

# Sustainability Appraisal

## Local Plan Allocations Focused Changes

### Adoption Statement 2019



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Sustainability Appraisal Local Plan Allocations

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## Section 1 Adoption Statement

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

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

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

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

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

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

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

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

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

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

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

Therefore the Sustainability Appraisal Adoption Statement includes information on:

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

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

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

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

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

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

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

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

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

### **Social**

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

### **Environment**

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

### **Economic**

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

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

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

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

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Table 1: Sustainability Appraisal Framework

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

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Table 1 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
			Loss of historic landscape features erosion of character and distinctiveness (HLC). Extent and use of detailed characterisation studies informing development proposals (HLC)
Cultural Heritage	3 To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their setting	<ol style="list-style-type: none"> <li>1. Will it preserve and enhance buildings and structures and their setting and contribute to the Districts heritage?</li> <li>2. Will it improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings?</li> <li>3. Will it preserve and enhance conservation areas including their setting?</li> <li>4. Will it offer opportunities to bring heritage assets back into active use?</li> </ol>	<p>Number and Proportion of major planning proposals which improved access to heritage features as part of the scheme.</p> <p>Number of listed buildings or structure in Lichfield District</p> <p>Heritage at risk and number of assets removed from Register.</p> <p>Proportion of Conservation Areas with an up to date character appraisal and management plan</p>
Cultural Heritage Population	4 Create places, spaces and buildings that are well designed, integrated effectively with one another, respect significant views and vistas and enhance the distinctiveness of the local character	<ol style="list-style-type: none"> <li>1 Will it achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality?</li> <li>2 Does it value and protect diverse and locally distinctive settlement and townscape character?</li> <li>3 Does it Safeguard historic views and valuable skylines of settlements?</li> <li>4 Is the site within a main settlement or a key rural settlement?</li> </ol>	<p>Improvements in the quality of the townscapes e.g. delivery of street/public realm audits, improvements works, de-cluttering works both in urban and rural areas.</p> <p>Development meeting design standards within Supplementary Planning Documents.</p>



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Table 1 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
		5 Is the site within close proximity to key services (e.g. schools, food shop, public transport, health centres etc.)?	
Soil Water and Air	5 Maximise the use of previously developed land/buildings and the efficient use of land.	1. Will it result in the loss of land that has not previously been developed? 2. Is the site capable of supporting higher density development and/or a mix of uses? 3. Does the site allow for the re-use of existing buildings? 4. Will it reduce the amount of derelict degraded and underused land within the District?	Proportion of new development on Brownfield Land. No of redundant buildings bought back into use. Proportion of long term vacant dwellings in the District. Housing Mix of sites with planning permission. Housing Density of sites with planning Permission.
Climatic Factors	6 Reduce the need to travel to jobs and services through sustainable integrated patterns of development, efficient use of existing sustainable modes of transport and increased opportunities for non-car travel	1. Does the site location encourage the use of existing sustainable modes of travel? 2. Will it reduce the overall impact on traffic sensitive areas? 3. Will it help develop walking, cycling rail and bus networks to enable residents access to employment, services and facilities?	Traffic Levels (million vehicle kilometres) in the local road network. Access to bus services. Increase opportunities for walking and cycling.
Climatic Factors	7 To reduce, manage and adapt to the impacts of climate change	1. Will it reduce the causes of climate change? 2. Will it encourage prudent use of energy? 3. Will it provide opportunities for additional renewable energy generation capacity within the District?	Carbon Dioxide emissions within the Authority Areas. Renewable Energy Capacity within the District.
Soil Water and Air	8 To minimise waste and increase the reuse and recycling of waste materials.	1 Will it reduce household and commercial waste?	Residual Household water per household.

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

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

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

Section 3 How the Environment Report has been taken into account

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

Table 2 How the Sustainability Appraisal influenced the Plan

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

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

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

Table 3 Shared evolution

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

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

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



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

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

The Sustainability Appraisal has presented recommendations at the following stages

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Adoption Statement  
Sustainability Appraisal Local Plan Allocations

# **APPENDIX A – LOCAL PLAN ALLOCATIONS SUSTAINABILITY APPRAISAL**

## **Adoption Statement**

## Appendix A

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Appendix A

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

Appendix A

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

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

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

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source								
		Tamworth Borough: £164,916.  Staffordshire: £191,260 West Midlands: £196,406	being significantly higher.	Lichfield District is seen as an attractive commuter area for Birmingham and the larger salaries associated with these jobs. The house prices in the District are particularly high due to the historic character of the city and attractive nature of its villages and countryside.									
	<div style="text-align: center;"> <h3>1995 - 2015 Average House Prices</h3> <table border="1"> <caption>Estimated Average House Prices (2015)</caption> <thead> <tr> <th>Region</th> <th>Price (£)</th> </tr> </thead> <tbody> <tr> <td>Lichfield</td> <td>250,000</td> </tr> <tr> <td>West Midlands</td> <td>196,406</td> </tr> <tr> <td>Staffordshire</td> <td>191,260</td> </tr> </tbody> </table> </div>					Region	Price (£)	Lichfield	250,000	West Midlands	196,406	Staffordshire	191,260
Region	Price (£)												
Lichfield	250,000												
West Midlands	196,406												
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Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
Housing affordability	The lowest quartile house price was 7.1 times the lowest quartile income		The lowest quartile house price was 7.1 times the lowest quartile income which is higher than the averages for Staffordshire (6.1), West Midlands (5.4) and England (6.5). These rates highlight possible affordability issues in Lichfield.		ONS
Net Housing completions since 2006	2008/9: 273 2009/10: 102 2010/11: 306 2011/12: 201 2012/13: 239 2013/14: 324 2014/15: 226 2015/16: 200	N/A	The level of house building reached its peak in 2005/6 with 647 being delivered and the supply of housing sites was not constrained. However since the recession the rate of house building has declined.	It is unlikely that until development starts on site for the remaining Strategic Development Allocations that this delivery rate will increase.  To date only 2 of the 8 Strategic Development Allocations are on site with only 1 having been partially completed and the other only recently starting with figures	

