

# **Lichfield District Local Plan Review Preferred Options and Policy Directions**

## **Sustainability Appraisal**

**January 2019**

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## **1.0 Introduction**

### **1.1 Background**

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

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

1.1.2 The extant Lichfield District Local Plan comprises:

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

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

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

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

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

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

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

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

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

## **1.2 Lichfield District Local Plan Review – Purpose and Objectives**

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

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

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

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

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

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

Objective 1 - Sustainable Communities:

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

Objective 2 - Rural Communities:

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

Objective 3- Climate Change

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

#### Objectives 4 – Our Infrastructure

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

#### Objectives 5 – Sustainable Transport

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

#### Objectives 6 – Meeting Housing Need

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

#### Objectives 7 – Economic Prosperity

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

#### Objectives 8 – Employment Opportunities

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

#### Objectives 9 – Our Centres

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

#### Objectives 10 – Tourism

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

#### Objectives 11 – Health & Safe Lifestyles

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

#### Objectives 12 – Countryside Character

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

#### Objectives 13 – Natural Resources

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

#### Objectives 14 - Built Environment

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

#### Objective 15 - High Quality Development:

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

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

### **1.3 Baseline Context**

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



## **1.4 Integrated Sustainability Appraisal**

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

### **1.1 Structure of this Sustainability Appraisal Report**

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

## **1.2 How to comment on this Sustainability Appraisal Report**

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

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

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

## **2.0 Methodology of the Sustainability Appraisal**


### **2.1 Introduction**

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

## **2.2 SA Key Steps and Tasks**

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

**Table 1: SA Process Stages**

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

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

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

#### *Tasks A1-A3 – Sustainability Context and baseline*

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

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

#### *Inter-relationships*

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

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

#### *Task A4 – Develop the SA Framework/Objectives*

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

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

**Table 2 – Sustainability Objectives (SO)**

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

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



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

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

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

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

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

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

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

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

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

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

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

## 2.4 Stage B – Developing and Refining options and assessing effects

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

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

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

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

## 2.5 Defining 'Significant effects'

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

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

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

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

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

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

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

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

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

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

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

## 2.6 Definitions

2.6.1 The following definitions are used in this Environmental Report:

### Duration of Effects

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

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

### *Nature of Effects*

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

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

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

## 2.7 **Assessing effects**

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

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

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

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

*Assumptions*

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



SA Objective	Questions
1. To provide housing to meet local need including provision of affordable homes.	1 Will the site deliver affordable housing?
	2 Will the site use previously developed land or buildings?
	3 Will it give a high housing yield?
	4 Will the site meet local need?
2. To promote safe communities and reduce fear of crime	5 Will the site meet cross boundary and/or neighbouring needs?
	1 Will it reduce crime through design measures?
3. Improve access to health facilities and promote wellbeing.	2 Will it contribute to a safe built environment?
	1 Will it improve accessibility to health care for existing residents (including older residents) and provide additional facilities for new residents?
	2 Will it support wellbeing including opportunities for recreational/physical activity?
4. Maximise the use of previously developed land/ buildings and encourage the efficient use of land	3 Will it provide new accessible green space?
	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?
5. To improve educational attainment of the working age population.	4 Will it reduce the amount of derelict, degraded and underused land within the District?
6. To achieve stable and sustainable levels of economic growth and maintain economic competitiveness.	1 Will it reduce the number of working age residents who have no, or lower level qualifications?
	1 Will it encourage higher skilled economic sectors in the District?

	2 Will it encourage new employment that is consistent with local needs?
	3 Will it encourage growth of existing businesses?
	4 Will it encourage small businesses to grow?
7. To reduce water and air pollution.	1 Which Source Protection Zone does the development fall within?
	2 Does the site fall within the River Mease SAC?
	3 Is the site within or directly connected by road to an AQMA?
8. To minimise waste and increase the recycling and reuse of waste materials.	1 Will it reduce household and/or commercial waste?
	2 Will it increase waste recovery and recycling?
	3 Will it reduce the proportion of waste sent to landfill?
9. To reduce and manage flood risk and surface water run-off.	1 Is the site located outside an area of risk from flooding?
	2 Will there be an opportunity for flood risk reduction?
10. To reduce and manage the impacts of climate change and the Districts contribution to the causes.	1 Will it reduce the causes of climate change?
	2 Will it encourage prudent use of energy?
	3 Will it provide opportunities for additional renewable energy generation capacity within the District?
11. To promote biodiversity protection enhancement and management of species and habitats.	1 Will it conserve protected/priority species?
	2 Will it conserve protected/ priority habitats and local nature conservation sites?
	3 Will it protect statutory designated sites?
	4 Will it encourage ecological connectivity (including green corridors and water courses)?
12. To ensure the protection and enhancement of the historic environment and its setting.	1 Will it preserve and enhance buildings and structures and their settings and contribute to the Districts heritage?

	2 Will it improve and broaden access to, and understanding of, local heritage , historic sites, areas and buildings?
	3 Will it preserve and enhance conservation areas including their setting?
	4 Will it offer opportunities to bring heritage assets back into active use?
13. Protect, enhance and manage the character and quality of the landscape and townscape.	1 Will it achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality?
	2 Does it value and protect diverse and locally distinctive settlement and townscape character?
	3 Does it safe guard historic views and valuable skylines of settlements?
	4 Is the site within a main settlement or a key rural settlement?
	5 Is the site within close proximity to key services (e.g. Schools, food shops, public transport, health centres etc.)?
14. To increase opportunities for non-car travel and reduce the need for travel.	1 Does the site location encourage the use of existing or provide sustainable modes of travel?
	2 Will it reduce the overall impact on traffic sensitive areas?
	3 Will it help develop walking cycling rail and bus networks to enable residents access to employment, services and facilities?

