 2016)	Under Construction	Planning Permission	Employment Capacity	Local Plan Strategy	Green Belt
	ELAA 82					Green		
	ELAA 83					Green		
	ELAA 84					Green		
	ELAA 85					Red	Green	
	ELAA 86					Yellow	Green	
	ELAA 87					Red	Red	Green
	ELAA 88					Red	Red	Red
	ELAA 89					Red	Red	Red
	ELAA 90					Red	Red	Red
	ELAA 91					Red	Red	Red
	ELAA 92					Red	Red	Red
	ELAA 93					Red	Red	Red
	ELAA 94					Red	Red	Red
	ELAA 95					Red	Red	Red
	ELAA 96	OR6			Green	Green	Red	Red
	ELAA 98					Red	Yellow	Green
	ELAA 99					Red	Red	Red
	ELAA 100					Yellow	Green	Green
	ELAA101					Red	Red	Red
	ELAA 102					Red	Red	Red
	ELAA 103					Red	Red	Red
	ELAA 104					Red	Red	Red
	ELAA 105	F2				Red	Yellow	Green
	ELAA 106					Red	Red	Green
	ELAA 107					Red	Green	Green
	ELAA 108					Green	Green	Green
	ELAA 109					Yellow	Red	Green
	ELAA 110					Red	Green	Green

Table 6 Key: Employment

	Urban Capacity, has Planning Permission, is Employment Capacity (as assessed in Employment Land Capacity Assessment), is in line with Local Plan Strategy, or is outside Green Belt
	Employment Land Capacity Assessment assess site as uncertain. Local Plan Strategy, outside existing employment area boundary, however is adjacent to sustainable settlement and/or employment area. Yellow indicates that the site is in line with quantum of development required for settlement having regard to Urban Capacity Assessment
	Site is not deemed as employment land capacity, is not in line with Local Plan Strategy and is in the Green Belt
	Not applicable - site Urban Capacity

Table 7: Reasons for Preferred Alternatives Gypsy & Travellers

	SA Ref	Allocations	Complete (since AMR 2016)	Under Construction	Planning Permission	Green Belt	Local Plan Strategy	SA Significant Effect	Suitable	Available	Allocate
GT1	SHLAA 376	N	N	N	N	N	Y	Y	N	N/A	N
GT2	SHLAA 377	N	N	N	N	N	Y	Y	N	N/A	N
GT3	SHLAA 27	N	N	N	N	N	N	N	N	N/A	N
GT4	SHLAA 641	N	N	N	N	N	N	N	N	N/A	N
GT5	SLAA 667	N	N	N	N	N	N	N	N	N/A	N
GT6	SHLAA 686	N	N	N	N	N	N	N	N	N/A	N
GT7	SHLAA 842	N	N	N	N	N	N	N	N	N/A	N
GT8	SHLAA 884	N	N	N	N	N	N	N	N	N/A	N
GT9	other rural	N	N	N	N	Y	N	N	N	N/A	N
GT10	other rural	N	N	N	N	Y	N	N	N	N/A	N
GT11	other rural	N	N	N	N	N	N	N	N	N/A	N
GT12	other rural	N	N	N	N	Y	Y	Y	N	N/A	N
GT13	other rural	N	N	N	N	N	Y	N	Y	N	N
GT14	other rural	N	N	N	N	N	Y	N	Y	N	N
GT15	other rural	N	N	N	N	N	N	Y	N	N/A	N
GT16	other rural	N	N	N	N	Y	N	N	N	N/A	N
GT17	other rural	N	N	N	N	Y	Y	N	N	N/A	N
GT18	other rural	N	N	N	N	N	N	N	N	N/A	N
GT19	other rural	N	N	N	N	Y	Y	Y	N	N/A	N
GT20	other rural	N	N	N	N	N	Y	N	N	N/A	N
GT21	other rural	GT21	N	N	N	Y	Y	N	Y	Y	Y

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APPENDIX I – List of deleted policies

Policy No.	Policy	Deleted or Redrafted¹
E2	Forest of Mercia	Deleted
C2	Character of Conservation Areas	Redrafted
C7	Buildings out of Scale or Character	Deleted
C9	Protected Open Spaces	Deleted
Emp.2	Existing Industrial Areas	Redrafted
Emp.5	Major Developed Sites in the Green Belt	Deleted
Emp.11	Wyrley & Essington Canal	Redrafted
T6	Rail Transport	Deleted
S2	Neighbourhood Shopping Centres	Deleted
L7A	Buffer Depot, Streethay	Redrafted
L9	Extension to Boley Park Industrial Estate	Redrafted
L10	Britannia Way	Redrafted
L12	Office Development - Sandford Street	Deleted
L13	City Centre Redevelopment	Redrafted
L15	Primary Retail Area	Redrafted
L16	Secondary Retail Areas	Redrafted
L17	Bird Street	Deleted
L18	Dam Street	Deleted
L19	Business Areas	Deleted
L21	New Roads	Deleted
L22	Road Line Safeguarding	Redrafted
L23	Road & Junction Improvements	Redrafted
L24	Traffic Management	Deleted
L26	Rear Servicing	Redrafted
L27	Pedestrian Access to the City Centre	Deleted
L31	Lichfield Rail Stations	Deleted
L35	Recreation Zones	Deleted
L36	Recreation Zones	Deleted
L37	Lichfield Linear Park	Deleted
L42	Environmental & Housing Improvement	Deleted
L46	Shopfronts	Redrafted
L47	Cathedral Close	Deleted
L49	Framework Open Space	Deleted
L50	Landscape Improvements in Framework Open Space	Deleted
B1	Existing Residential Areas	Deleted
B5	New Shopping Development	Deleted
B6	Indoor Leisure	Deleted
B9	Redevelopment & Town Square	Deleted
B13	Redevelopment & Expansion of Neighbourhood Centres	Deleted
B15	Road & Junction Improvements	Deleted
B21	Chasetown Industrial Estate	Redrafted

¹ Redrafted does not mean the policy will necessarily be a standalone policy, for a number of policies these are integrated into one policy.

Policy No.	Policy	Deleted or Redrafted¹
B22	Recreation Zones	Deleted
B24	Chasewater Area and Country Park	Deleted
NA1	Cannock Chase – Area of Outstanding Natural Beauty	Redrafted
NA12	Lea Hall Colliery	Deleted
NA13	Rugeley Power Station	Deleted
NA20	Public Open Space, Longdon	Deleted
EA1	Fradley Airfield Industrial Proposals	Redrafted
EA13	Hotel at Fradley	Redrafted
EA14	The Tame & Trent Valley	Deleted
EA16	The National Forest	Redrafted
SA3	Laural House, Lichfield Road, Fazeley	Deleted
SA6	Little Aston Park	Deleted
SA7	Canal Facilities at Fazeley	Deleted

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APPENDIX J – Local Plan consultation stages

Local Plan stage	Dates
Open consultation – Regulation 18	22.08.2016 – 10.10.2016
Local Plan Allocations Regulation 19	20.03.2017 – 12.06.2017
Local Plan Allocations – Focused changes – Regulation 19	08.01.2018 – 19.02.2018
Main Modifications	19.12.2018 – 06.02.2019

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equality impact assessment Appendix K

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:	Ashley Baldwin
Your service area:	Economic Growth
Your director/line manager:	Craig Jordan
Your cabinet member:	Cllr I. Eadie

Section 2: About your plans

Name of service/policy you are assessing:	Local Plan Allocations document – adoption version
--	--

Is it? (please delete as appropriate)
<ul style="list-style-type: none"> ▪ New policies ▪ Changes to existing policies

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 ▪ Other : 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):
The Local Plan Strategy has an Equality Impact Assessment attached to it, this should be read in conjunction with this document to understand the equality issues associated with the Local Plan.