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Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																																			
				expected to be included in the 2015/16 monitoring.																																																				
Household projections	<table border="1"> <thead> <tr> <th>Year</th> <th>Average household size</th> <th>Projected number of households</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>2.37</td> <td>42,000</td> </tr> <tr> <td>2019</td> <td>2.33</td> <td>44,000</td> </tr> <tr> <td>2024</td> <td>2.30</td> <td>45,000</td> </tr> <tr> <td>2029</td> <td>2.27</td> <td>46,000</td> </tr> <tr> <td>2034</td> <td>2.25</td> <td>47,000</td> </tr> <tr> <td>2039</td> <td>2.24</td> <td>48,000</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Number of projected households by Age</th> </tr> <tr> <th>Age</th> <th>2014</th> <th>2039</th> </tr> </thead> <tbody> <tr> <td>Under 25</td> <td>750</td> <td>740</td> </tr> <tr> <td>25-34</td> <td>3,700</td> <td>2,830</td> </tr> <tr> <td>35-44</td> <td>6,810</td> <td>6,320</td> </tr> <tr> <td>45-54</td> <td>8,760</td> <td>8,780</td> </tr> <tr> <td>55-64</td> <td>7,350</td> <td>7,180</td> </tr> <tr> <td>65-74</td> <td>8,160</td> <td>8,100</td> </tr> <tr> <td>75-84</td> <td>5,010</td> <td>8,730</td> </tr> <tr> <td>85+</td> <td>1,730</td> <td>5,480</td> </tr> </tbody> </table>	Year	Average household size	Projected number of households	2014	2.37	42,000	2019	2.33	44,000	2024	2.30	45,000	2029	2.27	46,000	2034	2.25	47,000	2039	2.24	48,000	Number of projected households by Age			Age	2014	2039	Under 25	750	740	25-34	3,700	2,830	35-44	6,810	6,320	45-54	8,760	8,780	55-64	7,350	7,180	65-74	8,160	8,100	75-84	5,010	8,730	85+	1,730	5,480		<p>Between 2014 and 2039 there is a projected fall in household size within Lichfield District from 2.37 to 2.24 persons per household.</p> <p>The Local Plan Strategy seeks to provide a minimum of 10,030 new dwellings between 2008 and 2029 of which 1000 are to accommodate the growth of neighbouring authorities.</p>	<p>Household projections are trend-based and indicate the number of additional households that would form if recent demographic trends continue.</p> <p>The projected fall in household size reflects the general ageing of the population evidenced by the projected household growth by age which shows that between 2014 and 2039 there is a large growth in the number of households within the 75+ age category. The age groups for the remaining categories remain largely similar</p>	ONS Household Projections – Published Tables (2014 base)
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Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
				between 2014 and 2039.	
<b>Deprivation</b>					
Deprivation	IMD Average Rank – 252 Employment – 202 Education Skills & Training – 243 Health Deprivation & Disability - 206 Crime – 287 Barriers – 160 Living Environment – 248 Income deprivation affecting children – 229 Income deprivation affecting older people - 240	<b>Local authority districts</b> include lower-tier non-metropolitan districts, London boroughs, unitary authorities and metropolitan districts. At the time of publication, there were 326 local authority districts in England with the local authority district with a rank of 1 being the most deprived, and the area ranked 326 the least deprived.	Since 2010 there has been an increase from 1 to 2 LSOAs falling within the bottom 20% of most deprived areas. The average IDM rank for Lichfield District in 2004 was 259 followed by 237 in 2010 and 247 in 2015, showing a dip during and immediately post the recession with recovery now underway.	The Indices of Deprivation 2015 is the relative measure of deprivation published by the government. The data is published for small areas (Lower-layer Super Output Areas, or LSOAs) across England. At a District Level with regard to the IMD average rank, Lichfield is within the top 30% nationally.  However there are pockets of deprivation within Lichfield District. Two lower super output areas fall within IMD’s 20% of most deprived areas nationally. These are found within the	DCLG English Indices of Deprivation 2015



