

Appendix A – Key Sustainability Issues identified in the Scoping Report (July 2019)

Scoping Report Topics	Sustainability Issues	Likely Evolution without the Plan
Population, Housing and Communities	<p>Lichfield has a higher elderly population, 5% higher than the national average. Over 65s already outnumber the under 15s.</p> <p>Significant growth in people over 65 and 85 is projected between 2015 – 2025.</p> <p>The working age population has decreased by 3% since 2010 which is higher than both the regional and national average.</p> <p>Average house price in Lichfield is considerably more expensive when compared to the regional and national averages. The lowest quartile house price is 6.72 times the lowest quartile income.</p> <p>Crime in the District has increased by 16.1% when compared to the previous 12 months. There has been an increase of burglary from dwellings, other violence against the person and public order offences.</p> <p>There has been a decrease in the proportion of completions on brownfield land, although the majority of development still occurs on brownfield land.</p>	<p>Services and infrastructure unable to keep up with requirements of an ageing population, leading to communities without access to required infrastructure and service's.</p> <p>A less co-ordinated approach to housing and delivery and risk of undersupply of affordable housing.</p> <p>Population forced to move out of District to have access to affordable housing</p> <p>Risk the ability for communities to interact and remain inclusive. Reduce the ability to create environment where crime and disorder and the fear of crime does not undermine quality of life or community cohesion.</p>
Health and Inequalities	<p>Higher than national average number of working age people having no qualifications. The District has a lower proportion of working age adults qualified to NVQ Level 4 than the national average.</p>	<p>The population will be less likely to contribute to and enable the reinforcement of a strong competitive economy.</p> <p>The district will be unable to proactively meet development needs of business and support a fit economy.</p>

	<p>Although Lichfield has a higher life expectancy and healthy life expectancy than the national average, residents can still expect to spend a large number of years in ill health. There is also some disparity between wards.</p> <p>A high rate of obesity can be seen in the District, from an early age through to adulthood.</p>	<p>A Local Plan can ensure the built environment contributes to delivering health benefits and supports the wellbeing of a population. Without a Plan developments are less likely to provide accessible open space or other infrastructure requirements that will have a positive impact on health and wellbeing.</p>
Economy and Employment	<p>High level of out commuting by residents of the District.</p> <p>Disparity between the gross weekly pay of residents in the District and those whose workplace is within the District.</p> <p>Both Lichfield City Centre and Burntwood Town Centre have the lowest vacancy rates in a number of years, with 19 out of 302 shops in Lichfield City Centre and 3 out of 67 in Burntwood being vacant.</p>	<p>Fewer residents being employed within the District leading to a lack of a skilled workforce and a strong competitive economy.</p> <p>Less co-ordinated approach to new employment and commercial infrastructure leading to the impediment of sustainable growth.</p> <p>Place at risk the continued vitality of our town centres to remain competitive providing customer choice access to services and facilities.</p>
Townscape and Historic Environment	<p>There are 21 conservation areas within the District, a total of 16 scheduled ancient monuments, a registered historic park and garden and 762 listed buildings of which 12 are Grade I, 63 are Grade II* and 687 Grade II. 17 listed buildings are on the 'Buildings at risk survey' with 4 of those being Grade I and II*.</p> <p>Within Lichfield there are many rural villages that are set within a varied and attractive rural area.</p>	<p>Loss of heritage assets due to a less co-ordinated approach to housing and delivery.</p> <p>Uncontrolled or unsympathetic development could harm local landscape and townscape character.</p>
Landscape and Ecology	<p>Lichfield supports a variety of wildlife rich habitats and species, with 2 SACs, 4 SSSIs, an AONB, and 78 Sites of Biological Interest.</p> <p>Areas within the District are at risk of pluvial and fluvial flooding.</p>	<p>Lack of local protection could lead to a degradation and loss of valued landscapes.</p>

	<p>Within the District there is a large amount of high quality agricultural land, in particular Grades 2 and 3.</p>	<p>Lack of strategic oversight leading to inappropriate development, damaging Districts valuable habitats and species.</p> <p>Potential risks from inappropriately located development.</p>
<p>Transport and Movement</p>	<p>Public transport provision across the District is variable.</p> <p>3% of employed residents commute by rail, which is the highest in Staffordshire.</p> <p>49.1% of residents commute out of the District to work. Lichfield District also has one of the highest rates of car drivers at 75%.</p> <p>In Lichfield City 83% of households are within 350 metres of a half hourly or better weekday bus service. Some settlements are limited to just 1-2 bus services a week with some rural villages having no bus service at all.</p>	<p>A less strategic overview of development and infrastructure delivery may occur.</p> <p>Necessary highway infrastructure may not be strategically implemented.</p> <p>Ensure that new development is in accessible locations that reduce the need to travel.</p> <p>Ensuring that new growth is integrated with new transport infrastructure.</p>
<p>Climate, Energy and Waste</p>	<p>Traffic continues to compromise air quality in the AQMA.</p> <p>50.65% of all household waste was recycled in 2015/16 which is above the EU target of 50% of waste being recycled by 2020.</p> <p>Over a ten year period average domestic consumption has decreased by 26% in Lichfield which is larger than both the regional (-22%) and national (-12%) figures.</p> <p>Bring up water to a 'good quality' rating in line with Environment Agency objectives.</p>	<p>Without a strategic approach to development and infrastructure, existing issues of air quality may be exacerbated.</p> <p>Positive trends could be reversed reducing the ability of the District to contribute a low carbon future.</p> <p>A Local Plan can provide further support in the long-term approach to climate change mitigation and adaption. Therefore, without a Local Plan development may be less ambitious in its energy performance.</p>

Appendix B: Assumptions

Local Plan Review: Preferred Options

Assumptions

Introduction

Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*.

SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. The SA/SEA of Lichfield District Council's Local Plan Allocation has been developed using this integrated approach and throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

Assumptions and Assessment

Every Local Plan Allocation proposed site along with reasonable alternatives have been assessed as part of the SA. In addition every revised policy has been assessed through the SA process. **For the purposes of Cabinet the SA will contain a detailed report and a matrix of site and policy assessments. At this point this stands at over a 1000 pages. As the SA assessment is a technical process, for the purposes of Leadership the relevant objectives and assumptions have been provided.** There are a number of SA indicators which assumptions have been attached before the SA assessment process was completed. These assumptions have been catalogued.

Assumptions

SA Objectives	Assumptions
<p>1. To provide housing that meet the needs of all of our existing and future residents</p>	<p>Employment Site Options</p> <p>Site Specific Question 1,2,3,4 and 5</p> <p>In relation to Site Specific Questions 1, 2, 3, 4 and 5 the location of employment sites are not considered likely to have an effect on this objective.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 1, 2, 3, 4 and 5.</p> <ul style="list-style-type: none"> • A neutral effect (N) score will be recorded. <p>Residential Site Options and Gypsy and Traveller Site options</p> <p>All sites of this development type will to some extent have a positive effect on this objective.</p> <p>Site specific Question 1 – Will the site deliver affordable housing?</p> <p>In relation to Site Specific Questions 1 housing development consisting of 15 dwellings or more or sites of 0.5ha or more in size in both Lichfield City and Burntwood are required to make provision for affordable housing. Outside of these two urban areas affordable housing is required in line with national thresholds which currently stands at sites of 10 dwellings or more.</p> <p>Therefore the following assumption will be made in relation to Lichfield City and Burntwood in regard to Site Specific Question 1:</p> <ul style="list-style-type: none"> • Sites with capacity for more than 15 homes or have a site size of 0.5ha or more will have a significant positive (++) effect • Sites with capacity for less than 15 homes or under 0.5ha in size will have a positive (N) effect. <p>Therefore the following assumptions will be made in relation to Site Specific Question 1 relating to areas outside of Lichfield City and Burntwood.</p>