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)	Neutral	No
Disability (physical, sensory or learning)	Neutral	No
Gender/sex	Neutral	No
Transgender/gender reassignment	Neutral	No
Race (includes ethnic or national origins, colour or nationality)	Neutral	No
Gypsies and travellers	Yes. Policy GT1 and Site GT1: (Gypsy and Traveller 1): Land at Bonehill Road, Mile Oak identifies an allocation for a gypsy, traveller site to meet the needs identified within the District.	No
Refugees / asylum seekers	Neutral	No
Sexual orientation	Neutral	No
Marriage and civil partnerships	Neutral	No
Religion or belief (includes lack of belief)	Neutral	No
Pregnancy and maternity	Neutral	No
Carers or the people cared for (dependants)	Neutral	No
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:

³ 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	Yes
Date completed:	June 2019

HS2 Draft Planning Memorandum – Decision on Qualifying Authority Status



Cabinet Member: Councillor A Lax and Councillor I Eadie

Date: 9th July 2019

Agenda Item: 5

Contact Officer: Jeff Upton

Tel Number: 01543 308199

Email: jeff.upton@lichfielddc.gov.uk

Key Decision? YES

Local Ward All Wards within Phase 2a of HS2 – Alrewas and Fradley, and

Members Armitage with Handsacre, Colton and The Ridwares

CABINET

1. Executive Summary

- 1.1 The purpose of this report is to seek authority to sign the HS2 Planning Memorandum, the effect of which is that Lichfield District Council will become a 'Qualifying Authority' for the purposes of the High Speed Rail (West Midlands - Crewe) Bill (the Bill). Those authorities choosing qualifying status are given greater control over the detailed design and external appearance of buildings and structures along the route. In agreeing to these controls, qualifying authorities are required to handle requests for approval in an expeditious manner, and to ensure appropriate delegated authority and Committee procedures are in place.

2. Recommendations

- 2.1 That the Cabinet approves the signing of the Planning Memorandum to become a 'Qualifying Authority' for the purpose of the High Speed Rail (West Midlands - Crewe) Bill (the Bill).
- 2.2 That Council be requested to amend the Constitution to include the determination of all planning matters submitted under Schedule 17 (the Planning Conditions Schedule) of the Bill, in line with the current provisions that already exist for Phase 1 of HS2 matters under Schedule 17 of the High Speed Rail (London – West Midlands) Act 2017 as set out in the attached Appendix A.

3. Background

- 3.1 The Bill will grant planning permission for the construction of a high speed railway between the West Midlands and Crewe. The line would be built between a junction with Phase 1 of HS2, near Fradley Wood, and a junction with the West Coast Main Line, near Crewe. The permission will be subject to a number of conditions requiring the nominated undertaker (the party/parties who will construct the railway) to obtain the approval of Local Planning Authorities along the route for matters of detail, including the design of buildings and structures – such as bridges and tunnel portals.
- 3.2 The Bill gives each Local Planning Authority a choice between having a wide or narrow range of controls over the approval of such details. Local Authorities opting for a wider range of control are referred to as 'Qualifying Authorities.' The Council is already a Qualifying Authority for Phase 1 of HS2 which is planned to be built between London and the West Midlands. This was agreed by Cabinet and Full Council in 2017. At its meeting of 21st May 2019 there was a notice of motion for the leader to write to Government to request that all enabling works for HS2 in Lichfield District should be paused until the notice to proceed to main works contractors has been approved, and also that, as required by the Department of Transport, notice to proceed should not be given until management capability, affordability of contracts and robustness of revised business case have all been proven. The Council

see no reason why the District should suffer significant disruption and long term environmental destruction until detailed design and cost has been approved. The Council therefore asked that HS2 Ltd significantly improves the effectiveness of its community engagement with those impacted by the line.

3.3 Whilst it is noted that this request has been made, the Council needs to prepare for the current Bill for Phase 2a being enacted. It is therefore necessary for the Cabinet and Council to make a decision associated with the current Bill for Phase 2a and the requested involvement and status of the Council in determining detailed planning matters. Qualifying Authorities are responsible for issuing approvals in relation to the detailed design and appearance of buildings, structures and features of the scheme. Under Schedule 17 (the Planning Conditions Schedule), the nominated undertaker is required to submit requests for approval to Qualifying Authorities for the following:

- plans and specifications;
- construction arrangements;
- bringing into use; and
- site restoration schemes.

3.4 Similar to the grant of reserved matters approval following outline planning permission, the approval of these details does not extend to the principle of their construction, as they would be permitted by the Bill itself. Examples of typical buildings, structures and features include:

- Road vehicle parks;
- Bridges, viaducts and tunnel portals;
- Terracing; cuttings; embankments and other earthworks;
- Fences and walls;
- Transformers and Telecommunication masts;
- Site restoration;
- Pedestrian access to the railway line;
- Artificial lighting.

3.5 If the Council decided to be a non-qualifying authority, it would have a significantly reduced role, effectively losing control over the majority of buildings, structures and features being constructed within the District.

3.6 There are two grounds on which structures, buildings and features forming part of the railway may be refused or permitted, subject to conditions of a qualifying authority. These are:-

- i) That the design or external appearance of the works ought to be modified:
 - a) To preserve the local environment or local amenity,
 - b) To prevent or reduce prejudicial effects on road safety or the free flow of traffic in the local area, or
 - c) To preserve a site of archaeological or historic interest or nature conservation value,

And, in respect of which, the relevant aspect of the scheme is reasonably capable of being so modified.

- ii) That the development ought to, and could reasonably, be carried out elsewhere on land within the developments permitted limits. [*This aspect would only relate to development within especially sensitive areas, such as Historic Parks*].

- 3.7 In determining requests for approvals, it would only be appropriate to raise an objection to the detailed design of a particular building, structure or feature if the impact of that design would be very significant in the surrounding area, beyond that which might reasonably be expected to be part of the railway scheme.
- 3.8 It is important to note that the reduced level of control applying to 'non-qualifying authorities' only enables refusal in respect of reasons i(a) and ii above – all other matters would remain with HS2. Therefore, given the concern over HS2's impact on heritage assets and the local road network, it is important that the Council takes advantage of the available powers conferred on it becoming a Qualifying Authority. This would also be consistent with the approach taken on Phase 1 of the route.
- 3.9 Councils wishing to become 'Qualifying Authorities' are required to sign the 'Planning Memorandum.' This document sets out the rules of conduct and administrative arrangements for both the Local Planning Authorities and nominated undertaker leading up to and during the construction of the railway. Importantly, it requires the Council to commit to dealing with applications in an expeditious manner (i.e. within 8 weeks), and to being sufficiently resourced to do so. The applications are likely to be for relatively minor works, but could be substantial in number and frequency.
- 3.10 In view of the level of interest that is likely to be generated by the proposals that come forward; the possibility that numerous such applications will be submitted either at the same time or in short succession; and the need to ensure they are dealt with particularly expeditiously, there is a risk that the anticipated volume of work could have significant impact upon the capacity of the Planning Committee to consider these additional items within the required period.
- 3.11 For this reason, in relation to Phase 1, delegated authority was given to Senior Officers to determine approvals under Schedule 17 (the Planning Conditions Schedule) of the Bill, subject to conditions in which such approvals will be reported to the Planning Committee. The approach to Committee reporting reflected that of the existing process for determining planning applications, allowing Members the opportunity to 'call-in' such approvals – subject to specifying planning reasons. It is recommended that this approach is also taken for the consideration of Schedule 17 submissions for Phase 2a. This will require the necessary update of the wording of the scheme of delegation to include reference to HS2 Phase 2a.
- 3.12 It is anticipated that the Council will be reimbursed for the cost of dealing with the additional applications by way of a Service Level Agreement (SLA) between the Council and HS2. Discussions in this regard are anticipated to mirror arrangements that are already in place for Phase 1 where officer time is reimbursed by HS2 on a cost-recovery basis. Proposals will be reported back to Cabinet in due course for relevant authority to be given. From the work carried out to date on Phase 1 the officer resources committed to the consideration of planning proposals has involved 9 applications and attendance and relevant liaison meetings regarding this phase of the project. The application proposals have principally involved ecological enabling projects, such as the construction of ponds and the erection of a bat house. There are anticipated to be approximately 5 further applications for Phase 1 in the coming year. These are likely to include more significant infrastructure such as the erection of bridges and viaducts. To date, the time of both planning officers and specialists, such as the Council's ecologist, has been recovered in accordance with the existing Service Level Agreement. This has resulted in an income of approximately £5,000 to cover the cost of service provision in 2018.
- 3.13 The work carried out to date on Schedule 17 approval requests has been managed within existing staff resources. The scheduling work anticipated on Phase 2a projects will assist in the review of resources going forward. This will ensure that all planning application casework, including the HS2 approval requests, can move forward with appropriate resources without impacting upon our performance on determining planning applications. It is anticipated that any resource requirements are addressed from the SLA for the project when this is brought forward in due course.
- 3.14 In summary, becoming a Qualifying Authority involves a continued commitment by the Council to deal with applications appropriately and with agreed timetables, in return for greater control over a

wider range of matters than would otherwise be the case. It should be noted that prior to any submissions being made, the works to construct the railway will already have the equivalent of outline planning permission, and as such, the Council will only have the powers to consider the reserved matters (i.e. design and appearance) for specified buildings, structures and other features along the route. This will need to be clearly communicated to all stakeholders involved in the process, so there is a clear understanding of what the planning regime can influence and control at the local level.

