

Lichfield District Local Plan 2040 Submission Plan (Regulation 22)

Sustainability Assessment

Prepared on behalf of Lichfield District Council

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1.0 INTRODUCTION

1.1 BACKGROUND

1.1.1 Lichfield District Council (The Council) is currently preparing the Lichfield District Local Plan 2040 (formerly the Local Plan Review) (the Plan), which will set out the following:

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

1.1.2 The extant Lichfield District Local Plan comprises:

- The Local Plan Strategy (adopted 17th February 2015);
- The Local Plan Allocations (adopted 16th July 2019); and
- Any 'made' neighbourhood plans.

The above documents will guide new development in the District for the period 2008 to 2029. The Local Plan 2040, the subject of this sustainability appraisal, comprises a full review of the Spatial Strategy set out in the adopted Local Plan Strategy and an associated review of the vision, strategic objectives and planning policies that support the Spatial Strategy. Once adopted the Local Plan 2040 will replace the extant Lichfield District Local Plan documents.

1.1.3 The Council prepared and consulted upon the Local Plan Review: Preferred Options document between November and December 2019. This represented the third stage in the Local Plan 2040 process. The Council has now reached the final stage of this process and produced the Local Plan 2040: Submission Plan in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

1.1.4 The preparation of the Lichfield District Local Plan 2040 will be the subject of an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (hereafter referred to as SA) in line with the requirements of:

- Planning and Compulsory Purchase Act 2004;
- Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations);
- Statutory Instrument 2012 No. 767: Town and Country Planning (Local Planning) (England) Regulations 2012;
- National Planning Policy Framework (NPPF); and
- Planning Policy Guidance (PPG).

- 1.1.5 Tetra Tech have been appointed to undertake a Sustainability Appraisal (incorporating the provisions of the EU SEA Directive) (hereafter referred to as SA) of the Lichfield District Local Plan 2040: Submission Plan. Tetra Tech are highly experienced in completing SAs and SEAs of spatial planning documents.
- 1.1.6 A Habitats Regulations Assessment (HRA) of the Lichfield District Local Plan 2040: Submission Plan has been prepared by Footprint Ecology. The HRA is presented as a separate 'standalone' document but the findings of the HRA to date have been taken into account in this SA.
- 1.1.7 This Sustainability Appraisal Report (SA Report) for the Lichfield District Local Plan 2040: Submission Plan (2021) has been prepared to meet all the requirements of an 'Environmental Report' set out at Paragraph 12 and Schedule 2 of the SEA Regulations 2004 and a 'Sustainability Appraisal Report' required by Section 19 (5) (b) of the Planning and Compulsory Purchase Act 2004. The SA report has been prepared in line with the Government Guidance entitled 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance on Regional Planning Bodies and Local Planning Authorities' dated November 2005.

1.2 LICHFIELD DISTRICT LOCAL PLAN 2040 – PURPOSE & OBJECTIVES

- 1.2.1 Lichfield District Council is seeking to pursue a plan that meets the future social, economic and environmental needs of the District. The Local Plan 2040s purpose is to shape the future of the District for the plan period up to 2040. The Submission version of the Local Plan sets an overall vision for the District which states:

In 2040, residents of our district will continue to be proud of their communities. They will experience a strong sense of local identity, of safety and of belonging. Our communities will take pride in our district's history and culture, its well cared for built and natural environment, its commitment to addressing issues of climate change, and the range of facilities our district has to offer.

People in Lichfield District will live in healthy and safe communities which provide opportunities for people to be active and healthy and to avoid social isolation and loneliness. Our residents will be able to access quality homes which meet their needs, local employment, facilities and services all of which provide communities with clean, green and welcoming places.

Our residents will have access to education provision which provides the skills and training to suit their aspirations and personal circumstances.

Those visiting the district will experience the opportunities and assets which our residents take pride in. Visitors to our district will be encouraged to stay for longer and wish to return and promote the area to others.

The need to travel by car will be reduced through improvements to public transport, walkways, cycle routes and the canal network.

Growth in our district will focus on enhancing the sustainability of our villages, delivering key infrastructure requirements to enable these communities to become cohesive, inclusive and healthy places where historic assets are enhanced and make a positive contribution to local character and distinctiveness.

Our existing largest sustainable settlements will continue to play the most significant role in enabling our district to grow, particularly until 2040. This will enhance the potential for sustainable commuting and footfall for retail and services in the City.

Development, wherever it occurs in our district, will provide the right type of infrastructure to address improvements to education, skills, training, health and incomes, leading to reduced levels of deprivation.

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

- 1.2.2 The vision for the District was the subject of an earlier Sustainability Appraisal process and thus is considered 'fit for purpose' for identifying the spatial options to be taken forward in the Lichfield District Local Plan 2040.
- 1.2.3 To support the above Vision the Local Plan 2040 sets 15 strategic objectives for delivering sustainable economic growth, healthy and safe communities and an integrated infrastructure network within an attractive environment. These are:

Strategic objective & priority 1 - Sustainable Communities:

Development will be directed principally towards creating a sustainable urban extension for Lichfield City. This will ensure that the existing infrastructure of the City can be utilised and reinforced, that the majority of new development allocated within this plan will be near to a rail hub ensuring that commuting by a range of sustainable means will be achievable.

An Area Action Plan (AAP) will be prepared for Burntwood.

Development will follow the settlement hierarchy, with smaller allocations being made as urban extensions to larger service villages to ensure they can continue to grow and deliver local needs.

This will ensure that the development of new homes, employment, commercial development and other facilities will contribute to the creation of balanced and sustainable communities by being focused on appropriate settlements, maximising the use of existing infrastructure and reducing the necessity of car use wherever possible.

This strategy will produce benefits in increasing the sustainability of development, allocating the majority of need in non-greenbelt locations, and ensuring new communities are well associated with existing settlements and services.

Strategic objective & priority 2 - Rural Communities

Rural communities will continue to grow through small scale incremental development where this is in accordance with the development plan, including relevant neighbourhood plans.

Strategic objective & priority 3- Climate Change

Development should meet the needs of Lichfield District's communities whilst minimising its impact on the environment and mitigating and adapting to the effects of climate change.

Strategic objective & priority 4 – Infrastructure

To deliver appropriate infrastructure, through partnership working and contributions for new development. To meet the need for increased infrastructure necessary to support new and existing communities, including assisting in the goal of community regeneration and infrastructure and service improvement where required.

Strategic objective & priority 5 – Sustainable Transport

New development and regeneration of existing development should reduce the need for people to travel by directing growth towards the most sustainable locations. Over the period of the plan new growth should always seek to increase the opportunities for travel using sustainable forms of transport including securing improvements to public transport, walking and cycling infrastructure. New development should integrate well with existing settlements and not create dislocated or isolated new communities dependent on the car.

Strategic objective & priority 6 – Meeting Housing Need

Throughout the plan period new development proposals and decisions should seek to create an appropriate mix of market, specialist and affordable homes that are well designed and meet the needs of our existing and new residents.

Strategic objective & priority 7 – Economic Prosperity

To promote economic prosperity for the district, and its residents, decisions, plans, policies and programmes should actively support measures which enable the local economy to thrive and adapt to changing economic circumstances and make the most of newly arising economic opportunities.

Strategic objective & priority 8 – Employment Opportunities

The local plan, and planning decisions should encourage employment opportunities within the district wherever this is sustainable and in accordance with the plan as a whole. They should encourage development of new enterprise and support the diversification of existing businesses to meet the identified needs and aspirations of the community.

Strategic objective & priority 9 – Our Centres

Over the plan period, the local plan and planning decisions will seek to continue to help our city centre thrive, serving Lichfield City and beyond. Through the mechanism of a proposed Area Action Plan we will seek an enlarged and improved town centre for Burntwood which meets the community's needs and aspirations. Across the district decisions, plans, policies and programmes should encourage a vibrant network of centres to develop and keep on developing, that serve to stimulate economic activity and provide for the needs of local communities.

Strategic objective & priority 10 – Visitor economy

The local plan and planning decisions will seek to increase the attraction of the district as a tourist destination through supporting and promoting the growth of existing tourist facilities and attractions. Part of the delivery of this objective will be the provision of a greater variety of accommodation for visitors, the development of new attractions which are appropriate in scale and character to their locations and the enhancement of our existing attractions.

Strategic objective & priority 11 – Health & Safe Lifestyles

Planning decisions, plans, policies and programmes across the plan period should seek to create environments that promote and support healthy choices and enable our residents to live longer, have a better quality of life and feel safer and more secure. Part of delivering this will be improving the quality and availability of open space, outdoor and indoor leisure and cultural facilities, providing active travel opportunities well linked to existing facilities, and wherever possible designing out crime and the fear of crime including the potential for antisocial behaviour.

Strategic objective & priority 12 – Countryside Character

Planning policies and decisions should give great weight to protecting and enhancing the quality and character of the countryside. Development which takes place must address rural development needs and contribute positively to local character through enhancements to the environment and preserving the openness of the Green Belt.