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

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

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																															
			<p>recorded the 8<sup>th</sup> lowest casualty severity ratio of the 153 local authorities across England and it can be inferred that the District's roads are some of the safest in the country.</p>																																																	
<b>Economic</b>																																																				
<p>Unemployment Job seekers allowance claimants</p>	<p style="text-align: center;">DWP benefits claimants % is a proportion of resident population of area aged 16-64</p> <table border="1"> <caption>DWP benefits claimants % (Estimated from Chart)</caption> <thead> <tr> <th>Year</th> <th>Lichfield (%)</th> <th>West Midlands (%)</th> <th>Great Britain (%)</th> </tr> </thead> <tbody> <tr><td>Nov-15</td><td>0.5</td><td>1.8</td><td>1.5</td></tr> <tr><td>Nov-14</td><td>0.6</td><td>2.3</td><td>1.9</td></tr> <tr><td>Nov-13</td><td>1.0</td><td>3.5</td><td>3.0</td></tr> <tr><td>Nov-12</td><td>2.0</td><td>4.4</td><td>3.6</td></tr> <tr><td>Nov-11</td><td>2.3</td><td>4.6</td><td>3.7</td></tr> <tr><td>Nov-10</td><td>2.3</td><td>4.2</td><td>3.4</td></tr> <tr><td>Nov-09</td><td>2.8</td><td>4.8</td><td>3.7</td></tr> <tr><td>Nov-08</td><td>2.0</td><td>3.5</td><td>2.8</td></tr> <tr><td>Nov-07</td><td>1.1</td><td>2.6</td><td>1.9</td></tr> <tr><td>Nov-06</td><td>1.2</td><td>3.0</td><td>2.2</td></tr> <tr><td>Nov-05</td><td>1.3</td><td>2.8</td><td>2.2</td></tr> </tbody> </table>	Year	Lichfield (%)	West Midlands (%)	Great Britain (%)	Nov-15	0.5	1.8	1.5	Nov-14	0.6	2.3	1.9	Nov-13	1.0	3.5	3.0	Nov-12	2.0	4.4	3.6	Nov-11	2.3	4.6	3.7	Nov-10	2.3	4.2	3.4	Nov-09	2.8	4.8	3.7	Nov-08	2.0	3.5	2.8	Nov-07	1.1	2.6	1.9	Nov-06	1.2	3.0	2.2	Nov-05	1.3	2.8	2.2	<p>Benefit claimants for Lichfield remains below the national and regional averages.</p>	<p>Benefit claimants has been variable in Lichfield over the last ten years, however this trend has broadly followed national and regional averages.</p>	<p>Department of Work and Pensions. Benefit claimants - working age client group</p>
Year	Lichfield (%)	West Midlands (%)	Great Britain (%)																																																	
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Nov-08	2.0	3.5	2.8																																																	
Nov-07	1.1	2.6	1.9																																																	
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Indicator	Lichfield District			Comparators	Local Trend	Commentary	Data Source
	Apr 10-Mar 11	20.3	25.8	23.9		regional indicator and consistently so.	
	Apr 11-Mar 12	22.1	25.7	23.7			
	Apr 12-Mar 13	15.8	24.9	23.1			
	Apr 13-Mar 14	22.1	24.5	22.8			
	Apr 14-Mar 15	15.8	24.8	22.6			
	Apr 15-Mar 16	19.1	25.2	22.2			
Net additional floorspace provided	<b>Use Class Order</b>	<b>Amount of Floorspace (m<sup>2</sup>)</b>				<p>In 2016 4,520m<sup>2</sup> of employment developments have been completed with the District providing an increase in employment floorspace.</p> <p>The Council continues to achieve in locating new employment land on previously developed land, with all the completed employment development being on brownfield sites.</p>	Authority Monitoring report 2016 Lichfield District Council
	B1a	455					
	B1b	830					
	B1c	600					
	B2	367					
	B8	175					
	B8/A1 combined	340					
	<b>Total</b>	<b>4,520</b>					

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

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source																																										
	Only two developments were completed within the Centres between December 2015 and the 2016 AMR, leading to a net new floorspace of 340m <sup>2</sup>																																														
<b>Education</b>																																															
Qualification of residents	<p><b>Level 1:</b> 1-4 O Levels/CSE/GCSEs (any grades), Entry Level, Foundation Diploma, NVQ Level 1, Foundation GNVQ, Basic/Essential Skills;</p> <p><b>Level 2:</b> 5+ O Level (Passes)/CSEs (Grade 1)/GCSEs (Grades A*-C), School Certificate, 1 A Level/ 2-3 AS Levels/VCEs, Intermediate/Higher Diploma, Welsh Bacallaureate Intermediate Diploma, NVQ level 2, Intermediate GNVQ, City and Guilds Craft, BTEC First/General Diploma, RSA Diploma;</p> <p><b>Level 3:</b> 2+ A Levels/VCEs, 4+ AS Levels, Higher School Certificate, Progression/Advanced Diploma, Welsh Bacallaureate Advanced Diploma, NVQ Level 3; Advanced GNVQ, City and Guilds Advanced Craft, ONC, OND, BTEC National, RSA Advanced Diploma;</p> <p><b>Level 4 and above:</b> Degree (for example BA, BSc), Higher Degree (for example MA, PhD, PGCE), NVQ Level 4-5, HNC, HND, RSA Higher Diploma, BTEC Higher level,</p> <p><b>Adult Qualification Levels – Proportion of the working age population (16-64), Jan-Dec 2014</b></p> <table border="1"> <thead> <tr> <th></th> <th>% with NVQ4+</th> <th>% with NVQ3+</th> <th>% with NVQ2+</th> <th>% with NVQ1+</th> <th>% with other qualifications</th> <th>% with no qualifications</th> </tr> </thead> <tbody> <tr> <td>Lichfield</td> <td>31.0</td> <td>57.9</td> <td>74.3</td> <td>87.2</td> <td>3.5</td> <td>9.3</td> </tr> <tr> <td>Staffordshire</td> <td>28.4</td> <td>53.3</td> <td>73.3</td> <td>83.5</td> <td>5.0</td> <td>11.5</td> </tr> <tr> <td>Staffordshire and Stoke-on-Trent LEP</td> <td>26.7</td> <td>50.9</td> <td>70.3</td> <td>80.9</td> <td>5.9</td> <td>13.3</td> </tr> <tr> <td>West Midlands</td> <td>29.4</td> <td>50.1</td> <td>67.4</td> <td>79.9</td> <td>7.0</td> <td>13.2</td> </tr> <tr> <td>England</td> <td>35.7</td> <td>56.5</td> <td>73.2</td> <td>85.1</td> <td>6.2</td> <td>8.6</td> </tr> </tbody> </table> <p><b>Apprenticeship success rates in Lichfield 2012/13 and 2013/14</b></p>		% with NVQ4+	% with NVQ3+	% with NVQ2+	% with NVQ1+	% with other qualifications	% with no qualifications	Lichfield	31.0	57.9	74.3	87.2	3.5	9.3	Staffordshire	28.4	53.3	73.3	83.5	5.0	11.5	Staffordshire and Stoke-on-Trent LEP	26.7	50.9	70.3	80.9	5.9	13.3	West Midlands	29.4	50.1	67.4	79.9	7.0	13.2	England	35.7	56.5	73.2	85.1	6.2	8.6			<p>Overall the proportion of the working age population (16-64) in Lichfield qualified to NVQ Level 3 compares favourably to the County, LEP, Regional and National averages. However, higher level adult skills are an issue across the SSLEP, including Lichfield, with the proportion of the working age population qualified to 'NVQ Level 4 and above' below the national average.</p> <p>Apprenticeship success rates in Lichfield are higher than the SSLEP area,</p>	<p>ONS Annual Population Survey and Apprenticeship Success Rates www.gov.uk</p>
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Appendix A

