

Sustainability Appraisal: Submission Local Plan Strategy (including EiP Modifications)

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1 Non Technical Summary

1.1 The sustainability appraisal (SA) process looks at all plans and programmes, which relate to the use of land and development, to find how these will affect Lichfield District and how they can help us to make development in Lichfield District compatible with the aims of sustainable development.

1.2 Sustainable development is about meeting the needs of this generation without harming the ability of future generations to meet their needs, and the sustainability appraisal also tries to incorporate the effects of social issues as well as environmental and economic issues.

1.3 How it does this is to use all the information gathered from all the plans and policies and make a list of things that Lichfield District needs to consider and wants to change; these are called the Sustainability Framework Objectives. How it is done is written down in a [Scoping Report June 2007](#).

1.4 Then, when policies and proposals are published they are checked against the list of Sustainability Framework Objectives to highlight the main impacts that would result if the proposals went ahead. This can be used to improve the policies and proposals to help reduce their impacts.

1.5 In total Lichfield District Council have published 5 previous documents in the preparation of the 'Local Plan: Strategy'; an 'Issues' document, an 'Issues and Options' document, 'Preferred Options', 'Policy Directions' and 'Shaping our District'. The Plan submitted to the Secretary of State was published in July 2012. The policy directions and spatial options contained within these documents have been assessed using the Sustainability Framework Objectives at each stage of the process. The Sustainability Appraisal also has to consider a do nothing option and found this would result in development which would not help address Lichfield District's existing problems.

1.6 With regard to Sustainability Appraisals of the documents published, the District Council has produced an 'Interim Core Strategy Sustainability Appraisal' (CD1-19), and addendum, and a 'Shaping our District SA' (CD1-17). A sustainability appraisal of the submitted Local Plan was published in July 2012 - 'Sustainability Appraisal: Proposed Submission Local Plan Strategy' (CD 1-10) and an updated version of this in November 2012 (CD1-8). This report should be read in conjunction with these other documents to give the full SA for the plan process, although the evolution of the Local Plan and the SA process is detailed in Chapter 11 of this document 'Background to Lichfield District Local Plan'.

1.7 The CD numbers referred to for documents are Core Documents as listed in the 'Submission Document List', compiled and updated for the Examination of the Lichfield District Local Plan Strategy. These can be accessed via the [Core Document List](#).

The Lichfield District Local Plan: Strategy

1.8 The Lichfield District Local Plan will plan, monitor and manage future growth and change in Lichfield District up to 2029. It covers a broad range of spatial issues that contribute towards the creation of sustainable communities, including the provision and management of new development, community infrastructure, environmental and heritage protection and

measures to help reduce carbon emissions. It comprises a Strategy and a Land Allocations document, with a number of supporting documents. Together, these will provide the framework for managing development, addressing key planning issues and guiding investment across the District.

1.9 The Lichfield District Local Plan Strategy provides the broad policy framework and establishes a long-term strategy to manage the development of housing and employment land, provide services, deliver infrastructure and create sustainable communities. The Strategy consists of a vision and strategic objectives, a spatial development strategy, core policies and development management policies and sets out how the strategy will be implemented and monitored.

1.10 The Spatial Strategy sets out the overall approach towards providing for new homes, jobs, infrastructure and community facilities to 2029 and thus outlines the broad approach to managing change in the District.

1.11 The core policies will steer and shape development and define areas where development should be limited. More detailed development policies will set out how development will be carried out. A section on 'Our Settlements' contains more specific visions and policies to guide change relevant to each of the settlements in the District.

1.12 Other documents will be produced as part of the Lichfield District Local Plan. The Local Plan Allocations document will identify the requirements for the development of smaller sites and areas that will contribute to the Strategy. In addition, five Supplementary Planning documents will be produced, covering Biodiversity and Development, Sustainable Development, Historic Environment, Rural Development and Trees, Landscaping and Development.

The Current State of Sustainable Development in Lichfield District

1.13 The main issues for sustainable development in Lichfield District and which are relevant to the Local Plan Strategy are summarised in the following table. It also predicts how the environment, social and economic conditions might be likely to evolve if the Local Plan Strategy is not implemented

Table 1.1

Issue	Key Findings	Likely Evolution without Local Plan
Landscape	The District is characterised by several areas of high landscape quality, including the Cannock Chase Area of Outstanding Natural Beauty. The Forest of Mercia and National Forest are landscape-orientated initiatives addressing woodland loss. Around half the District is covered by Green Belt.	There would be a loss of local distinctiveness, and opportunities to enhance the landscape and townscapes may be lost.
Biodiversity	Lichfield is home to some important species and habitats. The River Mease is a Special Area of Conservation (SAC), and Cannock	There would be difficulty in protecting locally significant biodiversity assets and possibly also the LGS. There is a high risk that any

Issue	Key Findings	Likely Evolution without Local Plan
	<p>Chase SAC and Cannock Extension Canal SAC are both close to Lichfield District. All are under pressure. There are six SSSIs wholly or partly in the Lichfield District, and 59 Biodiversity Alert Sites and 77 Sites of County Biological Importance. Chasewater County Park, the Central Rivers Initiative and an area from Cannock Chase to Sutton Park are areas identified for biodiversity enhancement.</p> <p>The District has one site designated as a Local Geological Site (formerly known as a Regionally Important Geological Site), south of Burntwood.</p>	<p>Impacts on Cannock Chase SAC arising from development may be inadequately controlled or mitigated, as there would be no local policies to prevent damage to Cannock Chase or the River Mease SACs. Less new green infrastructure may be delivered, and benefits for biodiversity including networks would be reduced.</p>
Heritage Assets	<p>Lichfield District has a valued built environment, with a significant historic built environment particularly within Lichfield city. The District contains 754 listed buildings, 16 Scheduled Monuments, 1 Park and Garden and 21 Conservation Areas. Some of these assets are classed as being 'at risk'.</p>	<p>There would be difficulty in protecting locally significant historic assets, and there may be an adverse impact on the setting of Lichfield's assets and the quality of the built environment. Opportunities for enhancement may be lost.</p>
Climate Change	<p>At 7.4 tonnes per capita, emissions of carbon dioxide for Lichfield are less than the County at 8.1 tonnes per capita, but higher than the national average which is 6.9 tonnes per capita (2011 figures - published 11.07.13).</p>	<p>Development may not be located in the most sustainable locations which would increase emissions from transport. Economies of scale in developments may not be achieved to deliver renewable energy.</p>
Air Quality	<p>Road traffic is the main emission source of pollutants in Lichfield. At present, there is one Air Quality Management Area (AQMA) at Muckley Corner due to nitrogen dioxide, although there are some other parts of the District that also have poor air quality.</p>	<p>Housing and economic growth may not be balanced, leading to increased road travel which is likely to reduce air quality further.</p>
Water Quality	<p>There is limited water availability from the surface and groundwater management units, especially from the Bourne/Black Brook and the Lichfield and Shenstone Groundwater Management Unit. Although this should not prevent development, it will require infrastructure upgrades which will require investment and may delay development.</p> <p>Some wastewater treatment works have either physical capacity or quality constraints which will require investment and upgrades before development can</p>	<p>Infrastructure upgrades are likely to still be required to meet the needs of new development and prevent a deterioration in water quality.</p>

Issue	Key Findings	Likely Evolution without Local Plan
	<p>proceed. A number of watercourses in the District are of poor or moderate quality, and developments within the catchments of these watercourses may be impacted by abstraction and wastewater treatment limitations.</p>	
Waste	<p>In 2009/10 52% of Lichfield's municipal waste was recycled.</p>	<p>Waste generation and recycling are unlikely to be affected. Recycling rates are likely to continue to improve.</p>
Energy	<p>There are currently 492 renewable energy installations across Lichfield District generating approximately 1,897MW of capacity per year.</p>	<p>It is possible that economies of scale in developments will not be reached, therefore renewable energy installations are likely to be fewer.</p>
Flood Risk	<p>Fluvial flood risk is a constraint to development in many areas of the District, most significantly within and around the settlements of Burntwood, Alrewas and Fradley.</p> <p>Settlements that have been identified as being at high risk of surface water flooding are: Lichfield, Armitage and the Longdons, Burntwood, Elford, Little Aston, Mile Oak and Fazeley and Whittington.</p>	<p>Through the NPPF, developers will still be required to take full account of flood risk and therefore it is likely that flood risks would be avoided or reduced.</p>
Transport	<p>Lichfield District is served by a high concentration of local routes such as the A51 and A515 and has good connections to the national transport network including the M6 Toll, A38(T) and A5(T). Most parts of the network are operating below capacity, although the Highways Agency has concerns regarding heavy traffic levels at junctions on the A38(T) to the south and east of Lichfield and on the A5(T) at Wall and Muckley Corner, and some junctions on the A5127 are operating at or just over capacity.</p> <p>The 2011 Census demonstrates that 50.6% of people within Lichfield District use the car to travel to work (either driving or as a passenger) - this is significantly higher than both the regional and national averages, at 44.4 & 40% respectively.</p> <p>Lichfield District has a very high level of car ownership with only 13.6% of households not having a car.</p>	<p>Without the Local Plan, it is possible that development will not be located in the most sustainable locations, and that the amount of housing and employment development will not be balanced leading to increased commuting in and/or out of the District. Further, it is likely that opportunities for walking, cycling and public transport improvement will be fewer. This is likely to have an adverse impact on the demand for road space in the District, and particularly increasing congestion on the key network including the A38 and A5. Any necessary highway improvements may not be carried out if development is piecemeal.</p>

Issue	Key Findings	Likely Evolution without Local Plan
	<p>The Government's proposed High Speed Rail network will pass through Lichfield District from south to north.</p> <p>Lichfield City, Burntwood and key rural villages such as Fazeley and Armitage are most accessible in terms of access to key services using existing transport infrastructure. The more rural locations within the district are least accessible.</p>	
Employment & Skills	<p>Three quarters of the working age population are economically active. Census data suggests that almost 50% of employees living in Lichfield District commute out of the District to work. Key sectors in terms of number of jobs are: public admin, education and health; distribution, hotels and restaurants; and finance, IT and other business activities.</p> <p>Qualifications are slightly higher than for England as a whole, with 28% educated to NVQ4 level and above compared to 27% for GB, while 22% of the over 16 population have no qualifications at all.</p>	<p>It is possible that insufficient employment land will be delivered, which will fail to create enough jobs for Lichfield District residents. It is also possible that the type of employment created does not match the skills of the resident workforce. Development may be piecemeal which could create difficulties in providing new education facilities.</p>
Housing	<p>The Southern Staffordshire Districts Housing needs Study and SHMA update identifies an annual need of between 377 and 702 affordable homes over a 5-year period, compared to the overall local annual housing target of 478 dwellings per year identified through the Local Plan Strategy Examination.</p> <p>Less than a fifth of all renting households in Lichfield District can afford market housing.</p>	<p>Economies of scale may not be reached in housing developments, which could reduce the amount of affordable housing provided. An insufficient mix of housing could be delivered that does not meet the housing needs of all residents. Homes may not be provided where need arises.</p>
Sport & Recreation	<p>Only 53% of children spend at least three hours of high quality PE and school sport within and beyond the curriculum per week, lower than the national average. Adult activity levels have increased within the District, with 27.7% of men and 22.7% of women now participating in sport at a minimum of once per week.</p>	<p>Enhancements to sports provision may not be delivered to the same degree as would be promoted by the Local Plan. Open spaces may be lost, adversely affecting opportunities for recreation. Less new green infrastructure would be delivered, reducing opportunities to walk and cycle. Community facilities could fail to be delivered to meet residents' needs.</p>

Issue	Key Findings	Likely Evolution without Local Plan
	Lichfield District has 5 sports hall sites. The majority of people are satisfied with the parks and open spaces within the District although a significant proportion of Burntwood residents felt there are not enough facilities for children and young people within the town.	
Crime & Safety	Recorded crime in Lichfield District has shown some considerable reductions over recent years, with a 24% reduction 2008. The most common crimes involved anti-social behaviour (42% of all recorded crimes 2011/2012). In 2011/2012 there were 202 road related deaths or serious injuries, this has decreased by 22% since 2009/2010.	Without the Local Plan, there may be less emphasis in developments on 'designing out crime', which may fail to deliver opportunities to reduce crime still further. Additional congestion on the roads and piecemeal infrastructure delivery could lead to an increase in the number of road casualties.
Health	According to the Index of Multiple Deprivation 2011 statistics, the majority of Lichfield District was ranked better than average in England for health deprivation and disability. Although some areas were below average, none were in the worst 20% of the country.	If development is piecemeal and economies of scale are not reached, it is likely that improvements to community services and facilities, including healthcare facilities will not be provided. This may negatively affect health outcomes for residents.
Participation	The Interim 2011-based subnational population projections state that Lichfield District has a population of 102,438 people in 2013. At November 2013 there were 7,916 individuals registered on the Development Plans consultation database.	Without the Local Plan, the community would not be able to participate in shaping the future development of the District.

Environmental Characteristics of Areas Likely to be Significantly Affected

1.14 The appraisal has considered the areas likely to be significantly affected by implementation of the Local Plan Strategy, in order to identify the sustainability characteristics of those areas.

1.15 The Local Plan Strategy focuses development on the key settlements of Lichfield City, Burntwood, Fradley, Tamworth (north) and Rugeley (east). Therefore these settlements are likely to be significantly affected. There will be more dispersed growth in the more rural parts of the District, and therefore other areas are not likely to be significantly affected. Therefore an assessment has been made of the environmental and sustainability conditions in each of the settlements of Lichfield City, Burntwood, Fradley, Rugeley and Tamworth. In addition there are proposals, submitted by those who have made representations for significant amounts of development at Curborough (New Village NE Lichfield city) and at

Brookhay Villages and Twin Rivers Park (BV&TRP) and therefore an assessment has also been made of the characteristics of these two areas. The key characteristics of these areas are summarised in Appendix E.

Existing Characteristics and Problems Relevant to the Local Plan Strategy

1.16 Lichfield District has a number of characteristics and ‘problems’⁽ⁱ⁾ which are relevant to the Local Plan Strategy. These are summarised below and described in detail in the baseline in Chapter 9.

- Lichfield District is an area of high demand for housing, with above average house prices and a strong need for housing which is affordable and meets the needs of all sections of the population.
- Younger age groups tend to move out of the District to other areas in search of affordable housing and jobs. Conversely, the District attracts in-migrants, particularly from Birmingham, who tend to be retired or retiring.
- Burntwood suffers from an inadequate town centre and associated facilities and services for its size, which do not meet local needs.
- The availability of jobs, the history of in-migration and the regional pattern of town centres all contribute to a high level of travel by residents. Journey to work movements are largely made by car.
- The District has a high level of carbon emissions, and some areas of poor air quality.
- Lichfield city has seen some major housing estates developed post-war which now need regeneration.
- A large part of the District is covered by Green Belt.
- There is a need to stem the gradual loss of biodiversity that has seen a decline in the extent of lowland heathland and loss of local biodiversity sites.
- Lichfield District has a job balance ratio considerably below the former West Midlands regional average. This indicates high levels of out-commuting.
- Although the District is relatively prosperous overall, there are pockets of deprivation in both urban and rural areas.
- Rural areas have a particular problem of public transport accessibility.
- There are shortfalls in places in relation to sports facilities and provision of open spaces.
- Road safety is a key priority.

1.17 In addition to the above, there are problems in three areas of European Nature Conservation Importance:

- The River Mease Special Area of Conservation (SAC) is in an adverse condition due to drainage, invasive freshwater species, water pollution from agriculture/run-off and discharge. Significant new development could take place within the catchment as a result of new housing and employment development which may impact on water quality and quantity. The continuing creation of the National Forest will lead to further catchment-wide changes in land use.

i The SEA Directive requires the report to identify relevant problems.

- The Cannock Extension Canal SAC contains an important species. If the canal is not used, other species may crowd it out unless routinely controlled by cutting. However, an increase in recreational activity would be to the detriment of the species. Existing discharges of surface water run-off, principally from roads, cause some reduction in water quality.
- Cannock Chase SAC is under pressure from visitors, particularly from dog walking, horse riding, mountain biking and off-track activities such as orienteering. Bracken invasion is significant, but is being controlled. Birch and pine scrub, much of the latter from surrounding commercial plantations, is continually invading the site and has to be controlled. It is also affected by mining fissures and potentially also from extraction from the underlying aquifer.

Taking Account of Relevant Sustainable Development Objectives

1.18 As part of the evidence gathering stages of the SA process, a review of relevant plans, programmes and policies at international, national, regional and local level was undertaken. This identified issues of relevance to the District and helped to produce a set of sustainability objectives against which the Local Plan could be appraised.

1.19 The SA Scoping Report set out for each plan or programme reviewed what the implications were for the Local Plan Strategy, and how the plan or programme influenced the choice of key targets and indicators relevant to the Local Plan Strategy and the SA. The results of this helped to formulate the issues and objectives for the Local Plan and SA process. In this way, the environmental protection, social and economic objectives established at international, national, regional and local level were incorporated into the framework of appraisal objectives and criteria for the SA and the Local Plan Strategy has been assessed against this framework to establish the effect it would have on those objectives.

1.20 The objectives established through this process are as follows.

- To maintain and enhance landscape and townscape quality
- To promote biodiversity and geodiversity through protection
- To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their settings
- To mitigate and adapt to the effects of climate change
- To encourage prudent use of natural resources
- To reduce flood risk
- To improve availability of sustainable transport options to jobs and services
- To encourage sustainable distribution and communication systems
- To create mixed and balanced communities
- To promote safe communities, reduce crime and fear of crime
- To improve the health of the population
- To enable improved community participation

1.21 Each one of these objectives has been further defined and clarified in greater detail by a series of detailed criteria. These are set out in Table 10.2 'SA Appraisal Framework'.

The Likely Significant Effects of the Local Plan Strategy

1.22 A proactive approach is taken to plan-making in the Strategy will improve the environmental, economic and social conditions of those that live in, work in and visit the District.

1.23 The Strategy has clear and strong positive effects on landscape and townscape, promotes biodiversity and geodiversity, through the protection and enhancement of species and habitats including multi-functional corridors, and reduces flood risk. The Strategy seeks to protect the historic environment and enhance heritage assets. It will promote renewable energy development, and mitigation of and adaptation to climate change. It seeks to direct development to areas of lowest landscape quality and reflects local distinctiveness. It also supports access to open spaces.

1.24 The Strategy will have positive effects on creating mixed and balanced communities. It will achieve this in a number of ways, including by supporting employment growth, and encouraging higher skilled economic sectors and sustainable distribution and communication systems. It will also support e-businesses and the growth of indigenous businesses, local supply chains and home working. It will address inequality by supporting growth in deprived areas. The Strategy supports a reduction in car use through locating the majority of new development in the more sustainable settlements and through transport improvements to enhance accessibility and promoting more sustainable travel modes and behaviour.

1.25 The Strategy seeks to improve the quality and affordability of housing to meet needs and address existing deficiencies, and to improve levels of housing consistent with local employment opportunities. It promotes the health and wellbeing of communities by reducing inequalities, encouraging the safeguarding and provision of new infrastructure and facilities, including healthcare and education facilities and retail, and promotes safe communities. Cultural activities, sport and recreation are encouraged, as well as community participation. Cross-boundary working will support the delivery of the required infrastructure, and ensure needs are met where they arise.

Mitigation of Adverse Effects

1.26 The Strategy seeks to deliver a continual supply of the right type of housing and mitigate for the impacts of development by addressing the imbalance in the market, meeting housing needs and ensuring delivery of the appropriate infrastructure. In concentrating the majority of housing growth in the more sustainable settlements the spatial strategy seeks to minimise the impacts of development on smaller communities. Other sensitive areas have been avoided where possible, with policies and concept statements to minimise impacts where this has not been possible.

1.27 Reducing travel, especially commuting distances is a fundamental aim of the Strategy. It also seeks to maximise existing resources by focusing development on the key towns, which also helps to mitigate against detrimental economic impacts by making centres more multi-functional. It also seeks to enable communities to maximise their own potential.

1.28 The Strategy seeks to minimise the impact of development on the environment and communities without affecting the viability of development. Partners can identify how benefits arising from new development can be planned for and maximised.

1.29 As result of the previous options appraisal detailed in the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated)' (CD1-8) three additional recommendations for mitigation were made:

- that all development be required to undertake an Appropriate Assessment to determine whether impacts on Cannock Chase SAC will be significant, and that policy NR7 also makes provision for financial contributions to the Cannock Chase Visitor Mitigation Strategy;
- that a site-specific flood risk assessment should also be required for the South Lichfield site; and
- that the Annual Monitoring Report monitors the amount of housing and employment development delivered in the District, and considers this in the light of: travel to work patterns; any capacity issues on transport networks; and the delivery of transport infrastructure improvements. This information should feed into reviews of the Local Plan Strategy.

