

Appendix A

Local Plan Review Sustainability Appraisal Scoping Report: Consultation Sheet

Comment	Response
<p>Statutory Organisation: Historic England</p>	
<p>We welcome the reference to the up to date National Heritage List for England on page 18 and would also recommend that you refer to the latest Heritage at Risk Register, 2017, to ensure that all of the baseline data is up to date. I enclose a link to the recent West Midlands document, below: https://content.historicengland.org.uk/images-books/publications/har-2017-registers/wm-har-register2017.pdf/</p>	<p>Duly Noted Recommendation Insert “There are a number of entries for Lichfield on the 2017 Heritage at Risk Register including 4 scheduled monuments, 3 Grade II* Listed Buildings and a Conservation Area” in the Townscape and Historic Environment section in the Baseline Data Section.</p>
<p>On page 25 within the table discussing baseline information, do you have any detail about local list heritage assets, likely non designated archaeology resource across the Borough?</p>	<p>Duly Noted Recommendation Information on local list heritage assets and likely non-designated archaeology resource within the District will be added to the baseline information section of the Scoping Report.</p>
<p>We welcome the inclusion of a specific indicator for cultural heritage on page 30 and are pleased to see the inclusion of protection and enhancement, as the overall aspirations for the Plan. May we enquire as to why only Grade II are referenced in the monitoring objectives? Is it because development that will harm Grade II* and Grade I will be wholly resisted by the Council? What about harm to their setting aswell? How will you positively reduce risk to the 13 Grade II* and Grade I assets on the register currently?</p>	<p>Duly Noted Recommendation Delete ‘Grade II’ from the sentence ‘Number of Grade II Buildings considered to be buildings at risk’ and replace with the word ‘Listed’ in Table 5.1, Section 12 ‘Likely Evolution without a Plan’ column. The number of Grade II and II* are currently incorrect due to a typographical error in Appendix B. The sentence should be amended to reflect that the District has 4 Grade I and Grade II* assets and 13 Grade II assets in the Historic Environment Indicator in Appendix B.</p>
<p>We would further recommend the inclusion of targets for the monitoring indicators – for example at risk buildings we would want to see a % reduction in at risk buildings as a result of the Local Plan and a no net increase of damage to the historic environment but a % decrease in damage, for example.</p>	<p>Duly Noted The monitoring indicators for all Objectives do not include percentage gains. It would be difficult to set a meaningful percentage improvement or decline figure at this point. Further, the ability of the Local Plan to directly influence % ‘damage’ caused to the historic environment is restricted.</p>

	<p>Recommendation None</p>
We support the inclusion of an objective on historic landscape on page 30.	<p>Duly Noted Recommendation None</p>
Page 60, within the table, suggest delete the term 'important' and instead protect heritage assets.	<p>Duly noted Recommendation Delete the word 'important' from the sentence 'The Local Plan Review should develop policy that protects important heritage assets' in Appendix A under 'Historic England Corporate Plan 2016- 2019'.</p>
<p>Within the SWOT analysis on page 104, will development pressure also be a threat for the medieval core or is there no development planned in this area?</p> <p>Also what about building heights which could threaten the setting of Lichfield Cathedral and other heritage assets?</p>	<p>Duly Noted The information requested in regards to buildings heights and the setting of Lichfield Cathedral is mentioned within Paragraph 2.69 of the Historic Environment SPD from which the SWOT Analysis is summarised from, which states that 'the layout of new development should be designed to... protect local views'. Recommendation Remove the SWOT Analysis table from the Historic Environment Section of Appendix B to avoid confusion.</p>
We are interested to work with the Council on their planning policies to address the issues identified on page 104.	<p>Duly Noted Recommendation None</p>
We would further recommend listing the three Good Practice Advice Notes and our range of Historic Environment Advice Notes within the section on relevant plans, as these advice documents will assist in the delivery of the local plan review. Please see our website for further details.	<p>Duly Noted Recommendation The following documents will be included in the review of Relevant Plans, Programmes and Policies: GPA1 – Local Plan Making Historic England Advice Note 3 – The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 8 – Sustainability Appraisal and Strategic Environment Assessment.</p>

<p>Additionally, please find enclosed a link to an Historic England advice note for Strategic Environmental Assessment and the historic environment. https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/</p>	<p>Duly Noted Recommendation See above.</p>
<p>Statutory Organisation: Natural England</p>	
<p>We acknowledge the context for this consultation i.e the benefits of early review of the district’s local plan strategy in terms of the planning challenge posed in relation to housing supply for the Greater Birmingham Housing Market Area.</p>	<p>Duly Noted Recommendation None</p>
<p><u>Biodiversity</u> We welcome the report’s coverage of biodiversity themes and issues.</p> <p>We note that the entry regarding European Sites in Appendix B1 links to previous Habitats Regulations assessment (HRA) of the existing local plan strategy and the conclusion that only Cannock Chase SAC and the River Mease SAC require measures to avoid and mitigate adverse effects on their integrity. With regard to the assessment during local plan making of road traffic impacts upon air quality Natural England draws your attention to the High Court judgement in March last year dealing with the methodology for assessment of air quality impacts on statutory nature conservation sites. Referred to as the ‘Wealden Judgement’ this case law affects Local Planning Authorities’ approach to the assessment of ‘cross border’ and in combination effects due to road traffic generated by planned new development.</p>	<p>Duly noted and consideration will be given to the Wealden Judgement during the site and policy assessment stage in particular at cumulative effects section, additionally the Judgement will also be considered via the updated Habitat Regulations Assessment (HRA).</p> <p>Recommendation Add ‘<i>Potential risk from cumulative impacts including from cross border upon European and nationally designated sites</i>’ in Table 4.1 - Sustainability Issues in the Landscape and Ecology section.</p> <p>Further include the following text to the Baseline Information taken from - Improvement Programme for England’s Natura 2000 Sites Site Improvement Plan, River Mease, October 2014 and Improvement Programme for England’s Natura 2000 Sites: Site Improvement Plan, Cannock Chase, October 2014:</p> <p><i>“Both sites currently are in unfavourable condition with pressures including drainage, air pollution, invasive species, hydrological changes, visitors, water abstraction, siltation and water pollution”</i></p> <p>After ‘There are 7 Special Areas of Conservation... and the River Mease SAC’ in the Landscape and Ecology section in the Baseline Data.</p>