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GCSE Results	<p>2014-15 Staffordshire:                      % pupils achieving 5+ GCSE grades A*-C: 64.9%                      Average A' Level Scores per candidate: 698.4</p>	<p>2014-15: England                      % pupils achieving 5+ GCSE grades A*-C: 64.2%                      Average A' Level Scores per candidate: 700.3</p>	<p>Staffordshire's results has decreased with regard to GCSEs from 2009 when 70.4% achieved grades A*-C. This level of achievement was in line with the national figure of 70%. There has also been a slight reduction in the average A Level scores per candidate achieving 707.6 in 2009 with the average for England being 739.1 substantially higher than Staffordshire's results.</p>	<p>Staffordshire's results are similar to the national picture.</p>	<p>Department for Education</p>																													
<b>Health</b>																																		
Life expectancy	<p>Males: 80 years                      Females: 84 years</p>	<p><b>West Midlands</b>                      Males: 78.9 years</p>	<p>Latest ONS population projections are trend-</p>	<p>Overall life expectancy at birth</p>	<p>ONS: Healthy life</p>																													

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



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

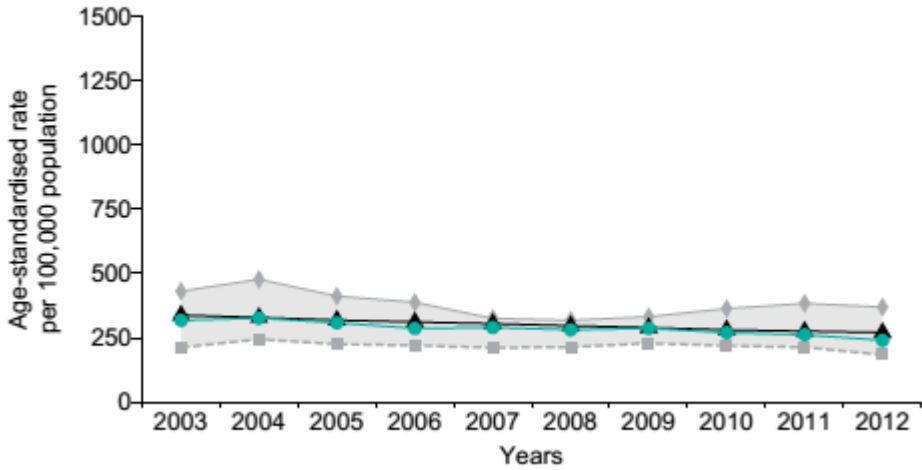
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	<div data-bbox="427 264 1384 919" data-label="Figure"> <p>The chart shows projected population change between 2014 and 2029. The Y-axis represents the percentage change, ranging from -20.00 to 140.00. The X-axis represents age groups: 0-15, 16-24, 25-49, 50-64, 65-74, 75-84, and 85+. For each age group, three bars are shown: Lichfield (blue), West Midlands (orange), and England (grey). The 85+ age group shows the most significant increase, with Lichfield at approximately 115%, West Midlands at 65%, and England at 60%. The 16-24 age group shows a decrease for Lichfield (-10%) and West Midlands (-5%), while England remains positive (5%).</p> <table border="1"> <caption>Projected population change between 2014 and 2029</caption> <thead> <tr> <th>Age Group</th> <th>Lichfield</th> <th>West Midlands</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>0.00</td> <td>8.00</td> <td>8.00</td> </tr> <tr> <td>16-24</td> <td>-10.00</td> <td>-5.00</td> <td>5.00</td> </tr> <tr> <td>25-49</td> <td>-5.00</td> <td>2.00</td> <td>2.00</td> </tr> <tr> <td>50-64</td> <td>5.00</td> <td>5.00</td> <td>10.00</td> </tr> <tr> <td>65-74</td> <td>20.00</td> <td>15.00</td> <td>20.00</td> </tr> <tr> <td>75-84</td> <td>60.00</td> <td>40.00</td> <td>45.00</td> </tr> <tr> <td>85+</td> <td>115.00</td> <td>65.00</td> <td>60.00</td> </tr> </tbody> </table> </div> <p data-bbox="427 962 1738 1066">The dependency ratio for older people in Lichfield (measures the number of people aged over 65 who depend on people of working age (16-64)) is 38 older people for every 100 people of working age. This is higher than the England average.</p>			Age Group	Lichfield	West Midlands	England	0-15	0.00	8.00	8.00	16-24	-10.00	-5.00	5.00	25-49	-5.00	2.00	2.00	50-64	5.00	5.00	10.00	65-74	20.00	15.00	20.00	75-84	60.00	40.00	45.00	85+	115.00	65.00	60.00		wards, Alrewas and Fradley, Chadsmead and Summerfield have high proportions of children under 16.	
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Health deprivation and disability	<p>Lichfield District is ranked as 206 out of 326 local authorities (i.e. in top 40%) where 1 is the most deprived.</p> <p>The Health Deprivation and Disability Domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation.</p>	<p>Staffordshire is ranked 91<sup>st</sup> out of 152 i.e. in the top 40%.</p>		<p>its claimants' rate is substantially lower than the West Midlands and Great Britain.</p> <p>The 2011 Census found that 18.1% (18,300 people) had a limiting long-term illness (LLTI) in Lichfield. This is higher than the England average of 17.6%. The proportion of people who have a LLTI also increases with age: around 48% (9,400) of people with 65 and over and 67% (5,100) of people aged 75 and over have a LLTI.</p> <p>In Lichfield 12 of 26 wards also have higher proportions of people with LLTI than the England average.</p>	<p>DCLG English Indices of Deprivation 2015</p>