Strategic objective & priority 13 – Natural Resources

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

Strategic objective & priority 14 - Built Environment

Throughout the plan period and beyond, the district's historic environment and local distinctiveness will be preserved and enhanced. Plans and decisions will ensure an appropriate balance between built development and open space, protecting the character of residential areas, protecting existing open spaces and improving accessibility to open spaces.

Strategic objective & priority 15 - High Quality Development:

All planning decisions and documents will reflect that high-quality design in new proposals, and in the redesign or alterations to existing buildings and landscapes is essential to retain the character and attractiveness of the district. Planners will work with developers to ensure that design standards are retained and raised, and poor quality design will not be approved.

- 1.2.4 To meet the above objectives and overall vision, the Lichfield District Local Plan 2040 will bring forward a proportionate level of new development, including the associated new dwellings and the provision of new employment land, for the period up to 2040. The Vision and Strategic objectives set out the Council's aim to accommodate growth and associated infrastructure, whilst protecting the District's built and natural environment and delivering a high quality of life for the District's residents, visitors and workers.

Development, wherever it occurs in our district, will provide the right type of infrastructure to address improvements to education, skills, training, health and incomes, leading to reduced levels of deprivation.

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

1.3 BASELINE CONTEXT

- 1.3.1 Lichfield District is located in south east Staffordshire and is situated adjacent to the West Midlands Conurbation. The District has a population of 103,100 which has increased by 2.18% since 2010. However, the population of the District is growing at a slower rate than the West Midlands (3.4%). The age structure of Lichfield shows that the District has a higher than the national average of elderly people over 65 years old. In addition, the number of people of 65 years old exceeds the number of children under the age of 15.
- 1.3.2 The District has two main settlements, the cathedral City of Lichfield and the town of Burntwood but also supports many villages that are set within a predominantly rural landscape. The key rural settlements are Armitage with Handsacre, Alrewas, Shenstone, Whittington, Fazeley Mile Oak & Bonehill. The southern extent of Lichfield District is covered by the West Midlands Green Belt.
- 1.3.3 The District has excellent transport links being well served by local routes such as the A51, A515 and A5127 together with easy access from the M6 Toll, A38 (T), A5148 (T) and A5(T). Lichfield District has four train stations, Lichfield City, Lichfield Trent Valley, Rugeley Trent Valley and Shenstone.

- 1.3.4 Economic inactivity in the working age population of Lichfield is lower than the regional and national indicators. This is due, in part, to the high level (38.5%) of working age people in Lichfield who are retired. This level is more than double the West Midlands and Great Britain figure. The number of benefit claimants in Lichfield is significantly below the regional and national averages.
- 1.3.5 The weekly earnings by residents of Lichfield District are higher than both the regional and national figures. However, as the weekly earnings by workplace within the District is lower than the national average, this indicates the significant amount of out migration of workers from the District to higher salaried jobs elsewhere. The District is ranked 252 out of 326 local authorities in terms of deprivation but Chadesmead and Chasetown represent two pockets of deprivation in the District.
- 1.3.6 Male and female life expectancy are similar to both the County and National averages at 79.9 for males and 83.1 for females. Obesity rates in the District shows that two thirds of adults are either obese or overweight which is similar to the national average. In children aged 4-5 years around 23% have excess weight (either overweight or obese) increasing to 31% for children aged 10-11.
- 1.3.7 The District contains 2 European Site (Cannock Chase SAC and the River Mease SAC), 4 SSSI's and an Area of Outstanding Natural Beauty. The District also supports 78 sites of Biological Interest.
- 1.3.8 The District also contains 16 scheduled ancient monuments, a registered park and garden, 762 Listed Buildings and has 21 Conservation Areas that are designated for their 'special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance'.

1.4 INTEGRATED SUSTAINABILITY ASSESSMENT

- 1.4.1 The Lichfield District Local Plan 2040 and accompanying SA represent an important opportunity to drive forward the sustainability agenda and assist with urban and rural renaissance across the District. SA is a powerful tool that can not only evaluate the sustainability of the Local Plan but also help promote patterns of development and ensure that sustainability considerations are reflected in the evolution of the plan and policy preparation. An independent Sustainability Assessment has been undertaken at each stage in the preparation of the Local Plan 2040.
- 1.4.2 This SA Report provides an independent qualitative assessment of the sustainability implications of all potential spatial allocations and policies in the Local Plan considered so far based on the evidence base currently available.

1.5 STRUCTURE OF THIS SUSTAINABILITY APPRAISAL REPORT

- 1.5.1 This chapter of the SA Report provides an introduction to the Lichfield District Local Plan 2040: Submission Plan, the baseline context of Lichfield District and the integrated SA process. The remainder of the report is structured as follows:

- Chapter 2 – outlines the methodology of the SA;
- Chapter 3 –provides sustainability context and objectives of the Plan;
- Chapter 4 – appraisal of `reasonable` options/alternatives considered;
- Chapter 5 – appraisal of the significant effects associated with the options;
- Chapter 6 – outlines the residual effects;
- Chapter 7 – Monitoring; and
- Chapter 8 - Conclusions/Next Steps.

2.0 METHODOLOGY OF THE SUSTAINABILITY ASSESSMENT

2.1 INTRODUCTION

- 2.1.1 Under Section S19(5) of the Planning and Compulsory Purchase Act 2004 and the SEA Regulations which came into force in England and Wales in July 2004, SA and Strategic Environmental Assessment (SEA) are mandatory for all Local Plans and Supplementary Planning Documents (SPDs). S39 of the Act requires Local Plans/SPDs to be prepared with a view to contributing to the achievement of sustainable development. SA is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. The production of a SA is one of the “*tests of soundness*” of a Local Plan/SPD.
- 2.1.2 The requirement to undertake SEA is established in the EU by the European Directive 2001/42/EC, ‘*The Assessment of the Effects of Certain Plans and Programmes on the Environment*’ (commonly known as the SEA Directive). The SEA Directive is transposed into English law by the SEA Regulations.
- 2.1.3 SEA and SA are closely linked. SA aims to integrate sustainability issues into decision making by appraising the plan or strategy using environmental, social and economic objectives, whilst SEA also aims to facilitate sustainable development but its emphasis is on integrating environmental considerations into decision making through analysis of environmental issues.
- 2.1.4 Although the requirement to undertake both SA and SEA is mandatory, it is possible to satisfy the requirements of both parts of the legislation, through a single appraisal process. This approach is confirmed at Paragraph 165 of the NPPF (See paragraph 1.7.11 above).
- 2.1.5 Further guidance on the preparation of the SA in relation to the stages of Local Plan production together with the information to be covered within the SA Report is set out in the Planning Policy Guidance (PPG) dated March 2014. The PPG states at paragraph 11-009 “*The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan*”. The level of detail set out in this SA Report is commensurate with the Regulation 22 stage of Local Plan.
- 2.1.6 The guidance goes on to state at paragraph 11-018 “*the sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach)*”. The findings of this SA have been used by the Council to assess “the overall sustainability of the different alternatives, including those selected as the preferred approach in the

Local Plan” and ultimately “inform the selection, refinement and publication of proposals”. An assessment of the alternatives/options considered as part of the SA process is set out at Chapter 4.

2.2 SA KEY STEPS AND TASKS

- 2.2.1 SA/SEA is a five-stage process. Figure 1 below sets out each of the stages and the stage currently reached.
- 2.2.2 The preparation of this SA Report comprises the next major step in the SA of the Lichfield District Local Plan 2040 and relates to Stage B of the five stage SA process set out at Paragraph 11-013 of the Planning Practice Guidance (March 2014). As detailed below, the three previous stages in the evolution of the Local Plan 2040, Scope Issues & Options (April 2018), Preferred Option and Policy Directions (January 2019) and Preferred Options (November 2019), have all been the subject of a Sustainability Appraisal.
- 2.2.3 The District Council published the ‘Lichfield District Local Plan Scoping Report’ in December 2017. This document related to Stage A of the SA process. The comments received during the formal consultation period on the Scoping Report have been reviewed by the District Council and the SA Framework has been refined, see Section 2.3 below.
- 2.2.4 Tetra Tech, on behalf of Lichfield Council, updated the Scoping Report in November 2020 to have regard for the changes that have occurred since July 2019 in respect of items 2 and 3 of the Stage A process.
- 2.2.5 With reference to Section 2, the issuing of the Greater Birmingham and Black Country Housing Market Area Housing Need and Housing Land Supply Position Statement (July 2020) have been considered alongside other changes in policy context. In relation to Section 3, the baseline data published in July 2019 has been compared to the most recently published information contained in a variety of sources including the Annual Monitoring Report, ONS, NOMIS Staffordshire Observatory etc. The statistical changes that have occurred are nearly all modest in scale.
- 2.2.6 There has been little change overall in respect of the trends identified in the previous scoping report. The issues also identified in the baseline from July 2019 therefore remain the same and the SA objectives are therefore also unaffected. A small number of minor text changes to the Scoping report have also been made to improve clarity.
- 2.2.7 Two previous SA Report were the subject of a consultation process in line with the Lichfield District Local Plan: Preferred Option version in December 2019 and the Lichfield District Local Plan: Proposed Submission Plan in July 2021. This SA Report has been updated in light of all consultation representations received.