<p>We note the scoping report's inclusion of two Air Quality Management Areas at the A38 between Lichfield and Alrewas and at Muckley Corner on the A5. In terms of European and nationally designated sites further consideration in relation to the Wealden Judgement may be needed. Natural England will liaise with the Council accordingly during the review of the local plan strategy.</p>	<p>Duly noted Recommendation Please see comments above regarding the Wealden Judgement.</p>
<p><u>Geodiversity</u> We note that the appendices appear to omit any reference to geodiversity and local geological sites. This should be addressed as the SA process moves on to the next stage.</p>	<p>Duly noted Recommendation A geodiversity section to be included in Appendix B, and the inclusion of a LoG site at Barrack Lane Quarry in Hammerwich to be added within the section.</p>
<p><u>Landscape</u> Wider landscapes and landscape character - We note that the district includes the following National Character Assessment³ (NCA) areas: Needwood & South Derbyshire Claylands Cannock Chase to Cank Wood Trent Valley Washlands Mease/Sence lowlands</p> <p>In order to understand and characterise likely trends we advise that the strategic environmental objectives (SEOs) for each NCA area are considered and relevant material from these SEO reflected in the SA process. This approach would reflect NPPF para 156 (i.e. Seeking to protect and enhance locally valued landscapes).</p>	<p>Duly Noted Recommendation Add '<i>and 4 National Character Assessment (NCA) areas.</i>' to the end of sentence 'Lichfield supports a variety of wildlife rich habitats...78 sites of Biological Interest' in Table 4.1 in the Landscape and Ecology section Add '<i>Needwood & South Derbyshire Claylands Cannock Chase to Cank Wood Trent Valley Washlands Mease/Sence lowlands</i>' to Appendix B under Landscape Character on page 109</p>
<p>Given the Greater Birmingham Housing Market Area issue you may also wish to consider commissioning a landscape sensitivity and capacity assessment in order to objectively assess the effects of new development in the context of the district's various landscape settings. The following link provides information: https://www.gov.uk/guidance/landscape-and-seascape-character-assessments</p>	<p>Duly Noted Recommendation Historic Environment Landscape Character Assessment and a Landscape Character assessment are identified as key studies/subject areas that the Council consider necessary to support the Local Plan Review.</p>
<p><u>Soils and agricultural land quality</u> We welcome the scoping report's reference to this subject on the map in figure 3.8 of the report</p>	<p>Duly Noted Recommendation None</p>

<p><u>Proposed Objective 4</u> 4. 'Maximise the use of previously developed land/ buildings and encourage the efficient use of land'. We acknowledge the main thrust of this objective but would also emphasise the synergies that can exist between long-standing brownfield/previously developed land and biodiversity value. The proposed % metric would present a more refined message if a corresponding % metric was used to express the proportion of previously developed sites retained and managed as an asset for biodiversity and/or green/open space.</p>	<p>Duly Noted Policy NR3: Biodiversity, Protected Species and their Habitats currently uses this methodology. The policy review element of this will consider how any future policies within the Local Plan Review should incorporate a % metric method. Recommendation None</p>
<p><u>Proposed Objective 7</u> 7. 'To reduce water and air pollution'. Acknowledging the linkages between this objective and the subsequent objectives 9 and 11 it would appear logical to amend the text of no.7 to read 'to reduce and manage water and air pollution'</p>	<p>Duly Noted Please see comment from Environment Agency below. Objective 7 reworded to "<i>To manage availability of water resources, and to reduce water and air pollution</i>". Recommendation None</p>
<p><u>Indicators</u> A significant number of the proposed sustainability objectives may be achieved by means of creating, restoring and enhancing areas of green (and blue) infrastructure and providing for their subsequent management. The indicators presented so far do not appear to include metrics that recognise or measure this synergy. A variety of metrics may be appropriate to reflect the multi-functional benefits of green infrastructure resources, for example: - Extent of open/greenspace created restored or enhanced. - Sustainable transport links created (footpaths, cycleways). - SUDS incorporated into the design of new developments</p>	<p>Duly Noted Whilst this is something that we support, the creation of additional indicators with monitoring requirements has resource implications. The SUDS Indicator is already captured and the following will be incorporated. Recommendation Add '<i>Extent of open/ greenspace created, restored or enhanced</i>' to the Indicator section for Proposed Objective 7 in Table 5.1. Add '<i>Sustainable transport links created (footpaths, cycleways)</i>' to Proposed Objective 14 in Table 5.1.</p>
<p>Statutory Consultee: Environment Agency</p>	
<p><u>Chapter 2 Relevant policies and programmes</u> The following documents should be added for consideration within the SEA/SA process: Preliminary Flood Risk Assessments (PFRAs) were originally published in 2011 under the Floods Directive and are in the process of being revised for publication in December 2017. The 2011 PFRA for Staffordshire can be viewed here: http://webarchive.nationalarchives.gov.uk/20140328094437/http://www.environment.gov.uk/flood-risk-assessments/</p>	<p>Duly noted Recommendation The following documents will be included in the review of Relevant Plans, Programmes and Policies: <ul style="list-style-type: none"> • Preliminary Flood Risk Assessments (PFRAs), 2011 • Humber Flood Risk Management Plan 2016 </p>