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Health inequality	<p>The charts provide a comparison of the changes in early death rates (in people under 75) between this area and all of England. Early deaths from all causes also show the differences between the most and least deprived quintile in this area. (Data points are the midpoints of 3 year averages of annual rates, for example 2005 represents the period 2004 to 2006).</p>			<p>Priorities in Lichfield include addressing inequalities in health, addressing the impact of alcohol, and supporting the ageing population.</p> <p>In 2012, 23.5% of adults are classified as obese.</p> <p>The rate of smoking related deaths was 229, better than the average for England. This represents 143 deaths per year. Rates of sexually transmitted infections, people killed and seriously injured on roads and TB are better than average. Rates of statutory homelessness, violent crime, long term unemployment,</p>	Public Health England																																																							
<p><b>Early deaths from all causes: MEN</b></p> <table border="1" data-bbox="434 542 1352 1007"> <caption>Estimated data for Early deaths from all causes: MEN</caption> <thead> <tr> <th>Year</th> <th>Grey Line (Diamonds)</th> <th>Black Line (Triangles)</th> <th>Teal Line (Circles)</th> <th>Dashed Grey Line (Squares)</th> </tr> </thead> <tbody> <tr><td>2003</td><td>680</td><td>550</td><td>500</td><td>450</td></tr> <tr><td>2004</td><td>650</td><td>520</td><td>480</td><td>420</td></tr> <tr><td>2005</td><td>600</td><td>500</td><td>450</td><td>400</td></tr> <tr><td>2006</td><td>580</td><td>480</td><td>430</td><td>350</td></tr> <tr><td>2007</td><td>560</td><td>470</td><td>420</td><td>280</td></tr> <tr><td>2008</td><td>540</td><td>460</td><td>410</td><td>280</td></tr> <tr><td>2009</td><td>520</td><td>450</td><td>400</td><td>280</td></tr> <tr><td>2010</td><td>480</td><td>440</td><td>380</td><td>280</td></tr> <tr><td>2011</td><td>470</td><td>430</td><td>370</td><td>280</td></tr> <tr><td>2012</td><td>460</td><td>420</td><td>360</td><td>280</td></tr> </tbody> </table>						Year	Grey Line (Diamonds)	Black Line (Triangles)	Teal Line (Circles)	Dashed Grey Line (Squares)	2003	680	550	500	450	2004	650	520	480	420	2005	600	500	450	400	2006	580	480	430	350	2007	560	470	420	280	2008	540	460	410	280	2009	520	450	400	280	2010	480	440	380	280	2011	470	430	370	280	2012	460	420	360	280
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# Health summary for Lichfield

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

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

**Indicator notes**

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

More information is available at [www.healthprofiles.info](http://www.healthprofiles.info) and <http://fingertics.phe.org.uk/profile/health-profiles> Please send any enquiries to [healthprofiles@phe.gov.uk](mailto:healthprofiles@phe.gov.uk)  
 You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence/version/3/](http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/)

