

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

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



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Agenda Item: 3
Contact Officer: Ashley Baldwin/ Craig Jordan
Tel Number: 01543 308147/ 308202
Email: ashley.baldwin@lichfielddc.gov.uk/
craig.jordan@lichfielddc.gov.uk
Key Decision? YES
Local Ward Members All

CABINET

1. Executive Summary

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

2. Recommendations

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

3. Background

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

Table 1 – Local Plan Review consultation information

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

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

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

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

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

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

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

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

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

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

Alternative Options	<ol style="list-style-type: none"> 1. Cabinet recommends not to progress with the Local Plan Review at this point in time. This would present difficulties in meeting the agreed timetable for completing the Local Plan Review. 2. Cabinet recommends alternative growth options be considered before consultation is undertaken.
Consultation	<ol style="list-style-type: none"> 1. Consultation is required on the Local Plan Review document and accompanying documents for a minimum of six weeks
Financial Implications	<ol style="list-style-type: none"> 1. Officer time will be needed to run the consultation on the Local Plan Review. 2. The costs of consultation will be met within approved budgets. 3. Officer time will be needed to run consultation events on the Local Plan Review. 4. There will be a need to commission evidence associated with the Local Plan Review.
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. Supports the priority of a vibrant and prosperous economy as it assists in the delivery of the planning function of the Council. 2. Supports the priority of Healthy and Safe communities by ensuring the provision of housing. 3. Supports the priority of clean, green and welcoming places to live by assisting in allocating land for affordable housing, as well as supporting the delivery of residential and commercial developments.
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. An Equality Impact Assessment has been undertaken as part of preparing the Local Plan Review (Appendix E)
Crime & Safety Issues	<ol style="list-style-type: none"> 1. There are no crime and safety issues.
GDPR/Privacy Impact Assessment	<ol style="list-style-type: none"> 1. A Privacy Impact Assessment has been undertaken.

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

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

Background documents

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

Relevant web links

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