2.7.1 Further details on the assumptions used in this SA are set out at Section 5.2 of this report.

#### *Difficulties Encountered*

2.7.2 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process. During the appraisal of the various options the fact that options had not yet been worked up in detail (comprising only suggested policy approaches) meant that at times it was difficult to assess in detail the likely effects on each SA objective. Once the draft policies had been finalised it was possible to draw more certain conclusions about their likely effects.

2.7.3 Each of the individual matrices include, to a greater or lesser degree, specific mitigation. For the purpose of the SA it is assumed that the proposed mitigation is delivered and the SA objective is 'scored' accordingly. To ensure consistency we have assumed that an SA 'score' may only be increased by one place on the scoring matrix i.e. a negative effect is changed to a neutral effect as a result of mitigation.

### **2.8 Stage C – Prepare SA Report**

2.8.1 The Publication Draft of the Lichfield District Local Plan Review will be accompanied by an SA report referenced at Stage C. The report outlines the significant effects on the environment, social and economic factors of the options Local Plan Review. The SEA Directive sets out at Article 5 and Annex I the information required to form part of the environmental report. This information is repeated as Schedule 2 of the 2004 Regulations.

### **2.9 Stage D – Consultation on SA Report**

2.9.1 The SA report will be published for comment alongside the Lichfield District Local Plan Review: Submission. The consultation period will comprise a period of 8 weeks and will be undertaken in accordance with the Council's Statement of Community Involvement.

### **2.10 Stage E – Post adoption Reporting and Monitoring**

2.10.1 The SEA Regulations require the significant environmental effects of plans and programmes to be monitored in order to identify at an early stage unforeseen adverse effects.

2.10.2 The Local Plan Review will set out a monitoring programme to identify if the policies and site allocations meet the overall Plan Objectives and Vision. This programme will allow the Council to monitor the success of individual policies and also monitor the baseline environmental, social and economic conditions of the Plan area. The results of the monitoring programme will be presented in the Authority Monitoring Report.

2.10.3 The final SA monitoring programme will be included in the SA adoption Statement (once the Local Plan Review is adopted) and this will reflect any changes made during the Examination Stage.

### **3.0 Sustainability Assessment – Context and Objectives**

#### **3.1 Lichfield District Local Plan Review: Preferred Options & Policy Directions**

3.1.1 The Lichfield District Local Plan Review is a spatial development plan introduced by the Government under the Planning and Compulsory Purchase Act 2004 (hereafter referred to as the 2004 Act) as amended by the Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter referred to as the 2012 Regulations). The Act requires each Local Planning Authority (LPA) to prepare a Local Plan for its administrative area. Local Plans set out the spatial framework which largely determine where, how and what development takes place.

##### *Sustainability Context – Plans, Policies and Programmes (Task A1)*

3.1.2 The Lichfield District Local Plan Review is not prepared in isolation but is greatly influenced by other plans, policies and programmes and by broader sustainability objectives. The adopted plan needs to be consistent with international and national guidance together with relevant environmental protection legislation.

3.1.3 Appendix A of the Local Plan Review SA Scoping Report (2017) set out a comprehensive list of the policy documents that are relevant to the preparation of the Local Plan Review together with a summary of the relevance of each document to the Local Plan Review and, more specifically, this SA. This outline will be updated at each stage of the process and published online as part of the evidence base.

##### *Key International plans, policies and programmes*

3.1.4 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the "SEA Directive") and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Local Plan Review.

3.1.5 These processes have been undertaken in an iterative and integrated manner in tandem with the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated. This matter is discussed further at Section 3.5 of this report.

3.1.6 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however a complete list of the relevant international directives have been included in Appendix A of the Scoping Report (2017).

##### *Key National plans, policies and programmes*

3.1.7 Sustainable development is a cornerstone of Government policy in relation to planning and the use of land. The Government's approach to sustainable development is set out in the national strategy "Securing the Future". The Strategy, published in March 2005 focuses on five principles; Living within Environmental Limits, Ensuring a Strong, Healthy and Just Society, Achieving a Sustainable Economy, Promoting Good Governance and Using Sound

Science Responsibly. The Strategy identifies four key priority areas: Sustainable Consumption and Production, Climate Change and Energy, Natural Resource Protection and Environmental Enhancement, and Sustainable Communities.

3.1.8 The Government's general statements of planning policy are set out in the National Planning Policy Framework (NPPF) which establishes the policies and principles which should be taken into account in the preparation of development plans and consideration of individual proposals. The NPPF was revised in July 2018.

3.1.9 The NPPF highlights the economic, social and environmental roles of the planning system and planning's contribution towards a strong, responsive and competitive economy; strong, vibrant and healthy communities; and the protection of the natural, built and historic environment. These objectives are seen as mutually dependent and should be pursued in an integrated way.

3.1.10 The NPPF has at its heart a presumption in favour of 'sustainable development' "*so that sustainable development is pursued in a positive way*".

3.1.11 Paragraph 11 states that

*"for plan-making this means that:*

*a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*

*b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*".

3.1.12 Section 14 of the NPPF emphasises that sustainable development involves securing radical reductions in greenhouse gas emissions; minimising vulnerability and improving resilience to the impacts of climate change; and supporting the delivery of renewable and low carbon energy and associated infrastructure. The NPPF contains a sequential approach designed to direct new development towards areas with the lowest probability of flooding.

*Conserving and Enhancing the Natural Environment*

3.1.13 Section 15 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by, amongst other things:

- minimising impacts on biodiversity and providing net gains in biodiversity; and

- preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

#### *Conserving and Enhancing the Historic Environment*

- 3.1.14 Section 16 of the NPPF aims to conserve and enhance the historic environment and both designated and undesignated heritage assets and the general principle is that heritage assets should be conserved in a manner appropriate to their significance.
- 3.1.15 The NPPF states at paragraph 16 that "*Plans should be prepared with the objective of contributing to the achievement of sustainable development*".
- 3.1.16 Paragraph 32 of the NPPF specifically references the approach to the Sustainability Appraisal. Paragraph 32 states; "*Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)*".