1.30 With regard to Policy NR7 main modification (MM9) now requires significant development to consider undertaking an Appropriate Assessment, unless falling within a 15km radius of any boundary of the Cannock Chase SAC, where development will be deemed to have an adverse impact and thus satisfactory avoidance and/or mitigation measures will be secured. The modified policy also identifies that ongoing work by relevant partner authorities will develop a Mitigation and Implementation Strategy for the Cannock Chase Special Area of Conservation, which may include financial contributions. The condition of the SAC and the effectiveness of mitigation will be monitored throughout the Plan period.

1.31 The South Lichfield site referred to above is the Strategic Development Allocation (SDA) identified in the Local Plan: Strategy (July 2012) (Appendix C: South of Lichfield SDA Concept Statement). A site specific flood risk assessment has been submitted in relation to a planning application on this site.

1.32 The Annual Monitoring Report monitors the amount of housing and employment development delivered in the District and these issues are also highlighted in the Infrastructure Delivery Plan (IDP). These issues are also considered in the light of travel to work patterns, any capacity issues on transport networks and the delivery of transport infrastructure improvements. This information will feed into reviews of the Local Plan Strategy and the Council considers that all of the above recommendations have been incorporated into the Local Plan Strategy through the identified modifications.

Alternatives

1.33 A number of alternatives or options have been considered at different stages during the development of the Local Plan Strategy to address a number of issues:

- Alternatives to the Spatial Strategy
- Alternative locations for development

- Scenarios for housing growth
- Scenarios for employment growth
- “Do nothing” options

1.34 Options for the Spatial Strategy were proposed at the ‘Issues and Options’ (2007) stage of the development of the Local Plan Strategy, as follows:

- **Option 1:** Town focused development (50% Lichfield, 20% Burntwood, 20% Tamworth, 10% Rugeley)
- **Option 2:** Town and key rural village focused development (40% Lichfield, 20% Burntwood, 40% between other sustainable settlements – Alrewas, Armitage with Handsacre, Fazeley, Little Aston, Shenstone and Whittington)
- **Option 3:** Dispersed development (30% Lichfield, 15% Burntwood, 55% rural areas)
- **Option 4:** New Settlement Development (60% new settlement, 20% Lichfield, 10% Burntwood, 10% rural areas)

1.35 In addition, two possible versions of a “do nothing” option were appraised at the ‘Issues and Options’ stage:

- A “do minimum” option, with only replacement dwellings and conversions allowed;
- A “no change” option, maintaining existing densities and greenfield allocations and allowing windfall development.

1.36 At Issues and Options stage, the SA also assessed possible directions of growth adjacent to Lichfield, Burntwood, Fradley, Tamworth and Rugeley, and a new settlement at Curborough (NE of Lichfield city), assessing the sustainability of potential development in specific locations:

- North Lichfield
- East Lichfield Streethay
- West Lichfield
- South Lichfield
- South-East Burntwood (Hammerwich)
- South Burntwood
- North Burntwood
- West Tamworth, around Fazeley
- North Tamworth
- East Rugeley
- Fradley
- Curborough new settlement (NE Lichfield city)

1.37 All of the above options and locations were appraised in the 'Interim Core Strategy Sustainability Assessment' (CD1-19).

Alternatives to the Spatial Strategy

1.38 The assessment of alternatives to the Spatial Strategy has been an iterative part of the Local Plan and sustainability appraisal process. Chapter 11 of this report details the background to the Local Plan, setting out the evolution of the spatial strategy and the testing of alternatives through its progression. In many cases alternatives were selected because they were submitted to Lichfield District Council as proposals for delivering housing and economic growth in the District.

1.39 At the 'Shaping Our District' stage of the Local Plan development (2010), three main alternative spatial strategies were submitted as representations. These were:

1. Fradley West, which proposed a mixed-use scheme of housing of around 850 dwellings and employment of around 30 hectares on land to the west of Fradley Park;
2. New Village North East of Lichfield, which proposed 2,000 or 4,000 dwellings on land between Lichfield and Fradley, around Curborough; and
3. JVH Town Planning Consultancy Ltd, which proposed two options combining sites (many of which were in the rural areas) submitted on behalf of clients with land interests across the District.

1.40 Subsequently, following the publication of the Local Plan in July 2012, additional information relating to a previous proposal and a completely new proposal were received which were also appraised:

- Updated information in relation to the proposal for the New Village North East of Lichfield for 2,000 dwellings, to include employment provision, health care and community facilities, as well as an anaerobic digestion plant. The results of the appraisal on this updated proposal, undertaken at this stage of the Plan, is set out in the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated)' (CD1-8) Section 14 and in Appendix A 'Spatial Options Matrix' to CD1-8.
- Brookhay Villages and Twin Rivers Park (BV & TRP), which proposes a development of 5 new villages and a sport and leisure and employment site. The results of the appraisal of this proposal undertaken at this stage of the Plan is set out in the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated)' (CD1-8) Section 14 and in Appendix F 'Options Appraisal Matrices' to CD1-8.

Scenarios for Housing Growth

1.41 As a part of the process of developing the Local Plan Strategy, the District Council commissioned a study into the future population, household projections and housing needs of the area, in partnership with Cannock Chase District Council and Tamworth Borough Council. Consultancy firm NLP was appointed to assess the potential scale of future housing requirements in the three districts. As a part of this study NLP developed a range of scenarios for future housing requirements in Lichfield District, according to demographic, economic

and housing factors. The scenarios, which represented those considered realistic by NLP, predicted the following levels of growth over 20 years and the number of dwellings per annum (dpa):

- A: Baseline Scenario 8,724 dwellings or 436 dpa
- Aa - Baseline Scenario Sensitivity Test (ASMigR 5yr) 10,223 dwellings or 511 dpa
- Ab: Baseline Scenario Sensitivity Test (ASMigR 10yr) 9,265 dwellings or 463 dpa
- B: Baseline Scenario: HSSA Vacancy Rates 8,716 dwellings or 436 dpa
- D: Changes in the Institutional Population : Constant Share 8,505 dwellings or 425 dpa
- E: 2008-based ONS/CLG Scenario: 8,453 dwellings or 423 dpa
- H: Static Employment Growth Scenario: 4,973 dwellings or 249 dpa
- I: Past Dwelling Completion Rates : 9,200 dwellings or 460 dpa
- J: RSS Phase Two Preferred Option: 8,000 dwellings or 400 dpa

1.42 Scenario J was further refined to allow for both the Phase Two Preferred Option and the Phase Two Panel Report

- Ja: RSS Panel Report: 10,000 or 500 dpa

1.43 An appraisal of the sustainability of these options is provided in 'Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated)' (CD1-8) Section 14 'Alternative Options,' with tables included in Appendix F of CD1-8. Section 14 of that document also described how the assessment was undertaken and difficulties encountered.

Scenarios for Economic Growth

1.44 As part of the process of developing the Local Plan Strategy the District Council commissioned GVA to undertake a review of employment land supply and demand in the District. This Employment Land Review (ELR) developed a number of scenarios for demand, based on baseline data for Lichfield District, local planning policy, past trends and economic aspirations. The ELR developed land requirements for each scenario and compared them with the committed supply to derive figures for the additional land needed. The following scenarios were developed with the different levels of predicted employment growth by 2028 (the plan end date at that time):

- Baseline: 6,200 new jobs
- Policy On Scenario1: 5,400 new jobs
- Policy On Scenario 2: 8,900 new jobs
- Past Trends: 9,060 new jobs

1.45 An appraisal of the sustainability of these options is provided in the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated)' (CD1-8) Section 14 'Alternative Options,' with tables included in Appendix F of CD1-8. Section 14 of that document also describes how the assessment was undertaken and difficulties encountered.

Development of the Plan following the Inspector's Interim Findings

1.46 The 'Lichfield District Local Plan: Strategy' (July 2012) (CD1-1) was submitted to the Secretary of State (SoS) for independent examination on 22nd March 2013, with hearing sessions held in June-July 2013. The Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated) (CD1-8) was submitted alongside the Local Plan Strategy.

1.47 Following recommendations made by the Inspector that the submitted Plan did not provide for enough housing to meet the District's 'objectively assessed need' the District Council undertook further work to identify sites to deliver additional housing. The Inspector recommended that the Council allocate an additional 900 houses to 2028 and extend the plan period from 2028 to 2029; meaning that a further 430 houses needed to be delivered and giving a total of 10,030 dwellings by 2029.

1.48 A number of key strategic sites/locations were assessed against the Sustainability Framework Objectives. These were sites which had been submitted to the Council through the Local Plan process, but which were not originally progressed as part of the submitted Local Plan strategy. These were (in no particular order):

1. Lichfield Deans Slade Farm (450 homes)
2. Lichfield Cricket Lane (450 homes with approx 12ha employment use)
3. NE Lichfield Watery Lane (750 homes)
4. Burtwood South East (500 homes)
5. Burntwood South (250 homes)
6. Burntwood Rake Hill & Meg Lane (567 homes)
7. Burntwood Meg Lane (445 homes)
8. Burntwood East of Rugeley Road (149 homes)
9. Burntwood North of Church Road (440 homes)
10. East Burntwood Farewell Lane (367 homes)
11. Burntwood Bleak House Farm (694 homes)
12. Fradley Gorse Lane - re-allocation of part of the Fradley SDA from employment to residential (250 homes)
13. Fradley Hay End Lane Pig Farm (425 homes)
14. Fradley South of Fradley Lane (258 homes)
15. Fradley North of Fradley Lane (272 homes)
16. Fradley West (850 homes)
17. The New Village Option NE Lichfield (2,000 homes)
18. Brookhay Village and Twin Rivers Park (BV & TRP) (7,500 homes but 3,600 homes to 2028)

1.49 The sites above are set out in Appendix D at Map D.1.

1.50 The results of the SA of these sites showed that both sites to the south of Lichfield City (Cricket Lane and Deans Slade Farm) scored far better than any others, being located on the edge of the most sustainable settlement in the District. The full findings are set out in Appendix A 'Spatial Options Appraisal' of this document (p.224-225).

1.51 In developing options/combinations of sites to address the shortfall in housing it was noted that the updated Strategic Housing Land Availability Assessment (SHLAA) November 2013 had identified further urban capacity of approximately 200 dwellings, meaning that sites to deliver a further 1,130 only were required.

1.52 The information from the SA of the sites was used to inform the selection of options, as set out below. This included a 'do nothing' option (i.e. do not allocate any additional dwellings). The options appraised were as follows:

- **Option 1:** 'Do nothing' i.e. don't allocate the 1,130 dwellings
- **Option 2:** Increase housing numbers in the same proportions as the housing distribution settlement hierarchy set out in the submitted Plan (Table 4.1 p.26 CD1-1)
- **Option 3:** New settlement option - 1,130 homes delivered within the Plan period at the New Village Option NE Lichfield or at Bookhay Villages & Twin Rivers Park (with delivery in the Plan estimated at 3,600 homes)
- **Option 4:** Allocate all 1,130 dwellings in/around Lichfield City (as most sustainable settlement) utilising a mixture of any additional brownfield sites and Green Belt release to the south of the City
- **Option 5:** allocate sites in/around main settlements of Lichfield, Burntwood & Fradley and possibly some additional housing at Tamworth & to Rugeley (to meet Lichfield's District's needs) - utilising a mixture of brownfield land and Green Belt release
- **Option 6:** more dispersed approach allocating additional housing numbers to Key Rural Settlements and other rural areas (excludes Fradley)
- **Option 7:** allocate the additional 900 & leave the additional 430 to be split among the rural areas as Allocations stage, or split the 430 between the rural settlements as in the same proportions as in the submitted Plan

1.53 In relation to Option 5, four different combinations of achieving this option were tested:

- **Option 5a:** combine the most sustainable sites: both sites from Lichfield City, and the most sustainable site in Burntwood
- **Option 5b:** combine the most sustainable sites: both sites from Lichfield City, and the most sustainable site in Fradley
- **Option 5c:** increase the capacity of the North of Tamworth BDL (the SHLAA identifies the total capacity of the Arkall Farm site as 1,909 dwellings and 250 dwellings at a site north of Brown's Lane i.e. sites 3, 4 & 5 which are options A, B, E and F in the SA of Tamworth Options - Chapter 17 Table 17.2 p.195-198 of this document). This would utilise the increased urban capacity to address the total shortfall and deliver 1,330 dwellings
- **Option 5d:** increase the scale of development at Fradley by a further 1,130 dwellings comprising an extension to the SDA for a further 250 and the addition of the 850 dwellings at Fradley West.

1.54 As well as assessing these options against the sustainability framework objectives the Council also assessed all of the above options for their strategic fit with the National Planning Policy Framework, how well each option addressed the 15 strategic priorities contained within the submitted Local Plan Strategy and with regard to their deliverability based on the information submitted by the cut-off date of 10th July 2013 (end of EiP hearing

sessions) . In addition to this work, those sites falling within the Green Belt were also considered within the context of a Green Belt review ('Lichfield District Local Plan Strategy Green Belt Review - Supplementary Report', December 2013). The results of the SA of these options is set out in Appendix A, which details the environmental, economic and social impacts of each, as well as consideration of the mitigation and maximisation of effects, uncertainties and risks, short/medium and long term impacts and cumulative and synergistic impacts.

1.55 This process culminated in the sites to the south of Lichfield City (Deans Slade Farm and Cricket Lane) being identified as the most sustainable and fitting well with the existing spatial strategy of locating the majority of development to the most sustainable settlement in the District. The Council was also of the opinion that these sites would be deliverable in the short term and would therefore assist with the achievement of a 5 year housing supply. Additionally they would deliver the additional infrastructure to serve their needs and also address the wider needs of Lichfield City, with the Cricket Lane proposal also providing additional jobs on approximately 12 hectares of employment land.

1.56 Cumulatively these sites would deliver 900 homes; necessitating the identification of a further site for the delivery of around 230 dwellings. Through the Local Plan Examination a potential housing site at Fradley had been submitted for around 250 dwellings - Fradley Gorse Lane. This was previously developed land, formerly part of the old airfield, and identified as part of the Fradley SDA for potential employment in the submitted Local Plan. However, the identification of around 12 hectares of employment land to the south of Lichfield therefore meant that any loss of employment land at Fradley could be offset, allowing this site to come forward for housing without any detrimental economic impacts to the District overall.

1.57 Thus Option 5b - a combination of the most sustainable sites; both sites from Lichfield City and the most sustainable site in Fradley, was selected as the District Council's preferred option to deliver the shortfall in housing provision identified by the Inspector and has been incorporated in to the submitted Local Plan Strategy as modifications.

1.58 As part of this process alternative sites and options that were appraised and discounted included the Brookhay Villages and Twin Rivers Park proposal, the New Village option/NE Lichfield, Fradley West and a number of sites adjoining the edge of Burntwood. Reasons for these not being pursued by the District Council to form part/all of the additional 1,330 dwellings are set out in Chapter 11 of this report.

1.59 Combining Option 5b with the spatial strategy set out in the submitted Local Plan, to take account of the increased housing numbers and lengthened plan period, results in a spatial strategy which is the most sustainable when compared against all reasonable alternatives.

Statement on the difference the process has made

1.60 The Sustainability Appraisal process has identified relevant sustainability objectives for the District and provided an independent assessment throughout the preparation of the Local Plan Strategy. It has identified data gaps early in the process and the need for further evidence to inform the assessment of directions of growth and spatial strategies arising from these prior to the identification of a preferred option.

Monitoring

1.61 The SA has made recommendations for monitoring, with suggested indicators to enable Lichfield District Council to monitor the likely significant impacts of the Local Plan Strategy. This also includes a number of indicators to allow the Council to identify unforeseen adverse effects in order to be able to take appropriate remedial action.

2 Introduction

Strategic Environmental Assessment and Sustainability Appraisal

2.1 The undertaking of a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA) are mandatory when seeking to prepare and adopt a Development Plan. The requirement for Strategic Environmental Assessment is from the European Directive 2001/42/EC, or 'SEA Directive', on the assessment of the effects of certain plans and programmes on the environment.

2.2 The SA process incorporates the requirements of the EU Strategic Environmental Assessment (SEA) Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

2.3 Section 39(2) of the Planning and Compulsory Purchase Act 2004 sets out the requirements of the SA. Previously further guidance was contained within 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents'. However, this guidance has been replaced by the Communities and Local Government Plan Making Manual section on sustainability appraisal. Recommendations on good practice are also contained within the CLG report 'Towards a more efficient and effective use of Strategic Environmental Assessment and Sustainability Appraisal', March 2010.

2.4 The objective of Strategic Environmental Assessment is 'to provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development'.

2.5 The purpose of SA is to fully appraise the environmental, social and economic effects of a plan and its policies from the outset, throughout the process of the preparation and adoption of the plan in order to support and promote sustainable development objectives. The SA is integral to the plan making process and should perform a key role in providing a sound evidence base for the plan. It should be transparent and open to public participation through consultation on its various stages. The SA should inform the decision making process to facilitate the evaluation of alternatives and should also help demonstrate that the plan is the most appropriate given the reasonable alternatives.

2.6 The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development, and identifies three dimensions to sustainable development: economic, social and environmental. The NPPF identifies that these three dimensions give rise to the need for the planning system to perform an economic, social and environmental role and similarly the SA includes the assessment of the social and economic impacts of plans, as well as the environmental impacts.

2.7 Resolution 24/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy 'Securing

the Future' set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

2.8 As the SA process incorporates the requirements of the EU SEA Directive, it is still considered that when preparing the SA the requirements of SA and the SEA Directive can be combined into one document. Thus for the Lichfield District Local Plan these processes have been combined within this document and will be referred to as Sustainability Appraisal (SA) throughout the remainder of this document.

3 Aims and Structure

3.1 This report documents how the Lichfield District Local Plan Strategy (formerly known as the Core Strategy) has been appraised and informed by the Sustainability Appraisal (SA). The aim of the report is to assess the sustainability of the Local Plan Strategy, identify any significant effects arising from its implementation and set a framework for monitoring.

3.2 For the purposes of clarity it should be noted that the 'Local Plan Strategy' is sometimes also referred to as the 'Core Strategy'. When the latter is referred to it is specifically because that was the name of the document at that particular time in the process. It has been renamed through its preparation as the 'Local Plan Strategy' in line with the National Planning Policy Framework (NPPF) which came into force in March 2012.

3.3 An SA report was published for consultation alongside the publication of the Lichfield District Local Plan Strategy (CD1-1) in July 2012; 'Sustainability Appraisal: Proposed Submission Local Plan Strategy' (CD1-10). This was updated and a revised SA was published in November 2012; 'Sustainability Appraisal: Proposed Submission Local Plan Strategy Updated' (CD1-8). This was to comply with Stage D as identified in the scoping report (CD1-23 page 37), 'Consulting on the Draft Plan & Final SA and Sustainability Appraisal'. The structure of those reports followed that identified in the Scoping Report for the SA (of the Core Strategy) published in September 2007 Section 5 'Preparing the Sustainability Report'.

3.4 This SA report follows modifications made to the published and submitted Local Plan Strategy, which have emerged either through the consultation on the published plan, or through the Hearing Sessions held in June/July 2013 as part of the Examination in Public, or as a result of recommendations from the Inspector contained within his 'initial findings' published in September 2013. The report will be published alongside the 'modifications' to the submitted Local Plan Strategy; and the 'main modifications' will be consulted on for six weeks. This report has been re-structured, and in some cases re-formatted, from those previously published to aid clarification.

3.5 This report is divided into chapters dealing with how the SA was undertaken, the sustainability issues and character of the District and the background/evolution of the Local Plan. The report details the methodology used and approach taken by this authority to Sustainability Appraisal throughout the preparation of the Local Plan Strategy' (Chapter 4). Consultation undertaken on the SA process and the considerations and response of the Lichfield Sustainability Working Group (LSWG) to this has been included (Chapter 5 & Appendix C). At Chapter 6 a table is also included which sets out details of how the requirements of the SEA Directive have been met and where these have been addressed in the SA Report (Table 6.1).

3.6 The report also details how the SA links to other plans and programmes, considering how the environmental, social and economic objectives established at international, national, regional and local level were taken into account (Chapter 7) and the environmental, economic and social issues likely to effect the District during the plan period and beyond are considered in Chapter 8. It establishes a baseline of statistics which correspond to these findings and which have enabled a framework to be established against which the effects of the plan can be assessed (Chapter 9). At Chapter 10 the sustainability framework is included within the document together with the appraisal methodology (scoring schedule) and details how these

sustainability framework objectives were derived. Chapter 11 sets out the background to the Local Plan Strategy and details how the sustainability process has integrated with the Plan and influenced its preparation, including how the modifications to the preferred spatial strategy were arrived at and alternatives discounted.

3.7 The report then goes on to appraise the spatial strategy and the policies as contained within the Lichfield District Local Plan Strategy, incorporating all modifications and highlighting the difference in the effects these modifications have had on the spatial strategy and policies. Chapters detail the appraisals of the strategic priorities (Chapter 12), the spatial strategy (Chapter 13) and the general policies (Chapter 14). For the strategic priorities these have been compared against the sustainability framework objectives (Table 12.1). An appraisal of the policies relating to specific settlements in the District is also included; Chapter 15 detailing Lichfield City, Chapter 16 Burntwood; Chapter 17 North of Tamworth; Chapter 18 Rugeley; and Chapter 19 the rural areas (including Fradley). The appraisals also identify where mitigation is possible, the uncertainties and risks, short, medium and long term impacts, and any cumulative and synergistic impacts.