- 2.2.8 This SA Report includes a review and updating of Stage B of the SA process whereby the Council has considered representations and further evidence base documents since the previous consultation processes to produce the Lichfield District Local Plan 2040: Submission Plan. This SA report accompanies the Lichfield District Local Plan 2040: Submission Plan (Stage C).

2.3 STAGE A – ESTABLISHING THE BASELINE, SCOPE AND SUSTAINABILITY OBJECTIVES

- 2.3.1 The Sustainability Objectives upon which this SA is based were developed as part of the SA Stage A and represent a key aspect of the Appraisal process. The scoping stage of a SA involves the collation of evidence relating to the baseline position and policy context for the Lichfield District Local Plan 2040, culminating in a series of key sustainability issues and problems that should be a focus for the SA and to establish a sustainability framework. The Scoping Report (2020) sets out a summary of the findings of the baseline review of relevant policies, plans and programmes.
- 2.3.2 The sustainability issues relevant to the pre-submission Local Plan 2040 are set out in Section 4 (Table 4.1) of the Scoping Report (2020) but are also included at Appendix A of this report. The sustainability issues are considered to represent the current baseline position in Lichfield District.

Inter-relationships

- 2.3.3 Each of the SA topics and issues listed in the Scoping Report, whilst presented individually, have clear inter-relationships.
- 2.3.4 The main inter-relationships between each of the SA topics considered in this SA is discussed in the Scoping Report (November 2020). No other potential inconsistencies were identified during the SA process.
- 2.3.5 The SA framework and associated objectives were developed on an iterative basis to reflect the sustainability issues relevant to the Lichfield District Local Plan 2040. The Sustainability Objectives were used in the SA for both the 'Scope, Issues and Options' and the 'Preferred Options and Policy Directions' stages.
- 2.3.6 The Sustainability Objectives were reviewed prior to the commencement of the SA and were considered 'fit for purpose'. The Sustainability Objectives used in this SA are set out in Table 2 which also shows the topics set out in the SEA Regulations are linked to the SA Objectives which can also be seen in Table 5.1 of the Scoping Report (2020).

Table 1: SA Process Stages

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

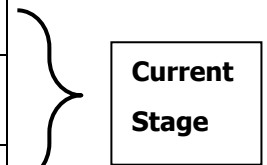


Table 2 – Sustainability Objectives (SO)

Ref. no.	Sustainability Objective	Link to topics in SEA Regulations
1	Provide housing that meets the needs of all of our existing and future residents	(b) population (j) material assets
2	To promote safe communities and reduce fear of crime	(b) population (c) human health
3	Improve access to health facilities and promote wellbeing	(b) population (c) human health
4	Maximise the use of previously developed land/ buildings and encourage the efficient use of land	(b) population (c) human health (j) material assets
5	To improve the educational attainment of the working age population	(b) population (c) human health
6	To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	(b) population (c) human health
7	To reduce and manage water and air pollution	(f) soil (g) water (h) air (i) climatic factors
8	To minimise waste and increase the recycling and reuse of waste materials	(i) climatic factors
9	To reduce <i>and manage</i> flood risk and surface water run-off	(g) water (j) material assets
10	To reduce and manage the impacts of climate change and the Districts contributions to the causes	(i) climatic factors
11	To promote biodiversity protection enhancement and management of species and habitats	(a) biodiversity (d) flora (e) fauna (f) soil
12	To ensure the protection and enhancement of the historic environment, heritage assets and <i>their</i> setting	(k) cultural heritage
13	Protect, enhance and manage the character and quality of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place	(l) landscape (k) cultural heritage
14	To increase opportunities for non-car travel and reduce the need for travel	(b) population (c) human health

- 2.3.7 In order to assess the preferred options against each of the SA objectives in a consistent manner, a number of appraisal questions and associated indicators have been developed. These are set out at Section 5 (Table 5.1) of the Scoping Report (2020).
- 2.3.8 The SA questions and indicators have been reviewed prior to the commencement of this Publication Version stage and modifications have been made to Sustainability Objective 1 through the Scoping Report (2020). The questions, assumptions and indicators used in this SA are presented at Appendix B.

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

- 2.3.9 The Lichfield District Local Plan 2040: Scoping Report was published in November 2020 and was the subject of formal consultation with statutory consultees/stakeholders and the comments received taken into account. This included, as a minimum the three statutory environmental consultation bodies set out in the SEA Regulations (namely Natural England, Environment Agency and Historic England).
- 2.3.10 A summary of the comments received to the consultation exercise and the District Council's response are presented at Appendix C. In terms of the Sustainability Objectives, two changes to the wording of the objectives used in the SA were agreed by the District Council. Historic England requested that SO 12 was amended to include specific reference to heritage assets and 'their setting' and Natural England requested that SO 7 is amended to reference 'reduce and manage water and air pollution. The revised wording is set out in Table 2 above.

2.4 STAGE B – DEVELOPING AND REFINING OPTIONS AND ASSESSING EFFECTS

- 2.4.1 A Sustainability Appraisal (SA) should meet all of the requirements of the Strategic Environmental Assessment (SEA) Directive and the Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 12 (2) of the 2004 Regulations states that where an environmental assessment is required an environmental report shall be prepared to "*identify, describe and evaluate the likely significant effects on the environment of –*

(a) Implementing the plan or programme; and

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

- 2.4.2 An assessment of 'reasonable' alternatives to the selected plan is required to meet the requirements of Regulation 12 of the 2004 Regulations and in doing so, identify and evaluate their sustainability impacts. The Regulations imply that alternatives that are not reasonable do not need to be subject of the SA process. For the purposes of the SA it is assumed that unreasonable alternatives include

policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.

2.4.3 The Lichfield District Council Local Plan: Preferred Options and Policy Directions (January 2019) identified seven housing growth options. These options were considered the 'reasonable alternatives' for the purposes of that SA. The seven housing requirement options were:

- Housing Requirement Option 1 – Local housing need only
- Housing Requirement Option 2 – Local housing need plus 1,000 home contribution
- Housing Requirement Option 3 – Local housing need plus 2,000 home contribution
- Housing Requirement Option 4 – Local housing need plus 3,000 home contribution
- Housing Requirement Option 5 – Local housing need plus 4,500 home contribution
- Housing Requirement Option 6 – Local housing need plus 10,000 home contribution
- Housing Requirement Option 7 – Local housing need plus 19,000 home contribution

2.4.4 Based on the finding of the SA for Lichfield District Local Plan: Preferred Options and Policy Directions and consultation responses the Council identified a preferred direction for the Spatial Strategy. This preferred growth option, which aligns with Options 3 to 5 above, has been taken forward into the Local Plan Preferred Options and is now set out in draft Strategic Policy SP1: The Spatial Strategy.

2.4.5 The Lichfield District Local Plan: Scope, Issues and Options (April 2018) identifies six broad spatial options for the distribution of housing growth and economic growth. These options are considered the 'reasonable alternatives' to the spatial strategy the purposes of this SA. The six spatial options are:

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

2.4.6 The preferred spatial option being taken forward in the Lichfield District Local Plan 2040: Submission Plan represents a combination of Residential Growth Option 2 and Employment Growth Option 1 and is also set out in draft Strategic Policy SP1: The Spatial Strategy.

2.4.7 Strategic Policy SP1: The Spatial Strategy defined the quantum of growth for Lichfield District for the plan period until 2040 as:

- the reuse of previously developed land and the efficient use of land will remain a key priority of the District;

- minimise and manage pressures on natural, built and historic environment, natural resources, utilities and infrastructure and areas at risk of flooding whilst also mitigating and adapting to climate change;
- proposals in existing communities and settlements will contribute to their improved sustainability, cohesion and community well-being by taking account of Neighbourhood Plans;
- new growth/development will be directed to the most sustainable locations via a hierarchy of centres and settlements;
- to deliver a minimum of 7,062 dwellings to meet local housing needs and contribute 2,665 dwellings to meeting the greater Birmingham and Black Country housing market area shortfall;
- new strategic allocations will be focussed on Lichfield and other larger service villages, namely Fradley, Fazeley and Whittington;
- strategic changes to the Green Belt will be made around Fazeley and Whittington;
- areas of safeguarding land will be identified at Burntwood Lichfield and Fazeley.

2.4.8 Strategic Policy E1: Employment and Economic Growth defines the quantum of economic growth as:

- The allocation of approximately 85 hectares of land to be informed by the ELAA;
- Supporting rural diversification;
- New business formations and sustainable forms of business will be supported;
- Encouraging education and skills development;
- Supporting the expansion, conversion and redevelopment of existing employment premises/areas; and
- Non-employment uses will not usually be supported in existing or allocated employment areas.

2.4.9 The proposed Economic Growth Strategy and the Spatial Strategy are supported by a suite of supporting planning policies that provide environmental and policy direction associated with bringing forward new development for the plan period. These policies are discussed in more detail in Section 5.