Assumptions

SA Objectives	Assumptions
	<ul style="list-style-type: none"> • Sites with capacity for more than 11 homes will have a significant positive (++) effect • Sites with capacity for less than 11 homes will have a positive (N) effect. <p>Site Specific Question 2 – Will the site use previously developed land or building?</p> <p>Development on brownfield land represents more efficient use of land in comparison to the development of greenfield sites.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 2.</p> <ul style="list-style-type: none"> • Sites that are mainly or entirely on brownfield land will be scored as having a significant positive effect (++) • Sites that are partly greenfield but include an element of previously developed land will be scored as having a minor negative effect (-) • Sites that are mainly or entirely on greenfield land will be scored as having a significant negative effect (--). <p>Site Specific Question 3 – Will it give a high housing yield?</p> <p>Higher density development with a number of integrated uses provides an efficient use of existing land resource. Whilst the great majority of sites have the natural ability to deliver high density development this can be restricted at detailed design stage when the surrounding context and other individual site specific elements are established.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 3.</p> <ul style="list-style-type: none"> • All sites will be scored as having a neutral (N) effect. <p>Site Specific Question 4 – Will the site meet local need?</p> <p>All sites of this development type will to some extent have a positive effect on this objective. Therefore the following assumption will be made.</p> <ul style="list-style-type: none"> • A significant positive (++) effect will be recorded against Site Specific Question 4.

Assumptions

SA Objectives	Assumptions
	<p>Site Specific Question 5 – Will the site meet cross boundary and/or neighbouring needs?</p> <p>All sites of this development type will to some extent have a positive effect on this objective. Therefore the following assumption will be made.</p> <ul style="list-style-type: none"> • A significant positive (++) effect will be recorded against Site Specific Question 5.
<p>2. To promote safe communities and reduce fear of crime</p>	<p>Site Specific Question 1 – Will it reduce crime though design measures? Site Specific Question 2 – Will it contribute to a safe built environment?</p> <p>The effect of new development on the reduction of crime and fear of crime will depend on factors which are not influenced by the location of development sites but through detailed design.</p> <p>Therefore the following assumption will be made in relation to Site Specific Questions 1 and 2</p> <ul style="list-style-type: none"> • A neutral effect (N) will be recorded.
<p>3. Improve access to health facilities and promote wellbeing</p>	<p>Residential Site Options and Employment Site Options</p> <p>Site Specific Question 1 – Will it improve accessibility to health care for existing residents (including older residents) and provide additional facilities for new residents?</p> <p>In terms of Site Specific Question 1, whilst it is possible that employees may choose to access health care facilities close to their place of work it is assumed that any generated need and required response will focus on residential growth points.</p> <p>The District Council’s Community Infrastructure (CIL) Levy Regulation 123 listed states that funds may be used where evidence is provided that there is no local capacity and expansion of services is required to support growth across the district. Therefore development that falls within and identified use on the adopted Schedule of Rates will result in a possible positive effect, however the extent is uncertain.</p> <p>Therefore in relation to Site Specific Question 1 the following assumptions will be made:</p> <ul style="list-style-type: none"> • A minor positive effect (+?) score will be recorded against Site Specific Questions 1.

Assumptions

SA Objectives	Assumptions
	<p>Gypsy and Traveller site options</p> <p>Development associated with the development of sites to accommodate Gypsy and Traveller need would not fall within an identified use on the adopted Schedule of Rates. As such CIL would not apply and a possible positive effect would not result.</p> <p>Therefore in relation to Site Specific Question 1 the following assumptions will be made</p> <ul style="list-style-type: none"> • A neutral effect (N) score will be recorded. <p>Site Specific Question 2 – Will it support wellbeing including opportunities for recreational/ physical activity?</p> <p>Sites that are within walking distance (480m, Policy HSC1 Lichfield District Council Local Plan Strategy) of existing open spaces (including play, amenity green space) may provide opportunities for people to improve their health and wellbeing.</p> <p>Therefore in relation to Site Specific Question 2 the following assumptions will be made.</p> <ul style="list-style-type: none"> • Sites that are within 480m of more than one area of open space will have a significant positive (++) affect. • Sites that are within 480m of one area of open space will have a minor positive (+) affect. • Sites that are not within 480m of an area of open spaces will have a Neutral (N) affect. <p>Employment Site options</p> <p>Site Specific Question 2</p> <p>Whilst it is possible that employees may choose to access green space close to their place of employment during the working day the location of employment sites and retail sites options are not considered likely to have an effect on Site Specific Questions 2 of this objective which relates directly to accessibility of greenspace.</p> <p>The following assumption will be made.</p> <ul style="list-style-type: none"> • A neutral effect (N) score will be recorded against Site Specific Question 2

Assumptions

SA Objectives	Assumptions
	<p>Residential and Employment Site Options Site Specific Question 3 – Will it provide new accessible green space?</p> <p>Improvements to open space provision, including play provision for key sites, in line with the Open Space Assessment are identified as infrastructure to be funded in whole or in part by CIL. Therefore development that falls within an identified use on the adopted Schedule of Rates will result in a possible positive effect, however the extent is uncertain.</p> <p>Development of a site that includes an existing area of open space could result in the loss of that asset depending on whether its retention is incorporated within the detailed design. Large-scale new housing site allocations could offer the opportunity for the creation of accessible open space provision within the development site. It is uncertain as it cannot be known until detailed design stage whether the open space would be incorporated or lost through development.</p> <p>Therefore in relation to Site Specific Question 3 the following assumptions will be made:</p> <ul style="list-style-type: none"> • Sites that include an existing area/s of open space could have minor negative (-?) effect. • All other sites will score a minor positive effect (+?) score will be recorded against Site Specific Questions 3. <p>Gypsy and Traveller Site Options</p> <p>Development associated with the development of sites to accommodate Gypsy and Traveller need would not fall within an identified use on the adopted Schedule of Rates. As such CIL would not apply and a possible positive effect would not result.</p> <p>Therefore in relation to Site Specific Question 3 the following assumptions will be made</p> <ul style="list-style-type: none"> • A neutral effect (N) score will be recorded.
<p>4. Maximise the use of previously developed land/ buildings and</p>	<p>Site Specific Question 1 - Will it result in the loss of land that has not been previously developed?</p>

Assumptions

SA Objectives	Assumptions
<p>encourage the efficient use of land</p>	<p>Development on brownfield land represents more efficient use of land in comparison to the development of greenfield sites.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 1.</p> <ul style="list-style-type: none"> • Sites that are mainly or entirely on brownfield land will be scored as having a significant positive effect (++) • Sites that are partly greenfield but include an element of previously developed land will be scored as having a minor negative effect (-) • Sites that are mainly or entirely on greenfield land will be scored as having a significant negative effect (--). <p>Site Specific Question 2 – Is the site capable of supporting higher density development and/ or a mix of uses?</p> <p>Higher density development with a number of integrated uses provides an efficient use of existing land resource. Whilst the great majority of sites have the natural ability to deliver high density development this can be restricted at detailed design stage when the surrounding context and other individual site specific elements are established.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 2.</p> <ul style="list-style-type: none"> • All sites will be scored as having a neutral (N) effect. <p>Site Specific Question 3 – Does the site allow for the re-use of existing buildings?</p> <p>The reuse of existing buildings is an efficient use of existing resources however the extent that new development is able to incorporate existing site infrastructure will only become apparent at detailed design stage.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 3.</p> <ul style="list-style-type: none"> • Sites that have existing buildings included within them will be scored as having a minor positive effect with uncertainty (+?) • Sites that do not have buildings included within them will be scored as having a neutral effect (N). <p>Site Specific Question 4 – Will it reduce the amount of derelict, degraded and underused land within the District?</p>