<p>ent-agency.gov.uk/research/planning/135526.aspx#</p> <p>The Humber Flood Risk Management Plan 2016 should be included in the list of relevant plans and Appendix A. This is a different plan from the Humber RBMP and just covers flood risk. Flood Risk Management Plans (FRMPs) highlight the hazards and risks of flooding from rivers, the sea, surface water, groundwater and reservoirs, and set out how Risk Management Authorities (RMAs) work together with communities to manage flood risk.</p> <p>Your Strategic Flood Risk Assessment (SFRA) should be included, although this will require updating to support the Local Plan Review.</p>	
<p><u>Chapter 3 Baseline Information</u> <u>Population, Housing & Communities</u></p> <p>Some of the key existing rural settlements identified for housing growth currently have flood risk issues which need to be taken into account when identifying locations for new development. Comments on specific locations have already been provided as part of the Local Plan Allocations 2008 - 2029 Consultation in 2017, but please see a summary below.</p> <ul style="list-style-type: none"> • Armitage with Handsacre: Villages are adjacent to the River Trent floodplain. Existing Environment Agency maintained flood defences help to reduce flood risk in some locations. Parts of the villages are also covered by Environment Agency Flood Warning Areas. • Alrewas: Alrewas is located at the confluence of the Rivers Trent and Tame and the Curborough Brook and is surrounded by Flood Zone 3 and 2 on two sides of the village. Parts of the village are covered by Environment Agency Flood Warning Areas. Any new development should avoid these areas. • Shenstone: The Fotherley Brook at Shenstone has areas of Flood Zones 3 and 2 associated with it. Any new development should avoid these areas. • Fazeley Mile Oak & Bonehill: Parts of Fazeley are at risk of flooding from the River Tame / Bourne Brook. Environment Agency maintained flood defences reduce food risk to some areas and Environment Agency Flood Warning areas also cover some locations. 	<p>Duly noted, consideration will be given to the information provided during the policy and site assessment stage.</p> <p>Recommendation None</p>

<p><u>Landscape & Ecology</u></p> <p>Although flood risk is not widespread throughout the plan area, flooding in the more rural communities often affects a relatively small number of properties and can be caused by complex flooding mechanisms. It is important for these communities to take measures to improve their preparedness by working closely with organisations such as the Environment Agency, district and county councils and the National Flood Forum.</p> <p>The impacts of climate change are likely to increase flood risk and flooding incidents. We recommend this section references the climate change allowances for flood risk available as part of the NPPG here (https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances). Table 1 identifies how high vulnerability development such as housing will need an additional 30% added to allow for the impacts of climate change on flood levels in the Humber district. Impacts will vary according to the type of development proposed and its projected lifespan, however climate change allowances are generally higher than that used under previous guidance. This links to the Climate, Energy and Waste section.</p>	<p>Duly noted</p> <p>Recommendation</p> <p>The sentence “<i>The impacts of climate change are likely to increase flood risk and flooding incidents. As a result of this climate change allowances in regards to flood risk will need an additional 30% added for high vulnerability developments such as housing to allow for the impacts of climate change on flood levels in the Humber district . This increased risk of flooding in turn creates water pollution issues</i>” has been added to the ‘Climate, Energy and Waste’ section of the Baseline Data.</p>
<p>A sustainable approach to flood risk management should consider the natural functions of rivers and reduce long term dependence on raised flood defences. This includes identifying opportunities to better utilise areas of natural floodplain to store flood waters and to attenuate rainwater that will reduce flood risk within the plan area and further downstream. Natural Flood Management measures could play an important role in managing overall flood risk and should be encouraged wherever possible. Your Authority should work with other bodies and landowners encourage and promote implementation of natural flood risk management measures which will contribute towards delivering a reduction in local and catchment-wide flood risk and impacts of climate change as well as achieving wider environmental benefits. This should be linked in with the wider objectives of the Humber River Basin Management Plan under Water Framework Directive (WFD).</p> <p>Further advice on how your SFRA should be updated can be found at the bottom of this letter.</p>	<p>Duly Noted</p> <p>Recommendation</p> <p>None</p>