Alternative Options	<ol style="list-style-type: none"> 1. The Council could decide not to take the opportunity to become a Qualifying Authority, but would relinquish those planning powers provided by Schedule 17 of the Bill, and in turn, reduce the influence it could have on managing and mitigating the physical impact of buildings, structures and features on the District's built and natural environment. 2. Should the Council not amend the Constitution it would have no delegated authority to determine Schedule 17 approvals – impacting on its ability to determine applications expeditiously within the required timeframes. Failure to meet those timeframes could result in the Council losing the additional powers of a Qualifying Authority.
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Consultation	<ol style="list-style-type: none"> 1. None.
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Financial Implications	<ol style="list-style-type: none"> 1. One of the objectives of the Service Level Agreement would be to ensure that the work undertaken by Council in determining these applications is fully reimbursed on a cost recovery basis.
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Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. Becoming a Qualifying Authority will ensure that the Council has influence over the physical development of HS2 - seeking to preserve the historic, built and natural environment along its route and maintaining the District as a clean, green and welcoming place to live.
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Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. Becoming a qualifying authority will ensure the Council can engage with stakeholders in the process, thus enabling them to contribute and influence the decision making process in an open and transparent manner.
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Crime & Safety Issues	<ol style="list-style-type: none"> 1. There will be no impact upon our duty to prevent crime and disorder within the District (Section 17 of the Crime and Disorder Act, 1988).
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	Risk Description	How We Manage It	Severity of Risk (RYG)
A	The Council decides not to become a Qualifying Authority – reducing its ability to influence the physical development of HS2 and its impact upon the built and natural environment.	Clearly highlight the benefits of 'Qualifying Status' which can be delivered on a cost recovery basis through an agreed SLA.	Yellow. There could criticism from the community that the Council had failed to take the opportunities available to fully engage in the process of managing and mitigating the physical development of HS2.
B	The Constitution is not updated to ensure appropriate delegated powers are in place to handle applications within the required timescales.	Amend the Constitution at Full Council.	Yellow. Without appropriate delegated authority in place the Council runs the risk of losing powers conferred as a result of not being able to

			meet those challenging deadlines.
C	The ability to secure additional planning officer resource, should Phase 2a work be heavy leading to current staffing levels proving insufficient.	Engage with the developer through scheduling and pre-application stages and through having an appropriate Service Level Agreement in place to cover the cost of officer provision.	Yellow – Without appropriate planning officer resource in place there could be an impact on the delivery of the development management service for other customers.

Background documents

Relevant web links:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/627556/E177_Draft_EMRS_Planning_Memorandum_WEB.pdf

Appendix A

CONSTITUTION

PART 3

SCHEME OF DELEGATION TO OFFICERS

APPENDIX A

SCHEME OF DELEGATION OF PLANNING DECISIONS

2.17 To determine all matters submitted under Schedule 17 (the Planning Conditions Schedule) of either the High Speed Rail (London-West Midlands) Act 2017 or the High Speed Rail (West Midlands – Crewe) Act 20xx, unless the application includes Council owned land or buildings; or a written call-in request is made by a Member which is in accordance with the HS2 Planning Memorandum proforma, which explains the planning reasons for the call-in. In relation to any application (Schedule 17 approval), which benefits from delegated authority to determine, if in the opinion of at least two of the following officers: Director of Place and Community; Head of Development Services, Planning Development Manager, and Principal Planning Officers, it is considered appropriate for the Planning Committee to determine the application, then the matter shall be reported accordingly.

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JIGSAW FUNDING AGREEMENT



Date:	9 July 2019
Agenda Item:	6
Contact Officer:	Susan Bamford/Gareth Davies
Tel Number:	01543 308170/ 015643 308741
Email:	Susan.bamford@lichfielddc.gov.uk/ Gareth.davies@lichfielddc.gov.uk
Key Decision?	YES
Local Ward Members	Cllr Ball & Cllr Robertson, Curborough. Cllr Ray & Cllr Grange, Chadsmead.

Cabinet

1. Executive Summary

- 1.1 The Jigsaw Centre based on Dimbles Lane, has been managed by Fusion Credit Union since January 2014. The current funding agreement ends in June 2019 and a review has been carried out to consider the effectiveness of and need for the funding provided to this project.

2. Recommendations

- 2.1 That the council does not seek to enter into a further funding agreement for Jigsaw.
- 2.2 That cabinet acknowledge the commitment by Fusion Credit Union to maintain a signposting service and continue to make the room at Dimbles Lane available for hire.

3. Background

- 3.1 Jigsaw opened in 2007 to 'offer local organisations the opportunity to work closely together and the chance for local people to find out what is going on in their area and become involved'. Located in a formerly derelict shop unit on Dimbles Lane, Lichfield, at the time it was North Lichfield Initiative's flagship project. Since then it has operated as a community hub which is open 6 days per week (Monday to Saturday) for a total of 35 hours. The property is owned by Midland Heart on a freehold basis.
- 3.2 When the council disbanded the community development team back in 2013, options were explored for its 3 community hubs to continue and the running of Jigsaw was taken over by Fusion Credit union, operating under a grant funding agreement. The first funding agreement was put in place from 1 January 2014 for an annual amount of £9,463 in 2014/15 and £9,663 in subsequent years.
- 3.3 The overall purpose of the agreement was to ensure that the community premises known as 'Jigsaw' continued to provide meeting space, information, signposting and support to local residents and offered appropriate services.
- 3.4 Since the agreement was originally put in place there have been a number of contextual factors that need to be taken into consideration:
- The growing trend to people carrying out on line transactions and accessing information via the internet
 - The transfer of the Old Mining College to Burntwood Town Council in 2015 and the closure of Mill Lane Link in 2016
 - The closure of the North Lichfield Initiative in 2016
 - The introduction of an annual rent of £7,500 for the premises in 2017

- The fact that the council is under increasing financial pressure with a funding gap forecasted in 2020.
- 3.5 At the meeting of 10 January 2019 Community Housing & Health Overview & Scrutiny Committee agreed a review should be carried out to consider the effectiveness of the project in delivering the original intended outcomes. A three month extension to the funding agreement was agreed in April 2019 to allow the review to be finalised and discussions held with Jigsaw. This final funding agreement ends on 30 June 2019. The scope of the review is attached as Appendix A.
- 3.6 To progress the review the following actions have been undertaken:
- An analysis of face to face contacts at Jigsaw
 - A survey of Jigsaw users
 - The identification of alternative local facilities
 - A review of performance against the agreed measures
- 3.7 A summary of the findings is set out in Appendix B.
- 3.8 From the actions undertaken to assess the standalone impact of Jigsaw, it has been difficult to identify its impact irrespective of Fusion. The premise provides office accommodation and a drop in facility for Fusion and is staffed by Fusion Volunteers. An analysis of visitors to the centre showed that most of those accessing the centre wished to use the services of the credit union. There were a small number of enquiries which resulted in people being signposted to other services but these types of enquiry constituted less than 6% of all enquiries.
- 3.9 During the course of this review the council has been advised that Fusion no longer require grant funding to continue to operate in the premises but have committed to continue to provide a signposting service and make the room available for hire. Once Fusion confirmed this position the review work was put on hold.
- 3.10 This will represent a continuation of the signposting service and room hire as it currently runs but with a cost saving for the council.
- 3.11 *Members of Community, Housing and Health Overview & Scrutiny Committee considered the report proposals at their meeting of 26 June and supported the recommendation not to enter into a further funding agreement for Jigsaw.*

Alternative Options	<ol style="list-style-type: none"> 1. To invite expressions of interest for the running of Jigsaw. However this may not be possible at the current premises due to the fact that Fusion Credit Union have entered into a rental agreement with Midland Heart. 2. To continue to fund Fusion Credit Union to run the Jigsaw Centre, however, this does not represent best value for money as Fusion have indicated they do not need the funding to continue and the Jigsaw Centre is currently operating largely as a base for the Fusion Credit Union.
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Consultation	<ol style="list-style-type: none"> 1. A review was undertaken of drop in users to the Centre over three separate dates. In addition a written survey was completed by the groups using the room at the centre and a survey was distributed to volunteers. 2. The ward councillors from Curborough have been consulted and are in support of the report recommendations. The ward councillors from the adjacent ward, Chadsmead have also been consulted. Cllrs Ray and Grange are in agreement with the recommendation.
Financial Implications	<ol style="list-style-type: none"> 1. Not entering into a further funding agreement for the operation of the Jigsaw Centre represents a saving of £9663 per annum.
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. The centre will continue to operate as the base for Fusion Credit Union and offer a local signposting service where appropriate and a room available for hire by local groups. These activities will contribute to the 'vibrant and prosperous economy' and 'healthy and safe communities' strands of the delivery plan.
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. There will not be any adverse impacts on equality, diversity or human rights as the centre will continue to operate as it currently does.
Crime & Safety Issues	<ol style="list-style-type: none"> 1. There will not be any adverse impacts on crime and safety as the centre will continue to operate as it currently does.
GDPR/Privacy Impact Assessment	<ol style="list-style-type: none"> 1. Fusion Credit Union will continue to comply with GDPR legislation in their activities.