Assumptions

SA Objectives	Assumptions
	<p>Development on derelict, degraded and underused land represents an efficient use of land.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 4.</p> <ul style="list-style-type: none"> • Sites that have an element of derelict, degraded and underused land within them will be scored as having a significant positive effect (++). • All other sites will be scored as having a neutral effect (N).
<p>5. To improve educational attainment of the working age population</p>	<p>Site Specific Question 1 – Will it reduce the number of working age residents who have no, or lower qualifications?</p> <p>The effect of new development in relation to participation and improved access to education and skills training will to a large extent be influenced by factors that will be addressed at detailed design stage and it is also noted that personal behaviour will also impact on this indicator.</p> <p>The following assumption has been made in relation to Site Specific Question 1.</p> <ul style="list-style-type: none"> • A neutral effect (N) score will be recorded.
<p>6. To achieve stable and sustainable levels of economic growth and maintain economic competitiveness</p>	<p>Site Specific Question 1 – Will it encourage higher skilled economic sectors in the District? Site Specific Question 2 – Will it encourage new employment that is consistent with local needs? Site Specific Question 3 – Will it encourage the growth of existing businesses? Site Specific Question 4 – Will it encourage small businesses to grow?</p> <p>Whilst housing development overall can contribute to economic growth, Sustainability Objective 6 relates to the link between, business growth and skills and forms the focuses of the above Site Specific Questions. It has therefore been assumed that the location of Residential and Gypsy and Traveller site options will not positively impact on the elements of economic growth identified within this objective.</p> <p>Therefore the following assumption will be made in relation to Site Specific Questions 1, 2, 3, and 4. If however the proposed housing site would lead to the loss of existing employment land a negative impact on sustainable economic growth could result. In recognition that the retail sector plays a role in the prosperity and growth also skills,</p>

Assumptions

SA Objectives	Assumptions
	<p>employment and business growth those housing sites that fall within either the Town Centre Boundary of Lichfield City Centre or Burntwood could result in a negative effect.</p> <p>Therefore the following assumptions have been made in relation to Site Specific Questions 1,2,3, and 4.</p> <ul style="list-style-type: none"> • A neutral effect (N) score will be recorded where the site is not in use for employment or is located within an Existing Employment Area. • Sites that are currently in Existing Industrial Areas or currently being used for employment use would have a significant negative effect (--) score will be recorded. • <p>Lichfield</p> <ul style="list-style-type: none"> • Sites that fall within the Primary Retail Area of Lichfield City Centre a significant negative effect (--) score will be recorded, • Sites that fall within the Secondary Retail Area of Lichfield City Centre a minor negative effect (-) score will be recorded. <p>Burntwood</p> <ul style="list-style-type: none"> • Sites that fall within the Primary Retail Area of Burntwood significant negative effect (--) score will be recorded against. <p>Employment Sites</p> <p>Site Specific Questions 1, 2, 3, and 4</p> <p>Employment sites by the nature of the allocation have the potential to result in a positive effect against Site Specific Questions 1, 2, 3, and 4 the extent of this effect will be unknown until detailed design stage and beyond.</p> <p>As such the following assumption will be made</p> <ul style="list-style-type: none"> • A significant positive effect reflecting the uncertain nature of the effect (Double +?).
7. To reduce water and air pollution	Site Specific Question 1 – Which Source Protection Zone does the development fall within?

Assumptions

SA Objectives	Assumptions
	<p>The effects of development on water quality will depend on the capacity of the relevant sewage treatment works to accommodate the impact of the new development, the level/extent of the effect cannot be assessed at this point. However, which water Source Protection Zone the site falls within can be established and a level of effect assumed.</p> <p>Therefore the following assumption will be made in relation to Specific Question 1</p> <ul style="list-style-type: none"> • Sites that are within Source Protection Zone 1 could have a significant negative (--) effect on water quality. • Sites that are within Source Protection Zone 2 or 3 could have a minor negative (-) effect on water quality. • Sites that are not within a Source Protection Zone are likely to have a neutral (N) effect on water quality. <p>Site Specific Question 2 – Does the site fall within the River Mease SAC catchment?</p> <p>The River Mease is designated as a Special Area of Conservation under the Habitats Regulations part of which falls within Lichfield District.</p> <p>Therefore the following assumptions will be made in relation to Site Specific Question 2</p> <ul style="list-style-type: none"> • Those sites that are located partly or wholly within the catchment of the River Mease SAC could have a significant negative (--) effect in water quality. • All other sites will record a Neutral (N) effect. <p>Site Specific Question 3 – Is the site within or directly connected by road to an AQMA?</p> <p>Within Lichfield District there are two Air Quality Management Zone designated (A5 Muckley Corner and A38 Wall Island to Alrewas). Site that are within one of the Air Quality Management Areas (AQMAs) in the District could increase levels of air pollution in those areas as a result of increase vehicle traffic.</p> <p>Therefore the following assumptions will be made in relation Site Specific Question 3</p> <ul style="list-style-type: none"> • Sites that are partly or wholly in an Air Quality Management Area are likely to have a significant negative (--) effect on air quality. <p>Sites that are not in an Air Quality Management Area are likely to have a neutral (N) effect on air quality.</p>

Assumptions

SA Objectives	Assumptions
<p>8. To minimise water and increase the recycling and reuse of waste materials</p>	<p>Site Specific Question 1 – Will it reduce household and/ or commercial waste?</p> <p>This will depend largely on behaviour patterns combined with the detailed design of the development.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 1.</p> <ul style="list-style-type: none"> • All sites that are considered to have a Neutral (N) effect. <p>Site Specific Question 2 – Will it increase waste recovery and recycling? Site Specific Question 3 – Will it reduce the proportion of waste sent to landfill?</p> <p>It is possible that previously developed land may offer opportunities for the reuse of materials and buildings as part of the development.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 2 and 3.</p> <ul style="list-style-type: none"> • All sites that are mainly or entirely on brownfield land will have a minor positive effect (+) <p>All other sites will record a Neutral (N) effect.</p>
<p>9. To reduce and manage flood risk and surface water run off</p>	<p>Site Specific Question 1 – Is the site located outside an area of risk from flooding?</p> <p>National Planning Guidance identifies which types of land uses are considered to appropriate in Flood Zones 2, 3a and 3b. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas particularly if the site has not previously been developed. No assumptions have been made that relate to existing mitigation that may or may not exist on sites that are brownfield.</p> <p>National Planning Practice guidance identifies residential properties as a ‘more vulnerable use’, which is suitable in areas of flood zone 1 and 2, but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b.</p> <p>Therefore the following assumptions will be made in relation to Site Specific Question 1.</p> <ul style="list-style-type: none"> • Sites that are entirely or mainly on greenfield land that are within flood zones 3 are likely to have a significant negative (--) effect. • Sites that are entirely or mainly on greenfield outside of flood zone 3 are likely to have a minor negative (-) effect. • Sites that are entirely or mainly on brownfield within flood zones 3 are likely to have a minor negative (--) effect.

Assumptions

SA Objectives	Assumptions
	<ul style="list-style-type: none"> • Sites that are on brownfield land outside of flood zones 3 are likely to have a Neutral (N) effect. <p>Gypsy and Traveller Site Options</p> <p>National Planning Practice Guidance identifies caravans, mobile homes and park homes intended for permanent residential use as a ‘highly vulnerable use’, which is suitable in areas of flood zone 1 but require an exception test in flood zone 2 and is unsuitable in flood zones 3a and 3b.</p> <p>Therefore the following assumptions will be made in relation to Site Specific Question 1.</p> <ul style="list-style-type: none"> • Sites that are entirely or mainly with flood zones 2 or 3 are likely to have a significant negative (--) effect. • Sites that are on greenfield land outside of flood zones 2 and 3 are likely to have a minor negative (-) effect. • Sites that are on brownfield land within flood zones 2 and 3 are likely to have a minor negative (-) effect. • Sites that are on brownfield land outside flood zones 2 and 3 area likely to have a Neutral (N). <p>Employment and Retail Site Options</p> <p>National Planning Guidance identifies buildings used for shops, as well as offices and general industry, as ‘less vulnerable uses’, which are suitable in areas of flood zone 1, 2 and 3a but are unsuitable in flood zone 3b.</p> <p>Therefore the following assumptions have been made in relation to Site Specific Question 1.</p> <ul style="list-style-type: none"> • Sites that are entirely or mainly on greenfield land that is within flood zone 3 are likely to have a significant negative (--) effect. • Sites that are either entirely or mainly in greenfield outside of flood zone 3, or that are entirely or mainly in brownfield within flood zone 3 are likely to have a minor negative (-) effect. • Sites that are on brownfield land outside of flood zone 3b are likely to have a Neutral (N) effect. <p>Site Specific Question 2 – Will there be opportunity for flood risk reduction?</p> <p>The effect of new development on flood management will depend on the extent to which SuDs or other flood elevation methods are incorporated within the development. It is however difficult to assume the level of effect such design elements (if incorporated) will have at this stage.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 2.</p>