<p>As referenced within the Humber RBMP and CAMS documents, there are number of the waterbodies within Lichfield District are under pressure with regards to water availability with the Lichfield and Shenstone GWMU and Bourne/Black Brook being classified as currently 'over abstracted'. The development implications of this is considered further within your 2010 Water Cycle Study, which needs to be updated to support the Local Plan Review.</p>	<p>Duly Noted Recommendation Following text to added to the Baseline Information, Landscape ecology <i>"As referenced within the Humber RBMP and CAMS documents, there are number of the waterbodies within Lichfield District are under pressure with regards to water availability with the Lichfield and Shenstone GWMU and Bourne/Black Brook being classified as currently 'over abstracted'"</i></p> <p>Further a Water Cycle Study has been identified as a key study to support the Local Plan Review.</p>
<p><u>Climate, Energy and Waste</u> This section should reference the impacts of climate change on flood risk (as detailed above) and correspondingly the impacts of increased flooding on water pollution issues and correspondingly Water Framework Directive failure.</p>	<p>Duly noted Please see above comment on Landscape and Ecology regarding climate change and increased climate change allowances. Recommendation None</p>
<p><u>Chapter 4 Identifying Sustainability Issues</u> <u>Key Sustainability Issues</u> Table 4.1, Landscape and Ecology – Climate change is likely to increase the risk of flooding and this should be acknowledged on page 25.</p>	<p>Duly noted Recommendation The sentence '<i>Climate change is likely to increase the risk of flooding</i>' has been added to Table 4.1 within the Landscape and Ecology section.</p>
<p>Page 26 under Climate, Energy and Waste should be reworded to reflect the wider remit of the Water Framework in improving the ecology of watercourses, not just the water quality. This is in line with the RBMP objectives (not Environment Agency objectives) which all Authorities have a legal duty to support in operating their functions. This should be reworded to state:</p> <p><i>Bring water bodies up to Good Status in line with the objectives of the Humber River Basin Management Plan (RBMP).</i></p>	<p>Duly noted Recommendation The sentence 'Bring up water to a 'good quality' standard rating in line with Environment Agency objectives' has been reworded to '<i>Bring water bodies up to Good Status in line with the objectives of the Humber River Basin Management Plan (RBMP)</i>' in Table 4.1 on page 28.</p>

<p>As advised above in the Baseline Data section, there are areas of Lichfield that suffer from low water resources and as such restrictions are in place to protect availability. Growth will need to take this into account, and early consultation with utility providers will be even more important to inform development proposals. The Local Plan Review will need to be supported by an up to date Water Cycle Study to further assess this.</p>	<p>Duly noted Recommendation Reference to low water resources and its influence on growth has been included in the Landscape and Ecology section of the Baseline Data section.</p>
<p><u>Chapter 5 Sustainability Objectives</u> We welcome objectives 7 and 9 in relation to flooding and pollution. We support the indicators relating to corresponding planning decisions contrary to our advice, and can provide data in relation to this here (https://www.gov.uk/government/publications/environment-agency-objections-to-planning-on-the-basis-of-flood-risk).</p>	<p>Duly noted Recommendation None</p>
<p>We recommend that Objective 7 is revised however to reflect pressure on availability of water resources. This should read <i>“To manage availability of water resources, and to reduce water and air pollution”</i>.</p>	<p>Duly noted Recommendation Objective 7 has been revised to read <i>‘To manage availability of water resources, and to reduce water and air pollution’</i>.</p>
<p><u>Appendix A</u> Page 53, Flood & Water Management Act 2010 (5th bullet point) – This is factually incorrect as Schedule 3 of the FWMA has not been commenced. Instead the government has focussed on using the planning system for increasing the installation of SuDS in new developments. The DCLG ministerial statement released in December 2014 states that the Local Planning Authority (LPA) should “ensure that through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development.” Defra has also published non-statutory technical standards for the design, maintenance and operation of SuDS to drain surface water.</p>	<p>Duly noted Recommendation The fifth bullet point has been deleted and replaced by the sentence <i>‘Local authority should ensure that through the use of planning consideration or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development’</i> in Appendix A under the ‘Flood & Water Management Act 2010’.</p>
<p>The Humber <u>Flood Risk Management Plan 2016</u> should be included in the list of relevant plans</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"> • The Humber Flood Risk Management Plan 2016
<p><u>Appendix B</u> Page 98, Fluvial Flood Risk - The Bourne Brook, Fotherley Brook, Mare Brook and Curborough Brook should be added to the list of rivers.</p>	<p>Duly noted Recommendation The following have been added to the list of rivers in the Fluvial Flood Risk Section in Appendix B:</p> <ul style="list-style-type: none"> • The Bourne Brook • Fotherley Brook • Mare Brook • Curborough Brook
Cannock Chase AONB Joint Committee	
<p>1 - The inclusion of the AONB Management Plan (2014-19) in the consideration of relevant policies, plans and programmes (section 2) is very welcome. You should note that this is to be reviewed over the next year or so.</p>	<p>Duly noted Recommendation None</p>
<p>2 – The brief reference to the AONB (and the Cannock Chase SAC) on page 19 under Landscape and Ecology is acknowledged, but I wonder if the importance of the AONB as a nationally designated landscape is understated? In addition, it would be helpful to see a map showing the AONB boundary included.</p>	<p>Duly noted. The Landscape ecology section of the Baseline section of the report does not provide a visual identification of the geographical location of any of the Districts natural assets, it would be difficult to provide a full and comprehensive picture at a readable scale. The AONB features within the Baseline data presented with the Scoping Report. Recommendation None</p>
<p>3 – In Section 4 (Sustainability Issues), reference could be made (under Landscape & Ecology) to the unique character of the AONB in terms of the extent of the built-up areas around it and the pressures that this brings.</p>	<p>Duly noted Recommendation Add the following to Table 4.1 in the Landscape and Ecology section in the Likely evolution without the plan column <i>“Unmitigated impact on the unique character of the AONB”</i>.</p>
<p>4 – In Section 5 (SA framework), the need to protect the landscape, scenic beauty and quiet enjoyment of the AONB (as specified in the NPPF and the CROW act) could be included as an additional sustainability objective with specific indicators included under Landscape on page 30.</p>	<p>Duly noted Objective 11 and in particular Objective 13 will enable such an assessment to be considered. Recommendation None</p>