2.4.10 Lichfield District Council has also considered an alternative policy option against not implementing the plan. This 'no development' option will result in the Council relying on extant local plan policy until it becomes out of date and national guidance only. It is acknowledged that this option is not supported by the Government and also does not give the Council control over the direction or quantum of future

growth or the delivery of associated infrastructure requirements but represents a 'reasonable alternative'. Policies have been assessed against a no development option in order to provide a baseline or fall-back environmental state as required by the SEA Directive.

2.4.11 The proposed Economic Growth Strategy and the Spatial Strategy set out above are considered to be the 'reasonable alternatives' in this SA are considered in more detail in Section 5.

2.5 DEFINING 'SIGNIFICANT EFFECTS'

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

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

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

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

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

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

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

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

- Is the effect positive or negative?
- Which risk groups are affected and in what way?
- Is the effect reversible or irreversible?
- Does the effect occur over the short, medium or long term?
- Is the effect continuous or temporary?
- Does it increase or decrease with time?
- Is it of local, regional, national or international importance?
- Are national standards or environmental objectives threatened?
- Are mitigating measures available and is it reasonable to require these?

2.5.6 Each policy and residential and employment site option is assessed (guided by the above questions) to identify the potential impact on the SA objectives. A combination of expert judgment, analysis of baseline data (contained in the Scoping Report 2020) and the definitions set out below were used to judge the potential significance of the specified effect on the plan's objectives.

2.6 DEFINING 'REASONABLE ALTERNATIVES' SITES

2.6.1 The proposed Economic Growth Strategy and the Spatial Strategy identifies that the Local Plan Preferred Options should deliver, during the plan period a minimum of 7,062 dwellings to meet local housing needs and a further 2,665 dwellings to meeting the greater Birmingham and Black Country housing market area shortfall. This comprises the need to bring forward 9,727 dwellings directed to previously developed land within the most sustainable locations identified via a hierarchy of centres and settlements.

2.6.2 The Sustainability Appraisal has a key role to play in identifying allocated sites for new housing and employment growth. The starting point are all the sites identified in the Local Plan 2040 is the SHLAA (2019 and 2020) and ELAA (2019 and 2020).

- 2.6.3 A Site Selection Methodology has been followed by the District Council taking account of relevant national planning policy and guidance alongside evidence-based studies to assess the sites within the District to determine the most appropriate sites for allocation within the Local Plan 2040. No employment sites are identified at the Local Plan: Preferred Option but for completeness an assessment of alternatives employment sites has been undertaken as part of this SA.
- 2.6.4 The site selection methodology developed by the District Council comprises a staged process through which sites are removed. The first stage of the site selection methodology process considers all of the sites and removes any sites that were either complete, that have full planning permission or are under construction.
- 2.6.5 The second stage of the site selection methodology process excludes sites that have significant policy constraints which removes sites that are wholly or largely within Flood Zone 3b and sites that are wholly within sites of international, national and local importance e.g. AONB, SSSI, SAC, SPA and Ramsar. The first two stages of the site selection methodology essentially exclude sites that are not acceptable in National Policy terms, due to significant policy constraints. Therefore, the District Council considers these to be 'unreasonable alternatives' and they are not subject to SA.
- 2.6.6 The third stage of the site selection methodology process excludes sites that do not, of themselves, accord with the Spatial Strategy in the adopted Local Plan Strategy and the emerging Spatial Strategy, namely, sites which are not located partially or wholly within a settlement boundary or adjacent to the Tier 1-4 settlements.
- 2.6.7 The SHLAA contains a total of 376 potential housing sites. Following the completion of Stages 1, 2 and 3 a total of 116 housing sites were excluded from consideration in this SA. The remaining 260 sites are considered as 'reasonable alternative' housing sites for the purposes of this SA and were each assessed against each of the sustainability objectives set out at Section 2.3. The findings of the Sustainability Appraisal and a more detailed assessment of key sites has been undertaken to identify preferred sites. Strategic Policy 12: Housing Provision identifies the following strategic allocations:
- Land to the North-east of Lichfield (3,300 dwellings);
 - Land west of Fazeley (800 dwellings);
 - Land off Hay End Lane, Fradley (500 dwellings): and
 - Land off Huddlesford Lane, Whittington (75 dwellings).
- 2.6.8 The appraisal results are set out in the matrix presented in Appendix D for each of the alternative housing sites considered in this SA Report. The full appraisal results for the allocated housing sites is presented at Section 5 and is based on the current evidence base.

2.6.9 A similar three stage site selection process was undertaken to identify the 'reasonable alternatives' for employment sites and associated allocations. The ELAA contains a total of 78 potential employment sites. Following the completion of Stages 1, 2 and 3 63 sites are considered as 'reasonable alternative' employment sites for the purposes of this SA and were each assessed against each of the sustainability objectives set out at Section 2.3. The appraisal results are set out in the matrix presented in Appendix E for each of the alternative employment sites considered in this SA Report.

2.7 DEFINITIONS

2.7.1 The following definitions are used in this Environmental Report:

Duration of Effects

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

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

Nature of Effects

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

Effect	Description
Positive effects	Effects that have a beneficial influence on the environment;
Negative effects	Effects that have an adverse influence on the environment;
Indirect/secondary effects	Effects that are due to activities that are not part of the specific plan proposal/policy,
Permanent effects	Effects will have a unchanging impact on the plan proposal/policy;
Temporary effects	Effects that are a consequence of a limited effect of the plan proposal/policy;
Synergistic (effects combining)	Combined effects or interactive effects are the result of impact interactions between the plan proposals/policies. Assessment of the

	individual proposal/policy effects may be insignificant but Combined the effects can have an overall significant impact,
Cumulative effects	Cumulative effects are the result of the interaction between effects associated with the plans proposals/policies.

2.8 ASSESSING EFFECTS

- 2.8.1 SA is an extremely powerful tool in the development and refinement of development plan document options. The assessment provides a means by which the relative merits of the individual options can be assessed. The appraisal process seeks to ascertain the environmental, social and economic effects of each option as well as the identification of mitigation or enhancement to be included in the emerging Local Plan 2040. This assessment process is done in the context of the level of information that is currently available for each site and so represents a desk-based assessment. However, recommendations put forward at each stage have helped to refine and enhance the sustainability performance of the options.
- 2.8.2 This stage offers the opportunity to review and confirm the policies and site options set out in Lichfield District Local Plan 2040: Submission Plan against the Sustainability Objectives developed at the scoping stage. The policy and site options have each been tested against the sustainability objectives developed for the purposes of the Sustainability Appraisal.
- 2.8.3 The assessment considers the effects of the preferred policy or site on the environment. The performance of each site option was scored using the following six-point scale:

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

- 2.8.4 The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.
- 2.8.5 The full appraisal results are set out in the matrixes presented in Appendices F and G for each of the policies and sites considered in this SA. A summary of the appraisal results is presented at Section 4.

Assumptions

- 2.8.6 The scoring was based on available information in respect of each site option and has been based on the SA team's judgement. In order to ensure consistency in the appraisal of the options a set of appraisal questions were developed to enable the SA team to consider each effect within clear parameters. Where mitigation measures have been proposed for the allocated sites, the long-term effects have been scored on the basis that the mitigation measures have been applied.
- 2.8.7 Further details on the assumptions used in this SA are set out at Appendix B of this report.

Difficulties Encountered

- 2.8.8 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.
- 2.8.9 The appraisal of the alternative sites has comprised a 'desk based' exercise and relied on publicly available information and the evidence base prepared by the District Council during the preparation of the Lichfield District Local Plan 2040 to complete the scoring matrix. Further detailed information associated with the Strategic Highways Modelling is still under preparation and will be taken into account in future SA Reports into the Local Plan 2040 when the scoring matrix will be amended as appropriate. No other specific difficulties have been identified.

2.9 STAGE C – PREPARE SA REPORT

- 2.9.1 The Submission Version of the Lichfield District Local Plan 2040 must be accompanied by a SA report referenced at Stage C. This document comprises the Stage C SA Report.
- 2.9.2 The SA Report outlines the significant effects on the environment, social and economic factors of the Local Plan 2040. The SEA Directive sets out at Article 5 and Annex I the information required to form part of the environmental report. This information is repeated as Schedule 2 of the 2004 Regulations.

2.10 STAGE D – CONSULTATION ON SA REPORT

2.10.1 This SA Report is published alongside the Lichfield District Local Plan 2040: Submission Plan. The SA Report take account of previous consultations on the emerging Local Plan undertaken in accordance with the Council’s Statement of Community Involvement.

2.11 STAGE E – POST ADOPTION REPORTING AND MONITORING

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

2.11.2 The Local Plan 2040 will set out a monitoring programme to identify if the policies and site allocations meet the overall Plan Objectives and Vision. This programme will allow the Council to monitor the success of individual policies and also monitor the baseline environmental, social and economic conditions of the Plan area. The results of the monitoring programme will be presented in the Annual Monitoring Report.

2.11.3 The final SA monitoring programme will be included in the SA adoption Statement (once the Local Plan 2040 is adopted) and this will reflect any changes made during the Examination Stage.