3.8 The report also includes a section on monitoring the sustainability effects of the Local Plan Strategy (Chapter 20) set out in Stage E of the Scoping Report.

3.9 Section 1 (Non Technical Summary) includes a section on the current state of sustainable development in Lichfield District, which considers the key issues relevant to the Local Plan. It gives a brief account of the environmental characteristics of areas likely to be significantly affected by the Local Plan, the likely significant effects of the Local Plan, how the relevant sustainable development objectives have been taken account of through the sustainability appraisal process, mitigation of adverse effects and alternatives appraised. Further detail on the characteristics of areas likely to be significantly affected by the Local Plan Strategy are set out in Appendix E, which also considers the characteristics of the areas likely to be significantly affected by the Curborough/New Village proposal and the Brookhay Villages and Twin Rivers Park proposal as these were put forward both as alternatives to the preferred spatial strategy and as a means of delivering the additional housing required to meet the objectively assessed housing need.

4 Purpose and Approach to Sustainability Appraisal

4.1 The purpose of sustainability appraisal is to promote sustainable development through the better integration of sustainability issues into the preparation and adoption of plans, and includes not just environmental considerations but social and economic impacts of plans. The process identifies and reports on the likely significant effects of the plan's policies and proposals. It also appraises the extent to which implementation of the plan will achieve the social, environmental and economic objectives of sustainable development and if mitigation is required.

4.2 To facilitate the Sustainability Appraisal the approach taken was to establish a multi-disciplinary working group, involving officers of Lichfield District Council and representatives from Staffordshire County Council, the Environment Agency, Housing Associations, and Staffordshire Wildlife Trust. The Lichfield Sustainability Working Group (LSWG) was established in 2007 following a workshop which identified the issues which should be considered in the Scoping Report (CD1-23) and thus determined the range of knowledge required to undertake the SA. The function of the group is to give wider consideration to sustainability issues in the District and to assist in the preparation of the Scoping Report and subsequent appraisal and re-appraisal of the development plan for Lichfield District.

4.3 During the preparation of the Local Plan Strategy membership of the group has changed and at times specific expertise has been invited to the meetings on matters such as economic development, sport, health, urban design and cross-boundary issues. Initially the approach taken was for group members to appraise the proposals individually and then discuss the findings as a group. Following the publication of the 'Policy Directions' (CD1-18) and the re-appraisal of the spatial strategy the group chose to assess the proposals as a group due to the range of expertise and local knowledge needed to fully appraise the proposals as they became more detailed. Not all members of the group are required to attend each meeting and it is determined by the group if a judgement is made or deferred, in part, until specific members are available. During the process the group were not always able to attract the involvement of representatives from the health, sport and leisure sectors. This has been addressed in part by the provision of further research in sport and leisure and more recently regular expertise has been added with regard to health, climate change, the voluntary sector and biodiversity.

4.4 It is considered that the working group approach has been beneficial, enabling flexibility and involvement of the relevant bodies throughout the entire preparation of the Local Plan. The group has been able to consider matters not only from the evidence gathered, but also has been able to draw upon local knowledge where matters of opinion and expert judgement have been required, which have then been discussed in the group situation with others whose knowledge and expertise is wider than that of the District.

Benefits and Limitations

4.5 The SA/SEA has provided an opportunity for early analysis and identification of data gaps in the evidence base. The early results changed as more information and detail became available through the process. However, it should be noted that the SA process only appraises the options proposed, and recommends those which are most sustainable; ultimately it is not the final arbiter of the chosen spatial strategy.

4.6 Due to the need for a simple scoring system the SA cannot differentiate easily between similar options and it also does not grade the sustainability framework objectives, or identify those which have greater importance locally.

4.7 The SA does not include considerations which are political or relate to the ambition of the District as a whole, but can be used to identify where these are in conflict with sustainability objectives and thus require those involved in the decision making process to justify their decisions. Some ambitions will require behavioural change and cultural change of the resident population and others outside the District. For example where these relate to a modal shift from the private car to using more sustainable means of transport this will require influences beyond just those of the Local Plan and may be difficult to achieve in a District where the numbers of elderly persons will steadily increase over the plan period. Such issues have often led the SA group to be unable to determine effects.

4.8 Initially some data did not exist, which again meant that effects were impossible to determine in the early stages of the Plan/SA process. As the evidence base for the Local Plan has evolved further baseline data has been added, assisting the SA process, and this will enable more efficient monitoring. However it is recognised that some baseline data is out of date: notably the National Census Information is only published every 10 years. Prior to the 2011 Census, the the 2001 Census data was utilised, with updated population projections where available. Information from the 2011 Census has more recently been utilised and through the Local Plan examination process more recent data from the latest Department of Communities & Local Government (DCLG) housing projections (based on the 2011 Census) has been taken into account.

Difficulties Encountered

4.9 Data: A common problem affecting SA is the availability and reliability of data. Although data has been collected to illustrate a number of the conditions and trends relevant to the SA of the Local Plan Strategy, some data sets are more useful than others, and some data sets are known to be old, incomplete or unreliable. In some cases, no data is available. It is therefore almost impossible to quantify effects with total certainty, but this has been done where possible. However, the quality of available data could in some situations lead to spurious accuracy, which should be avoided.

4.10 Differing levels of detail: This is particularly relevant to the appraisal of sites and housing development options, where for some, such as Deans Slade Farm, SE Burntwood, Fradley West and Brookhay Villages and Twin Rivers Park for example, a significant amount of detail is available from those proposing the sites as to the nature of the development that would take place. It is therefore possible to predict likely positive impacts for a number of objectives for these. For other sites, such as Meg Lane and Bleakhouse Farm at Burntwood,

no detailed information is available and therefore it is not possible to predict whether similar positive impacts will result. In many cases where detailed information is lacking this has resulted in many question marks being included in the assessment and often possible negative impacts identified where no mitigation is proposed in relation to certain Strategic Framework Objectives. This in a sense means the appraisal is not comparing like with like and therefore the comparison is not balanced.

4.11 Assumptions: It is important to note that a number of assumptions have underpinned various options for housing and employment growth throughout the SA of the Plan's evolution. These assumptions introduced an element of uncertainty about the likely effect of these options/scenarios if implemented. In particular, the type of residents (e.g. age profile) who might occupy new dwellings and the type of employment (e.g. sector) opportunities that might be created both affect the nature of impacts that might result, but are somewhat uncertain.

4.12 Significance: There are very few agreed sustainability thresholds or constraints, as little work has been done in the UK on this issue, although the idea of 'living within environmental limits' is increasingly being operationalised. Because of this, it is not always possible to assess the significance of any impacts with certainty. However, wherever possible the prediction and evaluation of effects utilises relevant accepted standards, regulations and thresholds e.g. the amount of priority habitat created or the number of Grade II Listed Buildings considered to be of building at risk standard. In many cases it is the scale of the impact on these standards, regulations and thresholds and the geographical extent which determine the significance of the effects.

4.13 Despite these limitations and uncertainties, it is still possible to draw conclusions about the overall effects that will result from the implementation of the Local Plan Strategy to 2029.

5 Consultation

5.1 As part of the SEA Directive there is a statutory duty to consult the appropriate SEA consultation bodies, as designated by each of the EU member states. For England these are English Heritage, Environment Agency and Natural England. The District Council's adopted Statement of Community Involvement (SCI) requires that where possible relevant stakeholders and the local community are given an opportunity to assist in the preparation of the Sustainability Appraisal.

5.2 The District Council began the SA process by preparing a Scoping Report in February 2007. A large multi-disciplinary meeting was held to identify the issues which affect Lichfield District and the identification of plans, policies and programmes which would influence the District in the the next 20 years and beyond. The first Scoping Report was published for consultation in June 2007 which helped inform an 'Issues' Document for the Core Strategy which was consulted upon in August 2007 (CD1-22). Consultation on the Scoping Report was undertaken with neighbouring authorities, key stakeholders, those listed on the Consultee Database and statutory consultation bodies. The Scoping Report was made available to the public for comment via the District Council's web based consultation centre which sends out email alerts to all those registered as wishing to be advised of the publication of Local Plan documents, and at the time seven comments were received. Details of responses to the various stages of the SA process are included at Appendix C of this document.

5.3 The results of the consultation, the addition of more information and subsequent changes which had been made to the Scoping Report were published in September 2007 (CD1-23), made available via the District Council's website. The revised report was sent to the 3 statutory consultees for consideration and no comments were received. All the revisions made and results of consultation are documented in the Interim Core Strategy Sustainability Appraisal (ICSSA) which was published for consultation in November 2008 (CD1-19).

5.4 In December 2007 the District Council published its 'Issues and Options' document (CD1-21) for consultation and the LSWG appraised this document. Feedback from the LSWG, which is detailed in the ICSSA, found that generally the Core Strategy was not in conflict with the Sustainability Framework Objectives (the objectives identified in the Scoping Report as of significance to Lichfield District). The LSWG appraised 5 potential options for growth of the District including a do nothing option, and commented on the 'Key Topic Options' and how these related to the Sustainability Framework Objectives; identifying a number of areas where further evidence was required and subsequently commissioned as a result.

5.5 In December 2008 the District Council published and consulted upon its 'Preferred Options' for a spatial strategy (CD1-20), which was accompanied by the ICSSA and meant all the statutory consultations bodies, all those on the consultee database, neighbouring authorities, and the public were notified and the document was at all of the deposit locations and was available for comment via the District Council's interactive website. The period of consultation was November 2008 to January 2009. Ten comments on the ICSSA were received and the results of the consultation were considered by the LSWG in April 2009. No changes to the ICSSA were considered necessary in response to the comments received, which are again set out at Appendix C of this document.

5.6 In April 2009 the 'Policy Directions' document (CD1-18) was published and although this document focused on policy options it did incorporate a revised spatial strategy. The findings of the LSWG on the Policy Directions document were reported directly to the Development Plan Team to assist in the redrafting of policies, and the outcomes of this are summarised in the Policies section of this report.

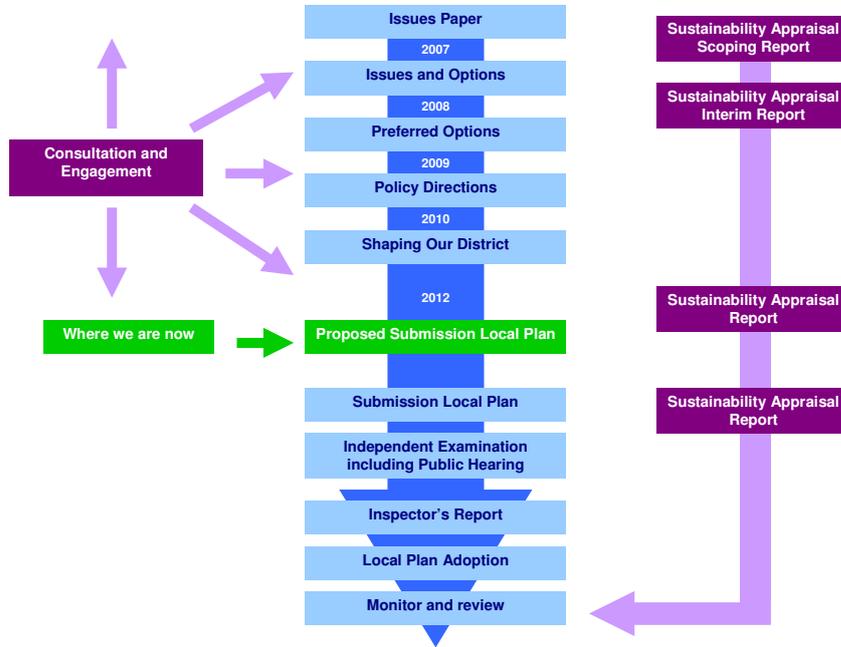
5.7 In November 2010 the 'Shaping our District' document (CD1-15) was published accompanied by the 'Sustainability Appraisal :Shaping our District' (CD1-17), which included the results of the SA of the 'Policy Directions'. Both documents were the subject of consultation and representations were made via the District Council's consultation centre. Four responses to this stage of the SA are also attached at Appendix C of this document.

5.8 Further work by the LSWG has been undertaken to compare the spatial strategy and policies contained within the 'Local Plan: Strategy' (CD1-1), and to determine the environmental, economic and social effects of the submitted plan, as required by Part D of the SEA Directive.

5.9 A Sustainability Appraisal (CD1-10) was published alongside the Local Plan Strategy (Proposed Submission) in July 2012. Both were available to allow for representation to be made for a period of 6 weeks between 30th July 2012 and 10th September 2012. An updated Sustainability Appraisal (CD1-8) followed the submission of representations made during the publication period, some of which updated information previously submitted with regard to proposed alternative options, others introduced completely new options for development within the District, and others challenged the legal compliance of the Sustainability Appraisal. The 'Sustainability Appraisal: Proposal Submission Local Plan Strategy (Update)' (CD 1-8) was published in November 2012 and was also available for consultation. These consultation responses are also summarised in Appendix C of this document.

5.10 The following diagram shows the timeline of the Local Plan and its relationship with the Sustainability Appraisal.

Picture 5.1 Local Plan Process



6 Compliance with SEA Directive

6.1 The SA Guidance published by the Government sets out the Requirements of the SEA Directive. To ensure all elements of the SEA Directive have been met the following table contains reference to where these have been addressed in this SA Document.

Table 6.1 Requirements of the SA Directive

Requirements of the SEA Directive	Where covered in SA
a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Chapter 3 & 7
b) The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan or Programme.	Chapter 8, 11 & 1
c) The environmental characteristics of areas likely to be significantly affected.	Chapter 8 & Appendix E
d) Any existing environmental problems which are relevant to the plan or programme including in particular, those relating to areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC ("Wild Birds' Directive") and 92/43/EEC ("Habitats' Directive").	Chapter 8 & Appendix E
e) the environmental protection objectives established at the International, Community or Member State level which are relevant to the plan or programmes and the way those objectives and any environmental considerations have been taken into account during its preparation.	Chapter 7, 8, 9 & 20
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and interrelationship between the above factors.	Chapter 13-19
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment when implementing the plan or programme. ⁽ⁱⁱ⁾	Chapter 13-19
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 11 & 4 (& Appendix A)
i) A description of measures envisaged concerning monitoring in accordance with Article 10	Chapter 20
j) A non-technical summary of the information provided under the above headings	Chapter 1

ii These effects should include secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects

Sustainability Issues & Character of Lichfield District

7 Links to other plans and programmes

7.1 As part of the evidence gathering stages of the Sustainability Appraisal process a review of relevant plans, programmes and policies at international, national, regional and local level was undertaken. The review helped inform the SA process by identifying issues of relevance to the District and producing a set of sustainability objectives against which the Local Plan could be appraised and monitored. The list of documents reviewed and the analysis of the implications for the Local Plan is contained within the Scoping Report September 2007 (CD1-23) Tables 3.1-3.4 and Appendix 1 of that document and is available to view via the District Council's website.

How Objectives Have Been Taken Into Account

7.2 The likely relevance of each plan or programme to the Local Plan Strategy was measured as either 'context' (provides background guidance), 'strategic' (strategic influence on the Plan) or 'direct' (Direct influence on the content of a development plan document).

7.3 The Scoping Report set out for each plan or programme reviewed what the implications were for the Local Plan Strategy, and how the plan or programme influenced the choice of key targets and indicators relevant to the Local Plan Strategy and the SA. The results of this helped to formulate the issues and objectives for the Local Plan and SA process. The key sustainability issues were derived from analysis of the baseline data, the review of relevant plans and programmes, discussions between officers, and consideration of comments received during the consultations.

7.4 In this way, the environmental protection, social and economic objectives established at international, national, regional and local level were incorporated into the framework of appraisal objectives and criteria for the SA and the Local Plan Strategy has been assessed against this framework to establish the effect it would have on those objectives.

7.5 Since the Scoping Report was produced, a number of additional plans, programmes and policy objectives have shaped the development of the Local Plan Strategy. These have been covered in earlier iterations of the Sustainability Appraisal. For this reason, there is little point in duplicating these here in their entirety, and hence this chapter focuses only upon those *key* influences, changes and updates to information contained in the earlier versions of the document.

National influences: General

7.6 The Localism Act 2011: Key provisions of the Localism Act which have particular relevance to the Local Plan are:

- The abolition of Regional Strategies;
- Duty to Co-operate: this requires local authorities and other public bodies to work together on planning issues;
- Neighbourhood Planning: which allows communities to prepare their own plans which - if meeting the Five Basic Conditions through independent examination, and supported by a majority referendum vote - would become part of the statutory Local Plan;

- Community Right to Build: which allows communities to bring forward development proposals in line with minimum criteria;
- Reforming the Community Infrastructure Levy (CIL);
- Reforming the way Local Plans are made.

7.7 National Planning Policy Framework: The National Planning Policy Framework (NPPF), which came into force in March 2012 is designed to stimulate development whilst keeping vital environmental protections. It focuses upon a 'presumption in favour of sustainable development' and is intended to streamline and simplify the planning system. Where existing Local Plans are out of date (such as the 1998 Lichfield District Local Plan), policies which were 'saved' in 2007 will only carry weight in decision making where they are in line with the NPPF.

7.8 In terms of the presumption in favour of sustainable development the NPPF defines three key strands. These are (as set out in paragraph 7 of the NPPF):

- **An economic role:** contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **A social role:** supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
- **An environmental role:** contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

7.9 The Town and Country Planning (Local Planning) (England) Regulations came into force on 6th April 2012. These regulations set out the procedures which need to be followed in preparing a Local Plan (the regulations now refer to Local Plans rather than Local Development Frameworks).

7.10 In terms of developing a sound Local Plan, the NPPF (para. 48) states that to be sound a Local Plan must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Environment

Key international environmental influences

7.11 EU (1991) Directive 91/271/EEC regarding urban waste water treatment. Its objective is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors (see Annex III of the Directive) and concerns the collection, treatment and discharge of domestic waste water; mixture of waste water; waste water from certain industrial sectors. Specifically the Directive requires:

- The collection and treatment of waste water in all agglomerations of >2000 population equivalents (p.e.);
- Secondary treatment of all discharges from agglomerations of > 2000 p.e., and more advanced treatment for agglomerations >10 000 population equivalents in designated sensitive areas and their catchments;
- A requirement for pre-authorisation of all discharges of urban wastewater, of discharges from the food-processing industry and of industrial discharges into urban wastewater collection systems;
- Monitoring of the performance of treatment plants and receiving waters; and
- Controls of sewage sludge disposal and re-use, and treated waste water re-use whenever it is appropriate.

7.12 EU (1991) Directive 91/676/EEC regarding the protection of waters against pollution caused by nitrates from agricultural sources and by promoting the use of good farming practises.

7.13 EU (1992) Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna: The EU Habitats Directive is the cornerstone of Europe's nature conservation policy. The Directive takes into account endangered species and habitats on a European scale, and therefore not all of the species are relevant to the habitats and conditions expected to be found in the UK. Animals covered by European legislation include species of bat, newt, frog, butterfly and otter. Plants covered by European legislation include orchid, fern and marshwort. The Habitats Directive also designates areas as Special Areas of Conservation (SAC), due to the presence of protected species. Lichfield District has one Special Area of Conservation, the River Mease, and two more nearby at Cannock Chase and Cannock Extension Canal. The EU Habitats Directive also requires a Habitats Regulation Assessment (HRA) to be undertaken in relation to proposed development.

7.14 EU (2000) Directive 2000/60/EC The Water Framework Directive, which came into force in 2000, established an integrated approach to the protection, improvement and sustainable use of Europe's rivers, lakes, estuaries, coastal waters and groundwater.

7.15 The Directive sets objectives to protect particular uses of the water environment from the effects of pollution and to protect the water environment itself from especially dangerous chemical substances. The new objectives are broader ecological objectives, designed to protect and, where necessary, restore the structure and function of aquatic ecosystems themselves, and thereby safeguard the sustainable use of water resources. One of the requirements is that all watercourses should be of 'good' status, and in order to do this, whole catchments are to be considered. The Directive therefore introduces a river basin

management planning system which will be the key mechanism for ensuring the integrated management of: groundwater; rivers; canals; lakes; reservoirs; estuaries and other brackish waters; coastal waters; and the water needs of terrestrial ecosystems that depend on groundwater, such as wetlands.

7.16 The planning system is seen to provide the decision-making framework when setting environmental objectives, providing new opportunities for anyone to become actively involved in shaping the management of river basin districts and their neighbouring river catchments. Lichfield District affects the large river basin of the Humber, and more directly the larger river catchments of the Tame and Trent.

7.17 EU (2008) Directive 2008/50/EC on ambient air quality and cleaner air for Europe. This includes the following key elements:

- The merging of most of existing legislation into a single directive
- New air quality objectives for fine particles including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target
- The possibility to discount natural sources of pollution when assessing compliance against limit values
- The possibility for time extensions for complying with limit values, based on conditions and the assessment by the European Commission.