#### *Local Plans, policies and programmes*

- 3.1.17 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Staffordshire and Lichfield District, and which provide further context for the emerging Local Plan Review. These plans and programmes relate to issues such as housing, employment land, transport, renewable energy and green infrastructure.

#### *Summary*

- 3.1.18 Based on the review of the relevant policies, plans and programmes the key sustainability issues and problems for the District were identified. These are set out in full in Appendix A.

### **3.2 Baseline information (Task A2)**

- 3.2.1 The Sustainability evidence baseline for Lichfield District used for the purposes of this Assessment is set out Appendix B of the Scoping Report (2017) and is not repeated in this report. This sets out updated empirical data on all relevant economic, social and environmental factors. The baseline information provides the basis for identifying trends, predicting the likely effects of the Plan and monitoring its outcomes. This will be updated at each stage.

### **3.3 Relationship between the SA and HRA**

- 3.3.1 In accordance with Article 6(3) of the EU Habitats Directive an assessment is required where a plan or project not directly connected to or necessary to the management of a European protected site for nature conservation (i.e. designated and proposed/candidate SPA's and SAC's sites) may give rise to significant effects upon a the designated site. The Habitats

Directive is primarily transposed in England under the Conservation of Habitats and Species Regulations 2010.

- 3.3.2 Lichfield District has two designated European sites within its boundary, namely Cannock Chase SAC and River Mease SAC. Lichfield District Council have prepared a Habitats Regulations Assessment of the Lichfield District Local Plan Review: Preferred Options to consider whether the options in the emerging plan are likely to have significant effects on European habitats or species. A HRA of the Lichfield District Local Plan Review is presented as a separate 'standalone' document.



## 4.0 Developing and assessing options and reasonable alternatives (Stage B)

### 4.1 Introduction

4.1.1 Regulation 12 (2) of the 2004 Regulations states that where an environmental assessment is required an environmental report shall be prepared to "*identify, describe and evaluate the likely significant effects on the environment of –*

*(a) Implementing the plan or programme; and*

*(b) Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*

4.1.2 An assessment of 'reasonable' alternatives to the selected plan is required to meet the requirements of Regulation 12 of the 2004 Regulations and in doing so, identify and evaluate their sustainability impacts. The Regulations imply that alternatives that are not reasonable do not need to be subject of the SA process. For the purposes of the SA it is assumed that unreasonable alternatives include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.

4.1.3 The Lichfield District Local Plan Review: Scope, Issues and Options identified six broad spatial options for the distribution of housing growth and economic growth. These options were identified by the District Council for the purposes of that SA. The six spatial options were:

- Residential Growth Option 1 – Town focused development;
- Residential Growth Option 2 – Town and Key Rural Villages Focused Development;
- Residential Growth Option 3 – Dispersed Development;
- Residential Growth Option 4 – New Settlement Development;
- Employment Growth Option 1 – Expansion of existing employment locations; and
- Employment Growth Option 2 – New Locations.

4.1.4 Based on the finding of the SA for the Lichfield District Local Plan Review: Scope, Issues and Options and consultation responses the Council has identified a **Preferred Option for Growth and Policy Directions**. The Lichfield District Local Plan Review: Preferred Options & Policy Directions sequentially considers more detailed locations for housing in terms of settlement based directions for growth before identifying specific new housing sites as part of future stages of the Local Plan Review.

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

4.1.6 The Council has also used current guidance to produce seven reasonable options for housing need requirements:-

- **Option 1: Local housing need only.**  
(This option would provide only for the local housing need for the district with no contribution to the unmet need from within the housing market area.)
- **Option 2: Local housing need plus 1,000 home contribution.**  
(This option uses the same approach as the current local plan which included provision of 1,000 dwellings to meet the needs arising from within the housing market area (specifically Cannock Chase and Tamworth).)
- **Option 3: Local housing need plus 2,000**  
(Such an approach provides an annual requirement which is consistent with the current objectively assessed need for the district incorporated into the current local plan.)
- **Option 4: Local housing need plus 3,000**  
(This option provides a reasonably significant contribution towards the unmet need and gives an annual requirement which is consistent with the current local plan's requirement of 478 dwellings per year.)
- **Option 5: Local housing need plus 4,500**  
(This addition is the mid-point for the range given in the strategic growth study for the sustainable urban extension options.)
- **Option 6: Local housing need plus 10,000 home contribution.**  
(This option would provide for local housing need established using the standard methodology plus a further 10,000 dwellings which related to the new settlement option identified within the strategic growth study.)
- **Option 7: Local housing need plus 19,000 home contribution.**  
(This option would provide for local housing need established using the standard methodology plus a further 19,000 dwellings which is the total of the three options within the strategic growth study; 10,000 for a new settlement and two 4,500 sustainable urban extensions using the mid-point between the range set out for urban extensions within the growth study.)

4.1.7 The Council's preferred spatial options are, for residential growth in:

- Lichfield City, Burntwood, Little Aston, Tamworth, Armitage with Handsacre, Kings Bromley, Alrewas, Fradley, Whittington; Fazeley, Mile Oak & Bonehill, Shenstone, Stonnall and Hopwas.

4.1.8 These are the options for town & key rural village focussed development, defined as Residential Growth Option 2 at the Scope, Issues and Options stage, with the exceptions of the deletions of Rugeley, Brownhills and Norton Canes/Penkridge, and the additions of Kings Bromley and Hopwas from the dispersed development option (Residential Growth Option 3).

4.1.9 These options, taken together, were considered to meet the requirement for 'reasonable' alternatives in the 2004 Regulations.

4.1.10 The work undertaken by the Council to date suggests that further growth options should be explored. The strategic growth study and the high-level analysis of growth options has concluded that there are two specific areas for further exploration; these being growth to the north-east of Lichfield city and growth to the north of Tamworth.