Assumptions

SA Objectives	Assumptions
	<ul style="list-style-type: none"> An uncertain effect (?) score will be recorded on all types of site options
<p>10. To reduce and manage the impacts of climate change and the Districts contribution to the causes</p>	<p>Site Specific Question 1 – Will it reduce the causes of climate change? Site Specific Question 2 – Will it encourage the prudent use of energy? Site Specific Question 3 – Will it provide opportunities for additional renewable energy generation capacity within the District?</p> <p>The effect on new development on the Sustainability Objective will depend to a large extent on options taken at detailed design.</p> <p>Therefore the following assumption will be made in relation to Site Specific Questions 1, 2 and 3.</p> <ul style="list-style-type: none"> All sites that are considered to have a Neutral (N) effect.
<p>11. To promote biodiversity protection, enhancement and management of species and habitats</p>	<p>Site Specific Question 1 - Will it conserve protected/ priority species?</p> <p>A site will score neutral (N) if the site is unlikely to support protected/ priority species (eg. Hardstanding, arable, amenity grassland)</p> <p>A site will score a minor negative effect (-) if there is a potential for a site to support protected/ priority species – if a site is within 2km of a protected/priority species.</p> <p>A site will score a significant negative effect (--) if protected/ priority species are on site (eg. Great Crested Newt, Bats).</p> <p>Site Specific Question 2 - Will it conserve protected/ priority habitats and local nature conservation sites?</p> <p>A site will score neutral (N) if it is composed of land that is not considered to be a habitat region (eg hardstanding, arable)</p>

Assumptions

SA Objectives	Assumptions
	<p>A site will score a minor negative effect (-) if the site comprised of partly protected/ priority species habitats (eg. Habitats with moderate distinctiveness such as semi improved grassland or ruderal).</p> <p>A site will score a significant negative effect (--) if the site contains protected/ priority species habitats (eg. Woodland, heathland, ancient woodland, hedgerows, veteran trees, mire) or falls within any designated sites such as SSSI, SBI, BAS.</p> <p>Site Specific Question 3 - Will it protect statutory designated sites?</p> <p>A site will score neutral (N) if it is not within a SAC area (CCSAC or RMSAC)</p> <p>A site will score a significant negative effect (--) if the site is within a SAC area or within the 0-15km area of CCSAC</p> <p>Site Specific Question 4 - Will it encourage ecological connectivity (including green corridors and water courses)?</p> <p>A site will score neutral (N) if it is isolated from or there are no watercourses/ green corridors present</p> <p>A site will score a minor negative effect (-) if the site is adjacent to or has a boundary with a green corridor or water course</p> <p>A site will score a significant negative effect (--) if the site is part of a green corridor or water course or is connected to an established network</p>
<p>12. To ensure the protection and enhancement of the historic environment and its setting</p>	<p>The NPPF para 193 states that the 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Development could also enable the enhancement of an asset preserving or revealing importance elements.</p>

Assumptions

SA Objectives	Assumptions
	<p>Site Specific Question 1 – Will it preserve and enhance buildings and structures and their settings and contribute to the Districts heritage?</p> <p>Therefore the following assumptions will be made in relation to Site Specific Question 1.</p> <ul style="list-style-type: none"> • Where sites have the potential to significantly enhance a listed building or its setting for example by repairing it, removing inappropriate development within its setting they will be scored as having a significant positive effect (++). • Where sites have the potential to enhance a locally listed building or its setting or they have the potential to make a modest improvement to a listed building or its setting they will be scored as having a minor positive effect (+). • Where sites are not considered to be within the setting of a listed or locally listed building they will be scored as having a Neutral (N). • Where a site has the potential to harm a locally listed building or its setting or would cause modest harm to a Grade II listed building or its setting but this would be minor harm and/or could be mitigated this will be scored as having a minor negative (-). • Where a site, however developed, would cause any harm to a Grade I or II* listed building or its setting or harm to a Grade II listed building or its setting that could not be mitigated it will be scored as having a significant negative effect (--). <p>Site Specific Question 2 – Will it preserve and enhance conservation areas including their settings?</p> <p>Therefore the following assumptions will be made in relation to Site Specific Question 3.</p> <ul style="list-style-type: none"> • Where sites have the potential to enhance a conservation area, for example where the area is highlighted as an area for improvement in the adopted conservation area appraisal, they will be scored as having a significant positive effect (++). • Where sites have the potential to preserve the conservation area they will be scored as having a minor positive effect (+). • Where sites are not considered to be within the setting of a conservation area they will be scored as having a significant positive effect (N). • Where a site has the potential to harm the conservation area or its setting but this would be minor harm and/or could be mitigated this will be scored as having a minor negative effect (-).

Assumptions

SA Objectives	Assumptions
	<ul style="list-style-type: none"> • Sites which however development would cause harm to a conservation area or its setting will be scored as having a significant negative effect (--). <p>Site Specific Question 3 – Will it offer opportunities to bring heritage assets back into active use?</p> <p>Therefore the following assumptions will be made in relation to Site Specific Question 4.</p> <ul style="list-style-type: none"> • Where sites have the potential to bring a listed building back into active use they will be scored as having a significant positive effect (++). • Where sites have the potential to bring a locally listed building or other non-designated heritage asset back into active use they will be scored as having a minor positive effect (+). • Where sites do not contain any designated or non-designated heritage assets or they have a designated or sites that contain designated or non-designated heritage assets that are already in active use they will be scored as neutral (N). • Where a site has the potential to harm a non-designated heritage asset so that it is less likely to be able to be brought back into use this will be scored as having a minor negative effect (-). • Where a site, has the potential to harm a designated heritage asset so that it is less likely to be able to be brought back into use this will be scored as having a significant negative effect (--).
<p>13. Protect, enhance and manage the character and quality of the landscape and townscape</p>	<p>Site Specific Question 1 – Will it achieve high quality and sustainable design for buildings, spaces, and the public realm sensitive to the locality?</p> <p>The effects of new development on Site Specific Question 1 will depend largely on its design, which is not yet known, therefore all effects will be to some extent uncertain at this stage. Therefore the assumption will be made that all sites have the potential to achieve a high quality and sustainable design sensitive to the locality but this depends wholly on the specific attribute of a particular scheme.</p> <p>Therefore the following assumptions have been made in relation to Site Specific Question 1.</p> <ul style="list-style-type: none"> • All sites will be scored neutral effect (N). <p>Site Specific Question 2 – Does it value and protect diverse and locally distinctive settlement and townscape character?</p>