Indicator	Lichfield District	Comparators		Local Trend		Commentary		Data Source																																				
Environmental Issues																																												
Energy Consumption	<b>Average Domestic Electricity Usage 2005-2014 per consumer</b>					<p>The average amount of electricity and gas usage per capita has decreased in line with the British average, however it remains at a higher rate.</p> <p>The rate of gas usage in Lichfield District per consumer has reduced by 33%, with the reduction in electricity usage by around 20%.</p>					<p>Department for Business, Energy &amp; Industrial Strategy  <a href="http://tools.dcc.gov.uk/en/content/cms/statistics/local_auth/interactive/domestic_ge/index.html">http://tools.dcc.gov.uk/en/content/cms/statistics/local_auth/interactive/domestic_ge/index.html</a></p>																																	
		<b>2005 (KWh)</b>	<b>2006 (KWh)</b>	<b>2007 (KWh)</b>	<b>2008 (KWh)</b>	<b>2009 (KWh)</b>	<b>2010 (KWh)</b>	<b>2011 (KWh)</b>	<b>2012 (KWh)</b>	<b>2013 (KWh)</b>	<b>2014 (KWh)</b>																																	
	Lichfield	5,320	4,910	4,850	4,630	4,520	4,510	4,410	4,360	4,290	4,310																																	
	GB Mean	4,600	4,460	4,390	4,200	4,150	4,150	4,080	4,020	3,940	3,950																																	
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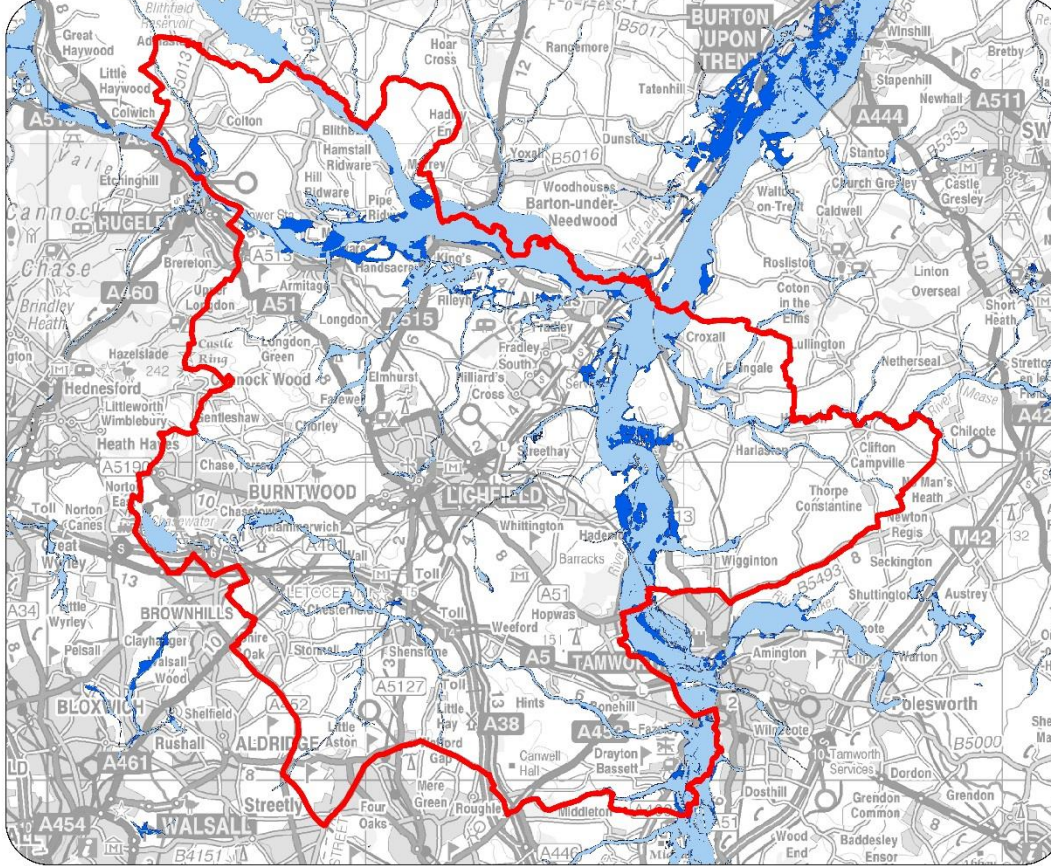
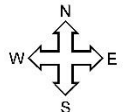


Appendix A

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	There has been an increase in the proportion of completions on brownfield sites to that recorded during 2014/15, the majority of development still occurs on brownfield land.			built on previously developed land will change in future years as greenfield releases will be required to deliver the housing requirements over the Local Plan Strategy Plan Period.	
EU Habitats sites	Within 20km of LDC: River Mease SAC – 23.03 ha Cannock Chase SAC – 1244.2 ha Cannock Extension Canal SAC – 5 ha Pasturefields Salt Marsh – 7.8 ha West Midlands Mosses – 184.62 ha Fens Pool – 20 ha Ensor’s Pool – 3.86 ha	N/A		It has been determined by the HRA of the Local Plan that the only 2 European Sites on which the Local Plan could cause significant harm are the Cannock Chase SAC and the River Mease SAC.	HRA, Lichfield District and Tamworth Borough
Nature conservation sites	Cannock Chase SSSI - 1279.1 ha Chasewater and Southern Staffordshire Coalfields Heath SSSI - 530.23 ha Gentleshaw Common SSSI - 80.47 ha Stowe Pool and Walkmill Claypit SSSI - 8.38 ha River Mease SSSI - 21.86 ha  78 SBIs (Sites of Biological Importance) within Lichfield District	N/A			