7.18 EU (2008) Directive 2008/98/EC on waste and repealing certain Directives. sets the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. It explains when waste ceases to be waste and becomes a secondary raw material (so called end-of-waste criteria), and how to distinguish between waste and by-products. The Directive lays down some basic waste management principles: it requires that waste be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest. Staffordshire County Council is the Local Authority dealing with waste, the waste hierarchy and energy from waste, and deals with these matters through the Staffordshire and Stoke on Trent Joint Waste Local Plan

7.19 EU (2009) Directive 2009/28/EC on the promotion of the use of energy from renewable sources: the UK has committed to sourcing 15% of its energy from renewable sources by 2020.

7.20 EU (2010) Europe 2020 EU growth strategy: The Country-specific recommendations are documents prepared by the European Commission for each country, analysing its economic situation and providing recommendations on measures it should adopt over the next 18 months.

7.21 UNFCCC (1997) Kyoto Protocol to the UN Framework Convention on climate change The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its Parties by setting internationally binding emission reduction targets.

Key national environmental influences

7.22 Climate Change Act 2008: Introduced a statutory target of reducing carbon emissions by 80% by 2050 below 1990 levels, with an interim target of 34% by 2020.

7.23 The Energy Act 2008: Introduced powers for Feed-In Tariff (FiT) and the Renewable Heat Incentive (RHI) aimed at driving an increase in renewable energy capacity. These were operational from April 2010 and April 2011 respectively.

7.24 The Wildlife & Countryside Act 1982 (England and Wales) (Amendment) Regulations 2004: The Act gives statutory protection to wild birds, their nests and eggs, certain wild plants, and animals including for example bats, great crested newts and some species of butterfly. The legislation also sets out the law for wildlife management, the introduction of native species and managing designated sites.

7.25 The Conservation of Habitats & Species Regulations 2010: Species afforded protection by the Habitats Directive are also listed in 'The Conservation of Habitats & Species Regulations 2010 (UK).' The Regulations state the legislative provision for the management of protected sites and species, as well as enforcement powers.

National Policy: environmental

7.26 The National Planning Policy Framework (2012): This makes the following provisions in relation to the environment (of relevance to the District) of which the 'presumption in favour of sustainable development' is the overarching theme:

- Local authorities should adopt proactive strategies to mitigate and adapt to climate change including energy generation from renewable or low carbon sources and factors such as flood risk, water supply and changes to biodiversity and landscape;
- Plans should contribute to, and enhance the natural and local environment by:
 - Protecting and enhancing valued landscapes, geological conservation interest and soils;
 - Recognising the wider benefits of ecosystem services;
 - Minimising impacts on biodiversity and providing net gains in biodiversity where possible including establishing coherent ecological networks that are more resistant to current and future pressures;
 - 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;
 - Remediating and mitigation despoiled, degraded, derelict, contaminated and unstable land where appropriate.
- Paragraph 119 of the NPPF states that the presumption in favour of sustainable development does not apply where development requires appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.
- Conserving and enhancing the historic environment, taking into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - the desirability of new development making a positive contribution to local character and distinctiveness; and
 - opportunities to draw on the contribution made by the historic environment to the character of a place.
- Facilitating the sustainable use of minerals.

Other Plans and Programmes: environmental

7.27 The work and objectives of other relevant bodies and policies have been taken into consideration and where appropriate, consultation and partnership working has occurred. Some key examples are set out in the following paragraphs.

7.28 The UK Sustainable Development Strategy 2005 (DEFRA): This has five main principles: living within environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; using sound science responsibly.

7.29 Housing Growth and Green Infrastructure Strategy 2009: This was produced by Natural England to assist in design and site selection. It is split into three main priorities, stating that: the most environmentally sustainable locations should be found for new housing development; assessments of environmental capacity should be central to decisions on future development; the environmental quality of all new housing development should be substantially improved by the use of green infrastructure for example. The principles, as set out in this strategy, need to be reflected in the formulation of local policies, ensuring proper regard to environmental issues. Natural England have been involved in the formulation of Lichfield District's Local Plan, advising on the spatial strategy as well as policy wording.

7.30 River Trent River Catchment Management Plan 2010 (Environment Agency): This covers both the River Tame and River Trent which run through Lichfield District. The aims of the River Catchment Management Plans fit in to the wider aims of the larger River Basin Management Plans which have a multi purpose objective of both improving water quality in order to meet the targets of the EU Water Framework Directive, as well as improving the management of water ensuring greater resilience to drought and floods. The aims of these management plans must therefore be supported in local policy.

7.31 The Forestry Commission's **Delivery Plan for England's Trees, Woods and Forests** sets out five aims:

- to provide a sustainable resource of trees;
- to ensure that all trees are resilient to the impacts of climate change and contribute to biodiversity and natural resources adjusting to a changing climate;
- to protect the cultural and amenity value of trees and woodlands as well as the resources of water, air, biodiversity and landscape as a whole;

- to increase the contribution that trees and woodlands make to England's quality of life;
- to promote the development of new or improved markets for sustainable woodland products, and improve the competitiveness of woodland businesses.

7.32 UK Biodiversity Action Plan (UKBAP): The UK Biodiversity Partnership runs the UKBAP which describes the biological resources of the UK and provides detailed plans for conservation of these resources, at national and devolved levels. Local Biodiversity Action Plans have been established throughout the country and the Staffordshire Biodiversity Action Plan is relevant to Lichfield District.

7.33 Biodiversity Planning Toolkit: A pilot version of an interactive landscape mapping toolkit was launched in August 2010 which aims to provide clear information of relevant designations and the species which may be present. The toolkit is also intended to provide users with easy access to all of the information that provides the statutory and policy framework for the conservation of biodiversity and geodiversity in the United Kingdom. The toolkit may become an important tool during the plan period (2008 - 2028), helping to ensure applicants are aware of any potential biodiversity and geodiversity issues at the early stages of the development process.

7.34 The Low Carbon Transition Plan: Published in July 2009, sets out a national strategy for climate change and energy and the Renewable Energy Strategy, also published in July 2009 sets out how the UK will reduce emissions and meet targets on renewables. It also announced the establishment of the Office for Renewable Energy Deployment (ORED).

7.35 The Household Energy Management Strategy: Published in March 2010 places greater emphasis on planning to facilitate district heating schemes and other community-scale energy schemes.

7.36 Zero Carbon Homes: Meeting the zero carbon standard will involve a combination of energy efficiency measures, use of decentralised energy and a range of "allowable solutions".

7.37 Climate Change Projections: Updated in 2009 by the UK Climate Impacts Programme (UKCIP - UKCP09) sets out three global emission scenarios based on high, medium and low forecasts for a range of climate and weather related impacts, such as temperature, rainfall, flooding and other extreme weather events. Projections for Lichfield / Burntwood indicated that by 2099 maximum daytime temperatures in Summer in the Lichfield area could rise by 5.8 degrees centigrade if CO₂ is still being emitted on a similar or higher level than today. Even if emissions are much lower than today, maximum Summer temperatures by 2099 will still be 3.5 degrees centigrade higher. However, it is likely that maximum temperatures could still be slightly higher in the centre of Lichfield or Burntwood, compared to the rural areas, due to the urban heat island effect.

Local environmental influences

7.38 A Plan for Lichfield District 2012 - 2016: has a number of environmental objectives under the strategic heading 'we'll shape place'. This includes:

- Enhancing and protecting the District's built environment assets, its historic environment, open spaces and local distinctiveness;
- Ensuring a cleaner and greener environment;
- Providing sustainable transport choices;
- Reducing carbon emissions and promoting energy efficiency and renewable energy.

7.39 The Lichfield District Strategic Partnership's Carbon Reduction Plan 2012 / 2013: This contains the following vision:

- To work towards a District which, whilst it is prosperous, also works to reduce its reliance on fossil fuels and to reduce its carbon emissions.

7.40 It aims to achieve this vision by:

- Reducing CO2 emissions from buildings, vehicles, services and activities throughout the district, starting with our own.
- Ensure that all buildings and services are resilient to changing climate impacts over coming decades.
- Encouraging developers to design and build new developments to minimise carbon emissions and reliance on fossil fuels and take into account other aspects of changing climate such as extreme weather and flooding.
- Acting as a community lead to advise and support local residents, businesses and other partners in contributing to the above.

7.41 Sustainable Community Strategy (Staffordshire) (2006 - 2021): The Staffordshire Sustainable Community Strategy (SCS) acts as the overarching strategy for the County. The Staffordshire Partnership's vision is 'to improve the quality of life for all our people, by increasing economic prosperity, improving local services, and developing partnership working.' The Partnership also states that sustainable development is at the heart of the Community Strategy with an aim to ensure Staffordshire continues to be renowned for its quality environment. The Strategy goes on to state that 'for this to be the case, we will need to work to minimise the threats to the natural environment, with a particular focus on climate change. By building on the work we have done in this area, we all, as individuals, organisations and as a County, will have the opportunity to be forerunners in the adaptation and mitigation of measures to tackle climate change, and in ensuring Staffordshire continues to be a place enjoyed by all who live, work and study in it.'

7.42 Locally Important Designations & Schemes: There are a number of locally important designations and schemes which have had a key influence on shaping policy at the local level and these are detail in the following paragraphs.

7.43 An area from Cannock Chase to Sutton Park was identified by Natural England, the Wildlife Trusts and the RSPB, primarily for the significant lowland heath landscape that has become fragmented over time, with the aims of protecting, enhancing and restoring the landscape, including the management of designated sites and the creation of new sites.

7.44 This work has led to 'Opportunity Mapping', which uses GIS based programs as a tool to assess the fragmentation of the landscape. Lichfield District Council supports the general principle of 'Opportunity Mapping' to improve the understanding of ecosystems and identify opportunities for improvement.

7.45 Sites of Biological Importance: A Site of Biological Importance (SBI) is designated on a County level and is non-statutory. Staffordshire County Council is one of three County Councils in the UK who use SBIs as a means of a protecting sites through policy, in association with the Staffordshire Wildlife Trust. Sites are selected using a number of attributes that include; habitat type, diversity and rarity of the species present, and site naturalness. SBIs are important as they are locally designated and have great meaning to the local landscape.

7.46 Forest of Mercia: The Forest of Mercia is a community project, and one of ten Community Forests across England. It lies between Penkridge and the west of Lichfield, and Walsall and Cannock Chase. The main aim of the Forest of Mercia is to provide improved access to natural environments for people living within the urban area, and as part of this, tree planting is a priority to increase woodland coverage and improve linkages between other natural areas of wetland, grassland and heathland. Trees are seen to improve the environmental quality of both urban and rural areas; provide key habitats for species; and help to mitigate against the effects of climate change. The community aspect of the Forest of Mercia ensures education facilities are available for local people and the Innovation Centre at Chasewater is a main focus for this.

7.47 Staffordshire Biodiversity Action Plan (SBAP): The SBAP identifies priority habitats and species, sets targets for their conservation and outlines the mechanisms for achieving these targets. Local policy must support these targets not only to meet UK and European targets but in order to enhance biodiversity throughout Lichfield District.

7.48 The National Forest: The National Forest is a national project for woodland creation, tourism and economic revival of former mining communities, in the areas approximately between Burton upon Trent and Loughborough. A small section of The National Forest falls within the northern portion of Lichfield District, at the settlements of Alrewas, Edingale and Croxall. Notably, the National Memorial Arboretum, to the east of Alrewas, is part of The National Forest, and is also a national centre for remembrance and commemoration. The National Forest Company has published a Design Charter (July 2010), which pulls together examples of sustainable construction and design principles recommended for development within the Forest. The aims of The National Forest have been taken into consideration through the Local Plan: Strategy in order to ensure the continued success of this national scheme. The wider benefits of tree planting and sustainable design will also be recognised throughout all new developments in the District.

7.49 Central Rivers Initiative: The Central Rivers Initiative is a partnership scheme with a vision to protect and enhance the river corridor of the rivers Tame and Trent between the urban areas of Tamworth and Burton upon Trent. A large portion of land lying to the east of the District is included within the Central Rivers Initiative area, an area which is also used for mineral and gravel extraction due to the alluvial deposits. The Initiative aims to link up

existing natural environments to create a distinctive landscape of high environmental value that benefits local residents and people visiting and working in the area and generate significant positive economic impact.

7.50 Greens & Open Spaces Strategy 2008: Green and open space is the collective term used to describe all parks, public gardens, common land, village greens, playing fields, children's play areas, cemeteries, recreation grounds, farmland, woodlands, nature reserves, allotment gardens, rivers, canals, water bodies and other open space. The network of traffic free routes, the canals, cycle routes and rights of way are also part of the green and open space infrastructure. Lichfield District Council has undertaken this strategy to promote the use and improvement of green and open space throughout the District. This work involved public consultation and assessments of the quality and type of sites provided in Lichfield District. It sets out the vision for the greens and open spaces stating that 'Lichfield District's greens and open spaces belong to local people and are there for everyone to enjoy. They should be cherished, accessible, rich in wildlife, safe and clean, and managed for the future.' The Greens and Open Spaces Strategy also has links with the Open Space, Sport & Recreation Assessment which looks at play provision, amenity play space, green space and sport facilities.

7.51 Conservation Areas and Management Plans: Lichfield District has 21 Conservation Areas, one of which covers sections of the Trent and Mersey Canal, one covers the historic core of Lichfield City, and 19 further Conservation Areas within rural villages. Conservation Areas are designated because they are deemed to be areas of special architectural historic interest the character or appearance of which it is desirable to preserve or enhance. Also of significance is the high tree canopy cover and green landscaping in Conservation Areas, which enhance the setting of the built environment, and receive extra statutory protection.

7.52 As part of the ongoing management and enhancement of the Conservation Areas, the Conservation Team have undertaken work on individual Conservation Area Appraisals. The Appraisals describe the particular special and important features of the Conservation Area as well as provide an insight into the historic significance of the locality. This has been seen as an opportunity to engage with local residents and explore issues of value and local distinctiveness. The Appraisals also make strong reference to the importance of natural resources within the urban environment. Management Plans will accompany the Conservation Area Appraisals.

7.53 Local List: As well as those assets afforded statutory protection, such as listed buildings and conservation areas, criteria have been established for buildings that have local historic or architectural importance, and may therefore qualify for 'local listing'. These form an important component of local distinctiveness and are integral in creating a sense of place and are therefore encompassed within the policy on our built and historic environment. As part of this, the District Council's local list will be continually updated.

7.54 River Mease SAC: Lichfield District Council has worked jointly with Tamworth District Council on Appropriate Assessment in relation to the Mease SAC (as per the Habitats Directive 92/43/EEC). The Appropriate Assessment highlights that there is a potential likely increase in pressure on the SAC as a result of growth in the District. The Spatial Strategy has deliberately sought to minimise the amount of development affecting the SAC however, and mitigation measures are incorporated within the **River Mease Water Quality**

Management Plan, managed by the River Mease programme Board. In the short term, mitigation includes the construction of silt traps to remove phosphorus arising from development which would otherwise harm water quality in the SAC.

7.55 Surface Water Management Plan (July 2010): The Surface Water Management Plan (SWMP) was devised in order to identify locations which may be at risk from surface water flooding. Those settlements identified as having a 'high risk' are Lichfield, Armitage, London and Upper Longdon, Burntwood, Elford, Little Aston, Mile Oak, Fazeley and Whittington. A large majority of the flood occurrences are identified as highways flooding. This may be a result of blocked highways drains, which falls under the responsibility of the highways authority, or the overflow of ordinary watercourses or drains within the town, which are the responsibility of the owner.

7.56 Cannock Chase AONB & SAC: Lichfield District Council has worked jointly with Staffordshire County Council, Cannock Chase District Council, South Staffordshire District Council, Stafford Borough Council, East Staffordshire District Council, Birmingham and the Black Country Authorities on an Appropriate Assessment in relation to Cannock Chase SAC (as per the Habitats Directive 92/43/EEC). Through implementation of the **Visitor Mitigation Strategy**, suitable mitigation measures will be introduced to overcome possible adverse impacts affecting the integrity of the SAC.

7.57 The UK Climate Projections (UKCP09): This provides climate information for the UK up to the end of this century. Projections of future changes to our climate are provided, based on simulations from climate models, showing three different scenarios representing high, medium, and low greenhouse gas scenarios. Projections for Lichfield / Burntwood indicated that by 2099 maximum daytime temperatures in Summer in the Lichfield area could rise by 5.8 degrees centigrade if CO₂ is still being emitted on a similar or higher level than today. Even if emissions are much lower than today, maximum Summer temperatures by 2099 will still be 3.5 degrees centigrade higher. However, it is likely that maximum temperatures could still be slightly higher in the centre of Lichfield or Burntwood, compared to the rural areas, due to the urban heat island effect.

7.58 Joint Waste Local Plan for Staffordshire and Stoke-on-Trent: With regard to waste, the Waste Planning Authority (WPA) is Staffordshire County Council, who are the authority responsible for planning for waste treatment and waste disposal facilities. However, Lichfield District Council is responsible for waste collection. National planning policy for sustainable waste management requires that the Local Plan of a Waste Planning Authority should set out policies that ensure sufficient opportunities for the provision of waste management facilities in appropriate locations. A key vision of the Joint Waste Local Plan for Staffordshire and Stoke-on-Trent is to treat waste as a resource, including waste as a source of energy, and reduce the overall contribution of waste management to climate change by diverting waste from landfill through developing a network of new and enhanced sustainable waste management facilities, in or close to, the main urban areas.

7.59 In terms of the Air Quality Updating and Screening Assessment for Lichfield District Council, this is updated annually, in fulfilment of Part IV of the Environment Act 1995. In relation to local air quality management an **Air Quality Management Area Order No.1**,

2008, came into force in 2008 for the A5 Muckley Corner traffic island, designated in breach of the Nitrogen Dioxide (annual mean) objective as specified in the Air Quality Regulations 2000.

Economic

Key national and international economic influences (including transport)

7.60 A Strategy for Sustainable Economic Growth (2010): This paper suggests that there needs to be a balance between making savings to public spending and promoting sustainable growth. The new plan sets out the three key ways that the department for Business, Innovation and Skills can contribute:

- Promoting business and innovation through entrepreneurship and individual engagement in the economy;
- Smarter public and private investment in the economy including creating a highly-skilled workforce and;
- Promoting free and open markets.

7.61 Local Growth White Paper (October 2010): This Paper set out the Governments approach to supporting economic growth in the regions. At the same time they also announced approval for an initial 24 Local Enterprise Partnership bid proposals (business and Local Authority partnerships for driving local economic growth). Key proposals in the White Paper:

- Shifting Power to Local Communities
- Increasing Confidence to Invest
- Focused investment - A Regional Growth Fund of £1.4 Billion over three years would be used to support economic growth in the regions

7.62 Following on from this was the formation of Local Enterprise Partnerships (LEPs). These followed on from the Government announcement that that Regional Development Agencies (RDAs) would be replaced with a new business support structure: LEPs (Local Economic Partnerships) bring local councils and businesses closer together in order to boost enterprise and create jobs.

7.63 The **National Planning Policy Framework** is pro-economic growth, and its presumption in favour of economic growth makes the following key provisions in relation to the economy:

- Building a strong competitive economy;
- Ensuring the vitality of town centres;
- Supporting a prosperous rural economy;
- Promoting sustainable transport;
- Supporting high quality communications infrastructure.

7.64 Sustainable transport is a key economic influence as well as impacting upon social and community issues. Current key influences upon sustainable transport at the national level are set out in the NPPF (section 4). This focuses upon the delivery of transport infrastructure, and the sustainable location of development which maximises the use of

sustainable transport modes, minimises car usage, encourages the provision of electric charging points, and encourages and enables walking and cycling. It requires all developments which generate significant amounts of movement to produce a travel plan.

7.65 High Speed Rail Link: Phase 1 of a high speed rail link was approved by Government (10th January 2012) and will run from London to just north of Lichfield. Phase two extends the network to Manchester and separately to Leeds. A preferred route has been identified by Government showing the link to Manchester coming off the current Phase 1 route near Streethay / Fradley and then progressing via the Ridwares to the District boundary with Stafford Borough. An Environmental Statement was deposited in Parliament with the HS2 Phase One hybrid bill on 25th November 2013.

Local economic influences (including transport)

7.66 Local Enterprise Partnerships (LEPs): These are aimed at strengthening local economies. At the local level their role is to provide strategic leadership setting out local economic priorities. Lichfield District Council is a member of two LEPs, the Greater Birmingham and Solihull LEP (GBSLEP), and the Stoke on Trent and Staffordshire LEP (SSLEP).

7.67 The GBSLEP has produced a consultation draft of its **Spatial Plan for Recovery and Growth** (September 2013). This Plan will cover a 20 year time frame looking at the broad scale and distribution of growth across the LEP, and currently contains a variety of potential options for delivering this. This will form part of the wider GBSLEP **Strategy for Growth**.