3.0 SUSTAINABILITY ASSESSMENT – CONTEXT AND OBJECTIVES

3.1 LICHFIELD DISTRICT LOCAL PLAN 2040: SUBMISSION PLAN

3.1.1 The Lichfield District Local Plan 2040 is a spatial development plan introduced by the Government under the Planning and Compulsory Purchase Act 2004 (hereafter referred to as the 2004 Act) as amended by the Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter referred to as the 2012 Regulations). The Act requires each Local Planning Authority (LPA) to prepare a Local Plan for its administrative area. Local Plans set out the spatial framework which largely determine where, how and what development takes place.

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

3.1.2 The Lichfield District Local Plan 2040 is not prepared in isolation but is greatly influenced by other plans, policies and programmes and by broader sustainability objectives. The adopted plan needs to be consistent with international and national guidance together with relevant environmental protection legislation.

3.1.3 Appendix A of the Local Plan 2040 SA Scoping Report (2020) sets out a comprehensive list of the policy documents that are relevant to the preparation of the Local Plan 2040 together with a summary of the relevance of each document to the Local Plan 2040 and, more specifically, this SA. This outline will be updated at each stage of the process.

Key International plans, policies and programmes

3.1.4 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the “SEA Directive”) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the “Habitats Directive”) are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Local Plan 2040.

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

3.1.6 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however a complete list of the relevant international directives have been included in Appendix A of the Scoping Report (2020).

Key National plans, policies and programmes

- 3.1.7 Sustainable development is a cornerstone of Government policy in relation to planning and the use of land. The Government's approach to sustainable development is set out in the national strategy "Securing the Future". The Strategy, published in March 2005 focuses on five principles; Living within Environmental Limits, Ensuring a Strong, Healthy and Just Society, Achieving a Sustainable Economy, Promoting Good Governance and Using Sound Science Responsibly. The Strategy identifies four key priority areas: Sustainable Consumption and Production, Climate Change and Energy, Natural Resource Protection and Environmental Enhancement, and Sustainable Communities.
- 3.1.8 The Government's general statements of planning policy are set out in the National Planning Policy Framework (NPPF) which establishes the policies and principles which should be taken into account in the preparation of development plans and consideration of individual proposals. The NPPF was revised in July 2018 and updated in February 2019.
- 3.1.9 The NPPF highlights the economic, social and environmental roles of the planning system and planning's contribution towards a strong, responsive and competitive economy; strong, vibrant and healthy communities; and the protection of the natural, built and historic environment. These objectives are seen as mutually dependent and should be pursued in an integrated way.
- 3.1.10 The NPPF at heart has a presumption in favour of 'sustainable development' "so that sustainable development is pursued in a positive way".
- 3.1.11 Paragraph 11 states that; for plan-making this means that:
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

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

Conserving and Enhancing the Natural Environment

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

- Minimising impacts on biodiversity and providing net gains in biodiversity; and
- Preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

Conserving and Enhancing the Historic Environment

3.1.14 Section 16 of the NPPF aims to conserve and enhance the historic environment and both designated and undesignated heritage assets and the general principle is that heritage assets should be conserved in a manner appropriate to their significance.

3.1.15 The NPPF states at paragraph 16 that "*plans should be prepared with the objective of contributing to the achievement of sustainable development*".

3.1.16 Paragraph 32 of the NPPF specifically references the approach to the Sustainability Appraisal. Paragraph 32 states; "Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)".

Local Plans, policies and programmes

3.1.17 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Staffordshire and Lichfield District, and which provide further context for the Lichfield District Local Plan 2040. These plans and programmes relate to issues such as housing, employment land, transport, renewable energy and green infrastructure.

Summary

- 3.1.18 Based on the review of the relevant policies, plans and programmes the key sustainability issues and problems for the District were identified. These are set out in full in Appendix A of the Scoping Report 2020. Definitions

3.2 BASELINE INFORMATION (TASK A2)

- 3.2.1 The sustainability baseline for Lichfield District used for the purposes of this Assessment is set out Appendix B of the Scoping Report (2020) and is not repeated in this report. This sets out updated empirical data on all relevant economic, social and environmental factors. The baseline information provides the basis for identifying trends, predicting the likely effects of the Plan and monitoring its outcomes.

3.3 RELATIONSHIP BETWEEN THE SA AND HRA

- 3.3.1 In accordance with Article 6(3) of the EU Habitats Directive an assessment is required where a plan or project not directly connected to or necessary to the management of a European protected site for nature conservation (i.e. designated and proposed/candidate SPA's and SAC's sites) may give rise to significant effects upon a the designated site. The Habitats Directive is primarily transposed in England under the Conservation of Habitats and Species Regulations 2010.
- 3.3.2 Lichfield District has two designated European sites within its boundary, namely Cannock Chase SAC and River Mease SAC. A Habitats Regulations Assessment of the Lichfield District Local Plan 2040: Submission Plan has been prepared by Footprint Ecology to consider whether the options in the emerging plan is likely to have significant effects on European habitats or species. The HRA of the Lichfield District Local Plan 2040 is presented as a separate 'standalone' document.
- 3.3.3 PPG states at paragraph 11-011 that "*the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken*". The conclusion of the standalone HRA have been reviewed in the production of this SA Report which will be updated as the HRA is updated.

4.0 DEVELOPING AND ASSESSING OPTIONS AND 'REASONABLE ALTERNATIVES' (STAGE B)

4.1 INTRODUCTION

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

(a) Implementing the plan or programme; and

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

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

4.2 PROPOSED SPATIAL STRATEGY AND ECONOMIC GROWTH STRATEGY

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

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

4.2.2 These spatial options were the subject of previous SA dated January 2019. The preferred spatial option being taken forward in the Lichfield District Local Plan 2040 represents a combination of Residential Growth Option 2 and Employment Growth Option 1. The Preferred Spatial Option is considered to meet the requirement for 'reasonable' alternatives in the 2004 Regulations but worth analysis of the specific site options, particularly for employment allocations, is on-going.

4.2.3 The specifics of the Preferred Spatial Option are set out in Strategic Policy SP1: The Spatial Strategy. Strategic Policy SP1: The Spatial Strategy defined the quantum of growth for Lichfield District for the plan period until 2040 as:

- the reuse of previously developed land and the efficient use of land will remain a key priority of the District;
- minimise and manage pressures on natural, built and historic environment, natural resources, utilities and infrastructure and areas at risk of flooding whilst also mitigating and adapting to climate change;
- proposals in existing communities and settlements will contribute to their improved sustainability, cohesion and community well-being by taking account of Neighbourhood Plans;
- new growth/development will be directed to the most sustainable locations via a hierarchy of centres and settlements;
- to deliver a minimum of 7,062 dwellings to meet local housing needs and contribute 2,665 dwellings to meeting the greater Birmingham and Black Country housing market area shortfall;
- new strategic allocations will be focussed on Lichfield and other larger service villages, namely Fradley, Fazeley and Whittington;
- strategic changes to the Green Belt will be made around Fazeley and Whittington;
- areas of safeguarding land will be identified at Burntwood Lichfield and Fazeley.

4.2.4 Strategic Policy E1: Employment and Economic Growth defines the quantum of economic growth as:

- The allocation of approximately 85 hectares of land to be informed by the ELAA;
- Supporting rural diversification;
- New business formations and sustainable forms of business will be supported;

- Encouraging education and skills development;
- Supporting the expansion, conversion and redevelopment of existing employment premises/areas; and
- Non-employment uses will not usually be supported in existing or allocated employment areas.

4.2.5 The proposed Economic Growth Strategy and the Spatial Strategy set out in Policies SP1 and E1 have been assessed against the Sustainability Objectives and the results are discussed in more detail in Section 5.

4.2.6 The proposed Economic Growth Strategy and the Spatial Strategy are also supported by a suite of supporting planning policies that provide environmental and policy direction associated with bringing forward new development for the plan period. The policies are split into groupings that correspond to the key aspects of the Local Plan 2040. The proposed policies are:

Strategy for sustainable development

- Strategic Policy SP1: The Spatial Strategy

Transport

- Strategic Policy SP2: Sustainable Transport
- Strategic Policy SP3: Sustainable Travel
- Strategic Policy SP4: Transport Safeguarding
- Local Policy LT1: Parking Provision

Infrastructure

- Strategic Policy SP5: Infrastructure Delivery
- Local Policy INF1: Supporting and Providing Infrastructure
- Local Policy INF2: Provision of Social and Community Infrastructure
- Local Policy INF3: Retention of Social and Community Infrastructure
- Strategic Policy SP6: Infrastructure and services that support healthy communities
- Strategic Policy SP7: Participating in Sport and Physical Activity
- Local Policy INF4: Green infrastructure, open space and playing pitches
- Local Policy INF5: New open space provision requirements
- Strategic Policy SP8: Blue infrastructure, watercourses and flood risk

- Strategic Policy SP9: Water Quality

Sustainable development

- Strategic Policy SP10: Sustainable development
- Local Policy SD1: Sustainable design and masterplanning
- Strategic Policy SP11: Protecting Green Belt Land
- Local Policy SD2: Renewables and low carbon energy