	Risk Description	How We Manage It	Severity of Risk (RYG)
A	Fusion cease to operate from the premises.	If that were to occur a needs assessment could be undertaken & options identified.	Green
B	Fusion no longer agreement to signpost callers & find alternative use for the meeting room	Alternative signposting options & meeting rooms could be identified	Green
C			
D			
E			

<p>Background documents</p> <p>Appendix A - Review scope</p> <p>Appendix B – Review summary</p>

<p>Relevant web links</p>

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Scope of project review – Jigsaw

Purpose

The aim of the review is to determine the evidenced impact of the Jigsaw project against the original intended outcomes of continuing to provide meeting space, information, signposting and support to local residents and offer appropriate services and assess if the project has addressed the need it was designed to meet.

This review will feed into the future funding decisions for the Jigsaw project, based on the evidenced impact the District Council funding has provided so far.

Background

Jigsaw is a community hub within a parade of shops in Dimbles Lane, North Lichfield (Curborough ward). The premises are owned by Midland Heart (Registered Housing Provider). Following a lengthy period when the unit was empty, it was converted to the current community use in 2006. Since this time, the Hub has been managed by the community development team employed by Lichfield District Council and supported by volunteers (many from the North Lichfield Initiative). Various voluntary groups use the facility for meetings and other events and there are opportunities for local residents to 'drop in'.

As a consequence of the Fit for the Future programme phase 1 (and the necessity to make savings of £1.7 million) in 2013 the District Council was no longer financially able to support the community development team and the team was disbanded. In order to keep the Jigsaw hub open discussions with partners took place to explore alternative options for the management of the Hub. Fusion Credit Union expressed an interest in managing the hub on behalf of the council and a serve level agreement was entered into on 1 January 2014.

At the time there were also Community hubs in Burntwood and Fazeley and as a result of the discontinuation of the community development team, it was decided that LDC would continue to manage the hubs, albeit remotely. In 2017 the management of the community hub at the Old Mining College, Burntwood was transferred to Burntwood Town council and the community hub at Mill Lane, Fazeley was closed in 2018 due to limited use. The NLI closed in 2016.

A subsequent funding agreement was entered into with Fusion Credit Union from April 2016, this agreement ends 31st March 2019. Fusion Credit union also use Jigsaw as their main office base. The premises were previously let on a peppercorn rent but in 2017 Midland Heart introduced a rent of £7,000. The amount awarded under the current funding agreement is 9,663 per year.

The current funding agreement specifies the following outcomes:

- That Jigsaw continues to operate as a sustainable Community Hub with maximum usage maintained
- That Jigsaw is a safe and welcoming place for users, groups, and members of the public to meet and access services
- That Jigsaw is accessible to service users with hours that reflect their needs
- That volunteers are developed, supported and used effectively

Review Outcome

As a result of this review we will be able to answer the following questions:

- Has the project delivered the intended outcomes? What contribution is it making to the delivery of the Strategic Plan?
- What difference does Jigsaw make for the local community? Are there any equality, diversity and human rights implications? Are there any crime and safety implications? What are the health and wellbeing implications?
- Is the LDC grant funding the only and/or most appropriate way to fund the project and achieve these outcomes?
- Is the project delivering value for money?
- Can the project be improved to deliver greater benefit?

Methodology

In order to carry out this project review, the following activities will be undertaken:

- **Review of the funding agreements and monitoring returns/visits or reports**
This will be done to determine the delivery of outputs and outcomes against those intended in the original project design. The review will look at what impact the community hub has on the local community, the difference it makes and where, if any, the gaps are and if these could be addressed. It will also allow a financial review to look at the actual costs against the original budget and make an assessment of value for money.
- **Review of alternative community venue provisions in the area**
This will include an examination of alternative community venues in the area, their opening hours, costs and a review of the types of activities they run.
- **Evaluation forms for users**
If not already available from the organisation, evaluation forms will be designed and provided for the project to distribute to users as a means of evaluating the impact on individuals when they access the building and where the users come from.
- **Evaluation forms for volunteers**
If not already available from the organisation, evaluation forms will be designed and provided for the project to distribute to volunteers as a means of evaluating the impact on individuals of volunteering on the project.
- **Number and purpose of visits to the centre**
A review of the data collected by the project about visitors to the centre including numbers and purpose of visit divided into categories to consider if there are unique functions Jigsaw offers.
- **Review of the projects sustainability strategy**
To include a review of any forward planning the project has undertaken to consider the long term sustainability of Jigsaw and the level of funding which would be required to continue.

Jigsaw - review summary

Use of Jigsaw – Community advice, support & signposting

Providing locally available general advice, support & signposting was a key objective in continuing to maintain Jigsaw as community Hub.

Figures from Fusion show that in 2018 show that a total of 162 direct visits were made to Jigsaw. This is summarised below:

By month		By type	
Jan	15	Foodbank enquiry/voucher	11
Feb	12	Request for taxi	2
Mar	12	Help to complete a form	8
Apr	10	CAB enquiry	44
May	10	Watch tower magazine	1
Jun	12	Request for printing/photocopying/stamps	27
Jul	18	Directions/request for info/location of local services /activities) (bus stop, parks, post office, mental health, nurseries, Drs, children & older people activities, phone shop repair, laundrette, shire oak, empty shops, Elmhurst, kings head/armed forces, fire alarm, winter fuel, Pathway)	17
Aug	16	Use of toilet	16
Sep	15	Volunteering enquiry	2
Oct	14	Problem reported - signposted to other services	9
Nov	12	General enquiries	15
Dec	16	immediate help required (bailiffs at family house, cheque dropped)	2
TOTAL	162	Donations/information leaflets	6
Average per month	13.5	Use telephone	2

162

Information is not available as to whether all these visits were made by residents in the local community although Fusion advise they are from primarily WS12, & WS13 postcodes, with a few WS14 postcodes. Of the drop-ins, a significant proportion of visitors could have potentially been helped by other local businesses or by contacting services direct. However they also reiterate that some residents still like to make face to face enquiries.

Overall these figures represent a significant reduction in reported callers made when the funding agreement was last reviewed in 2015 when it was reported that on average 120 visits were being made per month. A number of factors may have contributed to this including the increased availability of information on-line, the closure of the North Lichfield Initiative and (for some) the ability to access information on a mobile phone

Centre visitors

To supplement the above information a representative of LDC attended the centre on the following dates, to observe the centre in operation and the number of visitors to the centre:

- **19 December 2018**

On this date, between 9am-12pm, there were 3 visitors to the centre. They attended for the following reasons:

- 1 person attended to open a credit union account
- 1 person to check the balance of their credit union account
- 1 person to withdraw money from the credit union

There were five volunteers present on this morning – three of these were awaiting an appointment made to open an account but the applicant did not attend the appointment. The remaining two volunteers were managing the front desk and dealing with paperwork.

- **22 January 2018**

On this date between 9.30am- 12pm there were 4 visitors to the centre. They attended for the following reasons:

- 2 people attended to withdraw funds from the credit union
- 1 person attended to pay in to their credit union account
- 1 person attended to check the balance of their credit union account

CAB were also holding their drop in session on this morning. They had 1 visitor. There were two volunteers present this morning managing the front desk and dealing with credit union paperwork.

- **23 January 2018**

On this date between 9.15am- 12pm there were 3 visitors to the centre. They attended for the following reasons:

- 1 person attended to open a credit union account
- 1 person attended to pay in to their credit union account
- 1 person attended to check the balance of their credit union account

There were two volunteers present on this morning managing the front desk and dealing with credit union paperwork.

Use of Jigsaw- Local meeting place

During the course of the agreement Fusion have made a number of improvements to the premises including improved kitchen facilities, lighting and heating.