4.1.11 Both these options were considered at the Scope, Issues and Options stage as part of Residential Growth Option 4 and scored more positively when compared with the other options. All options will need to be explored in much greater detail before it can be determined whether they are options to be included within the local plan review. Evidence will need to be collected and considered to help determine the final locations of growth.

## **5.0 Appraisal of 'significant' environmental effects associated with Lichfield Local Plan Review: Preferred Options & Policy Directions**

### **5.1 Introduction**

5.1.1 An appraisal of the policy options in the Lichfield Local Plan Review: Preferred Options & Policy Directions considered in this SA is contained at Appendix B. This section of the report summarises the findings of the Sustainability Assessment of the Lichfield Local Plan Review: Preferred Options & Policy Directions in respect of any significant effects associated with the SA objectives and also considers ways of mitigating adverse effects and any cumulative effects arising from the Local Plan Review as a whole. This accords with Tasks B3 and B4 of the five stage SA process.

### **5.2 Assumptions, uncertainties and difficulties**

5.2.1 An appraisal of environmental effects inevitably relies on assumptions and an element of subjective judgement. As the Local Plan Review contains strategic policy directions there are no short, medium or long term effects associated with this stage of the Local Plan.

5.2.2 It is a requirement of the SEA Regulations that consideration is given to difficulties that are encountered during the SA process. This could include any data limitations or other the availability of other relevant assessments. This is noted in the individual option matrices. As the Local Plan Review evolves the evidence base for the document will expand and been refined resulting in a more robust understanding of the effects of the site options on the Sustainability Objectives.

5.2.3 If any other uncertain effects or difficulties have been encountered as part of the assessment process then these are noted under the relevant sections alongside the assessor's comments.

5.2.4 At this stage of Local Plan Review preparation the proposed spatial options do not have clear geographic boundaries and dimensions and therefore the effects of the spatial options on a number of the SA objectives could not be determined at this stage. For example, precise quantum of development in flood risk areas, the Green Belt and the landscape. These elements will be assessed in detail during the next stages of the Local Plan Review's evolution and the accompanying sustainability appraisal.

### **5.3 Lichfield Local Plan Review: Preferred Options & Policy Directions**

5.3.1 The policies in the Local Plan Review Preferred Options and Policy Directions are set out as the broad themes or subject areas:

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

- Our natural resources.
- Our built and historic environment.

5.3.2 Each Policy has been assessed. A summary of the SA assessments are set out, in turn, below under the three SA objective groupings of environmental, economic and social effects, highlighting significant effects only as required by regulation. Further general summaries are included from paragraph 8.2.

5.3.3 **Preferred Policy Direction for Strategic policy: Our spatial strategy-** will set out the spatial strategy for all development within Lichfield District from 2016 to 2036. This will include the level of growth to be accommodated within the District and where that growth should be located. This is a preferred policy direction as additional work is taking place that will allow the council to conclude on the appropriate spatial strategy which will be included in the local plan review.

5.3.4 The spatial strategy was considered three reasonable scenarios based on Government policy-balanced growth subject to constraints such as Green Belt, meeting neighbour local planning authority needs, and provision above locally assessed need in order to follow market signals and boost economic growth. The Council is working to respond to these alternatives as evidence becomes available and therefore it is a policy direction.

**Environmental:** most effects are neutralised by existing policy and mitigation.

**Economic:** no significant effects until policy detail is known.

**Social:** all development options deliver homes and will meet local housing need and therefore has a positive effect on **SA Objective 1**. Meeting neighbouring Authority needs will impact upon the state of Lichfield District without mitigation such as infrastructure. Health facilities may benefit from planning obligations and additional population as mitigation for the growth resulting a positive effect on **SA Objective 3** although, again, meeting neighbouring Authority needs will add pressure on local provision.

5.3.5 **Preferred Strategic Policy: Securing sustainable development** is a preferred strategic policy for delivering sustainable development in Lichfield District.

**Environmental:** significantly supports efficient use of land (**SA Objective 4**), managing flood risk (**SA Objective 9**) and climate change cause (**SA Objective 10**).

**Economic:** significant support by being positive when appropriate.

**Social:** significantly supports homes and community safety.

5.3.6 **Preferred Strategic Policy: Sustainable development principles.** This policy sets out the key issues that all planning applications will need to address.

**Environmental:** significant positive effects on reducing water and air pollution (**SA Objective 7**), minimising waste (**SA Objective 8**), managing flood risk (**SA Objective 9**) and climate change (**SA Objective 10**).

**Economic:** no significant effect.

**Social:** significant positive effects on landscape and townscape (**SA Objective 13**), and travel (**SA Objective 14**).

- 5.3.7 **Preferred Policy Direction - Renewable energy.** This is a preferred policy direction for which three policy options were considered namely a flexible policy using criteria, site allocations, and the preferred option of identifying areas of opportunity on the policies map.

**Environmental:** the preferred option would have significant positive effects on the water and air pollution (**SA Objective 7**), flood risk (**SA Objective 9**) and climate change objectives (**SA Objective 10**).

**Economic:** significant support if sites were allocated due to more certainty of delivery.

**Social:** no significant effects.

- 5.3.8 **Preferred Policy Direction - Flood risk.** This is a preferred policy direction in line with Government policy, any new development should be directed away from those areas at highest flood risk, and its sustainability.

**Environmental:** will have a significant positive effect on the management of flood risk (**SA Objective 9**).

**Economic:** no significant effects.

**Social:** no significant effects.

- 5.3.9 **Preferred Policy Direction: Air quality.** This is a preferred policy direction ensuring that new development in air quality management areas are consistent with the Council's forthcoming air quality action plan.

**Environmental:** will have a significant positive effect on reducing air pollution (**SA Objective 7**).

**Economic:** no significant effects.

**Social:** no significant effects.

- 5.3.10 **Preferred Policy Direction: Delivering our infrastructure.** This is a preferred policy direction supporting the provision, in conjunction with other agencies, the delivery of appropriate infrastructure within new development.