Housing

- Strategic Policy SP12: Housing Provision
- Local Policy H1: Achieving a balanced housing market and optimising housing density
- Local Policy H2: Affordable Housing
- Local Policy H3: Accommodation for Gypsies and Travellers

Employment

- Strategic Policy SP13: Employment and Economic Growth
- Strategic Policy SP14: Centres
- Local Policy E1: Drayton Manor Park
- Local Policy E2: Tourism, Arts and Culture

Natural Resources

- Strategic Policy SP15: Natural Resources
- Local Policy NR1: Countryside Management
- Local Policy NR2: Habitats and Biodiversity
- Local Policy NR3: Trees, Woodlands & Hedgerows
- Strategic Policy SP16: Natural and Historic Landscapes
- Local Policy NR4: Linked Habitats, Connectivity and Green Infrastructure
- Local Policy NR5: Cannock Chase SAC
- Local Policy NR6: Cannock Chase Area of Outstanding Natural Beauty
- Local Policy NR7: River Mease SAC
- Local Policy NR8: The National Forest

Built & historic environment

- Strategic policy SP17: Built and Historic Environment

Lichfield and Streethay

- Strategic Policy SHA1: Strategic housing allocation north of Lichfield
- Local Policy LC1 Lichfield Local Green Space Policy
- Local Policy LC2: Lichfield City Environment
- Local Policy LC3: Lichfield Services and Facilities

Burntwood

- Local Policy B1: Burntwood Environment
- Local Policy B2: Burntwood Services and Facilities

Larger Service Villages

- Local Policy A1: Alrewas Services and Facilities
- Local Policy A2: Alrewas Economy
- Local Policy A3: Alrewas Housing
- Local Policy AH1: Armitage with Handsacre environment, services and facilities
- Local Policy AH2: Armitage with Handsacre Housing
- Strategic Policy SHA2: Strategic housing allocation land west of Fazely
- Local Policy F1: Fazeley environment
- Local Policy F2: Fazeley services and Facilities
- Local Policy F3: Fazeley economy
- Local Policy F4: Fazeley housing
- Strategic Policy SHA3: Strategic housing allocation land north and south of Hay End Lane
- Local Policy FR1: Fradley environment
- Local Policy FR2: Fradley services and facilities
- Local Policy FR3: Fradley economy
- Local Policy FR4: Fradley housing
- Local Policy LA1: Little Aston environment, services and facilities
- Local Policy LA2: Little Aston housing
- Local Policy S1: Shenstone environment, services and facilities
- Local Policy S2: Shenstone economy
- Local Policy S3: Shenstone housing

- Strategic Policy SHA4: Strategic housing allocation land off Huddlesford Lane, Whittington.
- Local Policy W1: Whittington environment, services and facilities
- Local Policy W2: Whittington economy
- Local Policy W3: Whittington housing

Smaller Service Villages

- Local Policy SSV1: Development in Smaller Service Villages and Wider Rural Areas
- Local Policy H1: Hopwas economy
- Local Policy H2: Hopwas environment
- Local Policy H3: Hopwas facilities and services
- Local Policy KB1: Kings Bromley environment
- Local Policy KB2: Kings Bromley services and facilities
- Local Policy ST1: Stonnall economy
- Local Policy ST2: Stonnall environment
- Local Policy ST3: Stonnall services and facilities

4.2.7 The appraisal results for each of the policies are set out in the matrix presented in Appendix F and discussed in more detail in Section 5.

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

4.3 PREFERRED ALLOCATIONS – HOUSING AND EMPLOYMENT

4.3.1 The Sustainability Appraisal has a key role to play in identifying allocated sites for new housing and employment growth. The starting point are all the sites identified in the Local Plan 2040 is the SHLAA (2019 and 2020) and ELAA (2019 and 2020).

- 4.3.2 A Site Selection process was developed by the District Council taking account of relevant national planning policy and guidance together with the findings of the SA and other evidence-based studies to assess the sites within the District and determine the most appropriate sites for allocation within the Lichfield District Local Plan 2040. Details of the Site Selection methodology undertaken is set out at Section 2.6.
- 4.3.3 The SHLAA contains a total of 376 potential housing sites. Following the completion of the initial stages of the site methodology 116 housing sites were excluded from consideration in this SA. The remaining 260 sites were assessed against each of the sustainability objectives. The appraisal results are set out in the matrix presented in Appendix D for each of the sites considered as 'reasonable alternatives' for the purposes of this SA. A discussion of the appraisal results for the allocated sites is presented at Section 5.
- 4.3.4 The SA findings are not the only factors taken into account when determining options or housing allocations to be taken forward in a plan. Indeed, there will often be an equal number of positive and negative effects identified for each option such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as consultation responses, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.
- 4.3.5 The findings of the Sustainability Appraisal and a more detailed assessment of key sites has been undertaken to identify preferred sites. Strategic Policy SP12: Housing Provision identifies the following strategic allocations:
- Land to the North-east of Lichfield (3,300 dwellings);
 - Land west of Fazeley (800 dwellings);
 - Land off Hay End Lane, Fradley (500 dwellings); and
 - Land off Huddlesford Lane, Whittington (75 dwellings).
- 4.3.6 These options meet the requirements of the SEA Regulations and Task B2 of the SA Stages. A summary of the significant effects associated with the preferred options and allocated housing sites is considered in Section 5.
- 4.3.7 The appraisal matrix for each of the allocated housing sites, based on the evidence base currently available, is presented at Appendix G. Further detailed information associated with the Strategic Highways Modelling is still under preparation and will be taken into account in future SA Reports into the Local Plan 2040. The scoring matrix will be amended as appropriate.

4.3.8 A similar three stage site selection process was undertaken to identify the 'reasonable alternatives' for employment sites and associated allocations. The ELAA contains a total of 78 potential employment sites. Following the completion of Stages 1, 2 and 3 63 sites are considered as 'reasonable alternative' employment sites for the purposes of this SA and were each assessed against each of the sustainability objectives set out at Section 2.3. The appraisal results are set out in the matrix presented in Appendix E for each of the alternative employment sites considered in this SA Report.

5.0 APPRAISAL OF 'SIGNIFICANT' ENVIRONMENTAL EFFECTS ASSOCIATED WITH LICHFIELD LOCAL PLAN 2040: SUBMISSION PLAN

5.1 INTRODUCTION

5.1.1 An appraisal of the Lichfield Local Plan 2040: Submission Plan including the proposed strategic housing allocations and policies considered in this SA and based on the current evidence base are contained in Appendix F and G. The 'reasonable alternative' housing and employment sites assessed are presented at Appendices D and E respectively. This section of the report summarises the findings of the Sustainability Assessment of the Lichfield Local Plan 2040: Submission Plan in respect of any significant effects associated with the SA objectives and also considers ways of mitigating adverse effects and any cumulative effects arising from the Local Plan 2040 as a whole. This accords with Tasks B3 and B4 of the five stage SA process.

5.2 ASSUMPTIONS, UNCERTAINTIES AND DIFFICULTIES

5.2.1 An appraisal of environmental effects inevitably relies on assumptions and an element of subjective judgement. As the Local Plan 2040 contains strategic options there are no short, medium or long term effects associated with this stage of the Local Plan. Further details on the assumptions used in this SA are set out at Appendix B of this report.

5.2.2 Scoring considerations associated with whether a site is either mainly or entirely brownfield land, partly greenfield land or mainly or entirely greenfield have taken into account the presence or absence of existing buildings and structures on a site and the scale of these structures to the size of the overall site.

5.2.3 It is a requirement of the SEA Regulations that consideration is given to difficulties that are encountered during the SA process. This could include any data limitations or the availability of other relevant assessments. This is noted in the individual option matrices. As the Local Plan 2040 evolves the evidence base has expanded and been refined resulting in a more robust understanding of the effects of the site options on the Sustainability Objectives.

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

5.3 VISION AND OBJECTIVES

5.3.1 The SA scores for the Local Plan Vision and Objectives are presented in Appendix H.

- 5.3.2 The overall vision for Lichfield District sets out the aspiration for development in the District to be delivered in a sustainable way, to ensure that the District is a place where residents and communities feel safe/belong and are proud of the district's history, culture and the natural and built environment. The Strategic Objectives then provide more detail about how the Vision will be achieved. Therefore, where effects on the SA objectives have been identified these are broadly very positive. Where the Local Plan strategic objectives directly address a particular SA objective, significant positive effects have been identified although in most cases the positive effects are minor due to the general nature of the objectives and the fact that they will be delivered through more detailed policies in the Lichfield District Local Plan 2040.
- 5.3.3 No conflicts between SA objectives or the Local Plan Vision and Objectives were identified.