There are seven other organisations who use the centre, in addition to the credit union. Assuming that the room could be available for a morning and afternoon session each day Monday-Friday and every Saturday morning, the centre should be available to hire for **561** sessions a year (excluding Christmas week.) As of January 2019 the meeting room is booked for **135** sessions a year meaning that it is utilised for **24%** of the available time.

Latest information provided shows regular user groups of the centre are detailed below:

Day of the week	Morning	Afternoon	Evening
Monday	Credit Union Concern for Palestine (bi-monthly)		
Tuesday	Credit Union CAB (twice monthly)	U3A recorder group (twice monthly)	
Wednesday	Credit Union		
Thursday	Credit Union Knit and Knatter (weekly)		Credit Union Board meeting (monthly)
Friday	Credit Union French conversation group		Cllr's surgery (monthly from August 2018) Police surgery (bi- monthly from July 2018)
Saturday	Credit Union		

There is no regular group on a Wednesday or Saturday. Pro-rata the groups (other than the credit union) use the building approximately 3 sessions per week.

The income from rentals in the period September 2016-2017 is reported as £1,604. Bookings for the calendar year 2018 should produce a rental income of £1,890 per year.

Group	Number of bookings per year	Hours per session	Cost per session	Cost per year
UA3 Recorder	18	2	£ 14.00	£ 252.00
Police surgery	3	2	£ 14.00	£ 42.00
French	30	2	£ 14.00	£ 420.00
Colin Ball surgery	5	2	£ 14.00	£ 70.00
CAB drop-in	25	2	£ 14.00	£ 350.00
Concern for Palestine	5	2	£ 14.00	£ 70.00
Knit and Knatter	49	2	£ 14.00	£ 686.00
TOTAL	135	14		£ 1,890.00

Clearly local residents can benefit from local surgeries. It is not known the extent to which local residents participate in the groups who regularly meet at Jigsaw.

Feedback from user's group organisers is positive, with the 4 who responded to the survey classifying the facilities as excellent and reporting on the convenience of the location, size of the room and available parking.

Other local facilities

There a number of other community centres and halls within the vicinity. Those within 2 miles are detailed below:

- **Curborough Community Centre**

There are three meeting rooms available at Curborough Community Centre but the smaller rooms, which are more comparable to the room at the Jigsaw centre are: the Sarah Brogden room – seats up 30 people and costs £13.30 per hour and the Michael Bennett room – seats up to 15 people and costs £10.25 per hour. The smaller room has availability to accommodate all of the current users of the Jigsaw at their current times and days. There is some off road parking at the centre.

- **Martin Heath Hall**

There are two rooms at the hall with a smaller room comparable to the room at the Jigsaw centre available to hire for £9.50 an hour. The centre is well used so individual groups would need to contact the hall with their requirements to assess availability. There is off road parking at the centre.

- **Leasowe Scout Hall at Giffords Croft**

The hall here is larger than the current room at Jigsaw and costs £15 per hour. There is very little availability during the week but there is availability at weekends and on Friday evenings.

- **St Chad's Church hall at Giffords Croft**

The hall is £16.00 per hour as it can hold 80 people seated. All evenings and weekends are booked but there is some availability during the week. There is also a small meeting room which is available for £5.00 per hour.

Using alternative venues

It would cost £10.25 per hour to rent a similar room to that available at Jigsaw at Curborough Community Centre. Based on the reported usage for 2018, using Curborough community Centre would cost the community groups an additional £1,082.50 in total. In total the room hire would be £2,972.50 per year for the existing groups.

Group	number of bookings 2018	hours per booking	Cost per session	Cost per year	Cost per session at Curborough Community Centre	Total cost per year at Curborough	Variance
U3A Recorder	18	2	£ 14.00	£ 252.00	£ 20.50	£ 369.00	£ 117.00
Police surgery*	3	2	£ 14.00	£ 42.00	£ 20.50	£ 123.00	£ 81.00
French	30	2	£ 14.00	£ 420.00	£ 20.50	£ 615.00	£ 195.00
Colin Ball surgery*	5	2	£ 14.00	£ 70.00	£ 20.50	£ 246.00	£ 176.00
CAB	25	2	£ 14.00	£ 350.00	£ 20.50	£ 512.50	£ 162.50
Concern for Palestine	5	2	£ 14.00	£ 70.00	£ 20.50	£ 102.50	£ 32.50
Knit and Knatter	49	2	£ 14.00	£ 686.00	£ 20.50	£ 1,004.50	£ 318.50
TOTAL	135	14		£ 1,890.00		£ 2,972.50	£ 1,082.50

**these groups only began using the premise in July 18. For cost comparison purposes, it is assumed these groups would meet monthly (Cllr Ball) and bi-monthly (Police) for future years.*

Volunteering

In funding Jigsaw the council was keen to support volunteering both in terms of maintaining wellbeing and as route to moving into training or employment. Throughout the agreement Jigsaw has relied on volunteers with typically around 25 Fusion Credit Union volunteers, averaging around 71 volunteer hours per week. Prior to the ending of the North Lichfield Initiative their volunteers were also at Jigsaw. In 2018 4 volunteers have gone onto training or employment.

CONTRACT FOR THE PRINTING AND DISTRIBUTION OF GARDEN WASTE PERMITS

Cabinet Member for Recycling and Leisure

Date: 9th July 2019

Agenda Item: 7

Contact Officer: Nigel Harris

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Email: nigel.harris@lichfielddc.gov.uk

Key Decision? YES

Local Ward
Members



Cabinet

1. Executive Summary

- 1.1 The Joint Waste Service introduced charging for garden waste in 2018. The Service identifies which properties have subscribed by issuing an addressed sticker that is attached to the garden bin. This sticker enables crews to identify quickly and easily which bins are to be emptied.
- 1.2 The authority has a contract for the printing and distribution of the sticker plus the provision of a customer cloud management portal that allows the authority to monitor the process and make any required changes. The current contract will expire on 15th December 2019. In consequence a procurement exercise is nearing completion that will identify a preferred contractor for the next few years.
- 1.3 The procurement exercise is being jointly undertaken by Lichfield district and Newcastle-under-Lyme borough councils and the contract is due to be awarded by mid-July.
- 1.4 The initial contract will be for a period of two years with the option to extend for a further year subject to satisfactory performance.
- 1.5 The value to this council over the life of the contract is likely to exceed £75,000 so letting the contract represents a Key Decision.
- 1.6 Evaluation of the tenders will be completed shortly but a decision to let the contract needs to be made as soon as possible in order to allow systems to be configured and tested before go-live in October for 2020 subscriptions. In consequence, Cabinet is being asked to delegate authority to the Cabinet Member and Director to agree a contract.

2. Recommendations

- 2.1 It is recommended that Cabinet:
 - Award the contract for the printing and distribution of garden waste permits to the preferred tenderer.
 - In the event that a preferred tenderer has not yet been identified, delegates authority to the Cabinet Member for Recycling and Leisure in consultation with the Director of Place and Community to appoint the contractor that provides the most economically advantageous tender, provided the value of the contract is within approved budgets.

3. Background

3.1 The Joint Waste Service introduced a charge for the garden waste service at the start of 2018. Demand for the service was extremely high and in the first year more than 40,000 subscriptions were sold and it is likely that uptake will be even higher in 2019.

Administration of the subscription process is fully integrated such that there is no staff intervention required to establish a subscription.

3.2 The sticker is an essential component of the administration system. The resident attaches it to the bin in a way that enables the crew to see quickly that the bin is to be emptied. The permit displays the address of the property. A new sticker is issued each year using a different design and colour.

3.3 The contract covers the following services: the provision of garden waste permits, letters, envelopes, picking-and-packing and mailing - plus a customer cloud management portal which allows the council to view the status of each sticker and make changes such as approving replacements. The supplier receives a daily upload of all the subscriptions sold and they then have up to 10 working days to print and deliver the sticker.

3.4 The team has started to plan the 2020 service. The subscription window for 2019 will close in early October and the 2020 window will open two weeks later. This window allows all the required alterations to be made to the web forms and the integrated systems that administer the service including Jadu (customer relations systems), epayments, the land and property gazetteer, and Bartec, as well as to the sticker system.

3.5 The authority is collaborating with Newcastle Borough Council on the procurement in order to secure any economies of scale both in contract price and the costs of integrating with the Jadu CRM, which both councils use.