Assumptions

SA Objectives	Assumptions
	<p>Therefore the following assumptions will be made in relation to Site Specific Question 2</p> <ul style="list-style-type: none"> • Where sites have the potential to significantly improve locally distinctive settlement and townscape character they will be scored as having a significantly positive effect (++) • Where sites have the potential to improve locally distinctive settlement and townscape character setting they will be scored as having a minor positive effect (+). • Where sites have the potential to preserve locally distinctive settlement and townscape character they will be scored as having a neutral effect (N). • Where a site has the potential to harm locally distinctive settlement and townscape character but this harm would be minimal and/or could be mitigated this will be scored as having a minor negative effect (-). • Where a site, however developed, harm locally distinctive settlement and townscape character that could not be mitigated it will be scored as having a significantly minor effect (--). <p>Site Specific Question 3 – Does it safeguard historic views and valuable skylines and settlements?</p> <p>Therefore the following assumptions will be made in relation to Site Specific Question 3.</p> <ul style="list-style-type: none"> • Where sites have the potential to significantly improve historic views and valuable skylines of settlements they will be scored as having a significant positive effect (++) • Where sites have the potential to improve historic views and valuable skylines of settlements setting they will be scored as having a minor positive effect (+). • Where sites will have no impact on historic views and valuable skylines of settlements they will be scored as having a neutral effect (N). • Where a site has the potential to harm historic views and valuable skylines of settlements but this harm would be minimal and/or could be mitigated this will be scored as having a minor negative effect (-). • Where a site, however developed, harm historic views and valuable skylines of settlements that could not be mitigated it will be scored as having a significant negative effect (--). <p>Site Specific Question 4 – Is the site within a settlement or a key rural settlement? – reword to include updated hierarchy</p> <p>Connections and the access to integrated infrastructure (physical, green and social/community) is seen as important to the formation of sustainable communities.</p>

Assumptions

SA Objectives	Assumptions
	<p>Therefore the following assumption will be made in relation to Site Specific Question 4.</p> <ul style="list-style-type: none"> • Sites that are within or have a boundary with a Lichfield or Burntwood will be scored as having a significant positive effect (++). • Sites that are within or have a boundary with Alrewas, Armitage with Handsacre, Fazeley, Fradley, Shenstone and Whittington (Key Rural Settlements) will be scored as having a minor positive effect (+). • Sites that have a boundary with Rugeley and Tamworth (Neighbouring Town) will be scored as having a minor positive effect (+). • Sites that are within or have a boundary with those settlements identified as Other Rural (Clifton Campville, Colton, Drayton Bassett, Edingale, Elford, Hamstall Ridware, Harlaston, Hill Ridware, Hopwas, Kings Bromley, Little Aston, Longdon, Stonnall, Upper Longdon, Wigginton) will be scored as having a minor negative effect (-) • Sites that are isolated and are located away from any settlement boundary will be scored as having a significant negative effect (--). <p>Site Specific Question 5 – Is the site within close proximity to key services (eg schools, food shops, public transport, health centres etc)?</p> <p>Therefore the following assumptions will be made in relation to Site Specific Question 5</p> <ul style="list-style-type: none"> • Those sites identified as being within or having a boundary with an identified settlement identified within Site Specific Question 4 will score as having a minor positive effect (+). • All other sites will have a significant negative effect (--). <p>Site Specific Question 6 - Does it respect and protect existing landscape character?</p> <p>Landscapes that have been characterised as Active Landscape Conservation, Landscape Maintenance, and Landscape Enhancement are seen to have potentially high sensitivity to development. Landscapes that have been characterised as Landscape Restoration and Innovative Landscape Regeneration are seen to have a potentially moderate sensitivity to development. Landscapes that are classed as urban or have no recognised landscape character are seen to have a potentially low sensitivity to development as defined by the Staffordshire County Council Landscape Character Types (2001). In addition where development is within or close to designated landscapes negative effects could result.</p> <p>Therefore the following assumptions have been made in relation to Site Specific Question 6.</p>

Assumptions

SA Objectives	Assumptions
	<ul style="list-style-type: none"> • Sites that are entirely or mainly in Active Landscape Conservation, Landscape Maintenance and Landscape Enhancement are likely to have a significant negative effect (--) • Sites that are entirely or mainly in Landscape Restoration and Innovation Landscape Regeneration are likely to have a minor negative effect (-) • Site that are entirely or mainly in and urban or non-classified Landscape Character Area are likely to have a neutral (N) effect. <p>In addition where development is within or close to designated landscapes negative effects could result.</p> <ul style="list-style-type: none"> • Sites that are within or in close proximity to Cannock Chase AONB are likely to have a significant negative effect (--) <p>Employment Site Options</p> <p>Site Specific Question 4</p> <p>The settlement hierarchy articulated through site specific Question 4 is not relevant to employment sites.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 4</p> <ul style="list-style-type: none"> • A neutral (N) score will be recorded. <p>Site Specific Question 5</p> <p>Whilst it is possible that employees may choose to access services close to their place of employment during the working day a direct relationship between the two is considered at this point the SA to be neutral. It should be noted that accessibility is considered directly as part of SA Objective 6 and furthermore SA Objective 15 measures potential economic benefits.</p> <p>Therefore the following assumption will be made in relation to Site Specific Question 5</p>

Assumptions

SA Objectives	Assumptions
	<ul style="list-style-type: none"> • A neutral (N) score will be recorded.
<p>14. To increase opportunities for non-car travel and reduce the need for travel</p>	<p>Site Specific Question 1 – Does the site location encourage the use of existing or provide sustainable modes of travel?</p> <p>In the absence of transport data sites will be scored using information from the Lichfield District Settlement Sustainability Study (October 2018) to provide information on access to a range of services such as supermarkets, community facilities and employment locations. The study provides information for settlements that have a settlement boundary and their access to services and facilities. The settlements are then ranked within a Settlement Hierarchy to ascertain the sustainability of each settlement.</p> <ul style="list-style-type: none"> • To have a significant positive (++) effect a site would be within or adjacent to the settlement boundary of Level 1 and 2 Settlements (Lichfield inc. Streethay and Burntwood) • To have a minor positive (+) effect a site would be within or adjacent to the settlement boundary of Level 3 Settlements (Fazeley, Mile Oak and Bonehill; Little Aston; Shenstone; Armitage with Handsacre; Alrewas; Whittington and Fradley). • To have a minor negative (-) effect a site would be within or adjacent to Level 4 Settlements (Stonnall; Kings Bromley and Hopwas). • To have a significant negative (--) effect a site would be within or adjacent to Level 5 Settlements (Hill Ridware; Longdon; Edingale; Elford; Drayton Bassett; Clifton Campville; Wigginton; Harlaston; Hopwas; Kings Bromley; Upper Longdon; Stonnall; Hamstall Ridware and other rural areas) or considered to be isolated and are located away from any settlement boundary. <p>Site Specific Question 2 – Will it reduce the overall impact on traffic sensitive areas?</p> <p>Areas with potential sensitivities to increases in traffic flow include 11 key junctions in Lichfield, of which 7 have improvements planned, (see Local Plan Strategy 2008-2029 Policies Maps, Lichfield Inset 1), Lichfield’s historic core, 5 Way Island and the Gungate Corridor and Ventura Park in Tamworth. The likely impact on traffic sensitive areas has been considered in terms of the expected AM peak (0800-0900) and PM peak (1700-1800) traffic generations for each site and the likelihood that the distribution of trips will impact on traffic sensitive areas.</p>

Assumptions

SA Objectives	Assumptions
	<p>The traffic impact of sites with planning consent have been considered through the planning process and any impacts on traffic sensitive areas are able to be mitigated through the discharge of associated planning obligations. These sites have been assessed as a minor positive (+) effect.</p> <p>It has been assumed that sites of less than 25 dwellings are likely to have no impact on traffic sensitive areas due to the small number of vehicle trips the generate within the peak periods. This is the best outcome in traffic terms for a site and is considered a significant positive (++) effect.</p> <p>In the absence of transport evidence there is uncertainty as to the effect on traffic sensitive of sites larger than 25 dwellings, retail sites or employment sites. To acknowledge this uncertainty the assessment includes an unknown (?) effect element.</p> <p>Site Specific Question 3 – Will it help develop walking, cycling, rail and bus networks to enable residents access to employment, services and facilities?</p> <p>In the absence of transport data sites cannot be scored on the above site specific question – therefore all sites will be scored (?).</p> <p>Gypsy and Traveller Site Options</p> <p>There are a number of difference in relation to Gypsy and Traveller Site Options</p> <p>Site Specific Question 2</p> <p>In the absence to site yields and in view that Gypsy and Travellers do not generally produce the same trip rates as ‘bricks and mortar’ residential areas the impact on traffic sensitive areas is uncertain.</p> <p>Therefore in relation to Site Specific Question 2</p> <ul style="list-style-type: none"> • All sites will be scored has having an uncertain effect (?). <p>Site Specific Question 3</p>

Assumptions

SA Objectives	Assumptions
	<p>In the absence of yields and in view of the end use of the site an assessment would take place at detailed design stage all sites will be scored as having a neutral effect (N).</p> <p>Therefore in relation to Site Specific Question 3</p> <ul style="list-style-type: none">• All sites will be scored as having a Neutral effect (N).