<p>Taking into account the above, I am satisfied that the process for the remaining stages and intended consultation, as described on pages 32, 33 and 34 are comprehensive and robust.</p>	
<p>5 – In terms of the Appendices, we welcome the reference to the CRoW Act and the AONB on page 46 but I feel that a specific reference to the recognition of the importance of AONBs (and National Parks in the NPPF – paras. 115/116) could be included in the section on page55/56. We welcome the reference to the current AONB Management Plan and the SAC Access Management Measures on pages 68 & 69.</p>	<p>Duly Noted The National Planning Policy Framework (NPPF) is included within the Relevant policies, plans and programmes section of the Scoping Report and is considered as a whole document. Recommendation None</p>
<p>Birmingham City Council</p>	
<p>Thank you for consulting Birmingham City Council on the Lichfield District Council Local Plan Review Sustainability Appraisal Scoping Report.</p> <p>We have no comments to make on the report.</p>	<p>Duly Noted Recommendation None</p>
<p>Harborough District Council</p>	
<p>Many thanks for you recent email. I confirm that Harborough District Council does not have any comments to make on Lichfield District Council Local Plan Review SA/SEA Scoping Report.</p> <p>For future reference correspondence concerning planning policy matters can be sent directly to the Council’s Strategic Planning Team using the following email address planningpolicy@harborough.gov.uk.</p>	<p>Duly Noted Recommendation None</p>
<p>Highways England</p>	
<p>Section 2 defines all relevant documents which will or have informed the SA process. It is important to recognise that Circular 02/2013 ‘The Strategic Road Network and the Delivery of Sustainable Development’ is highly material, as this sets out the Government’s approach to new development impacting on the SRN and how the network will be safeguarded and protected, in order to deliver sustainable economic growth.</p> <p>It also includes guidance on when new accesses to the SRN will be acceptable, the implications of traffic growth for plan making and policies for specific activities, including roadside facilities. Given the relevance of these policies to development</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"> • The Strategic Road Network and the Delivery of Sustainable Development.

plan decisions in Lichfield, it is therefore recommended that this is a key policy document which should be referenced in section 2.	
Section 3 considers baseline transport conditions, but does not acknowledge that there are existing issues of highway safety and capacity in the District. It is recommended that the SA acknowledges the extant issues (for example at the A5 Muckley Corner, A38 Wall Island, A38 Swinfen, A38 Hilliard's Cross and A38 Fradley junctions) and gives a commitment to considering the impact of development scenarios on key congestion points and the opportunities to mitigate and manage these effectively (drawing on robust transport evidence). This is a key consideration in the assessment of sustainable development.	Duly noted. Consideration will be given to the impact on referenced junctions as part of the assessment of Sites and policies. Further, Transport studies will inform the Local Plan Strategy review and be considered where necessary by the District during the review. The Local Plan review will be supported by an Infrastructure Development Plan Recommendation Section 3 Baseline Information will be amended to include reference to the Strategic Road Network located within in the District including the junctions identified within the representation.
Section 4 considers the key sustainability issues for the District. Under the 'transport and movement' section, it is important to recognise the inherent links between traffic congestion and not attaining sustainable economic growth and for this to be recorded as a risk. In the absence of a Plan and an associated strategy for infrastructure delivery, there is a real risk to business growth and productivity in the District arising from an inefficient or congested road network.	Duly noted. These effects will be captured through Sustainability Objective 6. Recommendation None
Section 5 defines a range of mechanisms for measuring and reviewing development options and scenarios against development plan objectives. It is recommended that robust transport modelling also be cited as an appropriate means (e.g. up to date traffic modelling) of testing performance against these objectives and that this is expected to be an integral part of the Local Plan review process.	Duly noted Recommendation None
National Grid	
We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.	Duly noted Recommendation None
Wardell Armstrong on behalf of the Leavesley Group	
The Report in its introduction correctly avers to 'assisting with the Greater Birmingham HMA shortfall'. In this context the Scoping Report should encompass all the evidence being brought forward through relevant reports as part of this process,	Duly noted Evidence that informs cumulative effects will be considered as part of the assessment of effect.