7.68 Key aims of the GBSLEP are to:

- Increase economic output (GVA) in the area by 30% (£8.25 billion) by 2020;
- Create 100,000 private sector jobs by 2020;
- Stimulate growth in the business stock, survival rates and business profitability;
- Boost indigenous and inward investment;
- Achieve global leadership in key sectors, including: automotive assembly; low carbon R&D, transport and building technologies; business, professional and financial services; clinical trials; ICT; creative and digital sectors; and
- Build a world class workforce with the skills needed to achieve our ambitions whilst dramatically reducing worklessness.

7.69 The SSLEP has the following priorities:

- Stimulating enterprise, innovation and inward investment;
- Bringing forward key employment sites;
- Supporting towns, city and service centre developments;
- Building on existing industrial sectors and those with future potential for growth;
- Developing a well skilled workforce to meet current and future labour market needs;
- Ensuring appropriate housing to meet the needs to current and future workforce; and
- Developing and improving infrastructure to promote connectivity and mobility

7.70 The Tamworth and Lichfield Business Economic Partnership (BEP) has produced the **Tamworth and Lichfield Economic Strategy (2011)**. The overall aim of this strategy is to promote a stronger, more resilient local economy through sustainable business development and growth, which reflects both the urban and rural dimensions to the Tamworth and Lichfield area. In order to achieve this, the strategy will:

- Set a strategic economic vision for the Tamworth and Lichfield area which is more focused on identifying and developing key business sectors of importance to the local economy;
- Exploit and develop the main attributes of the area in terms of being a place that is good for business development and enhance the overall reputation and image of the area;
- Influence the immediate priorities of the two local LEPs and directly contribute to LEP workstreams;
- Be based on an assessment of the state of the local economy and the collective knowledge of local businesses and partners regarding economic and business issues and priorities;
- Highlight key themes around which issues and priorities can be grouped based on the acknowledged strengths and weaknesses of the area, along with an assessment of the current and future economic opportunities that have been identified; and
- Focus businesses and partner organisations to work together on common areas of priority and need where coordination of effort at the local level will be desirable and feasible. This will lead to more efficient use of resources, removal of duplication and ultimately decreased confusion amongst the business community.

7.71 The Plan for Lichfield District 2012 - 2016: This focuses on boosting business (under theme 3). It emphasises the need for an improved retail offer in Lichfield and Burntwood, more manufacturing and service sector jobs, encouraging entrepreneurship, innovation, inward investment, wealth creation, and skills development. It also focuses upon tourism and culture, and the creation of a vibrant rural economy.

7.72 Our County, Our Vision - A Sustainable Community Strategy for Staffordshire (2008-2023): Identifies 'a vibrant, prosperous and sustainable economy' as one of its four overarching priorities. Within this, a number of themes have been identified:

- Improving basic skills;
- Reducing the number of young people who are not in employment, education or training;
- Raising the high level skills base and retaining skilled workforce;
- Encouraging graduate retention;
- Maximising opportunities presented by Staffordshire universities and associated networks;
- Increasing levels of enterprise and ensuring higher value added sector business start ups;
- Raising aspirations of our children and young people;
- Reducing worklessness, increasing the employment rate and improving access to employment opportunities;
- Embracing and investing in new environmental technologies;

- Attracting sustainable, quality public and private investment in the County; and
- Developing housing which is decent, affordable and sustainable.

7.73 The **Lichfield District Integrated Transport Strategy** includes the development of Local Transport packages for south and east Lichfield and for Burntwood. Where development is allocated to meet local needs, such as in rural areas, developer contributions may be utilised with the aim of delivering appropriate local transport mitigation measures in accordance with Core Policy objectives

7.74 A Strategy for the A5: This has been recently produced, covering the section of the route from Gailey in Staffordshire to Weedon in Northamptonshire. The strategy looks at issues of capacity, economic activity and growth, access to leisure and tourism, priority improvements and reduction of the impact of traffic on communities along the route.

7.75 The aims of the strategy are as follows:

- To ensure that the A5 is fit for purpose in terms of its capacity and safety, both now and in the future;
- To allow the A5 to play its full and proper role in supporting and facilitating economic activity and growth at a national and local level;
- To promote and encourage improvements to sustainable transport (walking, cycling, public transport and behavioural change measures) in order to help reduce congestion on the A5, improve air quality and deliver a lower carbon transport system; and
- To reduce, where possible, the impact of the A5 on communities along the route.

Social

7.76 In relation to social issues, many cross-cutting influences have been covered in earlier sections of this chapter, particularly those in relation to transport, and the economy. This section therefore focuses upon key influences around housing, health, community safety and community engagement.

Key national social influences

7.77 National Planning Policy Framework: Provides the framework for 'delivering a wide choice of high quality homes' including planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, delivery of affordable housing where needed, and the identification of size, type, tenure and range of housing. It also provides the framework for sustainable transport, promoting healthy communities and community safety.

Key local social influences

7.78 The Plan for Lichfield District 2012 - 2016: This states 'we'll support people' as one of its key themes. This includes addressing crime and antisocial behaviour, supporting and encouraging individuals and groups to shape and improve their communities, supporting vulnerable adults, families and children to live independent and fulfilled lives in their own homes and communities and improving the health and wellbeing of the population making the biggest improvement for people with the lowest life expectancy.

7.79 Living Well in Staffordshire is the five year plan (2013 - 2018) of the Staffordshire Health and Wellbeing Board, which is jointly chaired by Staffordshire County Council and the Clinical Commissioning Group. The priorities for action set within this are informed by the Joint Strategic Needs Assessment for Staffordshire. Further specific and detailed information relating to Lichfield District is contained within the Health and Wellbeing profile for Lichfield District Council and the Enhanced Joint strategic Needs Assessment for Lichfield District (November 2012). The Living Well in Staffordshire strategy sets out the following areas for action:

- Starting well (parenting, school readiness);
- Growing well (education, NEET, In Care);
- Living well (alcohol, drugs, lifestyle and mental wellbeing);
- Ageing well (dementia, falls prevention, frail elderly); and
- Ending well (end of life).

7.80 Our County, Our Vision, A Sustainable Community Strategy for Staffordshire 2008 - 2023: This sets out the following long term priorities:

- Tackling the anti social behaviour and crime that matter most to our local communities;
- Addressing the causes of crime, and reducing the impact of crime on the vulnerable;
- Preventing domestic violence and reducing its impact on individuals and families;
- Building trust and confidence within and between our communities;
- Promoting participation in cultural activities and raising the aspirations of children, young people and communities; and
- Creating a strong, effective and influential third sector in Staffordshire, which is fully engaged in planning and delivering services.

7.81 Safer, Fairer, United Communities for Staffordshire 2013-2018: This is produced by the office of the Police and Crime Commissioner for Staffordshire and sets out the following strategic priorities:

- Early Intervention
- Supporting Victims and Witnesses
- Managing Offenders
- Public Confidence

7.82 Key areas for delivery will be set out in the commissioning plan, and Locality Plans will provide further detail of action at a local level.

7.83 Lichfield District Community Safety Strategic Assessment: This is produced annually, and provides information and analysis in terms of crime and antisocial behaviour issues, setting out key findings and highlighting priorities for action.

7.84 The **Lichfield District Housing Strategy 2013 - 17** sets out four priorities for action:

- Improve housing choice and access to a wide range of affordable homes;
- Prevent and reduce homelessness;
- Ensure warm, healthy, well maintained homes, reduce fuel poverty and cut carbon emissions; and
- Support older and vulnerable people to live as independently and healthily as possible.

7.85 The **Playing Pitch, Tennis and Bowls strategy (2012)** for the District sets out priorities for action and identifies areas of shortfall in terms of playing field provision and usage.

Cross boundary plans

7.86 The evidence base has been produced in partnership with others where there are cross-border matters which need to be taken into account (for example the Cannock Chase SAC, River Mease SAC, the A5 Strategy, High Speed Rail etc). This is set out in the preceding paragraphs: this shared evidence base has also helped to shape the plans of neighbouring local authorities, which are at varying stages of development and these plans have also been taken into account.

8 Environmental, Economic & Social Issues

General characteristics

8.1 The SEA Directive requires the characteristics of areas likely to be affected by the plan to be described.

8.2 Lichfield District is located in southern Staffordshire, bounded to the south by the West Midlands conurbation (Birmingham and Walsall), to the east by Tamworth Borough, to the north and north east by East Staffordshire District, and to the West by Cannock Chase District.

8.3 The District is comprised of a variety of landscapes within a relatively small area, due to significant variations in geology, the presence of two significant river valleys, the Tame and Trent, and remnants of historic landscapes, including extensive forest and heathland. The landscape is constantly changing, and much of today's countryside includes remnants of historic landscapes, such as the former Forest of Needwood, areas of heathland and historic field patterns. Some landscape character types and habitats have suffered significant losses or degradation, and all of the Districts landscape is affected by change arising from development, mineral working, agriculture and climate change.

8.4 Lichfield District has a population of 102,438.⁽ⁱⁱⁱ⁾ The population is mainly concentrated in two urban centres, Lichfield City and Burntwood, each with a population of around 30,000. The majority of the remaining 40% of the population live in rural villages of varying sizes and characteristics, some of which are very self contained, whilst others such as Fazeley or Little Aston have close links to the cross boundary settlements of Tamworth and Birmingham respectively.

8.5 The general trend of changes to the District's population have remained similar over the last 40 years in that younger age groups (especially 16 - 24 year olds) tend to move out to other areas in search of affordable housing, and jobs. This exacerbates the trend towards an already ageing population, with people in older age groups also moving in as they near retirement age. By 2023 there is predicted to be a 60.7% increase in those aged 75 and above, which rises to a 95% increase by 2033 (from 2013 figures).^(iv)

8.6 The compact cathedral city of Lichfield is the administrative centre of the District and has an important role within the West Midlands Region as a strategic centre fulfilling a wider role than just local need. It is also a nationally important, attractive and distinctive historic centre and focus for tourist activity.

8.7 Burntwood is a settlement of similar population size to Lichfield City, but with very different characteristics. It has formed through the coalescence of a number of different mining communities and expanded particularly rapidly between the 1960's and 1990's and as a result suffers from an inadequate town centre and associated facilities for its size which do not meet local needs. The town is sited close to boundaries with Cannock Chase and Brownhills (in Walsall).

iii Sources: CLG Interim 2011-based subnational population projections & [NLP Implications of the 2011-based CLG Household Projections \(May 2013\)](#)

iv Source: [NLP Implications of the 2011-based CLG Household Projections \(May 2013\)](#)

8.8 The availability of jobs, the history of in-migration in the District and the regional pattern of larger town centres all contribute to a high level of travel by residents of the District. High car usage is supported by generally good road connections, with the A38 and A5 being important routes to the north/south and east/west respectively. The construction of the M6 Toll has further increased accessibility and raised the profile of the District as an area for business investment, both in terms of distribution and office market potential.

8.9 Although the availability of a frequent rail service from Lichfield via the cross-city rail line allows a degree of rail commuting, journey to work movements from the District are largely made by car. This is one of the factors, combined with a high level of gas consumption in the regional context, that results in a relatively high level of carbon emissions by District residents.

Environmental Issues

Landscape, heritage, built and natural environment

8.10 The landscape of the District is varied due to underlying variations in geology and the presence of the two major river valleys of the River Trent and River Tame that have a confluence to the east of Alrewas. While modern changes to the landscape have been substantial, there remains evidence of former landscapes across the District and therefore historic character of the environment is a significant factor to be taken into account in determining future strategies, including development locations.

8.11 Evidence relating to landscape, heritage and the built and natural environment includes the Staffordshire Historic Landscape Characterisation project, the Lichfield Historic Environment Character Assessment (HECA, 2009) and the Lichfield Extensive Urban Survey (EUS) carried out by the County Council, the West Midlands Farmsteads and Landscapes Project (2010), Conservation Area Appraisals and Management Plans.

8.12 Lichfield District has a rich and varied heritage. Throughout history, settlers have made their mark on the District from the buildings they created, to the wars they fought, to the roads they laid. Features from across the centuries are still evident, including Roman roads (Ryknild Street, A38 or Watling Street, A5), Georgian buildings and Victorian shops. The village of Wall is famous for being a military base and still today Roman remains can be seen there. The importance of many of these sites has been recognised, for example, 15 archaeological sites have been given legal protection as Scheduled Ancient Monuments.

8.13 Across the District many settlements have access to the canal network which has been an important part of the historic development of many areas. The District has 21 conservation areas in total, 20 in rural settlements, and approximately 800 listed buildings. This indicates the wealth of historic and heritage assets which play a significant part in the character of Lichfield District both urban and rural.

8.14 The City of Lichfield is an important historic centre, with a major conservation area based around the Cathedral, a medieval street pattern and historic city centre buildings. The Cathedral Close and Linear Park is the only Registered Park and Garden within the District. The Cathedral spires (the 'ladies of the vale'), are visible from many points in the wider rural landscape. Post war growth has been a feature of the City, which saw some major housing

estates developed through 'overspill' agreements, mainly in the north of the City and these are now the subject of initiatives to help their regeneration. More recent housing developments from the 1980's at Boley Park and since 2000 at Darwin Park, have seen further outward expansion and growth of the City, to the south-east and south-west respectively.

8.15 Burntwood is a former mining town that has formed as a consequence of the amalgamation of several smaller settlements through significant residential growth from the 1960's to the 1990's. The character and physical structure of Burntwood is therefore unusual for a freestanding town. The structure and rate of its growth have had consequences that planning policies have previously sought to address, in particular the lack of a coherent centre and the need for a range of facilities and jobs that are appropriate for a town of its size that enable people to work, shop and access social and recreational infrastructure locally.

8.16 The rural landscape forms the setting for the District's villages that mainly have an agricultural past: this includes a number of historic farmsteads. Although many rural parts of the District have good quality agricultural land and remain productive, in common with most areas there is now relatively little employment in agriculture. Some of the villages retain a significant historic core - Alrewas being a notable example. Some of the larger rural settlements have a modern employment base with Fradley providing significant employment opportunities and other villages with small industrial estates or major employers, notably Armitage with Handsacre, Fazeley and Shenstone.

8.17 The historical and built heritage of the District is finite, and pressure for development and change in the District has the potential to provide for heritage led regeneration, contribute to a high quality environment, improve the management and maintenance of our historic assets, provide for better access and understanding of the historic environment yet it could also easily adversely affect archaeological sites, or the features and character of historical buildings and areas. The Council is keen to ensure that the effects of development on the District's heritage assets and their settings are adequately assessed, create a positive outcome through enhancement, or else minimised or where necessary mitigated. This includes as of yet unrecorded archaeological interest, other nationally important archaeological remains, non-designated archaeological remains, parks and gardens and other feature of local historic interest.

8.18 A large part of Lichfield District is covered by the West Midlands Green Belt. This has meant that a substantial area within the south of the District has been subject to development restraint for many years and the northern part of the District has been less constrained for rural growth, allowing for employment provision centred around the former Fradley airfield and significant levels of housing growth in Armitage with Handsacre, Fradley and Alrewas.

Biodiversity and nature conservation

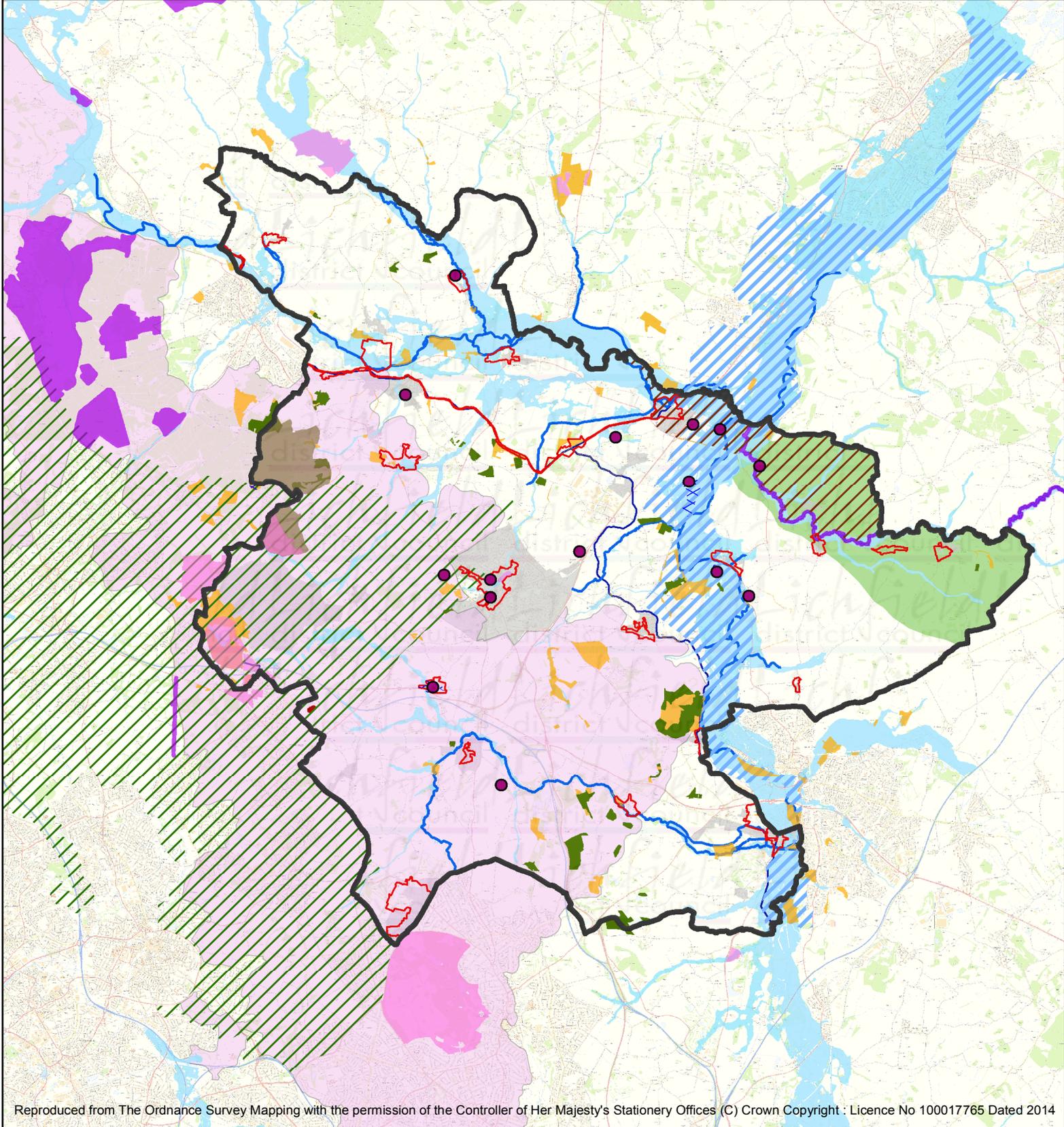
8.19 Key evidence in relation to biodiversity and nature conservation includes the Ecological Assessment for Lichfield District (2009), the Strategic Landscape and Biodiversity Assessment (2007), Cannock Chase SAC Visitor Survey & Mitigation reports (December 2012), Planning for Landscape Change, Staffordshire County Council SPD (1996-2011), River Mease SSSI/SAC Restoration Plan (2012); River Mease SAC Water Quality (Phosphate)

Management Plan (2011), Lichfield Biodiversity Opportunity Mapping, Habitat Regulations Assessment of the Lichfield and Tamworth Local Plans, Cannock Chase AONB Management Plan 2009-14, Staffordshire Biodiversity Action Plan (ongoing programme), Humber River Basin Management Plan (2009), Severn River Basin Flood Management Plan (2009), A Living Landscape (Wildlife Trust, 2009), Hedgerow Study (Lichfield District Council, 2008).

8.20 There are several areas of high landscape and nature conservation quality both within and adjoining the District. Of greatest importance are the River Mease Special Area of Conservation (SAC) and the eastern fringes of the Cannock Chase Area of Outstanding Natural Beauty (AONB), where there is a statutory obligation to protect and manage them. There are also 6 designated Sites of Special Scientific Interest (SSSIs) within the District which need careful management and protection. The varied landscapes within the District are home to a rich biodiversity resource, providing many types of habitats.

8.21 There is a need to stem the gradual loss of biodiversity that has seen a decline in the extent of lowland heathland and loss of local biodiversity sites. Recent years have seen the introduction of sustainable management practises at Chasewater and partnerships such as the Central Rivers Initiative, which both look to make the most of opportunities arising in these areas for management and habitat creation. The Forest of Mercia and the National Forest are both landscape orientated initiatives that seek to fundamentally change the character of parts of the District and to redress the major loss of woodland that the area has suffered, whilst enhancing the District's biodiversity and playing an important role in providing for recreation and tourism. The Midlands Plateau Integrated Biodiversity Delivery Area has also been identified as a major regional project that extends from Cannock Chase to Sutton Park (within Birmingham); aimed at promoting the improved management of lowland heathland.

8.22 In addition the District has one Local Geological Site at Barrack Lane Quarry, Hammerwich, designated as an example of triassic sandstone in the southern part of Staffordshire, which has statutory protection.