**Environmental:** will have a significant positive effect on reducing water and air pollution (**SA Objective 7**), minimise waste (**SA Objective 8**) and managing flood risk (**SA Objective 9**).

**Economic:** significant positive effects on economic growth (**SA Objective 6**).

**Social:** significant positive effects on these objectives- homes provision (**SA Objective 1**), health/wellbeing (**SA Objective 3**) and educational attainment (**SA Objective 5**).

5.3.11 **Preferred Policy direction: Sustainable transport.** This is a preferred policy direction as, although some content is to be retained, additional up to date evidence, including from other agencies, will be required as part of the evolution of a new sustainable Transport Policy.

**Environmental:** no significant effects until evidence detail is known.

**Economic:** sustainable transport is essential to economic growth and thus will have a significant positive effect on **SA Objective 6**.

**Social:** no significant effects until evidence detail is known.

5.3.12 **Preferred Policy Direction - Our homes for the future - housing provision.** This is a preferred policy direction for a strategic housing need policy. The Government is currently consulting on the changes to planning policy and guidance including the standard method for assessing local housing need. In the meantime, the Council has used current guidance to produce seven reasonable options for housing requirements during the Plan Period. The seven options are:-

- Option 1: Local housing need only.  
(This option would provide only for the local housing need for the district with no contribution to the unmet need from within the housing market area.)
- Option 2: Local housing need plus 1,000 home contribution.  
(This option uses the same approach as the current local plan which included provision of 1,000 dwellings to meet the needs arising from within the housing market area (specifically Cannock Chase and Tamworth).)
- Option 3: Local housing need plus 2,000  
(Such an approach provides an annual requirement which is consistent with the current objectively assessed need for the district incorporated into the current local plan.)
- Option 4: Local housing need plus 3,000  
(This option provides a reasonably significant contribution towards the unmet need and gives an annual requirement which is consistent with the current local plan's requirement of 478 dwellings per year.)
- Option 5: Local housing need plus 4,500  
(This addition is the mid-point for the range given in the strategic growth study for the sustainable urban extension options.)
- Option 6: Local housing need plus 10,000 home contribution.  
(This option would provide for local housing need established using the standard methodology plus a further 10,000 dwellings which related to the new settlement option identified within the strategic growth study.)
- Option 7: Local housing need plus 19,000 home contribution.  
(This option would provide for local housing need established using the standard methodology plus a further 19,000 dwellings which is the total of the three options within the strategic growth study; 10,000 for a new settlement and two 4,500 sustainable urban extensions using the mid-point between the range set out for urban extensions within the growth study.)

**Environmental:** Each of the proposed options will have potential significant effects on the use of previously developed land (**SA Objective 4**), positive where local need can be met within or adjacent to existing settlements, significant/minor negative effects for a new settlement probably requiring greenfield land. Other environmental effects are unknown until the precise locations are defined.

**Economic:** The provision of new homes are beneficial to economic growth (**SA Objective 6**). Each of the proposed options will result in a significant positive effect on this objective.

**Social:** Each of the proposed options will have potential significant effects on the provision of new homes and affordable housing (**SA Objective 1**). As the objective is based on the provision of local need, then options to provide for unmet need from neighbouring local planning authorities and go beyond the local needs of Lichfield objective, will put pressure on local infrastructure making overall delivery more difficult. Health facilities (**SA Objective 3**) may significantly benefit from the local need and new settlement options because of either links to existing infrastructure or economies of scale in providing necessary new facilities. Similarly, for educational resources (**SA Objective 5**) in a potential new settlement.

5.3.13 **Preferred Policy Direction: Our housing mix, including homes to meet specialist needs.** This is a preferred policy direction as the Council considers the components of housing need. Two affordable homes options are assessed- the current 40% policy and the Government's 10% minima. The benefit of mixed housing is assessed against market housing only, although it is acknowledged that, only on financially unviable sites, is affordable housing requirement absolved.

**Environmental:** The policy will have a potential significant effect on use of previously developed land (**SA Objective 4**), significant positive where local need can be met within or adjacent to existing settlements, significant negative for a new settlement probably requiring greenfield land.

**Economic:** The provision of new homes are beneficial to economic growth and will have a positive effect on economic growth (**SA Objective 6**).

**Social:** mixed housing significantly benefits the provision of homes to meet local needs (**SA Objective 1**) because it requires affordable homes for implementation. Market housing, however, is more financially viable for providing health facilities. A 40% affordable homes requirement is more likely to give educational access in appropriate locations for a sector of the population.

5.3.14 **Preferred Policy Direction: Density of housing development.** This a preferred policy direction seeking to set a range of housing density standards - higher around sustainable centres as current policy, thirty-five dwellings/hectare and variable standards for flexibility, and a broad density range for full flexibility.

**Environmental:** the policy will result in the efficient use of land and thus represents a positive effect on previously developed land (**SA Objective 4**).

**Economic:** no significant effect.



**Social:** the thirty-five dwellings/hectare and variable standards for flexibility option is considered to be the best opportunity for delivering housing by balancing design and viability. This option will also be flexible to fit design for landscape and townscape. The Policy will reduce the need to travel therefore resulting in a positive effect (**SA Objective 14**).

**Preferred Policy Direction: Self-build and custom-build housing.** This is a preferred policy direction supporting self-build and custom-build developments.

**Environmental:** no significant effects.

**Economic:** no significant effect.

**Social:** This policy will have a positive effect on the provision of new homes and affordable housing (**SA Objective 1**).

5.3.15 **Preferred Policy Direction: Provision for gypsies and travellers.** This is a preferred policy direction on the provision of gypsies and travellers pitches.

**Environmental:** no significant effects.

**Economic:** no significant effect.

**Social:** This policy will have a positive effect on the provision of new homes and affordable housing (**SA Objective 1**). Site allocations will be significantly beneficial by giving certainty on delivery for the housing need objective.