Appendix C - Local Plan Review - Sustainability Appraisal Scoping Report: Consultation Sheet (September 2019)

Comment	Response
Statutory Organisation: Historic England	
Welcome the opportunity to comment and raise the following comments	
<p>Page 5</p> <p>Insert a bullet point relating to Ancient Monument and Archaeological Areas Act 1979 and also include details in Appendix A.</p>	<p>Duly Noted</p> <p>Recommendation</p> <p>Agreed</p>
<p>Page 6</p> <p>Add a link to Historic England's Good Practice Advice Notes, especially number 1 and 3. As well as relevant Historic Environment Advice Notes. https://historicengland.org.uk/advice/planning/planning-system/ Further information could be listed in Appendix A.</p>	<p>Duly Noted</p> <p>Recommendation</p> <p>Agreed</p>
<p>We welcome the reference to heritage on page 9 and we look forward to seeing how the proposals conserve the Cathedral City and important heritage centre.</p>	<p>Duly Noted</p>

<p>Page 18</p> <p>Amend 'registered historic parks and gardens' to 'registered parks and gardens'. It is useful to include the number of assets in the area. Are there any ways in which the local plan can address the '17' assets on the at risk register? Does Lichfield have a local list of heritage assets? We would encourage the preparation of a local list through the local plan process, if possible. Would welcome the last sentence of this paragraph (top of page 19) and would recommend that 'preservation' is replaced with 'conservation'. Are there Conservation Area Appraisals and Management Plans available for all the 22 Conservation Area?</p>	<p>Duly Noted</p> <p>Recommendation</p> <p>Proposed amendment to '<i>registered parks and gardens</i>' accepted.</p>
<p>Page 28, objective 12</p> <p>Would welcome the inclusion of a specific objective for the historic environment and would recommend a slight amendment in its wording to 'to ensure the protection and enhancement of the historic environment, <u>heritage assets</u> and their setting'.</p>	<p>Duly Noted</p> <p><i>Agreed – Amend wording to SA Objective 12</i></p>
<p>Page 31, table, row relating to cultural heritage.</p> <p>Would recommend that the objective is amended here to include our comments above. Additionally, we would remove number of Grade II buildings at risk and replace with 'number of heritage assets removed from the at risk register' so that you can assess whether the Plan has had a positive strategy for the historic environment, or failing this 'number of heritage assets on the at risk register' as a total rather than Grade II. It is important to have</p>	<p>Duly Noted</p>

<p>a plan about how to remove heritage at risk. With respect to the indicator that relates to damage, this is a useful test to see whether decisions have been made that are negative for the historic environment. However, we consider rewriting the indicator so that it is measurable.</p>	
<p>Table 5.1</p> <p>Are cautious of the ‘?’ assertion as if it is uncertain what the effects may be then they cannot be assessed and tested and further information is required in order to make a judgement and for the Plan to be sound. Historic Environment Advice Note 3 relating to site allocations and local plans may assist in a methodology for considering impacts for the historic environment from development, link above.</p>	<p>Duly Noted</p>
<p>Page 120 discusses historic farmsteads. Welcome this inclusion and request how the Plan will deal with this issue, is there likely to be a policy relating to historic farmsteads?</p>	<p>Duly Noted</p>
<p>Page 121 we welcome that the Council has a Historic Environment SPD. The SWOT analysis notes weaknesses and threats and it may be an area that the Plan can consider whether there are any gaps that need addressing?</p>	<p>Duly Noted</p>
<p>The link below I have included a link to our Historic Environment Advice Note on Strategic Environment Assessment and the historic environment.</p>	<p>Duly Noted</p>

<p>https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</p>	
<p>Statutory Organisation: Natural England</p>	
<p>We acknowledge the context for this consultation i.e the benefits of early review of the district's local plan strategy in terms of the planning challenge posed in relation to housing supply for the Greater Birmingham Housing Market Area.</p>	<p>Duly Noted</p>
<p>NE have reviewed the proposed scope of the Sustainability Appraisal and is satisfied that it generally covers NE's interests in the natural environment. The advice letter focuses in particular on biodiversity and landscape as the principal topics within NE's remit and for which Natural England is the principal holder of information.</p>	<p>Duly noted</p>
<p>Biodiversity</p> <p>NE welcome the report's coverage of biodiversity themes and issues.</p> <p>NE note that the entry regarding European Sites in Appendix B1 links to previous Habitats Regulations assessment (HRA) of the existing local plan strategy and the conclusion that only Cannock Chase SAC and the River Mease SAC require measures to avoid and mitigate adverse effects on their integrity.</p> <p>With regard to the assessment during local plan making of road traffic impacts upon air quality Natural England draws your attention to the High Court judgement in March last year dealing with the methodology for assessment of air quality impacts on statutory nature conservation sites. Referred to as the 'Wealden</p>	<p>Duly Noted</p> <p>The importance of the Wealdon Judgement is understood and the Council looks forward to further discussions with Natural England on this issue.</p>

<p>Judgement' this case law affects Local Planning Authorities' approach to the assessment of 'cross border' and in combination effects due to road traffic generated by planned new development.</p> <p>NE note the scoping report's inclusion of two Air Quality Management Areas at the A38 between Lichfield and Alrewas and at Muckley Corner on the A5. In terms of European and nationally designated sites further consideration in relation to the Wealden Judgement may be needed. Natural England will liaise with the Council accordingly during the review of the local plan strategy.</p>	
<p>Geodiversity</p> <p>NE note that the appendices appear to omit any reference to geodiversity and local geological sites. This should be addressed as the SA process moves on to the next stage.</p>	<p>Duly Noted</p> <p>This omission will be corrected in the next stage of the SA process.</p>
<p>Landscape</p> <p>Wider landscapes and landscape character - NE note that the district includes the following National Character Assessment³ (NCA) areas:</p> <p>Needwood & South Derbyshire Claylands Cannock Chase to Cank Wood Trent Valley Washlands Mease/Sence lowlands</p>	<p>Duly Noted</p>

<p>In order to understand and characterise likely trends we advise that the strategic environmental objectives (SEOs) for each NCA area are considered and relevant material from these SEO reflected in the SA process. This approach would reflect NPPF para 156 (i.e. Seeking to protect and enhance locally valued landscapes).</p> <p>Given the Greater Birmingham Housing Market Area issue you may also wish to consider commissioning a landscape sensitivity and capacity assessment in order to objectively assess the effects of new development in the context of the district's various landscape settings. The following link provides information: https://www.gov.uk/guidance/landscape-and-seascape-character-assessments</p> <p>Soils and agricultural land quality We welcome the scoping report's reference to this subject on the map in figure 3.8 of the report.</p>	
<p>Objective 4: 'Maximise the use of previously developed land/ buildings and encourage the efficient use of land'</p> <p>NE acknowledge the main thrust of this objective but would also emphasise the synergies that can exist between long-standing brownfield/previously developed land and biodiversity value. The proposed % metric would present a more refined message if a corresponding % metric was used to express the proportion of previously developed sites retained and managed as an asset for biodiversity and/or green/open space.</p>	Duly Noted

