

Representation Reference	Consultee/Agent	Section	Comment Summary	Officer Response
SA1	Ben Cook (Pegasus) on behalf of Wilson Bowden	Overall SA	<p>Document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy.</p> <p>There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined, needs to be addressed.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, we consider that a number of changes are needed to enable a sustainable balanced strategy to be delivered, and thereby for the SA to be justified. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of nonstrategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects, the assumption was made that mitigation measures have been proposed that these have been applied. What are the mitigation measures are and who has proposed them? Section 3.1 sets out the context and objectives which have informed the Plan and the SA. The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA2	Highways England	Overall SA	No detailed comments. However at such time as individual planning applications are submitted it will be necessary to ensure compliance with the Design Manual for Roads and Bridges (DMRB) and DfT Circular 02/2013.	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA3	Liz Boden Pegasus for Drayton Manor Park	Overall SA	Document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives and this should also be expanded to relate to the employment strategy. The SA assess that two significant positive effects are expected for SA Objective 6: Achieving Stable and Sustainable economic growth, i.e. to support sustainable economic growth and improve employment opportunities in the District, including tourism and development of Drayton Manor Park together with SA objective 5: improving education attainment. DMP concur with this view. However, it is considered that DMP should be included within the Local Plan Review as an allocated employment site and should be assessed by the SA as part of that process.	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA4	Ben Cook (Pegasus) on behalf of Cooper Developments LPRPO411	Whole Document Sustainability Appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Strategic allocation of 5,535 dwellings is supported overall, but this needs to be as part of a balanced strategy. Proposed allocations are focused on Lichfield and other larger service village; Fradley, Fazeley and Whittington, this does not represent a balanced strategy or align with Policy OSS2.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA5	Darren Bell (David Lock Associates) on behalf of Tarmac	Whole Document Sustainability Appraisal	Representation relates to the sustainability appraisal. Object to the Sustainability Appraisal as the site promoted by Tarmac has been incorrectly assessed. Have undertaken reassessment using the criteria within the Councils SA. Consider given this assessment the Alrewas Quarry proposal should be reviewed and considered for allocation ahead of the next local plan consultation. The reassessment shows that Alrewas Quarry performs well against the selection criteria and the inclusion of the site for housing and mixed-use development would be justified.	Comments noted. Further evidence is being collected and will inform the judgments as the plan progresses.
SA6	K Fenwick (Pegasus) on behalf of Smith Brothers Farms	Whole Document Sustainability Appraisal	<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy. There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms that no employment sites are identified at the Local Plan Review: Preferred Option and therefore there no assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

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SA7	Neil Cox (Pegasus Group) on behalf of Bloor Homes LPRPO676	Whole Document Sustainability Appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Section 4 needs to clearly justify how the preferred spatial option has been arrived at having regard to all 'reasonable' alternatives. It should also justify how the 4,500 dwelling contribution towards the GBBCHMA has been derived. The identification of new strategic allocations is supported however this needs to form part of a balanced strategy. The proposed allocations are focused on Lichfield and other larger service villages: Fradley; Fazeley; and, Whittington. The inclusion of allocations at four settlements does not represent a balanced strategy. This does not align with Strategic Policy OSS2 (as set out at paragraph 2.4.7) which states new growth/development will be directed to the most sustainable locations via a hierarchy of centres and settlements. The proposal to allocate sites in four settlements does not align with this aim.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA8	D Oakley (RPS) for Fradley Consortium	Sustainability Appraisal	<p>The SA flawed as not considered alternative site boundaries or capacities in relation to other sites at Fradley, in particular the Fradley Junction site, as 'reasonable alternatives' to the preference for grouping sites. Not clear what the reasoning behind the preferred options now presented is, especially as alternative options at Fradley include part brownfield land.</p> <p>Needs to be consultation as the public should have an effective opportunity to comment on appraisal of alternatives. Detailed critique of the assessment of Land at Fradley junction submitted and ability to deliver submitted.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA9	I Deverell (Turley) for Redrow	Sustainability Appraisal	<p>Does not provide any conclusions as to the suitability of given sites for allocation, nor does it provide any consideration of why reasonable alternative were selected or rejected. Striking uniformity in the assessment and scoring of the four preferred options despite the significant differences in their respective social, economic and environmental constraints. The strategic allocations are out-performed by alternatives within the SA and without the specific reasons for selection.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA10	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd		<p>Document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy.</p> <p>There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined, needs to be addressed.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, we consider that a number of changes are needed to enable a sustainable balanced strategy to be delivered, and thereby for the SA to be justified. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of nonstrategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects, the assumption was made that mitigation measures have been proposed that these have been applied. What are the mitigation measures are and who has proposed them?</p> <p>Section 3.1 sets out the context and objectives which have informed the Plan and the SA. The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