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Key

-  Lichfield Boundary
-  Ancient Monuments
-  Schedule of Ancient Monuments
-  Site of Special Scientific Interest (SSSI)
-  Area of Outstanding Natural Beauty (AONB)
-  Conservation Areas
-  National Forest
-  Ancient Woodland
-  Midlands Plateau Integrated Biodiversity Delivery Area
-  Built up areas
-  Special Area Conservation (SAC)
-  Forest of Mercia
-  Local Wildlife Site
-  Local Geological Site
-  Central Rivers Initiative Area
-  Rivers
-  Canal Network
-  Flood Zone 3a
-  Flood Zone 2
-  River Mease SAC water catchment

NOT TO SCALE



Climate change and the use of natural resources

8.23 As a means of tackling climate change, Lichfield District must be a place where sustainable communities are created, where people can work, shop, learn and play near their homes and not have to drive unnecessarily long distances to access employment and other facilities, creating a district where people want to live and work, now and in the future. Communities must be safe and inclusive, well planned, built and run, offering equal opportunities and good services for all.

8.24 In terms of encouraging the prudent use of natural resources and mitigating and adapting to the effects of climate change, the need to respond pro-actively to this issue has been identified as a major priority for local authorities, and Lichfield District Strategic Partnership's Carbon Reduction Plan is the first step in the fulfilment of the District Council's commitment to tackling climate change. Planning has a key role to play in ensuring that development minimises its impact on the environment, helps to mitigate and adapt to adverse effects of climate change and reduces carbon emissions, including providing for renewable energy generation, in a sensitive way.

8.25 Utilising renewable energy from a variety of sources within Lichfield District will contribute to reducing carbon emissions. Under EU Directive 2009/28/EC on the promotion of the use of energy from renewable sources the UK has committed to sourcing 15% of its energy from renewable sources by 2020. Exploiting the District's wind and biomass resources is one way in which the District can contribute to this national target. In order to establish local feasibility and the potential for renewable energy generation within Staffordshire the Staffordshire Strategic Partnership (of which Lichfield District is a member) commissioned a study.

8.26 The Staffordshire County-wide Renewable / Low Carbon Energy Study made recommendations in relation retro-fitting the existing housing stock with renewables and has estimated that Lichfield District is capable of meeting around 10% of its energy demand through renewable energy sources by 2020. The study has identified that Lichfield District's greatest opportunity lies in the diversion of biomass sources as alternative fuel sources, particularly from wood waste, straw and energy crops; which it is estimated could contribute up to 40% of renewable resources in 2020. For wind energy, scenarios modelled within the study, have identified that six turbines could be installed within the District, which would generate 21% of the modelled renewable energy in 2020 and the study identified six individual sites of greatest opportunity for wind development, considered to have the capacity for three or more large-scale turbines.

8.27 Waste management issues are set out in the Waste Hierarchy approach as advocated by the Waste Authority: Staffordshire County Council. This approach is fundamental to the Joint Waste Local Plan 2010-2026 for Staffordshire and Stoke-on-Trent.

8.28 Lichfield District contains significant mineral reserves and although coal mining activity has now ceased, there remain significant areas of sand and gravel extraction, concentrated on 'pebble beds' stretching from Weeford to Hopwas and on alluvial deposits in the Tame and Trent valleys. Almost all of the sites with permission are being worked, have been restored or are in the process of restoration, which will offer opportunities for green

infrastructure projects, nature conservation, education and recreation. Staffordshire County Council is the minerals planning authority and has commenced the preparation of the new Mineral Local Plan which will replace the adopted 1994 - 2006 plan.

Air quality

8.29 The District has low levels of pollution and generally good air quality. Local Authorities are required to regularly review and assess air quality in their areas, and where objectives are not met an Air Quality Management Area (AQMA) must be declared and measures for addressing issues must be set out in an Air Quality Management Plan (AQMP). Lichfield District has an AQMA at Muckley Corner.

Flood Risk

8.30 The Water Cycle Study (2010) highlights pressure on watercourses and aquifers and advises on suitable drainage systems to reduce surface water flooding. It advises that where flood risk assessments are required, these should follow national guidance, set out in the National Planning Policy Framework. In relation to the safeguarding of water resources and maintaining water quality regard should be had to the Southern Staffordshire Surface Water Management Plan Phase 1 which guides certain land uses away from locations that are key to delivering water supplies to avoid contamination.

Economic Issues

Economic structure

8.31 The nature of employment in the District has changed significantly over time with the decline of traditional engineering industries. There has been a substantial increase in distribution activities, particularly with the development of employment at Fradley airfield, however the significance of Lichfield as a centre for administration and professional services has continued. Much of the District's employment land is already determined by existing stock and planning permissions, but in some instances is not adequate to meet changing needs such as smaller start up units, 'touch down' units to support growing levels of home working, or modern, accessible and well located facilities.^(v)

8.32 As well as industrial, service and limited agricultural employment the District has a notable minerals industry, now confined to the extraction of sand and gravel within the Tame and Trent Valleys and the sandstone ridge extending from Weeford to Hopwas. The rate of future extraction and locations for working are currently being considered through the preparation of a Minerals Core Strategy by Staffordshire County Council which is the Minerals Planning Authority.

8.33 Lichfield District has a wide range of shopping and service facilities. Lichfield City is considered a strategic centre, whilst Burntwood Town is much smaller and currently does not provide for the needs of its catchment population. Key rural centres and neighbourhood centres provide much needed shops and services for local residents to use on a day-to-day basis. New communities proposed as part of the Local Plan will require similar neighbourhood centres to provide retail and services to the locality.

v Employment Land Review February 2012

8.34 Tourism is a significant part of the local economy, based on the heritage, character and environment of the area, with Lichfield City being a particular focal point but with other attractions too. These include Drayton Manor Park to the edge of Fazeley, the National Memorial Arboretum at Alrewas, Chasewater Country Park near Burntwood, and the Cannock Chase Area of Outstanding Natural Beauty.

Workforce and employment

8.35 The following tables illustrate the main employment sectors in the District, with wholesale and retail being particularly significant, followed by health and social work, manufacturing and administration and support (Table 8.1). Table 8.2 shows that a higher percentage of residents than both the regional and national average work in professional occupations, are managers directors or senior officials or work in professional / technical operations. This situation is reflected in the later section on earnings (Table 8.3) where it can be seen that those who live in the District earn more than those who work here, and that there are high levels of commuting to other areas where many residents access high skilled jobs with higher wages.

Table 8.1 Employment by sector 2011 (Business Register and Employment Survey (BRES) Nomis)

Employment by sector	Lichfield	Staffordshire	Great Britain
Agriculture, forestry & fishing	0.1%	0.1%	1.7%
Mining & quarrying	0.2%	0.1%	0.2%
Manufacturing	11.7%	12.7%	8.5%
Electricity, gas, etc.	0.2%	0.0%	0.4%
Water supply	1.0%	0.8%	0.6%
Construction	6.7%	5.6%	4.8%
Wholesale & retail; including motor repair	16.0%	18.0%	16.1%
Transportation & storage	4.7%	5.6%	4.8%
Accommodation & food service	6.1%	6.7%	6.8%
Information & communication	3.0%	2.0%	3.8%
Financial & insurance	1.5%	2.1%	3.8%
Real estate activities	1.5%	1.4%	1.7%
Professional, scientific & technical	7.4%	5.2%	7.5%
Administrative & support	9.4%	7.7%	8.0%
Public administration & defence	4.3%	4.5%	5.0%
Education	8.1%	9.5%	9.1%
Human health & social work	11.6%	12.9%	12.9%

Employment by sector	Lichfield	Staffordshire	Great Britain
Arts, entertainment & recreation	3.2%	2.7%	2.5%
Other service activities	3.4%	2.4%	2.1%

Table 8.2 Workforce by Occupation (2011 Census)

Occupation	Lichfield	West Midlands	England
Managers, Directors and Senior Officials	6,852 (14%)	255,592 (10.1%)	2,734,900 (10.9%)
Professional Occupations	9,043 (18.4%)	401,102 (15.8%)	4,400,375 (17.5%)
Associate Professional and Technical Occupations	6,158 (12.6%)	282,595 (11.1%)	3,219,067 (12.8%)
Administrative and Secretarial Occupations	5,720 (11.2%)	289,595 (11.4%)	2,883,230 (11.5%)
Skilled Trade Occupations	5,756 (11.7%)	309,088 (12.2%)	2,858,680 (11.4%)
Caring, Leisure and Other Service Occupations	3,804 (7.8%)	241,235 (9.5%)	2,348,650 (9.3%)
Sales and Customer Service Occupations	3,479 (7.1%)	216,918 (8.6%)	2,117,477 (8.4%)
Process, Plant and Machine Operatives	3,227 (6.6%)	223,017 (8.8%)	1,808,024 (7.2%)
Elementary Occupations	4,977 (10.2%)	317,734 (12.5%)	2,792,318 (11.1%)

8.36 In terms of the working age population for the District this stood at 60.7% for Lichfield District in 2013 compared to 63.3% for the West Midlands as a whole and 64.8% for England.^(vi) However, of these, some 81.2% of the working population were economically active compared to 76.2% for the West Midlands.^(vii)

8.37 The Employment Land Review shows that Lichfield District has a job balance ratio of 83.3% based on 2001 Census figures, considerably lower than the West Midlands average of 88.1% (The job balance ratio is the number of jobs in the District divided by the number of economically active residents).^(viii) This is partly caused by the District's high levels of commuting, particularly due to its proximity to large conurbations which offer higher skilled / paid jobs, and the good road links to these conurbations such as the A38 and the A5 corridors which offer easy access by car. It should also be noted that many residents commute by train as rail links are good in parts of the District, particularly around Lichfield City and Shenstone.

vi CLG 2011-based subnational population projections

vii Nomis Official Labour Market Statistics 2013

viii Employment Land Review 2012

8.38 The economic downturn is showing an impact within the District as unemployment within Lichfield District stood at a rate of 5% in June 2013, although this is lower than both the Regional and National averages which stood at 9.2% and 7.8% respectively.^(ix)

Earnings

8.39 People living in Lichfield District on average earn 12% more than people working in Lichfield District, which is an indication of residents travelling out of the District for higher paid jobs elsewhere, principally within the wider West Midlands, and the lack of higher-skilled / wage jobs within the District. Higher wages also results in higher house prices across the District, which exacerbates issues of affordability, particularly for younger people and those in lower waged employment. Consequently many people of working age leave the District to seek more affordable housing elsewhere.^(x)

Table 8.3 Average Annual Income Gross (Nomis - Official Labour Market Statistics 2011)

	Lichfield (£)	West Midlands (£)	Great Britain (£)
Earnings by Residents	£28,574	£24,398	£26,094
Earnings by workplace	£25,319	£24,310	£26,021

Skills and Education

8.40 The percentage of students achieving high GCSE Grades (A* to C) is slightly above the average for England (86.9% for Lichfield District compared to 81.8% for England in 2012), although the average A level points score at 685.1 in 2012 was lower than the average for England (733).^(xi)

8.41 The percentage of residents with higher level qualifications (levels 4 and 5 i.e. degree level and above or the equivalent) is above both the West Midlands and National average - 28.4% as compared to 23.3% for the West Midlands and 27.4% nationally.^(xii)

Social Issues

Population

8.42 The CLG Interim 2011-based Subnational Population projections estimate that Lichfield District's population has grown to 102,438, from 93,232 as recorded in the 2001 census, this equates to an increase of 9,206 people. Figures show that 21.9% of the District's population is within the Older People category and 17.5% are under 16 years of age. The proportion of Under 16s is lower than the national and regional averages and the proportion of Older People is higher than the national and regional averages. The number of Older People within the District has grown significantly since the 2001 Census from 15.5% to 21.9%. The impact of an ageing population is recognised as a national issue, however, these

ix Nomis Official Labour Market Statistics June 2013

x Southern Staffordshire Districts Housing Needs Study and SHMA update 2012

xi source: Department for Education 'in your area' website 2013

xii 2011 Census

figures show that the ageing of the population within Lichfield District and its movement into retirement and older age groups, could be a greater issue than for many other areas of the region.

8.43 The ethnic make-up of Lichfield District differs significantly from the regional and national compositions, with people of White British origin accounting for a larger proportion of the population than any other ethnic group (94.6% of the population according to the 2011 Census).

8.44 Lichfield District is often considered to be a relatively prosperous area in the regional and national context, ranking as low as 237 of 348 in Local Authorities ranked for overall deprivation in the 2010 Index of Multiple Deprivation 2010. Whilst it is generally true as an indication of prosperity and the health of communities that deprivation in the area is not severe, there are however pockets of deprivation, of different types, that are present within the District. Significant among these are Chasetown and Chadsmead wards in terms of overall deprivation, whilst several rural wards have barriers preventing access to housing, local services and amenities.

Housing

8.45 Lichfield District is an area of high demand for housing, which has been exacerbated by significant levels of migration into the District, often from higher-income households. This has resulted in house prices that are higher than the average both nationally and in the wider West Midlands. Lichfield District will continue to be an area of housing growth which needs to be addressed in ways which protect the living standards and environment of those already resident as well as those people moving to the area.

8.46 Importantly, housing within the District will need to provide for a very different demographic by 2028. It will need to address issues relating to an ageing population and will need to encourage the retention of younger people and the economically active.

8.47 The overall quality of housing within Lichfield District is generally good and there is a high level of owner occupation, at over 79%, whilst social rented housing accounts for only about 13.5% of the total. The principal issues in relation to housing are affordability and meeting housing requirements.

8.48 The [Affordability Index](#) highlights how affordable an area is to live in by dividing house price by income, with lower figures indicating that an area is more affordable. Lichfield District's 'price:income ratio' has increased since 2009/2010 this is a trend that is reflected nationally. In terms of affordability, the ratio of income to house prices is amongst the highest in Staffordshire. Although there are significant variations in affordability within the District, there is a need for more affordable housing in all areas, to serve the needs of Lichfield, Burntwood and rural parts of the District where high house prices and limited availability are significant.

8.49 In addition there are a range of barriers to accessing housing and services which are particularly prevalent in the rural areas, these being: the rural north in the areas surrounding Armitage with Handsacre (including Kings Bromley, the Ridwares and Blithbury, Colton, the

Longdons, Gentlesahaw and Chorley); the Mease and Tame area to the east (including Croxall, Edingale, Harlaston, Clifton Campville and Thorpe Constantine), and the rural south (which includes Wall, Shenstone, Hopwas, Weeford, Hints and Drayton Bassett).^(xiii)

8.50 The Strategic Housing Market Assessment (SHMA 2008 & updated 2012) identifies the imbalance of housing types across the District with high concentrations of larger, detached homes, particularly in the rural areas. Consequently it has identified the need for smaller affordable dwellings, particularly those of an appropriate type and size for 'first-time buyers' or 'first-time renters' and families to access. Additionally, the shifting demographic patterns across the age ranges of 60-79 and the over 80s have major implications for meeting the differing and evolving housing and supporting the needs of older people living alone. In many of our rural areas issues arise in relation to "asset rich - income poor" home owners, and it is essential that sufficient resources are allocated to appropriate care and support services for older people living alone

8.51 Specialist accommodation also includes provision for Gypsies and Travellers, a need for 5 residential pitches has been identified.^(xiv)

Access to Services and facilities

8.52 Access to services and facilities is an issue within the District. As has been mentioned previously, the two main urban centres of Lichfield City and Burntwood are very different, with Lichfield operating as a strategic centre which serves a broad hinterland, and Burntwood having a shortfall in the services and facilities needed to serve its local population. In terms of the rural areas, these were scored based on a range of services and facilities, and transport access with the most sustainable (the Key Rural Settlements) being Alrewas, Armitage with Handsacre, Fazeley, Little Aston, Shenstone and Whittington.^(xv) It should be noted, however, that detailed work with the larger rural communities through the Rural Planning Project (2011) has, for the purpose of the Local Plan Strategy, removed Little Aston from the list of Key Rural Settlements.

8.53 Additionally, in 2008, Staffordshire County Council produced a report on the most sustainable locations for development in terms of public transport accessibility which showed particular problems in relation to rural areas. The best-served areas were Lichfield City and Fazeley (although the latter did not score quite so well in terms of access to supermarkets, secondary education and GP services).

8.54 The Infrastructure Delivery Plan (IDP) sets out the detail in relation to infrastructure needs which also includes existing shortfalls in services and facilities. Evidence used to inform the Local Plan and IDP in relation to indoor sports facilities shows there is a shortfall in serving Lichfield City and its hinterland in terms of the need for a six lane pool and learner pool and either a four or six court sports hall.^(xvi) The Playing Pitch, Tennis and Bowls Strategy 2012 identifies where there is a need to improve or provide facilities, and the Open Space Assessment 2012 looks at the quantity and quality of, and accessibility to a range of different

xiii Barriers to Housing and Services geographical barriers and wider barriers sub domains, CLG Indices of Deprivation 2010

xiv Gypsy and Traveller Accommodation Assessment 2012

xv Rural Settlements Sustainability Study 2011

xvi Swimming Pool and Sports Hall feasibility study October 2013

types of open space, identifying shortfalls and setting standards for provision. Open space types include: Play, Amenity Green Space, Natural and Semi Natural Green Space, Allotments, Green Corridors, Cemeteries, Churchyards and Civic Spaces.

8.55 In terms of arts and culture, organisations such as the Arts Foundation for Lichfield emphasise the importance of providing a range of facilities for the District, not just in relation to the larger tourist attractions (e.g. the Cathedral or the Lichfield Garrick theatre) but a range of facilities and locations where social and community events, courses and activities and delivery of outreach services can be held, for example in community halls, fields, parks and gardens. Sport England stress that provision should cater for a wide range of interests, needs and abilities to encourage more people in under-represented groups to participate and engage.^(xvii)

Health, Wellbeing and Community Safety

8.56 The Health and Wellbeing Profile for Lichfield District 2012 sets out details relating to the wider determinants of health, areas of health inequality and particular issues of concern. In summary these are:

- The Index of Multiple Deprivation 2010: two lower super-output areas (LSOAs) fall within the most deprived national quintile: these are in Lichfield City and fall within Chadsmead and Curborough wards;
- Child wellbeing index: the following LSOAs fall within the second most deprived quintile, these are within the wards of Chadsmead, Chasetown, Curborough and Fazeley;
- GCSE attainment: this is poor in Chadsmead ward (in 2011 only 24% attained five or more A* to C grades at GCSE level including English and Maths compared to 58% for Lichfield as a whole);
- Child poverty: 38% of children in Chadsmead ward are defined as living in poverty (compared to 14% for the District as a whole);
- Adults of working age: 9% live in income deprived households, income levels are particularly low in Summerfield ward (Burntwood);
- Older people living in poverty: around 13% of people aged over 60 in Lichfield District live in income deprived households;
- Jobseekers claimants: there are high proportions in Chadsmead and Curborough wards;
- Transport: around 36% of people in the District are defined as living in the most disadvantaged quintile nationally for geographical access to services. These are located in the wards of Alrewas and Fradley, Bourne Vale, Colton and Mavesyn Ridward, Hammerwich, Highfield, Kings Bromley, Leomansley, Little Aston, Longdon, Mease and Tame, St John's, Shenstone, Stonnall and Whittington.

xvii Sport England Active People Survey 2010

8.57 The Lichfield District Community Safety Strategic Assessment 2011 sets out key priorities in terms of community safety issues and particular hotspots. The report recommends the following priorities:

- The locality focus for priority neighbourhoods in relation to violent crime, criminal damage and anti social behaviour (including alcohol related offences) identified hotspots in Lichfield City Centre, North Lichfield, Chasetown (including burglary) and Fazeley and Mile Oak.
- Re-offending should continue to be a priority: there are links between higher rates of re-offending and offender need in relation to alcohol, drugs and finance.
- Vulnerable people and people susceptible to harm should continue to be prioritised, this is a particular issue in areas of lower income, and in rural areas where social engagement levels are also lower.

8.58 The Lichfield District Community Safety Strategic Assessment 2011 also shows road safety to be a key priority. During 2010 there were 457 road traffic casualties in Lichfield District, a reduction of 13% from 2009. Most collisions occur in similar areas, on the arterial roads through the District, mainly at junctions/roundabouts or high speed sections of road, or in congested or built up areas such as Lichfield City Centre and the residential areas of Chasetown, Boney Hay and Burntwood.

8.59 Part of the health and wellbeing agenda is the level to which people feel they belong to a community and how they can shape and influence decision making in the local area. The Lichfield District 'Feeling the Difference' survey (Staffordshire Observatory 2011) showed that slightly more people in Burntwood (16%) felt they did not belong to their neighbourhood than those living in Lichfield (11%) and the Rural areas (10%). Additionally, those who felt they could most influence decision making were residents of small / mid size towns (Mosaic Group B), and professionals living in suburban or semi-rural homes (Mosaic Group D). The 16 - 25 year olds were the age group least likely to feel they could influence decision making.

9 Baseline Data and Indicators

9.1 Baseline information provides the basis for predicting and monitoring environmental, economic and social impacts and alternative ways of dealing with them.

9.2 Baseline information assists in answering the following questions:

- How good or bad is the current situation? Do trends show that it is getting better or worse?
- How far is the current situation from any established thresholds or targets?
- Are particularly sensitive or important elements of the receiving environment affected? e.g. Vulnerable social groups, non renewable resources, endangered species, rare habitats;
- Are the problems reversible or irreversible, permanent or temporary?
- How difficult would it be to offset or remedy any damage?
- Have there been significant cumulative or synergistic effects over time? Are there expected to be such effects in the future?