5.3.16 **Preferred Policy Direction for Strategic policy: Our employment and economic development.** This is a preferred policy direction for delivery of strategic economic growth in the District. The Policy accords with Employment Growth Option 1 assessed at the Local Plan Review: Scope, Issues and Options stage and involves the expansion of existing employment locations, and therefore the scope assessments are reproduced.

5.3.17 Other options considered for inclusion in the policy including- home-working, the rural economy, brownfield and greenfield development, and additional employment growth.

**Environmental:** the use of brownfield land will result in a significantly positive effect on the efficient use of land compared to other greenfield options (**SA Objective 4**).

**Economic:** This policy will have a positive significant effect on the provision of economic growth (**SA Objective 6**).

**Social:** Given the intrinsic link between housing and employment, site allocations will be result in a positive indirect effect on the delivery of housing (**SA Objective 1**).

5.3.18 **Preferred Strategic Policy: Our centres.** This is a preferred strategic policy for supporting town and other centres.

**Environmental:** no significant effects.

**Economic:** the policy will have a significant positive effect on the economic growth (**SA Objective 6**).

**Social:** The Policy will support centres and reduce the need to travel therefore resulting in a positive effect (**SA Objective 14**).

5.3.19 **Preferred Policy: Lichfield economy.** This is a preferred policy seeking to promote the economy of Lichfield City.

**Environmental:** potential significant positive effect on the use of previously developed land (**SA Objective 4**) and the historic environment (**SA Objective 12**).

**Economic:** this policy will result in a significant positive effect on economic growth (**SA Objective 6**).

**Social:** no significant effects.

5.3.20 **Preferred Policy: Burntwood economy.** This is a preferred policy seeking to promote the economy of Burntwood Town Centre.

**Environmental:** potential significant positive effect on the use of previously developed land (**SA Objective 4**)

**Economic:** this policy will result in a significant positive effect on economic growth (**SA Objective 6**).

**Social:** potential significant positive effect on educational attainment (**SA Objective 5**)

**Preferred Policy Direction: Tourism.** This is a preferred policy direction based on the existing adopted Policy which supports the growth of sustainable tourism in the District.

**Environmental:** no significant effects.

**Economic:** this policy will result in a Significant/Minor positive effect on economic growth (**SA Objective 6**).

**Social:** no significant effects

5.3.21 **Preferred Policy Direction: Healthy & safe communities** This is a preferred policy direction for community safety, community infrastructure and health infrastructure.

**Environmental:** no significant effects.

**Economic:** no significant effect.

**Social:** the policy will have a significant positive effect on access to health facilities /well-being (**SA Objective 3**) and community safety (**SA Objective 2**).

5.3.22 **Preferred Policy Direction: Open space and recreation** is a preferred policy direction seeking to protecting existing open space, sports and recreation buildings/land and seek to encourage and enhance existing facilities.

**Environmental:** no significant effects.

**Economic:** no significant effect.

**Social:** the policy will have a significant positive effect on reducing the need for travel through support for local facilities (**SA Objective 14**).

- 5.3.23 **Preferred Policy Direction: Our natural resources.** This is a preferred policy direction, for Green Belt and Local Green Spaces; Internationally important natural environments; natural and historic landscapes; water quality; biodiversity; and Green Infrastructure.

**Environmental:** The policy offers significant positive effects on climate change (**SA Objective 10**), biodiversity (**SA Objective 11**), and landscape and townscape (**SA Objective 13**).

**Economic:** no significant effect.

**Social:** no significant effects.

- 5.3.24 **Preferred Policy Direction: Historic and built environment** This is a preferred policy direction seeking to protect and improve the historic and built environment.

**Environmental:** The Policy offers significant positive effects on the historic environment (**SA Objective 12**), and landscape and townscape (**SA Objective 13**).

**Economic:** no significant effect.

**Social:** no significant effects.

- 5.3.25 **Preferred Policy Direction: High Quality Design** This is a preferred policy direction seeking the promotion of high-quality design in all new development.

**Environmental:** The policy offers significant positive effects on the climate change (**SA Objective 10**), biodiversity (**SA Objective 11**), historic environment (**SA Objective 12**), and landscape and townscape (**SA Objective 13**).

**Economic:** no significant effect.

**Social:** The policy offers a significant positive effect on community safety (**SA Objective 2**).

- 5.3.26 **Preferred Policy Direction: Evidence Supporting heritage proposals** This is a preferred policy direction seeking to ensure that proposals affecting a heritage asset (whether designated or no-designated) are supported by a Heritage assessment.

**Environmental:** The Policy offers significant positive effects on the historic environment (**SA Objective 12**), and landscape and townscape (**SA Objective 13**).

**Economic:** no significant effect.

**Social:** no significant effects.

- 5.3.27 **Preferred Strategic Options for Growth.** The preferred strategic options for growth derive from the most sustainable residential and employment growth options identified as part of the Local Plan Review: Scope, Issues and Options stage. The preferred strategic option for growth will see new homes focused on those sustainable settlements identified in the

preferred settlement hierarchy. Growth will be attributed in accordance with the levels of the hierarchy, with larger levels of growth to those settlements higher in the hierarchy such as Lichfield and Burntwood. With regards to employment growth the preferred approach is to focus this on the existing employment areas within Lichfield, Burntwood and at Fradley Park.

**Environmental:** Lichfield City will have a significant positive effect on the efficient use of land (**SA Objective 4**). Development around Rugeley may have a significant negative effect on the flood risk (**SA Objective 9**). Lichfield City and north of Lichfield may have significant negative effects on the historic environment objectives (SA Objective 12) due to their high heritage assets.

Alrewas and Kings Bromley have potential significant negative effects on the flood risk (**SA Objective 9**).

**Economic:** no significant effects or for the non-key villages.

**Social:** Lichfield City would have a significant positive effect on the educational attainment (**SA Objective 5**) due to the potential increase in access to its infrastructure, and on the travel objective due to its highest local accessibility (**SA Objective 14**). Fazeley and Streethay have accessibility to high level (hospital) existing health facilities and so there will be a significant positive effect on access to health facilities (**SA Objective 3**).