Appendix A

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

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
<p>Fluvial Flood Risk</p>	 <div data-bbox="1505 245 1675 427" style="border: 1px solid black; padding: 5px;"> <p><b>Lichfield district Council</b>                  District Council House                  Frog Lane                  Lichfield                  Staffs                  WS13 6YJ                  Telephone: 01543 358000                  enquiries@lichfieldcc.gov.uk</p> </div> <div data-bbox="1505 434 1675 715" style="border: 1px solid black; padding: 5px;"> <p><b>Legend</b></p> <ul style="list-style-type: none"> <li><span style="border: 2px solid red; display: inline-block; width: 20px; height: 10px; margin-right: 5px;"></span> District Boundary</li> <li><span style="background-color: lightblue; display: inline-block; width: 20px; height: 10px; margin-right: 5px;"></span> Flood Zone 3</li> <li><span style="background-color: blue; display: inline-block; width: 20px; height: 10px; margin-right: 5px;"></span> Flood Zone 2</li> </ul> <p><small>© Environment Agency copyright and/or database right 2016. All rights reserved.</small></p> </div> <div data-bbox="1505 721 1675 912" style="border: 1px solid black; padding: 5px;"> <p><b>Drawing Details:</b></p> <p>Scale: 1:33,396                  Date: 01/08/2016                  Drawing No:</p> <p><small>Drawing Prepared by:                  Roberts Whittaker - GIS Officer</small></p> <p><small>Coordinate System: British National Grid                  Projection: Transverse Mercator                  Datum: OSGB 1936                  False Easting: 400,000.0000                  False Northing: -100,000.0000                  Central Meridian: -2.0000                  Scale Factor: 0.9996                  Latitude Of Origin: 49.0000                  Units: Meter</small></p> </div> <div data-bbox="1505 919 1675 1114" style="border: 1px solid black; padding: 5px;">  <p><small>© Crown Copyright.                  Database Rights 2016                  Lichfield District Council                  Licence No: 100017765.</small></p> </div>			<p>The main rivers located in the Lichfield District are:</p> <ul style="list-style-type: none"> <li>• River Tame.</li> <li>• River Trent.</li> <li>• River Mease.</li> <li>• Moreton Brook.</li> <li>• River Blithe</li> </ul> <p>The River Tame and River Trent are the main rivers that flow through the Lichfield District Council area. These rivers carry large volumes of water and have wide floodplains. The EA Flood Zone maps for the River Trent and River Tame indicate fluvial risk occurs predominantly into rural agricultural land where there is currently little proposed development.</p>	<p>Environment Agency Flood Map for Planning (Rivers and Sea)</p>

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

Appendix A

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

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source												
	<p><b>Water Resource Infrastructure Needs (defined by the Water Cycle Study)</b></p> <p><b>Water supply</b> SSW can supply water to all developments, but some may require additional investment, which is achieved by the developer working directly with the supplier.</p> <ul style="list-style-type: none"> <li>• Major upgrades will be required for all sites in Burntwood, and sites which link to the Brownhills network, including supply mains.</li> <li>• Minor infrastructure upgrades will be needed for:                             <ul style="list-style-type: none"> <li>○ Fradley Airfield;</li> <li>○ North Streethay;</li> <li>○ Fazeley; and</li> <li>○ South Lichfield.</li> </ul> </li> </ul> <p><b>Water abstraction</b> Any developments requiring the abstraction of water should consider the information contained within the Catchment Abstraction Management Strategy (CAMS).</p>																
Air Quality	<p><b>Mortality attributable to air pollution (adults aged 30 and over)</b></p> <table border="1" data-bbox="427 1219 1057 1366"> <thead> <tr> <th data-bbox="427 1219 701 1294">Area</th> <th data-bbox="701 1219 808 1294">2011 (%)</th> <th data-bbox="808 1219 918 1294">2012 (%)</th> <th data-bbox="918 1219 1057 1294">2013 (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="427 1294 701 1331">Lichfield</td> <td data-bbox="701 1294 808 1331">5.1</td> <td data-bbox="808 1294 918 1331">5.0</td> <td data-bbox="918 1294 1057 1331">5.1</td> </tr> <tr> <td data-bbox="427 1331 701 1366">Staffordshire</td> <td data-bbox="701 1331 808 1366">4.9</td> <td data-bbox="808 1331 918 1366">4.7</td> <td data-bbox="918 1331 1057 1366">5.0</td> </tr> </tbody> </table>	Area	2011 (%)	2012 (%)	2013 (%)	Lichfield	5.1	5.0	5.1	Staffordshire	4.9	4.7	5.0		The table displays the fraction of annual all-cause adult mortality attributable to anthropogenic (human-made) particulate air	Poor air quality is a significant public health issue. The burden of particulate air pollution in the UK in 2008 was	Public Health Outcomes Framework
Area	2011 (%)	2012 (%)	2013 (%)														
Lichfield	5.1	5.0	5.1														
Staffordshire	4.9	4.7	5.0														

Appendix A

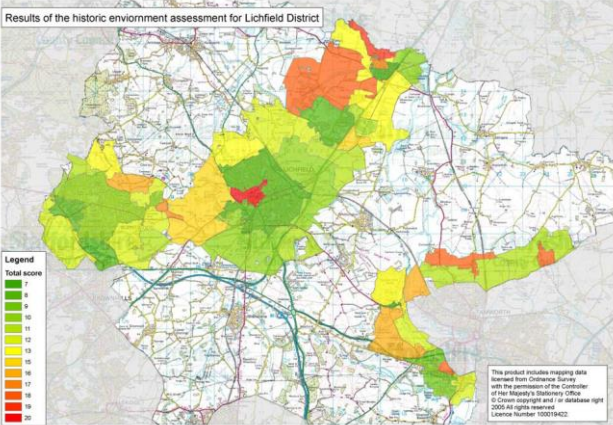
Indicator	Lichfield District				Comparators	Local Trend	Commentary	Data Source
	West Midlands	5.3	5.1	5.4		pollution (measured as fine particulate matter, PM2.5). This suggests that around 5% of Lichfield's mortality is attributable to air pollution which is similar to the regional and national picture.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