9.3 Baseline information is key to successful monitoring, and for this reason is incorporated into the table in the 'Monitoring Framework' Section of this report. It reflects the baseline information provided within the 2007 Scoping Report as this represents the 'starting point' for the implementation of the Local Plan which runs from 2008 - 2028. However, it also needs to be acknowledged that some data has only become available since the 2007 'start point' and so dates are also incorporated to provide a more accurate picture.

9.4 The baseline information covers environmental issues such as condition surveys of SSSIs and locally important wildlife sites, tree preservation orders and buildings at risk, whilst economic issues cover the percentage of the population of working age, qualifications and skills amongst many others. Social issues such as health data on life expectancy, affordable and specialist housing provision, access to and participation levels in sport and recreation, crime and health statistics and on engagement with communities are also included and this is set out in the 'Monitoring Framework' chapter of this report.

9.5 This data is monitored, where possible, through the Annual Monitoring Report (AMR), and the monitoring chapter also sets this out. The AMR indicators have developed over time to reflect the issues identified in the Scoping Report, information available, changes in national requirements and the changes to the Local Plan Strategy, and will be reviewed on an annual basis and baseline data will be updated were necessary.

Problems in Areas of European Nature Conservation Importance

9.6 A Habitats Regulations Assessment of Lichfield District's and Tamworth Borough's emerging local plan strategies has been undertaken.^(xviii) This identified three sites as being potentially affected by the Local Plan Strategy. These are the River Mease SAC within the District, and the Cannock Extension Canal SAC and Cannock Chase SAC outside of the District. Each of these sites has particular problems.

River Mease SAC

9.7 The River Mease is an unusually semi-natural system in a largely rural landscape, dominated by intensive agriculture. Water quality and quantity are vital to the European interests, whilst competition for water resources is high. Diffuse pollution and excessive sedimentation are catchment-wide issues which have the potential to affect the site. The SSSI assessment report undertaken in 2007 notes the site's adverse condition and identifies the following issues: drainage, invasive freshwater species, water pollution from agriculture/run-off and discharge. Significant new development could take place within the catchment as a result of new housing and employment development in North West Leicestershire, South Derbyshire and East Staffordshire which may impact on water quality and quantity. The continuing creation of the National Forest will lead to further catchment-wide changes in land use.

Cannock Extension Canal SAC

9.8 The population of Luronium natans in this cul-de-sac canal is dependent on a balanced level of boat traffic. If the canal is not used, the abundant growth of other aquatic macrophytes may shade out the Luronium natans unless routinely controlled by cutting. An increase in recreational activity would be to the detriment of Luronium natans. Existing discharges of surface water run-off, principally from roads, cause some reduction in water quality.

Cannock Chase SAC

9.9 Visitor pressures include dog walking, horse riding, mountain biking and off-track activities such as orienteering, all of which cause disturbance and result in erosion, new track creation and vegetation damage. Bracken invasion is significant, but is being controlled. Birch and pine scrub, much of the latter from surrounding commercial plantations, is continually invading the site and has to be controlled. High visitor usage and the fact that a significant proportion of the site is Common Land, requiring Secretary of State approval before fencing can take place, means that the reintroduction of sustainable management in the form of livestock grazing has many problems. Cannock Chase overlies coal measures which have been deep-mined. Mining fissures continue to appear across the site even though mining has ceased and this is thought to detrimentally affect site hydrology.

9.10 Furthermore the underlying Sherwood Sandstone is a major aquifer with water abstracted for public and industrial uses and the effects of this on the wetland features of the Chase are not fully understood.

xviii Habitats Regulations Assessment: Lichfield District and Tamworth Borough, May 2012

10 SA Appraisal Framework

10.1 Issues and objectives which the SA should consider were identified through a workshop event in 2007 with a wide range of consultees. The issues were then grouped together and the framework of questions and objectives were drafted.

10.2 From the workshop a smaller group of individuals were invited to form the Lichfield Sustainability Working Group (LSWG) to appraise the Local Plan in line with the objectives established by the group and following appraisal of the information from the scoping of the plans and programmes.

10.3 The group considered the framework objectives and these were published as part of the Scoping Report in June 2007. Comments were received from a number of sources especially with regard to the questions and these were amended to reflect the changes requested by English Heritage and Sport England. Subsequently when the group came to using the questions they found a number of them were duplicated unnecessarily, and further changes to the questions were decided by the group and these were published for consultation via the District Council website and sent directly to the statutory consultees. No comments were received, so the Scoping report as at September 2007 (CD1-23) set out the appraisal questions used for the appraisal of the Core Strategy.

10.4 The strategic framework objectives identified were considered in relation to topics listed in Annex (f) of the SEA Directive in Section 4 of the Scoping Report September 2007 (CD1-23) and is reproduced below:

Table 10.1 Draft Objectives & SEA Directive Topics

Sustainability Framework Objectives		SEA Directive Topics
Objective A	To maintain and enhance landscape and townscape quality	<ul style="list-style-type: none"> ● Material assets ● Cultural heritage ● Landscape
Objective B	To promote biodiversity and geodiversity through protection, enhancement and management of species and habitats.	<ul style="list-style-type: none"> ● Biodiversity ● Fauna ● Flora
Objective C	To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their settings.	<ul style="list-style-type: none"> ● Material assets ● Cultural heritage
Objective D	To mitigate and adapt to the effects of climate change.	<ul style="list-style-type: none"> ● Climatic factors
Objective E	To encourage prudent use of natural resources.	<ul style="list-style-type: none"> ● Soil

Sustainability Framework Objectives		SEA Directive Topics
		<ul style="list-style-type: none"> Water Air
Objective F	To reduce flood risk.	<ul style="list-style-type: none"> Water Climatic factors
Objective G	To improve availability of sustainable transport options to jobs and services.	
Objective H	To encourage sustainable distribution and communication systems.	
Objective I	To create mixed and balanced communities.	<ul style="list-style-type: none"> Population
Objective J	To promote safe communities, reduce crime and fear of crime.	
Objective K	To improve the health of the population.	<ul style="list-style-type: none"> Human health
Objective L	To enable improved community participation.	

10.5 The resultant sustainability framework objectives and the questions which are used to inform the appraisals are as below:

Table 10.2 SA Appraisal Framework

Sustainability Objective	Detailed Criteria	Suggested Target or Indicators
A. To maintain and enhance landscape and townscape quality	1. Will it promote and maintain and attractive and diverse landscape?	<ul style="list-style-type: none"> Landscape character and townscape quality Loss or damage to historic view lines and vistas Loss of historic landscape features, erosion of character and distinctiveness (HLC) Extent and use of detailed characterisation studies informing development proposals (HLC) Improvements in the quality of the townscapes, e.g. Delivery of street/public realm audits, improvement works, de-cluttering works both in the urban and rural areas Whether development meets design standards
	2. Will it protect areas of highest landscape quality?	
	3. Will it improve areas of lower landscape quality?	
	4. Will it preserve and enhance conservation areas including their settings?	
	5. Will it achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality?	
	6. Does it value and protect diverse and locally distinctive settlement and townscape character?	
	6a. Does it safeguard historic views and valuable skylines of settlements?	

Sustainability Objective	Detailed Criteria	Suggested Target or Indicators
B. To promote biodiversity and geodiversity through protection, enhancement and management of species and habitats.	7. What affect will there be on priority habitats?	<ul style="list-style-type: none"> • Amount of priority habitat created/recreated - Lowland/Heathland • Amount of priority habitat created/recreated - Wet Grassland • Amount of priority created/recreated - Rich Flower Grassland • Number of hectares of Local Nature Reserves • Number and type of internationally/nationally designated sites • Number of species relevant to the district which have achieved SBAP targets e.g otter and snipe • Veteran trees, ancient woodland
	8. What affect will there be on national and local sites, including veteran trees?	
	9. What affect will there be on green corridors/water courses. Will it reduce/eliminate fragmentation/wildlife connectivity?	
	10. Will it improve the number and diversity of sties and habitats of nature conservation value in the District?	
	10a. What affect will there be on the RIGS site?	
C. To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their settings.	11. Will it safeguard sites of archaeological importance (scheduled or unscheduled) and their settings?	<ul style="list-style-type: none"> • Number of Conservation Areas with and up-to-date character appraisal and a published Management Plan • Number of sites subject to development where archaeology is preserved in situ compared with those scientifically recorded • Number of Grade II Buildings considered to be of building at risk standard • Number of buildings of historic or architectural interest brought back into active use • Number of historic and archaeological sites, features and areas with improved management • Number of historic assets providing greater understanding, enjoyment and access • Number, or %, or area of historic buildings, sites and areas and their settings (both designated and non designated) damaged
	12. Will it preserve and enhance buildings and structures and their settings and contribute to the District's heritage?	
	13. Will it improve and broaden access to, and understanding of, local heritage, historic sites, areas and building?	
D. To mitigate and adapt to the effects of climate change.	14. Will it encourage prudent use of energy?	<ul style="list-style-type: none"> • CO₂ emissions per capita • Energy consumption • Average energy efficiency of housing stock
	15. Does it enable opportunities for renewable energy?	
	17. Will it result in a reduction in the amount of waste requiring treatment and disposal?	
E. To encourage prudent use of natural resources.	19. Will it improve air quality?	<ul style="list-style-type: none"> • Indicator for air quality • Indicator for water quality • Sand and gravel • Crushed rock
	20. Will it protect controlled waters?	

Sustainability Objective	Detailed Criteria	Suggested Target or Indicators
	21. Will it use water efficiently and with care?	<ul style="list-style-type: none"> National waste targets Lichfield recycling targets Increase the % of municipal waste recycled Reduction in the % of municipal waste landfilled Target from renewables CO₂ emissions
	22. Will it encourage greater use of alternatives to primary resources?	
	23. Will it prevent sterilisation of mineral resources?	
	25. Will it encourage a move towards alternative methods of waste re-use and recovery e.g energy?	
F. To reduce flood risk.	26. Will there be an opportunity for flood risk reduction?	<ul style="list-style-type: none"> Number and types of flooding incidents Number of residential units granted permission contrary to an EA objection % developments with Sustainable Drainage (SuDS)
G. To improve availability of sustainability of sustainable transport options to jobs and services.	27. Will it provide opportunities to reduce trips by car? (Economic)	<ul style="list-style-type: none"> Traffic levels (million vehicle kilometres) on the local road network Access to bus services Increased opportunities for walking and cycling
	27a. Will it provide increased opportunities/facilities for walking and cycling? (Social)	
	28. Will it provide access to new developments for those without access to a car? (Social)	
	29. Will it reduce the overall impact in traffic sensitive areas? (Social)	
H. To encourage sustainable distribution and communication systems.	30. Will it encourage an increase in the provision and use of e-businesses?	<ul style="list-style-type: none"> Introduce Workplace Travel Plans in x% of companies by 20xx
	31. Will it encourage local supply chains?	
	32. Will it encourage business to use more sustainable forms of transport (e.g Travel Plans)?	
	33. Will it encourage distribution and warehousing to be close to main transport networks?	
I. To create mixed and balanced communities.	34. Will it encourage higher skilled economic sectors in the District (e.g R&D, high technology)? (Economic)	<ul style="list-style-type: none"> Number of VAT registrations per 1,000 populations % of Working Age Population with NVQ Level 4 and above % of Working Age Population with NVQ Level 2 and above Numbers of leavers achieving a skills for life qualification Entry Level 3 and above Success rate for further education
	35. Will it encourage new employment that is consistent with local needs? (Economic)	
	36. Will it encourage growth of indigenous businesses? (Economic)	

Sustainability Objective	Detailed Criteria	Suggested Target or Indicators
	37. Will it encourage micro and small businesses? (Economic)	<ul style="list-style-type: none"> • Success rate for Work Based Learning (WBL) • % of 18-59 year olds attending Higher Education Institutions • % of new retail floorspace development in centres and on the edge of centres • % of new housing that is affordable • Employment rate • Mean household income attained in Targeted Wards • Increase the numbers of businesses registered with Think Local in Lichfield District • Proportion of children and young people with good access to high quality leisure, cultural and sport experiences • Increase from 35.2% the % of the population within 20 mins travel time of a range of 3 different sports facilities, one of which is quality assured
	38. Will it provide for affordable housing for local people in need of a home? (Social)	
	39. Will it provide housing that meets the needs of the young, elderly, those on limited incomes including within the rural areas and those with special accommodation requirements such as Gypsies and Travellers and disabled people? (Social)	
	40. Will it improve levels of housing consistent with local employment opportunities? (Economic)	
	41. Will it encourage home-based businesses? (Economic)	
	42. Will it improve service provision for the young, elderly and disabled, in particular transport? (Social)	
	43. Will it address the sport and recreational needs of children and under-represented groups like girls/women, the disabled, the elderly? (Social)	
	44. Will it provide for local retail needs? (Economic)	
	46. Will it encourage cultural activity? (Social)	
	48. Will it improve transport provision and accessibility? (Social)	
49. Will it improve choice of transport mode? (Social)		
J. To promote safe communities, reduce crime and fear of crime.	50. Will it encourage crime-sensitive design?	<ul style="list-style-type: none"> • Reduction in overall British Crime Survey comparator recorded crime - Lichfield District • % of residents who say that they feel "very" or "fairly" safe when outside in Staffordshire during the day • % of residents who say they feel "very" or "fairly" safe when outside in Staffordshire after dark • Public perceptions of high levels of Anti-Social Behaviour
	51. Will it target, reduce and sustain a reduction in burglary?	
	52. Will it reduce the likelihood of anti-social behaviour?	
	53. Will it help ensure safe journeys and reduce road casualties?	
K. To improve the health of the population.	54. Will it improve the standard of health care, particularly for the elderly?	<ul style="list-style-type: none"> • Reduction in health inequalities between the populations of most deprived super output areas and least deprived areas by

Sustainability Objective	Detailed Criteria	Suggested Target or Indicators
	55. Will it support a healthy lifestyle?	narrowing the gap in all ages, call cause mortality (age standardised rate per 1,000) <ul style="list-style-type: none"> Number of adults aged 18-64 with physical disabilities helped to live at home, per 1,000 population Life expectancy Increase the level of physical activity from 22.4% of the population taking 3x30 mins of moderate exercise a week (Active Peoples Survey)
	56. Will it help to reduce the use of drugs and alcohol?	
	56a. Will it help to reduce health inequalities?	
L. To enable improved community participation.	57. Will it empower all sections of the community to participate in decision-making and the impacts of those decisions?	<ul style="list-style-type: none"> Compliance with the Statement of Community Involvement Number of community led plans being progressed in the District Number of Neighbourhood Plans successfully meeting the Five Basic Conditions at examination Numbers of respondents from the community participating in the development plan process
	58. Will it improve community capacity to enable engagement in community enterprise?	
	59. Is there a framework for engagement with communities, including novel approaches to reach particular groups/sectors?	

10.6 As the SA process evolved it became apparent that it was necessary to identify which of the above questions related to the assessment of environmental, economic or social effects. Sustainability Framework Objectives A-F inclusive relate to environmental effects, whilst J, K and L inclusive relate to social effects and H to economic. However objectives G and I incorporate questions relating to both economic and social effects and for clarity whichever of these is relevant for each question has been included within Table 10.2.

10.7 The appraisals were undertaken using the following scoring matrix:

Table 10.3 Scoring System Used for Appraisals

++	Clear and strong positive effect in response to criterion
+	Positive effect in response to criterion
--	Clear and strong negative effect in response to criterion
-	Negative effect in response to criterion
+/-	Mixed effect in response to criterion
0	No effect in response to criterion
?	Effects impossible to determine from information in Strategy

10.8 The LSWG arrived at the scores using the expert judgement of members of the group. Where relevant the technical expert for each question was asked to contribute in the first instance and then in many cases following discussion and agreement the appraisal was

completed. All members of the group had the opportunity to contribute to process. In the case of a +/- score being given this was in the main arrived at where a policy or proposal mitigates for its own impacts and in some cases was a result of a compromise situation after discussion by members of the LSWG.

10.9 As the appraisal process evolved the group found a need for a wider range of conclusions to be drawn and the addition of a ++ and - - was added to help differentiate between the options. A comments box was also added to assist in clarification and to identify any mitigation and uncertainty remaining. Again this was included as part of the September 2007 Scoping Report.

10.10 Since the original scoring matrix was developed, situations have arisen where the group have felt it is necessary to identify major constraints/ opportunities which could get hidden in the analysis - identified at the time with either a green or red asterisk. For example a red asterisk was used to refer to loss of an SBI. The Local Plan Strategy appraisals have resulted in no asterisks being incorporated as all of the issues previously identified in this way have now been addressed through the added narrative which accompanies each appraisal.

Interrelationship Between Effects

10.11 The SEA Directive requires the appraisal to consider the interrelationship between the significant effects of the Local Plan Strategy. This has been done as an integral part of the appraisal of the spatial strategy, policies and options, and examples of this can be found throughout chapters 13 to 19 of this report. The main interrelationships found through the appraisal are set out at the end of Chapter 13 on 'The Spatial Strategy'.

11 Background to Lichfield District Local Plan

Outline of the Development of the Local Plan

11.1 The Lichfield District Local Plan will plan, monitor and manage future growth and change in Lichfield District up to 2029. It covers a broad range of spatial issues that contribute towards the creation of sustainable communities, including the provision and management of new development, community infrastructure, environmental and heritage protection and measures to help reduce carbon emissions. It comprises a Strategy and an Allocations document, with a number of supporting documents. Together, these will provide the framework for managing development, addressing key planning issues and guiding investment across the District.

11.2 The Local Plan comprises a Strategy and an Allocations document, with a number of supporting documents, which include:

Table 11.1 Local Plan & Supporting Documents

Local Development Documents	
Local Development Scheme (LDS)	Local Plan Process
Statement of Community Involvement	
Local Plan:Strategy	Local Plan Policy
Local Plan:Land Allocations	
Neighbourhood Plans (Made)	
Supplementary Planning Documents (SPD)	Interpretation and Guidance
Parish and Other Community Led Plans	
Annual Monitoring Report (AMR)	Monitoring and Delivery
Infrastructure Delivery Plan (IDP)	

11.3 The Lichfield District Local Plan will provide a framework for managing development, addressing key planning issues and guiding investment across the District to manage change to meet the needs of the current and future generations.

11.4 The Local Plan Strategy provides the broad policy framework and establishes a long-term strategy to manage the development of housing and employment land, provide services, deliver infrastructure and create sustainable communities. The Strategy consists of a vision and strategic objectives, a spatial development strategy, core policies and development management policies and sets out how the strategy will be implemented and monitored.

11.5 The Local Plan Strategy is divided into a number of chapters. The first section of the document includes a spatial portrait and vision for the District by 2029. It sets out the key characteristics of Lichfield District and identifies the strategic issues and challenges facing the District that the Local Plan seeks to address. To deliver the vision the following strategic priorities are identified:

1. to create balanced and sustainable communities
2. to develop and maintain more sustainable rural communities
3. to mitigate and adapt to the adverse effects of climate change
4. to provide the necessary infrastructure to support new and existing communities
5. to reduce the need to travel and increase opportunities for sustainable forms of transport
6. to provide an appropriate mix of well-designed homes
7. to promote economic prosperity
8. to create employment opportunities to meet the needs of local people
9. to create a prestigious city centre in Lichfield, an enlarged town at Burntwood and a vibrant network of district and local centres
10. to increase the attraction of the District as a tourist destination
11. to create an environment that promotes and supports healthy choices
12. to protect and enhance the quality and character of the countryside
13. to protect and enhance the quality and diversity of the natural environment within and outside urban areas
14. to protect and enhance the District's built environment and heritage assets and open spaces
15. to deliver high quality development in sustainable locations whilst protecting and enhancing the quality and character of the built and natural environments.

11.6 The spatial strategy sets out the overall approach towards providing for new homes, jobs, infrastructure and community facilities to 2029 and thus outlines the broad approach to managing change in the District.

11.7 The core policies will steer and shape development and define areas where development should be limited. More detailed development policies will set out how development will be carried out. A section on Our Settlements contains more specific visions and policies to guide change relevant to each of the settlements in the District.

11.8 The Local Plan Allocations document will identify the requirements for the development of smaller sites and areas/designations that will contribute to the Local Plan Strategy. Work on the document has commenced with a Call for Sites.

11.9 In addition, five Supplementary Planning documents will be produced. These are non statutory documents used to supplement policies and strategies set out in Local Plan, and cover the following topics:

- Biodiversity and Development
- Sustainable Development
- Historic Environment
- Rural Development
- Trees, Landscaping & Development.

11.10 It is anticipated that all of the above SPDs will be consulted upon in 2014, and adopted and published following adoption of the Local Plan Strategy.

11.11 The Lichfield District Local Plan will provide one of the primary means of delivering the spatial elements of both the Sustainable Community Strategy and Plan for Lichfield District.