## **5.4 Cumulative Effects**

- 5.4.1 Cumulatively, the town focused development residential growth options are the most sustainable, followed by the new settlement options, the town and rural focused development options, and the dispersed development option.
- 5.4.2 Cumulatively, the expansion of existing employment areas growth options are the most sustainable, ahead of the new locations options.

## **5.5 Conclusions**

- 5.5.1 The precise location of new development is not identified in the Lichfield District Local Plan Review: Preferred Option & Policy Direction document, however the appraisal of the preferred options reveals positive effects on SA objectives.
- 5.5.2 Overall, the meeting local homes needs only option is the most sustainable, with options in town focused development being spatially the most sustainable for residential growth; and the expansion of existing employment areas growth options are the most sustainable employment growth options.
- 5.5.3 The delivery of new development in line with the preferred option is likely to deliver a critical mass of development to enable significant development contributions towards community and transport infrastructure.

## **6.0 Mitigation (Task B4)**

### **6.1 Introduction**

- 6.1.1 As the Lichfield District Local Plan Review develops a number of site specific and policy mitigation measures will be identified via the SA process.
- 6.1.2 This stage has suggested some mitigation measures as part of the assessments of the Policy Directions in order to emphasise best sustainability or make them acceptable. The Infrastructure Delivery Plan is seen to be a significant contributor to this aim. Sites could be selected from across the growth options as desired and combined if the most sustainable locations do not all fit into an assessed growth direction.
- 6.1.3 During the evolution of the Local Plan Review the evidence base will expand and more detailed environmental assessment work will be undertaken on each of the proposed site allocation options. The increased information will result in the identification of the specific items of mitigation and enhancement which will be fully considered in future SAs that accompany future stages of the Local Plan Review.

## **7.0 Monitoring (Task B5)**

### **7.1 Introduction**

- 7.1.1 The SEA Regulations state *"the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"*. The Environmental Report is required to provide information *"a description of the measures envisaged concerning monitoring"*. Monitoring proposals are designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 7.1.2 Monitoring will be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.
- 7.1.3 It is considered that the Sustainability Report on the Publication document is the appropriate stage to identify indicators.

### **7.2 Next Steps**

- 7.2.1 This SA has been prepared to support the Lichfield District Local Plan Review: Preferred Option and Policy Directions Document. Consultation on this version of the initial stage of the Plan is taking place in January 2019.
- 7.2.2 Following consultation on the Plan, the District Council will take into account any consultation responses and the findings of sustainability appraisal during the preparation of the next stage of the Local Plan Review.

## **8.0 Conclusions**

### **8.1 Introduction**

8.1.1 This SA has considered the Preferred Option and Policy Directions each of the options in the Lichfield District Local Plan Review: Preferred Options and Policy Directions document against the agreed Sustainability Objectives agreed at Stage A of the SA process. The role of the SA process is to promote sustainable development by assessing the extent to which the emerging Local Plan Review, taken together, will help to achieve relevant environmental, economic and social objectives.

8.1.2 A combination of meeting local homes needs in town focused development with expansion of existing employment areas is the most sustainable development.

8.1.3 The delivery of new development under all of the options assessed in this SA are likely to deliver a critical mass of development to enable significant development contributions towards community and transport infrastructure.

8.1.4 Overall, the assessment concludes that the Spatial Options set out in the Lichfield District Local Plan Review: Preferred Options and Policy Directions document will generally result in a neutral to positive effect on the majority of the SA objectives, although site options each have sustainable merits and drawbacks.

8.1.5 The following conclusions are made on the sustainability of the Preferred Local Plan Policy Directions:

#### **Preferred policy direction for Strategic policy: Our spatial strategy**

8.1.6 The Policy will result in the efficient use of land (**SA Objective 4**) by utilising previously development land and buildings within the Settlement Hierarchy which will, in turn, reduce the need to travel (**SA Objective 14**)

#### **Preferred strategic policy: securing sustainable development**

8.1.7 Generally, having no policy would be significantly detrimental to sustainability. The policy has significant benefits on the homes, community safety, efficient use of land, economic, flood risk and climate change objectives; and no negatives; therefore having the policy is better than not.

#### **Delivering Sustainable Development**

8.1.8 The policy is generally positive with significant positive effects upon the pollution, waste, flood risk, climate change, landscape and townscape and travel objectives.

#### **Preferred Policy Direction: Renewable Energy**

8.1.9 No policy has generally negative effects, especially on the economic growth, pollution and climate change objectives.

8.1.10 Policy Map identifying areas of opportunity for renewable energy is the most sustainable option, significantly for the pollution, flood risk and climate change objectives, and no negative effects.

8.1.11 Site allocations would have significant positive effects on the economic growth objective, and the climate change objective shared with the Policy Map option but is less effective on flood risk and has question marks on some objectives which could be mitigated by site choices.

8.1.12 A flexible policy has some negative effects, significantly upon the historic environment objective.

**Preferred policy: air quality**

8.1.13 No policy would have mostly negative effects upon the objectives, significantly upon the pollution objective. A policy would have mixed effects upon the sustainability objectives with a significant positive effect on the pollution objective as would be hoped.

**Preferred Policy Direction: Delivering our infrastructure**

8.1.14 Generally, having no policy would have negative effects upon this objective, significantly on the homes, community safety, health, efficient use of land and economic growth objectives. The policy would have significant positive effects on seven objectives; and no negatives; therefore having the policy is better than not.

**Preferred policy direction: sustainable transport**

8.1.15 Generally this policy is positively sustainable, especially to the economic growth objective, with no negative effects.

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

8.1.16 The no development option for SEA has been considered under the our spatial strategy option for residential growth, therefore only development options are now considered.