5.4 STRATEGY FOR SUSTAINABLE DEVELOPMENT

- 5.4.1 The amount of housing and employment development to be provided through the Strategic 'Spatial Strategy' Policy SP1 will have generally significant positive effects on SA Objective 1: Housing Needs as it will meet the objectively assessed housing need for Lichfield and a fair contribution to the greater Birmingham and Black Country housing market area shortfall. The strategy will also have a positive effect on SA Objective 6: Stable and Sustainable Economy by seeking to meet the identified needs for employment land in the District by delivering a portfolio of potential sites. Balancing the amount of housing and employment land will ensure that local needs are appropriately met.
- 5.4.2 Providing everyone with an opportunity to live in a decent and affordable home is a key social target. A steady supply of housing is necessary to generate vitality, facilitate continued economic prosperity, help support local shops and services required by local residents and help achieve the aim of creating mixed and balanced communities.
- 5.4.3 A full range of household sizes for all income levels and ages, will help reduce the levels of outward commuting, will help attract business and improve the supply of employees. The proposed strategy has the opportunity to deliver a range of housing types, including affordable housing and scores well against the social objectives.
- 5.4.4 The proposed strategy will contribute positively to maximising previously developed land and buildings but the proposed housing allocations which will focus new development outside of existing settlements boundaries, will have an adverse effect on the loss of land that has not been previously developed (Sustainability Objective 4) as new developments outside of the existing settlement boundaries are being proposed.

- 5.4.5 The proposed strategy will have a positive score on promoting safe communities and reducing the fear of crime (Sustainability Objective 2) by providing enhanced access to health and recreational services.
- 5.4.6 Specific measures relating to the reduction and management of water, flood risk and surface water run-off (Sustainability Objective 9), minimisation of waste and recycling (Sustainability Objective 8), air pollution levels (Sustainability Objective 7) and managing climate change (Sustainability Objective 10) are addressed by a suite of policies in the Submission Plan which, once the Local Plan 2040 is adopted, will come into force and replace the existing policies in the Lichfield Local Plan Strategy. Based on the above, the Strategy represent a generally neutral effect on these sustainability objectives albeit new development does provide an opportunity to bring forward a strategic approach to managing areas of flood risk (Sustainability Objective 9).
- 5.4.7 The Strategy will have the potential to have a negative impact on the District's biodiversity assets (Sustainability Objective 11) in both the urban and countryside areas but also offer the opportunity for significant ecological enhancement and habitat creation. Local Policies on, Countryside Management, Habitats and Biodiversity, trees/hedgerows, SAC's and Green Infrastructure/Connectivity will ensure that any biodiversity loss is reduced to an acceptable minimum. Based on the above, the Strategy represent a neutral effect on this sustainability objective.
- 5.4.8 The Strategy will have the potential to result in negative impacts on the historic environment, heritage assets including archaeological remains, and their settings (Sustainability Objective 12). The Strategic Policy on built and historic environment will ensure that any heritage impacts are minimised. Based on the above, the Local Plan Strategy represents a neutral effect on this sustainability objective.
- 5.4.9 The Strategy has the potential to impact negatively on the District's landscape and townscape (Sustainability Objective 13). The Strategic Policy on natural and historic landscapes will ensure that any landscape impact is reduced to an acceptable minimum. Based on the above, the proposed strategy represents a neutral effect on this sustainability objective.
- 5.4.10 The proposed Strategy focusses new growth, principally, on the strategic center and larger service villages which offer the best opportunities to increase non-car travel and reducing the need for travel (Sustainability Objective 14), improve health/promoting well-being (Sustainability Objective 3) and potentially improving educational attainment (Sustainability Objective 5) due to the focusing of new development in existing settlements where public transport, including opportunities for enhanced services, is available. Based on the above, the proposed strategy represents a positive effect on these sustainability objectives.

5.5 LOCAL PLAN 2040: SUBMISSION PLAN - POLICIES

Transport

- 5.5.1 The strategic and local transport policies are likely to have a positive effect on SA Objectives 7: reducing and managing air quality in the District and SA Objective 10: climate change together with significant positive effects on SA Objective 14: increasing opportunities for non-car travel as the policies will support future sustainable transport infrastructure, improvements to the walking and cycling network and encourages developments that will contribute to improved connectivity.

Infrastructure

- 5.5.2 Meeting housing needs and the promotion of economic prosperity are strategic objective of the Lichfield District Local Plan 2040 which are equally dependent on the delivering of timely and supporting infrastructure. The Strategic and Local Policies have the potential to indirectly improve economic and housing growth in the District by providing important infrastructure. The policies represent a minor positive effect on Sustainability Objective 2: promoting safe communities, Sustainability Objective 3: improving access to health and recreational facilities, Sustainability Objective 5: educational attainment; Sustainability Objective 3: improving access to health facilities, Sustainability Objective 14: increasing opportunities for no-car travel, by seeking to retain and enhance social and community infrastructure but is likely to have a neutral effect or no link on the remaining SA objectives.

- 5.5.3 Strategic policies SP8 (Blue Infrastructure, watercourses and flood risk) and SP9 (water quality) will have a positive effects (either minor or significant) in relation to reducing and managing flood risk and surface water run-off (Sustainability Objective 9), managing climate change (Sustainability Objective 10) and protecting and managing impact on biodiversity species and habitats (Sustainability Objective 11). The policies are likely to have a neutral effect or no link to the majority of SA objectives.

Sustainable development

- 5.5.4 The nature of the Sustainable development policies means that positive effects (either minor or significant) are identified for all policies but significant positive effects are in relation to Sustainability Objective 2: promoting safe communities, Sustainability Objective 3: improving access to health and recreational facilities, managing climate change (Sustainability Objective 10) and protecting and enhancing character and quality of landscapes and townscapes (Sustainability Objective 13). The policies are likely to have a neutral effect or no link to the remaining SA objectives.

Housing

- 5.5.5 Providing everyone with an opportunity to live in decent and affordable home is a key social target. Housing is a key driver to revitalisation and it is an essential community need to provide a variety of housing types. A steady supply of housing is necessary to generate vitality, facilitate continued economic prosperity, help support local shops and services required by local residents and help achieve the aim of creating mixed and balanced communities. There is a shortage of affordable housing in Lichfield District. The Local Plan's growth strategy will further increase the pressure for affordable housing which the Affordable Housing Local Policy H2 seeks to address by encouraging the provision of affordable housing in development proposals. The provision of allocated housing areas will contribute positively to these objectives.
- 5.5.6 All the housing policies and allocations score positively (either minor or significant) against the social objectives. It is the Council's intention to bring forward a range and mix of housing tenures during the plan period to support the planning of high levels of economic growth. This is likely to contribute to meeting housing needs (Sustainability Objective 1) providing safe communities (Sustainability Objective 2), improving health facilities (Sustainability Objective 3), thereby delivering an equitable sharing of the benefits of prosperity.
- 5.5.7 The Housing policies are expected to have no effects on a relatively high proportion of the SA objectives as there is no direct linkage between the Policy and the SA Objectives. There is only one likely significant negative effect identified in relation to the loss of land that has not been previously developed (Sustainability Objective 4). This is due to new housing developments outside of the existing settlement boundaries being proposed, to meet local need, which cannot be mitigated.
- 5.5.8 The housing policies and allocated housing sites will result in a neutral effect on economic factors (Sustainability Objective 6) and retention of employment/trained personnel (Sustainability Objective 5) in the District.

Employment

- 5.5.9 Overall, there are likely to be mainly positive effects from the Employment policies. Two significant positive effects are expected for Sustainability Objective 6: Achieving Stable and Sustainable economic growth, i.e. to support sustainable economic growth and improve employment opportunities in the District, including tourism and development of Drayton Manor Park together with Sustainability objective 5: improving education attainment.

- 5.5.10 Policy SP13 confirms that a total of 85 hectares of new employment land is required in the District during the plan period.
- 5.5.11 The employment policies set out the framework for the delivery of this future employment land, including the expansion of existing employment areas and future local plan allocations and thus score positively in the SA.
- 5.5.12 Employment activity can also have an indirect positive effect on human health in the longer term. Supporting economic growth will result in an indirect positive effect on SA Objectives 3: promoting wellbeing.
- 5.5.13 The Employment policies are expected to have a neutral effect on a relatively high proportion of the SA objectives as there is protection built into these policies could therefore prevent adverse impacts on the environment.

Natural Resources

- 5.5.14 A large number of positive effects have been identified for the Natural Resources policies as they cover specific topics such as Countryside Management, Habitats and Biodiversity, Cannock Chase and River Mease Special Areas of Conservation, The National Forest, habitat connectivity and green infrastructure together with natural and historic landscapes. As the policies seek to protect the natural environment and landscape character of the District thus all the effects identified are positive (either minor or significant).
- 5.5.15 All the policies will have positive effects on SA Objective 11: promoting, protecting and enhancing species and habitats, SA Objective 12: promoting and enhancing the historic environment and Sustainability Objective 13: protecting and enhancing character and quality of landscapes and townscapes.
- 5.5.16 In addition, the wider indirect benefits of green infrastructure mean that positive effects are also likely to result for Sustainability Objective 3: Health and wellbeing, Sustainability Objective 7: reducing air pollution Sustainability Objective 10: Climate Change and Sustainability Objective 12: Heritage.
- 5.5.17 No significant negative effects have been identified for any of the Natural Resources policies in relation to the SA objectives.