3.6 The key milestones for the procurement are as follows:

Actions		Date(s)
1.	Date opportunity advertised	16.04.2019
2.	Closing date for requests of clarification	10.05.2019
3.	Date for receipt of Tender Submission	17.05.2019
4.	Evaluation Period	20.05 - 27.06.2019
5.	Notification to unsuccessful tenderers	28.06.2019
6.	Letter to preferred tenderer of Intent to award contract	28.06.2019
7.	De-briefing of unsuccessful bidders and standstill period (10 days)	29.06.2019 to 10.07.2019
8.	Contract Award	18.07.2019
9.	Contract Commencement Date	01.10.2019
10.	Contract End Date	30.09.2023

Alternative Options	<ol style="list-style-type: none"> 1. There are no viable alternative options that would allow the crews to quickly identify which properties have paid for the service. 2. The trucks do have the benefit of in cab units that contain the data base of subscribing properties. However the bin collectors often have to fetch bins some distance from the truck and it would be inefficient if they had to keep returning to the truck to check the status of subscriptions.
Consultation	<ol style="list-style-type: none"> 1. Consultation has taken place with our partner in the Joint Waste Service – Tamworth Borough Council – and with Newcastle.
Financial Implications	<ol style="list-style-type: none"> 1. The full financial impact of the new contract will not be known until the tendering process has been completed. However assuming that the tenders are in line with the current contract price there will be sufficient provision within the Joint Waste Budget. 2. A total of £35,240 was spent on permits for the 2018 subscription period. Each sticker currently costs £0.88 to print and distribute. 3. The budget for the procurement is £37,500. The total over a three year period is £112,500 of which Tamworth’s share is £46,920.
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. The provision of the Garden Waste Service plays a key role in assuring we have a clean, green and welcoming place.
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. There are no equality, diversity and human right implications associated with the award of the contract. Therefore an equality impact assessment has not been undertaken.
Crime & Safety Issues	<ol style="list-style-type: none"> 1. The award of the contract will not have an impact on crime and safety issues.
GDPR/Privacy Impact Assessment	<ol style="list-style-type: none"> 1. A Privacy Impact Assessment has not been undertaken because the contractor will not be handling any personal data. They are only provided with a list of subscribing addresses and the UPRN.

	Risk Description	How We Manage It	Severity of Risk (RYG)
A	Tender prices are higher than expected	Joint procurement with Newcastle Under Lyme should ensure increased competition and hopefully achieve economies of scale.	Green
B	The appointed contractor fails to deliver the required level of service	Robust contract specification and monitoring. Regular contract review meetings.	Green
C	The appointed contractor ceases trading.	Robust selection criteria and evaluation.	Green
D	Delays in integrating the appointed contractors system with Jadu.	Robust project planning and management.	Green
E	The power to charge for garden waste is revoked.	Termination clause to be included in the contract	Green
F	Deterioration of the existing service if the incumbent contractor fails to win the new contract	Robust monitoring. Maintenance of a good working relationship with the existing contractor.	Green

Background documents

Invitation to Tender

Relevant web links

LICHFIELD DISTRICT PARISH FORUM

25 JUNE 2019

PRESENT:

Councillors Salter (Chairman), Tapper (Vice-Chair)
Anketell, Ball (also representing Lichfield City Council), Binney (also representing Armitage with Handsacre Parish Council), Brown (also representing Burntwood Town Council), Checkland (also representing Lichfield City Council), Cox (also representing Armitage with Handsacre Parish Council), Grange, Gwilt and Robertson – Lichfield District Council

Councillor A Castle (Armitage with Handsacre Parish Council)
Councillor C Gittings (Burntwood Town Council)
Councillor T Loughbrough Heron (Burntwood Town Council)
Councillor S Woodward (Burntwood Town Council)
Councillor S Plater (Colton Parish Council)
Councillor J Meikle (Edingale Parish Council)
Councillor N Biden (Elford Parish Council)
Councillor J Wright (Elford Parish Council)
Councillor J Sadler (Fazeley Parish Council)
Councillor G King (Hammerwich Parish Council)
Councillor K V Wasdell (Hammerwich Parish Council)
Councillor S Clarke (Hints with Canwell Parish Council)
Councillor H Ashton (Lichfield City Council)
Councillor D Dundas (Lichfield City Council)
Councillor M Field (Lichfield City Council)
Councillor J Greaves (Lichfield City Council)
Councillor J Marks (Lichfield City Council)
Councillor P McDermott (Lichfield City Council)
Councillor P Stevenson (Mavesyn Ridware Parish Council)
Councillor Stockdale (Mavesyn Ridware Parish Council)
Councillor K Vernon (Mavesyn Ridware Parish Council)
Councillor M Cox (Shenstone Parish Council)
Shirley O'Hara (Shenstone Parish Council Clerk)
Jayne Minor (Swinfen & Packington Parish Council Clerk)
Councillor J Crowe (Wall Parish Council)
Councillor K Stevens (Wigginton & Hopwas Parish Council)

Officers in Attendance: Mr A Baldwin, Mrs C Billings, Miss W Johnson and Ms C Tims

Also Present: Mr Mark Smith, Chief Inspector – Staffordshire Police

1 INTRODUCTION AND WELCOME

Councillor Salter (Chairman) introduced himself and welcomed everyone to the first Lichfield District Parish Forum meeting of the new municipal year.

2 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Barnett (Lichfield District Council), Harrison (Mavesyn Ridware Parish Council), Marshall (Lichfield District Council and Armitage with Handsacre Parish Council), Place (Burntwood Town Council and Hammerwich Parish Council), Silvester-Hall (Lichfield District Council), Thompson (Shenstone Parish Council) and Warburton (Lichfield District Council and Fradley & Streethay Parish Council).

3 TO RECEIVE THE MINUTES OF THE PREVIOUS MEETING HELD ON MONDAY 22 OCTOBER 2018

The minutes of the meeting held on 22 October 2018 as circulated were received and signed as a correct record.

4 NEIGHBOURHOOD PLANNING

Mr Ashley Baldwin, Spatial Policy & Delivery Manager at Lichfield District Council introduced himself and presented a power point presentation entitled "Neighbourhood Plans & Planning Policy". Mr Baldwin assured all attendees that the presentation would be circulated to all parish clerks for onward transmission.

Mr Baldwin said he and his team would also be willing to visit any parish council should they feel it helpful and said the first point of contact if anyone was interested in achieving a neighbourhood plan was his colleague, Mr Patrick Jervis. Mr Baldwin advised that there were already 11 neighbourhood plans in place and if any other parish was thinking of going through the process he would suggest they engage with these other parishes that have achieved theirs i.e. Little Aston and Stonnall/Alrewas as they would have good lessons to share, however, if any one was considering beginning their neighbourhood plan or even considering a review of a current one he asked that they look at the Lichfield District Council Local Plan timetable because Lichfield District Council has a requirement to keep their Local Plan up to date and there is an open consultation on it at the moment which is due to end in November 2019 which went to last week's Economic Growth, Environment & Development (Overview & Scrutiny) Committee meeting for discussion.

The following questions were asked:-

Q – As you say a neighbourhood plan is to be reviewed every 5 years – does this mean the whole process needs to be repeated?

A – No, not necessarily – it must be fit for purpose – A review might be about looking at a specific component and focusing on reviewing that aspect. If the parish look at it in the context that if the local plan changes the implications for the Neighbourhood Plan i.e. there are going to be significant conflicts with the then yes, will have to go through the whole process. This will be a decision for the parish.

Q - What growth is needed for Birmingham?

A - Birmingham went through with their plan and managed to get it signed off by an Inspector even though there was circa 60,000 dwellings shortfall inclusive of other areas including the Black Country. Lichfield have been working with Birmingham and the wider housing market area to reduce that figure down to a much more negligible figure, however, there will be a need for the Authority to accommodate some cross-border growth.

Q – What might this look like and how does it compare to the current Plan?

A – The current Local Plan has a housing figure of just over 10,000 dwellings. The Birmingham shortfall is to be addressed through the Plan Review. Government have identified a standard method for calculating housing needs. For Lichfield District this identifies a Plan Review requirement of 6,600 or 330 per annum. However, this is considered the baseline. In the last consultation the Council identified accommodating an additional 3,000 – 4,500 on top of its baseline need.

Q - What growth is being provided by the surrounding authorities?

A - It is a real mixed bag – South Staffs have identified similar to Lichfield District Council. However, the Council have objected to other Plans such as Bromsgrove and Solihull because it is considered that they could contribute more. Subject to our Members' agreement, we will attend their examinations. In practice this works more effectively when done jointly with other authorities there is more credence given i.e. Tamworth attended our examination as wanted an uplift but they were unsuccessful.

Q - How important is the call for sites document?

A - It identified the potential supply out there. An example would be Thorpe Constantine was never promoted so we discounted that option.

Q – If land is not submitted to the Authority would the Authority still pursue it through the Local Plan?