8.1.17 The local housing need only option is the most sustainable, with no negative effects and significant benefits to the 'housing to meet local need including provision of affordable homes', 'improve access to health facilities and promote wellbeing', and 'maximising the use of previously developed land/ buildings and encouraging the efficient use of land' objectives.

8.1.18 The up to 4,500 home contributions options in the mid-range of sustainability.

8.1.19 The larger home contributions options are the least sustainable with significant negative effects on the community safety and crime, and the 'maximising the use of previously developed land/ buildings and encouraging the efficient use of land' objectives; although this is balanced by the significant positive effects on the 'improve access to health facilities and promote wellbeing' and 'improve educational attainment of the working age population' objectives.

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

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

8.1.20 Having a housing mix has significant positive effects on the housing provision and efficient use of land objectives. Having open market housing could have a significant benefit of generating finance for other planning obligations such as health facilities.

8.1.21 Other parts of the housing mix are generally positive but the only potential significant benefit is to high affordable housing through providing access to educational attainment.



### **Preferred policy direction: Density of housing development**

8.1.22 The proposed thirty five dwellings per hectare or the specific density standard option has mostly positive effects on most objectives, significant with respect to the housing provision, use of previously developed land, landscape and townscape, and travel objectives. The current higher density around sustainable centres policy is also mostly positive but less so because of a lack of certainty without specific standards; and, to an even lesser extent, the broad density range option. The no density policy option is mostly negative or neutral with no positives. Therefore, a density policy is recommended.

### **Preferred policy: Provision for gypsies and travelers**

8.1.23 No policy will have generally negative effects, significantly upon the homes provision and health objectives.

8.1.24 Site allocations are the most sustainable option, especially for the homes provision and health objectives, although they would have some uncertainties until sites are identified and they can be assessed.

8.1.25 The criteria and over-provision options are similar in effects and have some positives but no significant benefits.

### **Preferred policy direction for strategic policy: Our employment and economic development**

8.1.26 This latest appraisal assesses the details of the policy which support the locational direction. Having no policy generally has neutral or negative effects, significant in respect of previously developed land use and economic growth objectives.

8.1.27 Home-working is generally positive across objectives but its significance is limited by its current limited scale relative to all employment and economic development.

8.1.28 Supporting the rural economy is marginally more positive than detrimental to sustainability, but significantly beneficial to economic growth objective. The minor negatives result from remoteness reducing accessibility.

8.1.29 Promoting brownfield development is significantly more beneficial than greenfield development, especially, of course, on use of previously developed land, with no negatives; whilst use of greenfield land would be marked by negative effects.

8.1.30 Additional economic growth has some negative effects but none significant, balanced by positive effects on economic related objectives.

### **Preferred strategic policy: Our centres**

8.1.31 Generally, having no policy would have negative effects on sustainability objectives, significantly upon efficient use of land, economic growth, the historic environment and travel; with no positives. The policy would have generally positive effects and significant benefits on the economic growth and travel objectives; and no negatives; therefore having the policy is better than not.

### **Preferred policy: Lichfield economy**

8.1.32 Generally this policy is positively sustainable, especially to the economic growth objective, with no negative effects.

**Preferred policy: Burntwood economy**

8.1.33 Generally this policy is positively sustainable, significantly to the efficient use of land, educational attainment, economic growth and travel objectives, with no negative effects.

**Preferred Policy Direction: Healthy & Safe Communities**

8.1.34 No policy will have a significant negative effect on the health objective. The policy will have significant positive effects on the health and community safety objectives.

**Preferred Policy Direction: Open Space and Recreation**

8.1.35 Generally, having no policy would have negative effects on sustainability objectives; with no positives. The policy would have generally positive effects and significant benefit on the travel objective; and no negatives; therefore having the policy is better than not.

**Preferred policy direction: Our natural resources**

8.1.36 Generally, having no policy would have negative effects on sustainability objectives, significantly upon the climate change and biodiversity objectives; with no positives. The policy would have mostly positive effects and significantly for the climate change, biodiversity, and landscape and townscape objectives; therefore having the policy is better than not.

8.1.37 **Preferred Policy Direction : Cannock Chase Special Area of Conservation**

8.1.38 Generally, having no policy would have negative effects on sustainability objectives, significantly upon the biodiversity objective; with no positives. The policy would have mostly positive effects and significant benefits on the biodiversity and travel objectives as hoped; therefore having the policy is better than not.

8.1.39 **Preferred Policy Direction historic and built environment**

8.1.40 Generally, having no policy would have negative effects on sustainability objectives, significantly upon the historic environment and landscape and townscape objectives; with no positives. The policy would have mostly positive effects and significantly for the historic environment and landscape and townscape objectives as expected; therefore having the policy is better than not.

**Preferred Policy Direction: High Quality Design**

8.1.41 Generally, having no policy would have negative effects on sustainability objectives, significantly upon the community safety, historic environment and, landscape and townscape objectives; with no positives. The policy would have mostly positive effects and significantly for the community safety, climate change, biodiversity, historic environment, and landscape and townscape, and travel objectives as expected; therefore having the policy is better than not.

**Preferred Policy Direction: Evidence supporting heritage proposals**

8.1.42 Having no policy would have some negative effects on sustainability objectives, significantly upon the historic environment and its setting objective; with no positives. The policy would have some positive effects and significantly for the historic environment and its setting objective; therefore having the policy is better than not.

**Preferred Option for Growth**

- 8.1.43 Our preferred strategic options for growth generally derive from the most sustainable residential and employment growth options from the scope, including town focused Lichfield City, Brentwood, north and north-west of Tamworth, and Little Aston, and Armitage with Handsacre, Kings Bromley, Alrewas, Fradley, Whittington, Fazeley, Mile Oak & Bonehill, Shenstone key rural settlements. However, the addition of Hopwas and Stonnall from the dispersed option would share the generally negative effects, significantly so on the travel objective.
- 8.1.44 The preferred areas for employment growth derive from the most sustainable existing employment areas Option 1 at the Local Plan Review: Scope, Issues and Options stage.