<p>in that whilst they may be wider based than the Lichfield District they are setting the context for 'cross boundary matters' (fourth bullet point of Review considerations).</p> <p>It is suggested that this Scope, as well as quantum and location should also include type of development in that Governmental priorities included specific provision of housing for the elderly and custom and self-build.</p>	<p>Further, Sustainability Objective 1 will be used to assess housing and local need.</p> <p>Recommendation None</p>
<p>It is noted that there is only passing reference to Green Belt at page 9, and also the matter of rural growth restraint. There is however no reference to baseline studies that were undertaken to form the basis of the Local Plan Strategy 2015. These include Green Belt Studies (two reports); Landscape character / capacity, Strategic Flood Risk Assessment and housing studies including the SHMA and SHLAA. It is recommended that these are relevant to the Plan Review.</p>	<p>Duly noted The evidence base of the Local Plan Strategy will be reviewed as part of the Local Plan Review.</p> <p>Recommendation None</p>
<p>Section 5 infers that the Sustainability objectives are fixed. It is conversely recommended that these be reviewed to include broader consideration of housing provision, including for the elderly, and custom and self-build.</p> <p>There is also a lack of an objective related to the provision of suitable facilities to serve local needs in accessible locations.</p>	<p>Duly noted Further, Sustainability Objective 1 will be used to assess housing and local need.</p> <p>Sustainability Objectives 13 and 14 feature townscape and accessibility.</p> <p>Recommendation None</p>
<p>Staffordshire County Council</p>	
<p><u>Ecology and Landscape</u> <i>Section 2 Relevant policies, plans and programmes</i> Consideration could be given to referring to the Biodiversity Opportunity Mapping carried out for the District by Natural England. In addition there is work being carried out in regard of Cannock Chase to Sutton Park and Connecting Cannock Chase related to mapping and analysis of opportunities for heathland and other habitat creation to enhance connectivity.</p>	<p>Duly noted Biodiversity Opportunity Mapping is carried out by the District Council which is referred to in the Biodiversity and Development SPD, Dec 2016 as well as in Policy NR3: Biodiversity Protected Species and their Habitats</p> <p>Recommendation Include reference to the Connecting Cannock Chase – Lowland Heath Project and the Cannock Chase to Sutton Park Biodiversity Enhancement Area within Section 2- Relevant Plans, Programmes and Policies and Appendix B.</p>
<p><i>Section 3. Baseline Information</i></p>	<p>Duly noted</p>

<p>In listing landscape scale initiatives for biodiversity enhancement the Landscape and Ecology section could refer to the Transforming the Trent Valley Partnership project which recently achieved Heritage Lottery funding see http://www.staffs-wildlife.org.uk/TTTV .</p>	<p>Recommendation Include reference to Transforming the Trent Valley Partnership project within the Landscape and Ecology section of the Baseline Information.</p>
<p>In regard of the Staffordshire Minerals Plan Land to the west of the A38 within Alrewas Parish has been identified as an area of search rather than as a potential new sand and gravel site.</p>	<p>Duly noted Recommendation Amend sentence on page 19 to read '<i>Land to the West of the A38 within Alrewas Parish has been identified as an areas of search within Policy 1: Provision for Sand and Gravel</i>'.</p>
<p>There is a typographical error – wildlife sites of County importance are Sites of Biological <u>Importance</u> (not Interest).</p> <p>You might wish to refer to Ancient Woodland area especially as this will be impacted by HS2.</p>	<p>Duly noted Recommendation Amend typographical error on page 19 to read '<i>Sites of Biological Importance</i>'.</p> <p>Reference to Ancient Woodland has been included within the Landscape and Ecology section of the Baseline Information.</p>
<p><i>Section 4. Identifying Sustainability Issues</i> Table 4.1 Clarity is needed under Landscape and Ecology: Natural England has designated Cannock Chase Area of Outstanding Natural Beauty (AONB), 'to conserve and enhance its natural beauty'. Although factors such as ecology and natural heritage contribute to the decision to designate the area an AONB, landscape and scenic quality are of prime importance in order that it meets the 'natural beauty criterion'. The Local Authority needs to ensure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of the AONB, and decisions and activities must consider the potential effect both within the AONB and on the setting of the AONB.</p>	<p>Duly noted Recommendation None, see comment from the AONB Joint Committee regarding Section 4 of the report.</p>
<p>In regard of Table 4.1 Likely Evolution without the Plan, impacts could be adverse effects on the integrity of Cannock Chase SAC and of the River Mease SAC due to unmitigated development.</p>	<p>Duly noted Recommendation '<i>Adverse effects on the integrity of Cannock Chase SAC and of the River Mease SAC due to unmitigated development</i>' has been</p>

	added within Table 4.1 in the Likely Evolution without a Plan related to Landscape and Ecology.
<p><i>Section 5. Sustainability Appraisal Framework</i> Table 5.1 It is suggested that for objective 11, to promote biodiversity protection enhancement and management of species and habitats, an indicator could <i>condition of internationally/ nationally designated sites</i>. Rather than <i>number and type of internationally/ nationally designated sites</i>, which the Local Plan cannot influence, but Plan policies can influence the suggested indicator.</p>	Duly noted Recommendation Amend Indicator to read ' <i>Condition of internationally/ nationally designated sites</i> '.
Number of species relevant to the District which have achieved BAP is not a meaningful indicator. In regard of species, any indicator needs to be related to Plan policies. Measuring and monitoring species indicators can be challenging and resource intensive. A meaningful and measurable indicator could be % of planning consents that include enhancement for species.	Duly noted Recommendation Remove indicator 'Number of species relevant to the District which have achieved BAP' and replace with: ' <i>Number of planning permission granted where no net gain in biodiversity was able to be achieved</i> '.
It is suggested under Objective 13 reference is made to the need to conserve and enhance the AONB and its setting.	Duly noted Objective 13 is inclusive of all landscape and townscapes and therefore specific reference to sites are not necessary. Recommendation None
<p><u>Historic Environment</u> <i>Section 2 Relevant policies, plans and programmes</i></p> <p>Consideration could also be given to including the Ancient Monuments and Archaeological Areas Act (1979) and the three Extensive Urban Surveys (EUS) undertaken for Lichfield, Alrewas and Colton within the SEA. The three EUS studies were chosen as having originated as medieval market towns and include an assessment of the significance of their historic character and heritage assets.</p>	Duly noted Recommendation The following documents will be included in the review of Relevant Plans, Programmes and Policies: <ul style="list-style-type: none"> • Ancient Monuments and Archaeological Areas Act (1979) • Extensive Urban Surveys (EUS) for Lichfield, Alrewas and Colton https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Extensive-Urban-Survey/Staffordshire-Extensive-Urban-Survey-Project.aspx