A – This is unlikely because we are not in a position to persuade land owners to bring land forward i.e. there is sufficient supply to meet the needs of the area.

Q – Are the Council currently consulting on a Green Belt Review, if so what does this mean?

A – Yes, at the moment we are consulting on the Green Belt Review methodology. We want to know whether the principles we are proposing are correct.

Q – In Armitage with Handsacre – southbound – there is a green belt and developers have invited the Parish Council to meet as they are looking at a potential build of 300//400 houses within the green belt. Due to the concerns that the Birmingham equation is putting pressure on developers to put pressure on Planning Authorities to build developments – what is the best action for the Parish Council to take? What advice would you give?

A – Firstly, consider and hear what the request is. It can be appropriate to meet and at the end of the meeting remain completely neutral. However, always ask for them to put something in writing; agree some minutes; as wouldn't want developer to say the parish is in favour when keeping neutral, always keep some sort of audit trail.

Q – There is disparity across the district regarding the CIL rates. Any indications that there will be a review of CIL?

A - Rates across district are low when compared with neighbouring areas. However, the rates were calculated based on viability, specifically land value. This does require review and will follow the Local Plan Review.

Q - S106 query – since CIL is defined by square meterage does the S106 get the left overs – If there is a low CIL parish will they get low S106 money too?

A - S106 monies is dependent on the site dynamics, therefore the level of S106 will vary from site to site.

Q – As apartments have a £0 rating are we intending to review this? The foot print can be very large – would we look at infrastructure delivery?

A – Yes, at the moment the apartments are £0 rated. However, where development occurs such as apartments and commercial units (also £0 rated) there is clearly an incentive for the developer. We need to investigate this further and it will be reviewed as part of the CIL review.

Q – There are 3 wards which have independent Neighbourhood Plans as they were early birds before the boundary changes of 2015 – Little Aston, Shenstone and Stonnall. However,

the newly created Little Hay was part of Shenstone originally – will the de-joining affect the Plans?

A – He would like to get a legal view on this one as the Neighbourhood Plans would have been based on the boundaries in place at that time. Ashley to report back to Chairman on this one.

5 AN INTRODUCTION TO PLANNING AND MAKING DECISIONS ON PLANNING APPLICATIONS

Mrs Claire Billings, Planning Development Manager at Lichfield District Council introduced herself and presented a power point presentation entitled “An Introduction to Planning & Making Decisions on Planning Applications”. (Presentation to be circulated to all parish clerks for onward transmission after the meeting as requested).

The following questions were asked:-

Q – Query relating to abandoned hedges - Whose responsibility?

A - If a hedge is an important part of a development site then often a condition would be included on the decision requiring retention and maintenance, but the maintenance period may be limited to up to 5 years. The developer or subsequent landowner is responsible to conform to the condition. However, if not a condition matter/related to a particular development, then maintenance would be a private civil matter between neighbours/landowners.

Q - Can a Parish Council call-in a planning application?

A – No, but if there are significant planning objections received from the Parish Council or a statutory consultee and officers are minded to approve then this will be considered. Only a Ward Councillor can call-in an application for consideration by Planning Committee.

Q – As presentation said when planning application comes in for local authority owned land it always goes to Planning Committee, is this the same with Certificate of Lawfulness applications?

A – No, Certificates of Lawfulness for Existing Development are dealt with differently – there is no call-in process regarding these types of applications, as it is not about the planning balance it is whether there is evidence or not to prove the development or use has been there for a certain length of time.

Q – If a Parish Council supports an application but other statutory consultees have objected then will it definitely go to a Planning Committee meeting?

A – Yes, if the Planning Officer is minded to recommend approval and a statutory consultee has objected.

6 UPDATE ON LICHFIELD POLICING (INCLUDING Q&A SESSION)

Chief Inspector Mark Smith attended the meeting and gave a verbal update on Lichfield Policing to the forum.

Due to financial constraints Mr Smith advised that over 800 officers had left the police force over the last 10 years and, as a consequence, the Chief Constable, quite rightly, had said things had to change and introduced the new target operating model. They were now operating from two sides: - one side was the uniformed police – 24/7 – police immediate

response unit which used to be provided from Lichfield, Tamworth & Burton but now they come from Burton only but he assured all that there are always 2 response cars in Lichfield at all times. And the other side was the Neighbourhood team – his responsibility – he is responsible for 20 Police Officers and approximately 20 PCSO's; split down in to four shifts. There is also a small team - County Lines - who look at organised crime. Mr Smith confirmed the PCSO's are ward aligned with the Police Officers.

Mr Smith summarised the issues and priorities for Lichfield which included car crime particularly as this was still an issue for Lichfield. He said last year's rise was now stabilising and hoped we would be looking at a down ward dip now as 18 offenders had been convicted and serving custodial sentences. He said there were two types of car crime either forced entry to a property to steal the keys from the house and keyless theft – where thieves use a relay device which communicates to the house to the keys + a lot of cars are keyless now. The best evidence which helps with these crimes are CCTV, forensics and witnesses/neighbours in the street along with ANPR.

Anti-social behaviour was another focus – Mr Smith confirmed that the Police Community Support Officers focus on repeat locations, victims and offenders and hoped everyone saw some PCSO focus in certain areas.

Vulnerabilities/Domestic abuse was another focus – there is a harm reduction hub within the neighbourhood and they meet every day to overview all cases which have come in over the night and fast track options available. Mr Smith said some progress had been made with this but there was still a lot more to do. He said there was a series of programmes for victims and offenders available through the providers NEW ERA.

Mr Smith advised that the new office on Eastern Avenue homed 50 detectives also so there was additional capacity nearby as well as a Priorities Team which is there too which focuses on the car crime in Lichfield.

Mr Smith said there were many challenges in the next 12 months but wanted to reassure the community that there is some good work taking place – County Lines is very prevalent in Burntwood and have recently eradicated fairly swiftly a major drug operation. He said he does not tolerate any drug activity as these only bring a series of other crimes along with them.

Challenges:-

- Mental Health and mental health provision – a lot of Police Officers get tied up with vulnerabilities which is restricting capability so nothing else gets done. This is currently a National issue and a very big challenge and although a joint issue around vulnerability – better provision would assist in freeing up Police Officer time.
- Establishment – Increase in precept – He wants to increase his establishment to 25 Police Officers – some may have seen the Police force have taken a fairly significant recruitment drive including a degree entrance criteria so hopefully new recruits will join with a number of officers due to transfer from other regions so they can retain some proactive capability and experience.
- Organised Crime Groups – Haven't got any in Lichfield but there is cross-border criminality taking place. The PSCO's or Police Officers are visible at key locations on roads/train stations etc.
- Knife Crime – Haven't got a problem in Lichfield but offenders linked to robberies in the area are using knives to remove people of their mobile phones and bicycles. A National issue with potential to grow over the coming years – daily focus in the hub on intelligence linked to weapons being carried.

- Loss of Partnership Manager, Marisha Place – Although the loss of this key member of staff is disappointing, it is the way forward, he was not part of the review or decision-making process and accepts the role has moved on and covered in other areas so there is duplication in role and the hub as well as PCSO's pick up a lot of what the Partnership Manager used to do, however, rest assured there won't be any gaps from Marisha's involvement. Although she will be greatly missed she will leave the contacts/pathways she has made and the Police Force will fill the gaps with PCSO's and additional Co-ordinators employed by Staffordshire Police and will also look after Marisha planning her future.

Good news:-

Successfully moved a number of drug dealers from the area.

Car key burglaries reduced albeit still a pattern and series in Lichfield and South of the County – this is a National challenge and being experienced across the UK; there can be up to 9 car key burglaries a day in Staffordshire against 50 a day in the West Midlands so we have to put that into context.

Closure Notice served x 2 the first ever served in Lichfield.

A Youth Injunction has been served on a well-known youth causing problems in the area.

Integrated support is now offered by Claire who has set up a support group for drug and alcoholics in the area; she will also support individuals to hospital appointments/counselling/doctors etc. and goes over and above to help those who engage.

Mr Smith summarised by saying that Lichfield crime is level/static and assured all that we live in a safe place even though there are some spikes in some areas.

The following questions were asked:-

Q – How many Special Constables are there in the area?

A - 20

Q – Because of the Cross City line and the increase in late night services, are plans in place to deal with increase in problems?

A – The railway stations are repeat stations and known as hot spot locations so direct radio contact with the Town Centre CCTV and intelligence-led cross county line staff is always available along with regular contact with colleagues in BTP.