<p>Objective 7: 'To reduce water and air pollution'.</p> <p>Acknowledging the linkages between this objective and the subsequent objectives 9 and 11 it would appear logical to amend the text of no.7 to read 'to reduce and manage water and air pollution'</p>	<p>Duly Noted</p> <p>Recommendation</p> <p>Agreed – amend wording of sustainability objective No 7.</p>
<p>Indicators</p> <p>A significant number of the proposed sustainability objectives may be achieved by means of creating, restoring and enhancing areas of green (and blue) infrastructure and providing for their subsequent management. The indicators presented so far do not appear to include metrics that recognise or measure this synergy. A variety of metrics may be appropriate to reflect the multi-functional benefits of green infrastructure resources, for example:</p> <ul style="list-style-type: none"> - Extent of open/greenspace created restored or enhanced. - Sustainable transport links created (footpaths, cycleways). - SUDS incorporated into the design of new developments. 	<p>Duly Noted</p>
<p>Statutory Organisation: Environment Agency</p>	
<p>EA have no additional comments to make to the previous response on the original scoping report, dated 22 January 2019 in our letter referenced UT/2007/101798/SE/21-SP1-L01.</p> <p>EA note that changes to <i>Chapter 2: Relevant Plans Policies and Programmes</i> have been made to bring the report up to date, and continue to recommend that the Preliminary Flood Risk Assessment and Humber Flood Risk Management Plan 2016 is added into this section</p>	<p>Duly Noted</p>

<p>EA note that further to the previous response EA are aware that work on the draft Water Cycle Study and Strategic Flood Risk Assessment are ongoing and should be published shortly.</p> <p>The findings of these reports are reflected within the SA.</p>	<p>Duly Noted</p>
<p>Statutory Organisation: Network Rail</p>	
<p>Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).</p> <p>Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.</p>	<p>Duly Noted</p>

<p>With regards to the Local Plan Review Scoping Report</p> <p>(1) The local plan identifies a number of possible rail enhancements that would benefit the district. However, the document does not make any reference to considering the level of growth in the area and the impact on railway stations/existing operational railway infrastructure. Network Rail understands the high-level nature of the scoping report, but Network Rail would be looking for some assurance that the CIL123 list would include railway station improvements to meet growing demand.</p> <p>As Network Rail is funded by public remit it is not reasonable to expect Network Rail to fund mitigation measures on the railway as a consequence of outside party developments. Transport Assessments should include consideration of the impacts on railway stations of increased footfall and developers either via CIL or S106 should fully fund mitigations measures.</p> <p>(2) Transport Assessments should include consideration of the impact of proposal upon level crossings. Consideration should include both an increase in the volume of user and a change in the character of user (including vulnerable users – defined below).</p>	<p>Duly Noted</p> <p>This matter will be discussed with Network Rail as part of the Infrastructure Funding Statement.</p>
<p>Councils and developers are advised that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> • By a proposal being directly next to a level crossing 	<p>Duly Noted</p>

- By the cumulative effect of developments added over time in the vicinity of a level crossing
- By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route
- By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway
- By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing
- By any proposal that may cause blocking back across the level crossing
- By any proposal which may see a level crossing impacted by the introduction of cycling or walking routes.

Going forward the Local Plan should include specific policy wording to ensure that developments resulting in a material increase or change in character of the traffic using a rail crossing of a railway, should ensure that these will not result in an adverse impact on the operational safety/increase in risk of the railway network. Any discussion of the impacts upon level crossing must include Network Rail. Mitigation measures are to be fully funded by the developer either via CIL or S106.

<p>‘Vulnerable Users’ are characterised as those who are unable to use the level crossing quickly and effectively, and are not fully aware of the dangers at a level crossing.</p> <p>This term does not relate exclusively to disabled or elderly people with impaired mobility; but also those with impaired hearing or vision, learning difficulties or do not speak English, young children who do not have a mature perception of the risks that are inherent in crossing the railway, older children in groups and fully able bodied people who are vulnerable because, say, they may be carrying heavy bags, or pushing buggies, or walkers with a dog either on, or off the lead. Many pedestrians now wear head-obscuring clothing and/or earphones and just do not see or hear an approaching train until it is too late. Those who walk/lead a dog (or dogs) import a real possibility for vulnerability, albeit we do not say that every dog walker will always exhibit an equally high level of vulnerability. Again, the approach is measured and ultimately, public safety-led.</p>	Duly Noted
<p>Statutory Organisation: Severn Trent Water</p>	
<p>Severn Trent Water have no specific comments to make however, please keep us informed as your plans develop and when appropriate we will be able to offer a more detailed response.</p>	Duly Noted
<p>Statutory organisation: Highways England</p>	
<p>Highways England is responsible for the operation and maintenance of the strategic road network (SRN) in England. The network includes all major motorways and trunk roads. The A5, A5148 and A38 are part of the SRN. In the Lichfield area also lies a section of the M6Toll which is operated by Midland Expressway Limited under concession to DfT.</p>	Duly Noted

<p>The updated document has been reviewed in terms of the amendments/updates made, which are:</p> <ol style="list-style-type: none"> 1. To take account of the issue of Greater Birmingham Housing Market Area Strategic Growth Study February 2018 and the National Planning Policy Framework standard method for assessing housing need published in February 2019. 2. To take into account newly updated baseline information. 3. Minor text changes to improve clarity. <p>This has resulted in changes being made to Sustainability Appraisal Objective 1 to read “To provide housing that meet the needs of all of our existing and future residents”, and certain amendments to the text in Section 2 (relevant policies, plans and programmes) and in Section 3 (baseline information).</p> <p>Highways England have no specific comments to make at this time in relation to the revised and updated Sustainability Appraisal Scoping Report.</p>	
<p>Staffordshire County Council</p>	
<p>Thank you for consulting Staffordshire County Council on the SEA Scoping Report. We provided comments in January 2018 on the original consultation on the SEA scope. We note that it appears the scoping report has not incorporated any of the suggestions made. We have nothing further to add to the comments made in 2018, which are copied below for further consideration with additional updates in italics.</p>	<p>Duly Noted</p>

Staffordshire County Council: Ecology and Landscape	
<p>Section 2 Relevant policies, plans and programmes</p> <p>Consideration could be given to referring to the Biodiversity Opportunity Mapping carried out for the District by Natural England. In addition there is work being carried out in regard of Cannock Chase to Sutton Park and Connecting Cannock Chase related to mapping and analysis of opportunities for heathland and other habitat creation to enhance connectivity. It is understood that further opportunity mapping in line with NPPF is being undertaken which is likely to supersede the references mentioned above; it would be helpful to have a note of this forthcoming work as a key reference for the future.</p>	Duly Noted
<p>Section 3. Baseline Information</p> <p>In listing landscape scale initiatives for biodiversity enhancement the Landscape and Ecology section could refer to the Transforming the Trent Valley Partnership project. Earlier this year Transforming the Trent Valley Project received its Stage 2 funding from the National Lottery Heritage Fund and commenced in April. More details about the project can be found here: http://www.staffs-wildlife.org.uk/TTTTV .</p> <p>In regard of the Staffordshire Minerals Plan Land to the west of the A38 within Alrewas Parish has been identified as an area of search rather than as a potential new sand and gravel site.</p> <p>There is a typographical error – wildlife sites of County importance are Sites of Biological <u>Importance</u> (not Interest). You might wish to refer to Ancient Woodland area</p>	Duly Noted

<p>especially as this will be impacted by HS2. Ancient woodland and veteran trees are now clearly identified in NPPF as irreplaceable habitat and would merit a specific reference. Veteran trees may occur in woodland, wood pasture and parkland or as individual trees in hedges and fields.</p>	
<p>Section 4. Identifying Sustainability Issues</p> <p>Table 4.1</p> <p>Clarity is needed under Landscape and Ecology: Natural England has designated Cannock Chase Area of Outstanding Natural Beauty (AONB), ‘to conserve and enhance its natural beauty’. Although factors such as ecology and natural heritage contribute to the decision to designate the area an AONB, landscape and scenic quality are of prime importance in order that it meets the ‘natural beauty criterion’. The Local Authority needs to ensure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of the AONB, and decisions and activities must consider the potential effect both within the AONB and on the setting of the AONB.</p> <p>In regard of Table 4.1 Likely Evolution without the Plan, impacts could be adverse effects on the integrity of Cannock Chase SAC and of the River Mease SAC due to unmitigated development.</p>	<p>Duly Noted</p>