Built and historic environment

- 5.5.18 Strategic Policy SP17: Built and Historic Environment provides a number of likely significant positive effects where the policy directly addresses an SA objective, for example which seeks to conserve and enhance the historic environment so is likely to have a significant positive effect on SA Objective 12: protecting and enhancing the historic environment and heritage assets.
- 5.5.19 The strategic historic environment policy requires that new development proposals take full account of the characteristics and setting of the heritage asset to ensure that features of historic interest are protected and conserved. The implementation of the policy will therefore result in a neutral or slight positive significant and cumulative effect on cultural heritage coming forward as a result of the proposals in the Plan.
- 5.5.20 Based on the above, the built or historic environment policies of the Local Plan will result in a neutral or slight positive effect in relation to the SA objectives.

Area specific policies

- 5.5.21 The SA scores for each of the Area Specific Policies, excludes those that allocate strategic housing areas are presented in Appendix G.
- 5.5.22 Each of the areas specific policies focus on improvements to the environment, economy of the level of facilities and service in the identified areas. The economy polices, therefore, score positively against SA Objective 6: Achieving Stable and Sustainable economic growth, i.e. to support sustainable economic growth and improve employment opportunities in the service centre and service villages together with an indirect impact on SA objective 5: improving education attainment.
- 5.5.23 The environment policies score positively positive effects on SA Objective 11: promoting, protecting and enhancing species and habitats, SA Objective 12: promoting and enhancing the historic environment and preserving or enhancing the District's landscape and townscape (Sustainability Objective 13).
- 5.5.24 The policies focused on the protecting and enhancing the range and access to services and facilities in the centres and villages scored positively SA Objective 3: Health and wellbeing, SA Objective 7: reducing air pollution and SA Objective 14: reducing the need to travel.
- 5.5.25 No significant negative effects have been identified and a neutral or no link score was recorded for the remaining SA objectives.

Lichfield District Local Plan 2040 – Housing Allocations

- 5.5.26 The Sustainability Appraisal has a key role to play in identifying allocated sites for new housing and employment growth. The starting point are all the sites identified in the Lichfield District Local Plan 2040 is the SHLAA (2019 and 2020) and ELAA (2019 and 2020).
- 5.5.27 Details of the Site Selection process developed by the District Council is set out at Section 2.6 and the findings of the SA were taken into account to determine the sites for allocation within the Lichfield District Local Plan 2040.
- 5.5.28 A total of 260 alternative housing sites were assessed against each of the sustainability objectives as part of this SA process. The appraisal results are set out in the matrix presented in Appendix D for each of the sites considered in this SA.
- 5.5.29 The SA findings confirmed that, with such a large number of potential sites being assessed an equal number of positive and negative effects were identified for each site. Whilst it is not possible to 'rank' the sites based on sustainability performance alone the SA findings indicate that sites falling within or on the edge of existing service centres and service villages scored positively in respect of the efficient use of land (Sustainability Objective 4), SA Objective 3: improving access to health facilities, SA Objective 7: reducing air pollution and SA Objective 14: reducing the need to travel.
- 5.5.30 The initial findings of the Sustainability Appraisal were utilised by the District Council as part of a more detailed assessment of key sites which informed the strategic residential sites in the Lichfield District Local Plan 2040: Submission Plan. Strategic Policy SP12: Housing Provision identifies the following strategic allocations:
- Land to the North-east of Lichfield (3,300 dwellings);
 - Land west of Fazeley (800 dwellings);
 - Land off Huddlesford Lane, Whittington (75 dwellings); and
 - Land off Hay End Lane, Fradley (500 dwellings).
- 5.5.31 The SA scores for each of the strategic housing allocations, based on the evidence base currently available, are presented in Appendix G.
- 5.5.32 All the strategic allocations have a significant positive effect on providing housing to meet the needs of existing and future residents (SA Objective 1), a neutral or slight positive effect on enhancing the character and quality of the landscape/townscape (SA Objective 13) and minimising the need to travel (SA Objective 14).

- 5.5.33 As the strategic allocations are located in open land on the edge of existing settlements the each have a significant negative score on maximising the use of previously developed land and encouraging the efficient use of land (Sustainability Objective 4) which cannot be mitigated.
- 5.5.34 The remaining SA Objectives are generally neutral, or the effects are uncertain. This is due in part to the envisaged concept plans and mitigation measures identified in the policy supporting each allocation and which identifies specific protection/enhancement matters.

5.6 CUMULATIVE EFFECTS

- 5.6.1 The Lichfield District Local Plan 2040: Submission Plan seeks to deliver housing and economic growth in the District over the life of the plan to meet the objectives of the Local Plan and the future needs of residents. The Local Plan Strategy seeks to distribute growth within existing settlements and on the edge of the City Centre and the larger service villages.
- 5.6.2 This SA has also considered the cumulative effects of the Local Plan 2040. The Local Plan 2040 will result in significant positive effects on SA Objective 1: Housing Needs as it will meet the objectively assessed housing need for Lichfield and a fair contribution to the greater Birmingham and Black Country housing market area shortfall and have a positive effect on SA Objective 6: Stable and Sustainable Economy.
- 5.6.3 The adoption of policies to protect and enhance the natural and built environment including the important landscape and heritage assets of the District will ensure that the Local Plan 2040 will result in a neutral or slight positive effect on all the key SA Objectives.
- 5.6.4 The only negative score relates to the efficient use of land (SA Objective 4) due to the allocation of new housing sites on open land where mitigation is not possible.

6.0 MITIGATION AND ENHANCEMENT (TASK B4)

6.1 INTRODUCTION

- 6.1.1 The Lichfield District Local Plan 2040 sets out site specific and policy mitigation and enhancement measures within the preferred policies. These have been assessed as part of the SA process and no further mitigation has been identified.
- 6.1.2 During the evolution of the Local Plan 2040 the evidence base has continued to expand as more detailed environmental assessment work has been undertaken on each of the proposed site allocations. The increased information resulted in the identification of the specific items of mitigation and enhancement which are considered in the Submission version of the Lichfield District Local Plan 2040 and thus this SA Report.

7.0 MONITORING (TASK B5)

7.1 MONITORING

- 7.1.1 The SEA Regulations state “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”. The Environmental Report is required to provide information “a description of the measures envisaged concerning monitoring”. Monitoring proposals are designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 7.1.2 Monitoring will be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.
- 7.1.3 The SA Scoping Report (2020) sets out suggested monitoring indicators for each of the SA Objectives used in this SA process. The Lichfield District Local Plan 2040, once adopted, should be monitored in the long terms against these indicators. The suggested indicators have been reviewed at each stage of the Local Plan 2040’s evolution.

7.2 NEXT STEPS

- 7.2.1 This SA has been prepared to support the Lichfield District Local Plan 2040: Submission Plan.
- 7.2.2 The District Council has taken account of all the consultation responses and the findings of sustainability appraisal during the preparation of the Lichfield District Local Plan 2040 Submission Plan. The Lichfield District Local Plan 2040 Submission Plan, this SA Report and the supporting evidence base will be submitted to the Planning Inspectorate for review.

8.0 CONCLUSIONS

8.1 SUMMARY

- 8.1.1 The role of the SA process is to promote sustainable development by assessing the extent to which the Lichfield District Local Plan 2040, taken together, will help to achieve relevant environmental, economic and social objectives.
- 8.1.2 The document has been prepared to assist Lichfield District Council Cabinet in their consideration of the sustainability issues and support the Regulation 22 version of the Lichfield District Local Plan 2040: Submission Plan.
- 8.1.3 This SA Report has considered the emerging Spatial Strategy, Economic Growth Strategy, Preferred Policies, and strategic allocations in the Lichfield District Local Plan 2040: Submission Plan, based on the current evidence base, against the agreed Sustainability Objectives agreed at Stage A of the SA process.
- 8.1.4 This document includes a detailed analysis or appraisal of all the reasonable alternatives site options being considered for new residential and employment allocations within the Submission Plan.
- 8.1.5 The SA Report concludes that the Local Plan 2040 will result in significant positive effects on SA Objective 1: Housing Needs as it will meet the objectively assessed housing need for Lichfield and a fair contribution to the greater Birmingham and Black Country housing market area shortfall and have a positive effect on SA Objective 6: Stable and Sustainable Economy.
- 8.1.6 The Local Plan 2040: Submission Plan confirms that a total of 85 hectares of new employment land is required in the District during the plan period.
- 8.1.7 The employment policies set out the framework for the delivery of this future employment land, including the expansion of existing employment areas and future local plan allocations and thus score positively in the SA.
- 8.1.8 The adoption of policies to protect and enhance the natural and built environment including the important landscape and heritage assets of the District will ensure that the Local Plan 2040 will not result in a neutral or slight positive effect on all the key SA Objectives.
- 8.1.9 Overall, the assessment concludes that the Lichfield District Local Plan 2040: Submission Plan will generally result in a neutral to positive effect on the majority of the SA objectives. The only negative score relates to the efficient use of land (SA Objective 4) due to the allocation of new housing sites on open land which cannot be specifically mitigated.

APPENDIX F- MATRIX OF SUBMISSION PLAN POLICIES