<p><i>Section 3 Baseline Information: Townscape and Historic Environment</i></p> <p>The paragraph does not make any reference to the wealth of undesignated heritage assets present within the District, which includes archaeological sites and monuments, unlisted buildings, historic farmsteads and the historic landscape character. It is noted that under the Landscape and Ecology section there is a passing reference to the depth of history within the District (first paragraph; second and third sentences). This could also be reflected within the Townscape and Historic Environment paragraph. Archaeological sites within the District include Neolithic and Bronze Age ceremonial landscapes, particularly within the Trent Valley; Roman military activity as well as late Prehistoric, Roman and later evidence for settlement, agriculture and infrastructure.</p>	<p>Duly noted Please see comment above from Historic England</p> <p>Recommendation Information on local list heritage assets and likely non-designated archaeology resource within the District will be added to the baseline information section of the Scoping Report.</p>
<p><i>Section 4 Identifying Sustainability Issues: Table 4.1 Townscape and Historic Environment</i></p> <p><i>Sustainability Issues Column:</i> The table could consider referencing the undesignated heritage assets as noted above. There are isolated historic farmsteads and smaller settlements which also contribute to the historic landscape of the District alongside the villages noted within the table.</p>	<p>Duly noted</p> <p>Recommendation Reference to historic farmsteads will be included within the Townscape and Historic Environment section of the Baseline Section of the Scoping Report and in Table 4.1 within the Townscape and Historic Landscape section.</p>
<p><i>Likely evolution without the plan column:</i> For clarity the first section may wish to include 'harm to...' as well as 'loss of' heritage assets.</p> <p>There is inevitably a degree of cross-over between the Historic Environment and Townscape section and the Landscape and Ecology section. To identify the specific issues within the Historic Environment and Townscape section it may be beneficial to specify that the harm to character specifically relates to historic landscape and townscape.</p>	<p>Duly noted</p> <p>Recommendation Amend sentence to read '<i>Harm to and loss of heritage assets due to a less co-ordinated approach to housing and delivery</i>'.</p>

<p><i>Section 5: Sustainability Appraisal Framework: Table 5.1 SEA Directive Topic (k) Cultural Heritage 12. To ensure the protection and enhancement of the historic environment and its setting</i></p> <p>Indicator: there is no reference to Scheduled Monuments or the Registered Park and Garden within the table. It is further advised that the ‘Number, or % or area of historic buildings, sites and areas and their settings (both designated and non-designated) damaged’ include reference to archaeological sites.</p>	<p>Duly noted Objective 12 is fully inclusive of all historic environments, therefore no mention of a specific site is necessary. Recommendation Indicator ‘Number, or % or area of historic buildings, sites and areas and their settings (both designated and non-designated) damaged’ to be removed as it is not something that the Council monitors.</p>
<p><u>Rights of Way</u> Whilst we understand that rights of way are not one of the key topics, they do provide linkages into a number of the specified areas namely human health, landscape, population and cultural heritage. As such it is suggested that consideration for their inclusion in the report is given.</p>	<p>Duly noted The Countryside Rights of Way Act (2000) is included within the Relevant Plans, Programmes and Policies section in Section 2 and can be found in Appendix A. Recommendation None</p>
<p><u>Health and Care</u> Sustainability Objective 1</p> <ul style="list-style-type: none"> It is recommended the indicators specifically refer to older people’s needs within the housing mix in order to demonstrate it meets the needs of the largest growing population group in terms of numbers of lifetime homes / retirement housing accommodation completions. 	<p>Duly noted Older peoples housing needs within the District is addressed in Sustainability Objective 1 as it is fully inclusive of all needs within the community Recommendation Number of lifetime homes/ retirement housing accommodation completions to be added as an indicator within Sustainability Objective 1.</p>
<ul style="list-style-type: none"> Specialist housing provision rather than just extra care needs to be included in the indicator (to include care homes and both short term and long term supported housing accommodation supporting vulnerable people). 	<p>Duly noted Recommendation Amend indicator to read ‘Number of extra care homes <u>and supported housing accommodation for vulnerable people</u> delivered in the District annually.</p>
<ul style="list-style-type: none"> Both affordable and social housing completions are recommended to be included on the indicator here. 	<p>Duly noted Recommendation Amend indicator to read ‘Net affordable <u>and social</u> housing completions.</p>
<p>Sustainability Objective 3</p>	<p>Duly noted</p>

<p>It is suggested that the indicators need more specificity to encompass safe and independent accessibility. For example:</p> <ul style="list-style-type: none"> • Wheelchair access • Access for mobility impaired individuals into and around sites on foot (considering lighting, quality of footpaths / pavements and road crossings etc.). • Access using public transport (based on reasonable distance assessments) to the site • Availability of subsidised public transport to the site • Co-location of complementary services / facilities to facilitate easier access (e.g. GP surgeries and pharmacies) and proximity to existing complementary services / facilities <p>It is also recommended consideration of access to green space, leisure facilities etc. are also considered here. In addition indicators reflecting social cohesion are considered: creation of mixed-use and socially mixed areas – and sufficient provision of vibrant public spaces that facilitate inter-ethnic and intergenerational encounters.</p>	<p>Detailed design is addressed through policy. The policy review will address such matters.</p> <p>Recommendation None</p>
<p>Sustainability Objective 4 The indicators need to extend beyond a working population to consider the wider mobile and mobility impaired population (as per row above).</p>	<p>Duly noted Sustainability Objective 5 is fully inclusive of the working age mobile and mobility impaired population.</p> <p>Recommendation None</p>
<p>Lichfield District Housing Strategy (p77-78) It is recommended some of the key messages, indicators, targets etc. are better reflected in the objectives for this document (these link well with statements we have made above).e.g.</p> <ul style="list-style-type: none"> • Improve the housing options for people in need • Ensure new housing developments include a mix of homes to meet identified housing needs 	<p>Duly noted Recommendation</p>
<p>Community Safety Delivery Plan (p80)</p>	<p>Duly noted Recommendation</p>