Q – The less affluent area of Chadsmead in Lichfield is suffering from open drug taking/dealing in Oakmead Park. How can we convince resources in to North Lichfield?

A - Every shift has a North Officer as actually the North of Lichfield is the busiest. They also have a PCSO who has an engagement meeting there every month. Use these resources, engage people to use them and start the conversations – Will gladly meet up after tonight's meeting to try to help more.

Q - Marisha going – what is the impact on operations if cover for Marisha's Partnership Manager post is with existing resources?

A – As the neighbourhood policing has developed with weekly partnership meetings where all partners attend, all Marisha's avenues (over time) can be picked up, these partnership meetings could quickly be moved to daily meetings if required and he is confident that all contacts Marisha has made will evolve and we will continue with developing those

relationships in Marisha's absence and build on the excellent work Marisha has done over the years.

Q – There is concern that there is no longer a local police presence in Lichfield as the front desk at Frog Lane has been closed recently. From time to time someone may find a wallet/purse - where should this now be handed in to?

A – Ideally everywhere should have a front desk but the Police and Crime Commissioner made a decision to close all front desks and the financial constraints meant that we had to operate more efficiently – footfall through the front office counters had reduced considerably meaning that they were not all required. The force community engagement plan provides opportunity for the public to meet their local officers on every ward every month and this would allow the face to face contact if required. Staffordshire Police will be visible again within Lichfield District Council at a weekly engagement session perhaps between the hours of 2pm-4pm one afternoon but as there was a real problem with lost property it was decided to not keep it all as there was nowhere to store items nor no one to take responsibility for the auditing of it so people are asked to either take lost property to Cannock, Burton or Hanley or ring 101 to report and await advice if they believe the items have been involved or the subject of a crime. Private property would need to be disposed of by the individual themselves.

Q – Applaud the work you are able to do with the resources but is there work with the Greater Manchester Police Force being done because of the close proximity to M6/Toll Road?

A – Intelligence is shared and automatic number plate registration mark reading is used as a tactic so the Central Motorway Policing Group/West Midlands Group and Greater Manchester Police Force can stop criminals on any network.

Q - Are Staffordshire looking at a more community approach?

A – A program of recruiting for PCSOs in the community on a wider scale is taking place next year and for special constables. There is a volunteer co-ordinator at HQ in Stafford who is looking at this and they have set up a Citizens Academy where 30 volunteers from the community will have a series of training days and then go out with PCSOs and be visible (they will not have any special powers above a citizen, however). As yet, there are no plans for these volunteers to come in to Lichfield – they are just being placed in Stoke because the need is greater but the citizens' academy will be delivered in Lichfield in the next 12 months.

Q – Is there not a case to push Neighbourhood Watch again?

A – Yes, but the Police and Crime Commissioner's Office had ownership of smart alert, OWL and neighbourhood watch all incorporated into smart alert. This has all been handed back to the police and via corporate comms who own social media this has gone out for tender and will be re-launched.

Q – There has been numerous robberies/burglaries on the Britannia Business Park, can any resources be put in there during the day and night please?

A – As a neighbourhood team we have no resources at night but support can be given to the businesses on-site to prevent repeated crimes. As well as a request for patrols from the 24/7 response to visit and provide reassurance. What does the crime prevention strategy look like in that area? Usually, if somewhere has been a subject more than once the police would look at it a bit more – point of contact to be passed on to Mark for more investigations to take place as usually the Crime Scene Investigation team would attend for forensic opportunities and this may be dealt with by the desk based officers in the resolution centre.

Q - If a PC arrested someone in Lichfield where is the nearest custody suite?

A – The nearest custody suite is Watling Street or Hanley.

Q – If both were full, what then?

A – Hanley is a large property and he has never seen Hanley full. However, it is appreciated that to take an offender to Hanley is a good hours drive away and has to be done by two members of staff – therefore capability is written-off because of the travel. The closure of Burton was made based on finances and the fact that operationally it was also under-utilised.

Q – Thank you for your visibility tonight – it's just been noted there are more District Councillors than Police Officers in Lichfield and communication is two-way. Would like to inform the group that Mark and his team are happy to meet with the public and they can only work with the information they get. As Councillors, everyone needs to ensure incidents are reported to the police as if it's important to our residents then it is important. We can make demands of the police but what are we doing to reinforce communications – We must publicise calling 101 or Crime Stoppers and report it.

Q – The two PCSO's at Curborough Community Centre, are they covering the Chadsmead area too?

A – Yes, they are in an office at Curborough as have premises and there is no public premise in Chadsmead. The whole of Lichfield has 6 PCSO's and a Neighbourhood Officer as well per shift (x3). Jigsaw host drop-in centres with the PCSO's.

Q – Where does traffic and motoring offences feature in the priorities?

A – The investment of 2 sergeants and 18 officers has been agreed for the force to focus on the new roads policing strategy. Community speed watch are a valuable asset and we need to invest in officers who are trained in using laser devices. One of our roles to promote.

Q – Are Lichfield resources actually coming from Burton then?

A – Yes, we get the resources from Burton. The sergeant will allocate police officers at the briefing every day but resources will move to where the demand is.

Q – Would it be possible to circulate a map of where Police Officers and PSCO's are in Lichfield?

A – Yes, this can be arranged and circulated. For information a single on-line home is imminent also to inform local community on local issues and community engagement opportunities.

7 BEST PRACTICE/SHARED PRACTICE

The Chairman explained that this item had been added on to tonight's agenda with the intention of having a short brainstorming exercise to share best practice. However, due to the lateness following such well received agenda topics, the subject would be deferred to another meeting. He said the idea had stemmed from the fact all Parish Clerks are invited to attend SLCC (Society of Local Council Clerks) meetings where they are given an opportunity to share best practice and discuss initiatives and, after receiving a couple of idea for tonight's meeting, he had felt it may be a beneficial platform to discuss ideas at this meeting. For example, in Shenstone, because of the cuts in the provision of maintenance from higher tiers, the parish council now employs a lengths man two days a week. He said the Shenstone Parish Clerk, Shirley O'Mara, and he would be happy to discuss this with anyone if they were interested in doing the same.

8 THE FUTURE OF THE LICHFIELD DISTRICT PARISH FORUM

The Chairman appealed for any ideas for future Lichfield District Parish Forum meetings as it was noted that tonight had been very successful and engaging. He said it was good to see such a good attendance as previous meetings had not been so well attended.

Christie Tims, Head of Corporate Services said this forum was meant to foster relations between the district and the parishes yet very little agenda items ever come forward. She said it would only continue if there was engagement as the coordination of this meeting was very time consuming and dependent on officer resources. Ms Tims asked if members felt it was useful and asked for outcomes of what members were looking to achieve from this meeting – should it now be done differently. Perhaps through discussion forums/newsletters/in a more timely way? Ms Tims appealed for ideas ahead of September's scheduled meeting and agreed that it had been a valuable night tonight with two sets of training as well as a verbal update from the Chief Inspector, Mark Smith, but asked for members to consider the future.

9 ANY OTHER BUSINESS

The Chairman introduced Lichfield City Cllr Jayne Marks as she had asked if an agenda item on the "waste management of the district" could be included in the future as an agenda item. She felt it would be beneficial to receive an update on this and the importance of still using the brown and blue bins. Cllr Marks also asked if there could be an opportunity to offer a trip to a recycling centre for which she would be happy to pay up to £20 for and this was noted for the next meeting.

The Chairman introduced Lichfield City Cllr David Dundas who had asked what LDC's policy on the maintenance of street furniture was as the results of the Lichfield survey of 70 streets in the city conducted by the U3A was imminent but early indications suggested that a lot of maintenance had been neglected over the last decade making the city untidy and unkempt – even the planters around the city were untidy.

Christie Tims, Head of Corporate Services replied to say that there was no published policy on street furniture in the Lichfield district and she would be very interested to receive the results of the survey. Ms Tims said that after initial investigations, the only remit for the Operational Services Manager at Lichfield District Council were the street litter bins and most of these had been replaced over the past few years. Discussions took place around planters, benches, notice boards and road signs and it was queried if the parishes were responsible for the notice boards and perhaps Staffordshire County Council for the road signs and/or perhaps BID had some responsibility? It was agreed to circulate the results of the survey and set up a meeting to discuss this further.

10 DATE OF NEXT MEETING

The date of the next meeting is Tuesday 17 September 2019 at 7pm in the Council Chamber, Frog Lane, Lichfield.

(The Meeting closed at 9.45 pm)

CHAIRMAN

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By virtue of paragraph(s) 3, 4 of Part 1 of Schedule 12A of the Local Government Act 1972.

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