<p>Section 5. Sustainability Appraisal Framework</p> <p>Table 5.1</p> <p>It is suggested that for objective 11, to promote biodiversity protection enhancement and management of species and habitats, an indicator could <i>condition of internationally/ nationally designated sites</i>. Rather than <i>number and type of internationally/ nationally designated sites</i>, which the Local Plan cannot influence, but Plan policies can influence the suggested indicator.</p> <p>Number of species relevant to the District which have achieved BAP is not a meaningful indicator. In regard of species, any indicator needs to be related to Plan policies. Measuring and monitoring species indicators can be challenging and resource intensive. A meaningful and measurable indicator could be % of planning consents that include enhancement for species.</p> <p>It is suggested under Objective 13 reference is made to the need to conserve and enhance the AONB and its setting.</p>	<p>Duly Noted</p>
<p>Staffordshire County Council: Historic Environment</p>	
<p>Section 2 Relevant policies, plans and programmes</p> <p>Consideration could also be given to including the Ancient Monuments and Archaeological Areas Act (1979) and the three Extensive Urban Surveys (EUS) undertaken for Lichfield, Alrewas and Colton within the SEA. The three EUS studies were chosen as having originated as medieval market towns and include an assessment of the significance of their historic character and heritage assets.</p>	<p>Duly Noted</p>

<p>Section 3 Baseline Information: Townscape and Historic Environment</p> <p>The paragraph does not make any reference to the wealth of undesignated heritage assets present within the District, which includes archaeological sites and monuments, unlisted buildings, historic farmsteads and the historic landscape character. It is noted that under the Landscape and Ecology section there is a passing reference to the depth of history within the District (first paragraph; second and third sentences). This could also be reflected within the Townscape and Historic Environment paragraph. Archaeological sites within the District include Neolithic and Bronze Age ceremonial landscapes, particularly within the Trent Valley; Roman military activity as well as late Prehistoric, Roman and later evidence for settlement, agriculture and infrastructure.</p>	<p>Duly Noted</p>
<p>Section 4 Identifying Sustainability Issues: Table 4.1 Townscape and Historic Environment</p> <p>Sustainability Issues Column: The table could consider referencing the undesignated heritage assets as noted above. There are isolated historic farmsteads and smaller settlements which also contribute to the historic landscape of the District alongside the villages noted within the table.</p> <p>Likely evolution without the plan column: For clarity the first section may wish to include 'harm to...' as well as 'loss of' heritage assets.</p>	<p>Duly Noted</p>

<p>There is inevitably a degree of cross-over between the Historic Environment and Townscape section and the Landscape and Ecology section. To identify the specific issues within the Historic Environment and Townscape section it may be beneficial to specify that the harm to character specifically relates to historic landscape and townscape.</p>	
<p>Section 5: Sustainability Appraisal Framework: Table 5.1 SEA Directive Topic (k) Cultural Heritage 12. To ensure the protection and enhancement of the historic environment and its setting</p> <p>Indicator: there is no reference to Scheduled Monuments or the Registered Park and Garden within the table. It is further advised that the 'Number, or % or area of historic buildings, sites and areas and their settings (both designated and non-designated) damaged' include reference to archaeological sites.</p>	Duly Noted
<p>Staffordshire County Council: Rights of way</p>	
<p>Whilst we understand that rights of way are not one of the key topics, they do provide linkages into a number of the specified areas namely human health, landscape, population and cultural heritage.</p> <p>As such it is suggested that consideration for their inclusion in the report is given.</p>	Duly Noted however this is not a matter for the SA.

Staffordshire County Council: Health and Care	
<p>Sustainability Objective 1</p> <ul style="list-style-type: none"> • It is recommended the indicators specifically refer to older people's needs within the housing mix in order to demonstrate it meets the needs of the largest growing population group in terms of numbers of lifetime homes / retirement housing accommodation completions. • Specialist housing provision rather than just extra care needs to be included in the indicator (to include care homes and both short term and long term supported housing accommodation supporting vulnerable people). • Both affordable and social housing completions are recommended to be included on the indicator here 	<p>Duly Noted</p> <p>Issues are considered to be addressed in SO1.</p>
<p>Sustainability Objective 3</p> <p>It is suggested that the indicators need more specificity to encompass safe and independent accessibility. For example:</p> <ul style="list-style-type: none"> • Wheelchair access • Access for mobility impaired individuals into and around sites on foot (considering lighting, quality of footpaths / pavements and road crossings etc.). • Access using public transport (based on reasonable distance assessments) to the site • Availability of subsidised public transport to the site • Co-location of complementary services / facilities to facilitate easier access (e.g. GP surgeries and 	<p>Duly Noted</p> <p>Issues are considered to be addressed in SO3.</p>

<p>pharmacies) and proximity to existing complementary services / facilities</p> <p>It is also recommended consideration of access to green space, leisure facilities etc. are also considered here. In addition indicators reflecting social cohesion are considered: creation of mixed-use and socially mixed areas – and sufficient provision of vibrant public spaces that facilitate inter-ethnic and intergenerational encounters.</p>	
<p>Sustainability Objective 14</p> <p>The indicators need to extend beyond a working population to consider the wider mobile and mobility impaired population (as per row above)</p>	Duly Noted
<p>Lichfield District Housing Strategy</p> <p>Some of the key messages, indicators, targets etc. are better reflected in the objectives for this document (these link well with statements we have made above).e.g.</p> <ul style="list-style-type: none"> • Improve the housing options for people in need • Ensure new housing developments include a mix of homes to meet identified housing needs 	Duly Noted
<p>Community Safety Delivery Plan</p> <p>Some of the key messages, indicators, targets etc. are better reflected in the objectives for this document (these link well with statements made above) e.g.</p> <ul style="list-style-type: none"> • Increasing feelings of safety • Support vulnerable members of the community 	Duly Noted

<p>Lichfield District Council Strategic Plan</p> <p>Some of the key messages, indicators, targets etc. are better reflected in the objectives for this document (these link well with statements made above) e.g. More people will be living independently at home.</p>	<p>Duly Noted</p>
<p>Alrewas Parish Council</p>	
<p>Would like to make the following points in relation to possible actions to be incorporated into your plans:</p> <p>Support for train stations along the A38, especially at Alrewas and Barton Under Needwood to reduce car travel into Burton on Trent and Lichfield. A train station at Alrewas could link to the National Memorial Arboretum and so minimise car and coach travel to the venue</p> <p>Work with Highways England to reduce speed limits on the A38 with average speed monitoring cameras to reduce emissions from vehicles</p> <p>The various substandard road junctions on the A38, for example at Alrewas, Fradley village and Fradley South and Catholme increase the amount of time vehicle idle their engines while waiting to join the main carriageway so increasing emissions and should be upgraded. They are also, of course, dangerous to road users.</p> <p>An increase in the number of electric vehicles charging points in rural areas would be beneficial and encourage the purchase of</p>	<p>Duly Noted but the consultation response does not raise any specific SA matter.</p>

electric vehicles. There would be a need to advertise their locations

Affordable housing is a priority given the increase in house prices in the Lichfield District. Smaller starter homes and “downsizer” homes are needed in rural areas as well as in the urban areas in the District. Planning applications should be reviewed in the light of these and should be encouraged to include renewable energy provision

Health facilities are under pressure in villages. Travel to larger, more centralised facilities will increase car use where public transport is inadequate

Provision for young people in many areas are inadequate. To reduce travel and enhance the quality of life in rural communities could LDC offer guidance to local councils and groups wishing to run facilities such as youth clubs, including guidance on safeguarding?

Set up awards for local community groups who take initiatives: e.g. walk to school schemes, car sharing, tree planting etc.

To support biodiversity green routes between major green sites should be protected. This could include the canals network

Flooding and sewerage provision need to be considered when planning new infrastructure projects given the pressure on existing facilities

We support LDC's efforts to operate more sustainably, including by the increased use of email, electronic submissions etc	
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