<p>It is recommended some of the key messages, indicators, targets etc. are better reflected in the objectives for this document (these link well with statements made above) e.g.</p> <ul style="list-style-type: none"> • Increasing feelings of safety • Support vulnerable members of the community 	
<p>Lichfield District Council Strategic Plan (p80-81) It is recommended some of the key messages, indicators, targets etc. are better reflected in the objectives for this document (these link well with statements made above) e.g. More people will be living independently at home.</p>	<p>Duly noted Recommendation</p>
<p><u>Transport</u> Pg. 20 Table 3.8 and accompanying text relating to 2011 Census method of travel to work. It is not very helpful to include population classed as ‘not in employment’ within the analysis as it is inconsistent with the text analysis taken from Lichfield District Integrated Transport Strategy.</p>	<p>Duly noted Recommendation The Not in Employment section of Table 3.8 has been removed.</p>
<p>Pg. 20 para. 4 – Service changes since this figure was produced now mean that only 75% of address points in Lichfield City are within 350m of a half hourly or better weekday service (November 2017 data). Also, since the information was produced Colton, Longdon and Upper Longdon have no scheduled bus service at all as well as the Ridwares, their only service is now the Lichfield and Rugeley Village Connect (Longdon and Upper Longdon) or Needwood Forest Connect (Colton).</p> <p>Note that in all cases of % households within 350m of a half hourly or better weekday service this could change again in April 2018 pending the outcome of the subsidised local service review.</p>	<p>Duly noted Recommendation Amend sentence to reflect the loss of scheduled bus services to Colton, Longdon and Upper Longdon and their only service available to the settlements.</p>
<p>Pg. 21 – the map is no longer up to date based on changes to services in 2017, and will change further in 2018 based on the outcome of the review of subsidised local bus services.</p>	<p>Duly noted Recommendation Remove Map.</p>
<p>Pg. 26 Table 4.1 Transport and Movement – change 83% of households to 75%.</p>	<p>Duly noted Recommendation Change 83% to 75%.</p>

<p>Pg. 77 Plans and policies – the latest Lichfield district Integrated Transport Strategy 2015 to 2029 should be referenced and summarised (Please note we are likely to refresh this document in the next 12 months)</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"> • Lichfield district Integrated Transport Strategy 2015- 2029
<p>Pg. 106 Appendix B Transport Issues – in Commuter Trips, change 83% of households to 75%.</p>	<p>Duly noted Recommendation Change 83% to 75%.</p>
<p>Pg. 106 Appendix B Transport Issues – sentence relating to Burntwood enhanced bus services to support housing. Keep this under review as SAD focused changes consultation proposes the removal of two residential sites in Burntwood.</p>	<p>Duly noted Recommendation None</p>
<p>Pg. 106 Appendix B Transport Issues – in Traffic Congestion to amend rail section to say ‘Lichfield Trent Valley rail station disabled access to allow access to Cross City platform and London bound platform’.</p>	<p>Duly noted Recommendation Amend sentence to read ‘Lichfield Trent Valley rail station disabled access to allow access to Cross City platform and London bound platform’.</p>
<p>Pg. 107 Appendix B Bus and Rail – amend 83% of households to 75%. Description of Lichfield and Rugeley Village Connect is required following the description of Needwood Forest Connect as this service has replaced a number of infrequent local services. Colton, Longdon and Upper Longdon now have no scheduled bus services so amend the text in the local trend column. In the rail text amend to say ‘Lichfield Trent Valley rail station disabled access improvements are required to allow access to the Cross City and London bound platforms’.</p>	<p>Duly noted Recommendation Change 83% to 75%.</p> <p>Add a description of the Lichfield and Rugeley Connect service to be added to Appendix B: Bus and Rail</p> <p>Amend sentence to read ‘Lichfield Trent Valley rail station disabled access to allow access to Cross City platform and London bound platform’.</p>
<p>Under the Floods and Water Management Act entry on page 53, your last paragraph states that local authorities have a duty to adopt Sustainable Drainage systems, once completed. In fact this part of the Act has never been empowered so I would remove that last paragraph.</p>	<p>Duly noted Recommendation Please see comment from the Environment Agency above.</p> <p>The following documents will be included in the review of Relevant Plans, Programmes and Policies:</p>

You may also want to refer to SCC's Suds Handbook which gives specific advice to developers on the kind of Sustainable Drainage systems we would like to see. Follow the link below to access this. We are asking LPA's whether they would like to adopt the Handbook as a Supplementary Planning Document within their Local Plans. We have already consulted the public on the Handbook. Good quality Sustainable Drainage also feeds into many of the other issues you are looking to address such as water quality and reducing flooding.

<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx>

- Staffordshire County Councils SUDs Handbook