Appendix A

Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
<p>National Forest, Forest of Mercia and the Central Rivers Initiative</p>	<p>There are a number of regional initiatives affecting parts of the District that aim to achieve enhancements to existing landscapes and create valuable new habitats that can play a part in increasing biodiversity value within the District. In particular these include the National Forest, the Forest of Mercia and the Central Rivers Initiative,</p> <p>The <b>National Forest</b> for the Midlands was originally a Countryside Commission initiative. The Forest area is located principally within Derbyshire, Leicestershire and East Staffordshire District. A small area to the north of the District which includes the National Memorial Arboretum and Alrewas fall within the National Forest. The District Council currently supports the principle of establishment for the National Forest through saved policy EA.16 Lichfield District Local Plan June 1998.</p> <p>The <b>Forest of Mercia</b>, originally sponsored by the Countryside Commission and Forestry Authority, includes part of South Staffordshire, Cannock Chase, Lichfield District and Walsall Metropolitan Borough which are partners in the project. In Lichfield District the Forest areas encircles Burntwood, with its eastern fringes reaching the northern and western edge of Lichfield.</p> <p>The <b>Central Rivers Initiative (CRI)</b> is a broadly based partnership which the District council is part working together to shape and guide the progressive</p>	<p>N/A</p>	<p>N/A</p>	<p>The Forest of Mercia and the National Forest are both landscape ordinated initiatives that seek to fundamentally change the character of parts of the District to redress the major loss of woodland the area has suffered whilst enhancing the District's biodiversity and playing an important role in providing for recreation and tourism.</p> <p>The National Forest, Forest of Mercia and Central Rivers Initiative are supported through Core Policy 1 &amp; 13 of the Local Plan Strategy 2008-2029.</p> <p>In addition the principle of the National Forest and Forest of Mercia</p>	<p>Lichfield District Local Plan June 1996</p>

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

Appendix A

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

Appendix A

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

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

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

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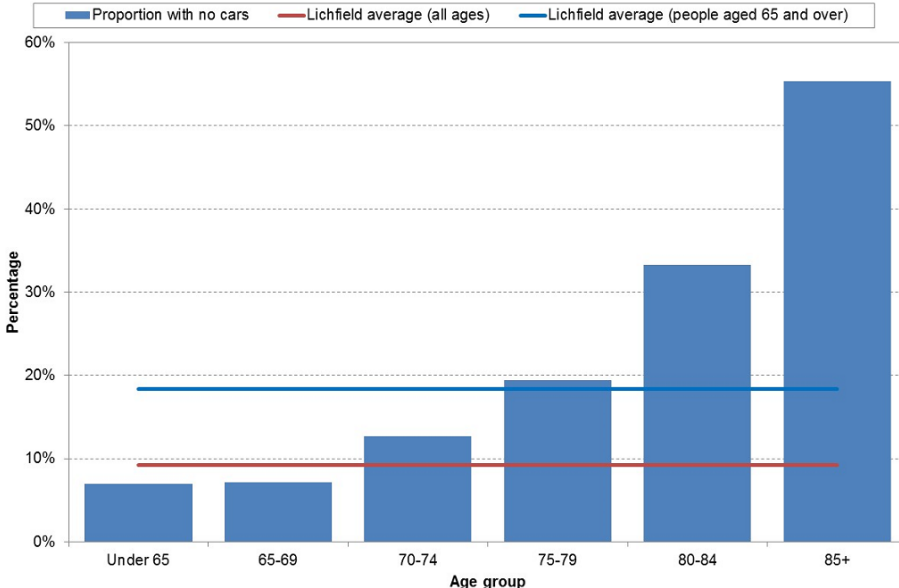
Indicator	Lichfield District	Comparators	Local Trend	Commentary	Data Source
	<p>of the highest levels of car drivers, at 75%. Lichfield District has four rail stations Lichfield City, Lichfield Trent Valley, Rugeley Trent Valley and Shenstone. There are also a number of community transport services operating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

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



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

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

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

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

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



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

## Local Plan Allocations Sustainability Appraisal Scoping Report: Consultation Sheet

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

Table 1:

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

Table 2:

Comment	Original response	Amended Response
<p><b>Statutory Consultee: Natural England</b> In terms of wider themes we note that the district's high level of car use and 'out commuting'. The Council should consider related air quality impacts on 'ecological receptors' (semi natural habitats and their wildlife) in order to understand potential effects arising from site allocations.</p>	<p>Duly Noted Recommendation The following site specific question will be added to Table 1 against Sustainability Objective Seek to improve air, soil and water quality.</p>	<p>Duly noted Recommendation the following site specific questions will appear against Sustainability Objective 9</p> <ol style="list-style-type: none"> <li>1. Which Source Protection Zone does the development fall within?</li> <li>2. Does the site fall within the River Mease SAC?</li> <li>3. Is the site within or directly connected by road to an AQMA?</li> <li>4. Will it result in the loss of quality agricultural land?</li> </ol>
<p>Statutory Consultee: Natural England Sustainability objective – 'To protect and enhance the rich diversity of natural</p>	<p>Duly Noted Recommendation</p>	<p>Duly Noted Recommendation The Following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2</p>

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

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

Appendix B (i)

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



## Local Plan Allocations Sustainability Appraisal Scoping Report: Consultation Sheet

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



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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



# **APPENDIX C – LOCAL PLAN ALLOCATIONS SUSTAINABILITY APPRAISAL**

Adoption Statement

## General Methodology Housing Sites

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

## Appendix C

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

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

### General Methodology Employment Sites

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

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

### General Methodology Gypsy and Traveller Sites

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

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

### General Methodology Saved Policies

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

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

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

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

# **APPENDIX D – LOCAL PLAN ALLOCATIONS SUSTAINABILITY APPRAISAL**

## Adoption Statement

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

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

APPENDIX D

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

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

APPENDIX D

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

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



APPENDIX D

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

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

APPENDIX D

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

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

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

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

APPENDIX D

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

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

Table 6 Key: Housing

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

**Table 6: Reasons for Preferred Alternatives Employment**

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

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

Table 6 Key: Employment

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

Table 7: Reasons for Preferred Alternatives Gypsy &amp; Travellers

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