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SA11	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd		<p>Document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy.</p> <p>There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined, needs to be addressed.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, we consider that a number of changes are needed to enable a sustainable balanced strategy to be delivered, and thereby for the SA to be justified. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of nonstrategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects, the assumption was made that mitigation measures have been proposed that these have been applied. What are the mitigation measures are and who has proposed them?</p> <p>Section 3.1 sets out the context and objectives which have informed the Plan and the SA. The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA12	K Ventham (Barton Willmore) for Curborough North	Sustainability Appraisal	<p>Barton Willmore has undertaken a compliance review of the SA and has set out where areas can be strengthened to ensure the SA complies with the relevant legislation- Existing environment (HRA), environmental protection objectives, reasonable alternatives, monitoring, non-technical summary (details provided). Revised score for the site is suggested.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA13	David Pickford (Pegasus) on behalf of Daniel Wright	Sustainability Appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>SA discusses the site selection methodology for residential sites, which has led to the identification of four strategic allocations. As discussed above, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Section 4 needs to clearly justify how the preferred spatial option has been arrived at having regard to all 'reasonable' alternatives. It should also justify how the 4,500 dwelling contribution towards the GBBCHMA has been derived. The identification of new strategic allocations is supported however this needs to form part of a balanced strategy. The proposed allocations are focused on Lichfield and other larger service villages: Fradley; Fazeley; and, Whittington. The inclusion of allocations at four settlements does not represent a balanced strategy. This does not align with Strategic Policy OSS2 (as set out at paragraph 2.4.7) which states new growth/development will be directed to the most sustainable locations via a hierarchy of centres and settlements. The proposal to allocate sites in four settlements does not align with this aim.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA14	K Ventham (Barton Willmore) for Curborough North	Sustainability Appraisal	<p>Barton Willmore has undertaken a compliance review of the SA and has set out where areas can be strengthened to ensure the SA complies with the relevant legislation- Existing environment (HRA), environmental protection objectives, reasonable alternatives, monitoring, non-technical summary (details provided). Revised score for the site is suggested.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

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SA15	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Sustainability Appraisal	<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the mainrepresentation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA16	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Sustainability Appraisal	<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA17	Vistry Homes	Sustainability Appraisal	<p>The SA work prepared by the Council in relation to the identification, selection and assessment of strategic housing delivery options is unsound in that it has failed to provide reasons for the selection or rejection of the reasonable alternatives. It is also clear that the Council has not undertaken an objective assessment of the proposed site allocations, the flaws of which become clear when it is considered that sites such as Land north of Tamworth have not been allocated despite out-performing strategic allocations against some SA Objectives. In addition to being in a highly sustainable location, Vistry Homes are not aware of any environmental constraints that would prevent the site from being developed to provide much needed private and affordable homes.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA18	Neil Cox (Pegasus Group) on behalf of Richborough Estates		<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

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SA19	Neil Cox (Pegasus Group) on behalf of Richborough Estates		<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment.</p> <p>However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA20	Neil Cox (Pegasus Group) on behalf of Richborough Estates		<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment.</p> <p>However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA21	Neil Cox (Pegasus Group) on behalf of Richborough Estates		<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.