11.12 As of January 2014, Lichfield District Council has a number of designated Neighbourhood Areas where communities are preparing their own Neighbourhood Plans. The designated areas are the wards of Stonnall, Shenstone and Little Aston, and the Parishes of Alrewas, Armitage with Handsacre, Lichfield, Longdon, Wigginton and Hopwas. In addition, Burntwood and Wall Parishes have applied for designation with further areas indicating an interest. Updates are contained at www.lichfelddc.gov.uk/neighbourhoodplans.

11.13 The District Council has completed various stages in the preparation of this Local Plan Strategy:

- Core Strategy Issues - August 2007 (CD1-22)
- Core Strategy Issues & Options - December 2007 (CD1-21)
- Core Strategy Preferred Options - December 2008 (CD1-20)
- Core Strategy Policy Directions - April 2009 (CD1-18)
- Core Strategy Shaping our District - November 2010 (CD1-15)
- Lichfield District Local Plan Strategy: Proposed Submission - July 2012 (CD 1-1).

Core Strategy Issues

11.14 The Spatial Strategy has been developing since December 2007, when a 'Core Strategy Issues' document was published for consultation. Six District wide issues were identified as climate change, demographic change, lack of affordable / specialist housing, attracting businesses and business investment, high levels of out-commuting for work, and protection of the historic environment. Several local issues were also identified for Lichfield City, Burntwood and the rural areas.

11.15 For Lichfield City the three issues identified were: the protection of the character of Lichfield City from large scale development pressure; Lichfield Southern Bypass remains incomplete; Lichfield City is a popular destination for day visitors but there is a desire to encourage longer stays.

11.16 For Burntwood the three local issues identified were: the need for facilities to complement planned improvements to the town centre; not enough jobs for local people and are we making the most of Chasewater?

11.17 With regard to the rural areas two key issues identified were: the declining number of rural key services and facilities, including shops, post offices, doctors, village halls and public houses; many areas are not well served by public transport providing poor access to services and facilities.

11.18 These issues were further developed at 'Issues and Options' stage and a sustainability appraisal carried out as part of this process.

Core Strategy Issues and Options

11.19 An 'Issues and Options' Core Strategy (CS) document was published for consultation in December 2007. This identified 11 issues facing the District, along with 15 strategic objectives to address these issues. The SA process compared these issues with the Sustainability Framework Objectives, and also with the 15 strategic objectives of the Core Strategy (CS). The Issues and Options Core Strategy document also identified a number of key topic areas as an initial stage of policy development and asked a series of questions on each. The key topic areas were: climate change; services and facilities; sustainable transport; housing; employment; built & historic environment; recreation, leisure, culture & tourism; and natural environment. The SA considered how these issues related to the sustainability objectives and identified where further evidence was required.

11.20 The 'Issues and Options' document incorporated four options for directing growth within the District. Due to the eco-town submission at Curborough a further option was also considered together with a do nothing option. The four options (with % of new housing growth apportioned to each) were as follows:

- **Option 1:** Town focused development (50% Lichfield, 20% Burntwood, 20% Tamworth, 10% Rugeley)
- **Option 2:** Town & key rural village focused development (40% Lichfield, 20% Burntwood, 40% between other sustainable settlements - Alrewas, Armitage with Handsacre, Fazeley, Little Aston, Shenstone & Whittington)
- **Option 3:** Dispersed development (30% Lichfield, 15% Burntwood, 55% Rural Areas)
- **Option 4:** New Settlement Development (60% new settlement, 20% Lichfield, 10% Burntwood, 10% Rural Areas).

11.21 In addition two possible versions of a 'do nothing' option were tested by the LSWG at this stage of the development of the spatial strategy: a 'do minimum' option, with little or no net new development (only replacement dwellings & conversions allowed) and a 'no change' option, where existing densities and greenfield allocations would be maintained and windfall development allowed - resulting in a modest increase in housing stock.

11.22 The full findings of the SA of the Issues & Options Core Strategy document can be found within the [Interim Core Strategy Sustainability Assessment \(ICSSA\)](#) (CD1-19). In brief, the Option 3 (dispersed development) was found to be the least sustainable option. This option would result in the largest increase in car usage, provide the least opportunities for walking and cycling, and may also result in very few local amenities or service being delivered within communities, due to only small amounts of development being allocated to any one place.

11.23 Option 2 was found to be slightly more sustainable, but still scored negative overall. This was the option of town & key rural village focused development, where public transport is at a similar level of provision to areas on the edge of major settlements, and negative impacts were identified on the historic environment due to the greater number of village Conservation Areas that would be affected.

11.24 Option 4 (the new settlement option) scored better than options 2 & 3, as this option was found to have the greatest potential for the least impact upon the historic core of Lichfield City, although this would be dependent upon the exact location. Economies of scale for a new village meant that this option also scored well in relation to the potential for utilising renewable energy and for affordable housing provision, but very negatively for impacts upon wildlife and connectivity between habitats.

11.25 The SA demonstrated that Option 1 (focusing more development within Lichfield City) scored better in sustainability terms than other options (especially when the direction of growth in South Lichfield is factored in) due to the good access to services and facilities within and around the City. The only potential negative impacts identified were in relation to biodiversity, as an increase in the number of people to Lichfield City may affect the SSSIs and also growth at Burntwood may impact negatively on Gentleshaw Common.

11.26 The results of this stage of the SA process identified a number of areas where the LSWG felt they were unable to answer questions satisfactorily due to lack of information. Further work was then undertaken for the evidence base which included: historic environment character analysis (HECA), affordable housing viability study, rural housing needs study, demographic information, Strategic Flood Risk Assessment, updated employment profile, new information on crime, health and community participation, sport and recreation and improvements to public access to information & services.

11.27 In developing the spatial strategy, transport evidence was commissioned in 2008, which included a Phase 1 Transport Appraisal, undertaken by Atkins on behalf of Staffordshire County Council (SCC) to determine the most sustainable locations for strategic development in transport terms for Lichfield District. This work assisted in identifying the Preferred Option for the Core Strategy (as published in 'Preferred Options' December 2008). Accession analysis undertaken by SCC was analysed by Atkins to help identify the most sustainable locations across the District, and rank settlements within the District in terms of their relative sustainability.

11.28 The analysis of the various accessibility calculations built up a robust picture of those areas within the District that were more sustainable in terms of access to key services using existing transport infrastructure. Ward level composite scores highlighted Lichfield City as most consistently having high accessibility scores, with the Fazeley Ward receiving a score within the second quartile. The majority of Burntwood had a third quartile level of accessibility, with the exception of Chase Terrace, which had greater access to essential services and facilities. Armitage with Handsacre Ward also fell within the third quartile. Journey time contour maps demonstrated that these areas experienced relatively short journey times to services. In addition these locations commonly had a number of the key services in their locality enabling residents to easily access these services through walking or using public transport. The analysis also highlighted that the rural areas of Lichfield District consistently received accessibility scores that fell within the bottom quartile.

11.29 Of the four options for directing growth incorporated within 'Issues and Options' document, the findings of this accessibility analysis supported Spatial Options 1 (town focused development) and Option 2 (town and key rural village focused development). Thus

sustainable development, in terms of access to services and facilities, would be challenging to deliver in the rural parts of the District as existing levels of public transport services are limited and few facilities are located there.

11.30 The study found it difficult to assess the potential sustainability of a new settlement using information for existing services and facilities, but noted that the scale of development for a new settlement would be sufficient to provide transport infrastructure and local facilities for the new residents.

11.31 In addition, during 2007/8 Lichfield District Council undertook a 'Rural Settlement Sustainability Study' (CD2-70). The purpose of this study was to assess the sustainability of rural settlements within the District primarily using:

- data available on key facilities and services present within settlements - Post Offices, GP Surgery, Pharmacy, Dentist, Primary School, Community Hall and Pub;
- accessibility to other key services and facilities by means of public transport; and
- accessibility to employment, leisure, retail locations and hospitals by public transport.

11.32 The analysis suggested that there were a group of larger villages within the District with characteristics in terms of accessibility and facilities that suggested a degree of local sustainability in the context of rural living. The scoring suggested that these villages were Shenstone, Armitage with Handsacre, Alrewas, Fazeley, Whittington and Little Aston. However, even within these more 'sustainable settlements' there were other factors which contributed to the presence of and higher number of services and facilities - this can be seen in relation to Fazeley and Little Aston where there is a clear relationship with adjoining urban areas. The other more sustainable settlements arising out of this study were typically the largest rural settlements in the District: Armitage, Alrewas, Whittington and Shenstone and as such these were considered able to support a certain number of services.

11.33 The study also highlighted five other settlements where the factors resulted in a positive scoring within the system used: Hopwas, Fradley, Kings Bromley, Streethay and Stonnall (in descending order of sustainability based on scoring). With the exception of Stonnall, the analysis of the matrix tables shows that all of these settlements scored poorly in relation to provision of services within the settlements themselves but scored highly in relation to accessibility to other key services and facilities as well as other urban destinations.

11.34 This study in addition to providing evidence which assisted in developing a hierarchy of settlements to inform a spatial strategy for the District, also assisted in the development of spatial strategies to improve the overall quality of life for the communities that live within them: now incorporated into the Local Plan Strategy place policies for the rural areas.

Core Strategy Preferred Options

11.35 In December 2008 the District Council published and consulted upon its 'Preferred Options' for a spatial strategy, which was accompanied by the 'Interim Core Strategy Sustainability Assessment' (ICSSA) (CD1-19). The 'Preferred Options' document focused on developing the spatial strategy for the District and included a possible list of themes and subjects for topic based policies. The ICSSA appraised the options considered as part of the spatial strategy, and considered directions of growth around the main settlements,

including options for cross-boundary housing delivery, as well as re-appraising the new settlement proposal at Curborough. Appendix i of the ICSSA sets out the scoring and orders the directions of growth/options from least to most impact, with the results as follows:

- South Lichfield, West Tamworth
- North Lichfield
- East Rugeley, East Lichfield (Streethay), Fradley
- Curborough New Settlement
- West Lichfield, South Burntwood (adjoining Burntwood)
- North Burntwood
- North Tamworth
- South Burntwood (including Hammerwich), Key Rural Settlements
- Dispersed Rural Settlements

11.36 The preferred development strategy proposed at 'Preferred Options' stage included elements of the previously identified broad options 1 & 2, and in addition allowed for a small level of local needs housing within smaller villages. Option 3 (dispersed development) was considered unsuitable in that it would disperse too high a proportion of growth to settlements within the District that are relatively unsustainable. It was also considered that it would not build upon/make best use of the existing infrastructure that exists within the District, particularly at Lichfield and Burntwood (CD1-20).

11.37 At 'Preferred Options' stage only one realistic location for development of a new settlement had been advanced – the Curborough new settlement, proposing around 3,800-4,000 dwellings by 2026. This was therefore taken into account when assessing Option 4. Although it was recognised that the construction of a new settlement would to a large degree reduce the need to develop urban extensions to Lichfield and Burntwood, a number of problems were also identified (CD1-20 p.55 para.12.14).

11.38 Key difficulties included the fact that the location of Curborough meant that development of a new settlement here would still mean a reliance on Lichfield City for many services and facilities and would therefore be more likely to exacerbate, rather than relieve, the City of pressure. The danger of visual encroachment on the historic setting of Lichfield City was also identified as significant drawback of a large new settlement in this location. Additionally, significant highway capacity issues on the A38, without sufficient mitigation, would only serve to increase problems of congestion and highway safety. It was also considered that concentrating the bulk of new development in one location would not meet the needs of other settlements, especially with regard to local housing needs and affordable housing.

11.39 At 'Preferred Options' stage Lichfield City was identified as the main focus for housing growth within the District, reflecting the District Council's desire to promote and strengthen its role as a strategic centre and its high level of sustainability, due to good accessibility and wide range of services and facilities. The 'Preferred Options' proposed Lichfield City to take 50% of the District's housing growth to 2026, equating to a total of 4,075 dwellings, split between 2,500 capacity within directions of growth and the rest being made up from deliverable urban capacity, including on sites with planning permission and completions since 2006 (CD1-20 p.57).

11.40 Preferred directions of housing growth were identified to the south of Lichfield City, for 1,650 dwellings and to the east (around Streethay) for 850 dwellings (CD1-20 p.28-29), with options to the north-east and west being discounted due to landscape impact, potential harm to the views and skylines of the city and to adverse ecological impacts (CD1-20 p.29 & CD1-19 p. 28 & 35).

11.41 Consultation on these preferred options resulted in some 2,800 representations, of which a large number related to the option to the South of Lichfield City, partly on land designated as Green Belt.

11.42 The Council has long recognised that Burntwood, although a similar settlement in population size to Lichfield, suffers from a reduced level of accessibility to a key number of facilities, services and employment, when compared with Lichfield. Thus the strategy advanced at 'Preferred Options' stage focused growth within the main urban area in order to try and increase levels of public transport usage and generate further investment in sustainable transport systems. For Burntwood a lower level of housing growth to Lichfield City was therefore proposed (12.5% of the District's housing growth). Housing options on land designated as Green Belt to the south and south-east of the settlement were proposed to deliver 750-800 dwellings, with a further option to the north being discounted due to the potential significant impact on landscape, historic environment and biodiversity (CD1-20 p.36-38). A further large site to the north of Burntwood was also discounted. This site at Meg Lane, which was included in the 'JVH alternative strategy' and appraised later in the Plan process, consistently scored poorly against the sustainability appraisal framework objectives throughout the evolution of the Local Plan, particularly in relation to the impact on biodiversity (CD1-8 p.116).

11.43 Consultation on these preferred options resulted in a significant number of representations relating to the housing options to the south and south-east of Burntwood, with many being opposed to the release of land from the Green Belt.

11.44 In response to this opposition the District Council committed at 'Policy Directions' stage to undertake further work to seek to identify the extent to which new housing can be accommodated with brownfield and redevelopment sites in Burntwood, to avoid the need for expansion of the town into the Green Belt (CD1-18 p.7).

11.45 Fradley, although lying with the rural area to the north-east of Lichfield City, is the largest employment location within the District, with a high proportion of warehouse/logistics units, and has a range of housing located within an older village and a newer area of housing known as 'Fradley South'. Both the employment area and Fradley South are located on former airfield land, once part of RAF Lichfield.

11.46 In relation to the rural areas the Rural Settlement Sustainability Study 2008 (CD2-70 p.31) found Fradley to have a positive score, although it did not at that time rank as one of the more 'sustainable settlements' due to lack of in-settlement facilities and services. This study was used to inform the 'Preferred Options' stage of the Plan, where it was proposed that the settlement hierarchy should be amended to include Fradley as an additional key rural settlement (CD1-20 p. 46), making it a focus for further housing development, through the re-allocation of some airfield land, to complement the existing employment offer at Fradley

Park and to bolster existing services and facilities. At 'Preferred Options' Fradley was therefore included within the rural settlements, which were apportioned 20% of the District's housing growth (divided between key rural and other rural settlements) (CD1-20 p.57-58).

11.47 Preferred options also included cross-boundary housing considerations and noted that consultations between Lichfield District Council and Cannock Chase District Council had been undertaken in relation to issues identified by the RSS review (CD1-20 p.49). 'Preferred Options' noted (CD1-20 p. 50) that there was significant housing capacity at part of the former Lea Hall Colliery Site and at part of Rugeley Power Station lying within Lichfield District. This had previously formed part of the Rugeley Eastern Redevelopment Zone designated by the Staffordshire and Stoke-on-Trent Structure Plan (CD 4-9 unsaved Policy H1) and changes in the electricity generating industry and a subsequent re-organisation of operations at the power station had led to surplus land.

11.48 At 'Preferred Options' stage planning permission had been granted for 680 dwellings, but development had not commenced and two potential housing sites in the same general location had been identified through the Strategic Housing Land Availability Assessment (SHLAA) 2008 (CD2-27) that could provide for longer-term development related to Rugeley. Housing capacity was estimated at 380 dwellings, mostly reliant upon the infilling of a former Borrow Pit within land encompassed by Rugeley Power Station. In relation to Rugeley the SA process had considered one strategic scale location, encompassing the 680 units at the power station and the 380 units at the Borrow Pit, which was found to perform well against the strategic framework objectives (CD1-20 p.50).

11.49 Thus the preferred spatial strategy set out in 'Preferred Options' allocated 12.5% of Lichfield District's housing growth to the edge of Rugeley, identifying 1,000 dwellings, comprised of the 600 dwellings with planning permission in the Rugeley Eastern Redevelopment Zone and the remaining 400 from land at the Borrow Pit and former British Waterways land, to meet longer term housing needs (CD1-20 p.57).

11.50 The preferred spatial strategy set out in 'Preferred Options' allocated 5% of Lichfield District's housing growth to Tamworth at Fazeley, with an identified housing capacity of 400 dwellings, to contribute to Tamworth's housing needs in the short term (CD1-20 p.57). Preferred Options also acknowledged that (CD1-20 p.50) conclusions about additional housing needs for Tamworth to be met within Lichfield District would need to await the outcome of the Tamworth Future Development and Infrastructure Study (CD2-31).

11.51 At 'Preferred Options' stage the SA identified that there were still elements of evidence and information missing, these related to the design of the buildings, water efficiency, use of primary resources, employment (as this was a housing exercise), cumulative impacts of development on transport infrastructure, local retail needs, crime, and community involvement, due to this largely due to it being an assessment of locations which did not incorporate the details of design. An appraisal of the vision and strategic objectives was also completed. The detailed response is published in the Interim Core Strategy Sustainability Appraisal (ICSSA). The LSWG found that spatially there was no one spatial option which would address all the sustainability framework objectives for the District and there was an over riding need for certain locally spatially significant issues to be addressed within the Core Strategy.

Core Strategy Policy Directions

11.52 Pressure to limit the amount of Green Belt released around Lichfield City led to the District Council giving further consideration to whether the proportions of housing growth in the urban extensions should be amended to reduce the scale of growth to the south of the City at 'Policy Directions' stage, published in April 2009 (CD1-18 p. 7). 'Policy Directions' consultation was undertaken in April 2009, which included an amended preferred spatial strategy.

11.53 As well as scaling back development at Lichfield City, in relation to Burntwood consideration was also given to brownfield sites as alternatives to Green Belt release for housing. This responded to opposition generated at 'Preferred Options' stage.

11.54 With regard to Fradley, by 'Policy Directions' additional evidence had been completed and the document proposed that Fradley should play a major role in meeting the rural housing need with an expansion of the existing settlements. A Market Assessment of General Employment Land (CD2-34 p.44) concluded that if any de-allocations of employment development land were deemed appropriate, then Fradley Park would seem the most obvious candidate, based on the fact that it holds over 75 ha of development land, but noting that this would need to be balanced with the fact that any re-allocation of land here may negatively impact on inward investment from logistics companies.

11.55 'Policy Directions' acknowledged that a substantial area of employment land remained available at Fradley with planning permission and allocated for employment development (CD1-18 p.43). A growth level of around 1,000 dwellings was proposed, including the use of this former airfield brownfield employment land and an undertaking given to carry out further work to confirm an appropriate level of growth for Fradley (CD1-18 p.7).

11.56 For Rugeley the preferred inclusion of around 1,000 dwellings on brownfield land at Rugeley Power Station was carried through from the 'Preferred Options' stage, with acknowledgement being given to consideration of Tamworth's housing needs, and further work on the rural areas also highlighted as required.

11.57 Full wording of draft policies was published within the 'Policy Directions' document. It incorporated preferred policy directions for core policies and development management policies and posed questions to refine options, as well as seeking alternative options which should be considered. The LSWG assessed these policies using the sustainability framework objectives and the questions set out in the Scoping Report. Generally the preferred policy directions were found to be supportive of the objectives within the scoping report, but with opportunities identified for strengthening policies and cross referencing between policies.

11.58 The findings of the SA of the Policy Directions were considered alongside the SA of the refined draft policies set out in the 'Shaping our District' document and are summarised also within the Policies section (Chapter 15) of the Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated) (CD1-8).

Core Strategy Shaping our District

11.59 The 'Shaping our District' consultation document (November 2010) incorporated a revised preferred spatial strategy including Strategic Development Locations (SDLs) and a Broad Development Location (BDL) at Fradley for the delivery of key housing sites, together with a broad range of emerging policies.

11.60 The settlement hierarchy and spatial distribution of housing growth was proposed as follows:

- 8,000 dwellings between 2006 & 2026;
- **Lichfield City:** approximately 41% of housing growth, scaling back the level of new housing proposed to the south of the City from 1,650 to 550 dwellings to focus development on land which was partly non Green Belt (designated as an Area of Development Restraint [ADR] in the Lichfield District Local Plan adopted in 1998 – CD 1-27 p.13 Policy E.5A). This was primarily in response to representations from local objectors. This area, to the south of Lichfield, was proposed as a Strategic Development Location (SDL), with a further SDL proposed to the east of Lichfield, at Streethay, in addition to the redevelopment or infilling of sites within the urban area;
- **Burntwood:** approximately 13% of the District's housing was apportioned to Burntwood. New housing locations to the south and south-east of the town were no longer proposed, with the majority (62%) instead proposed to be located within Burntwood's urban area. At this time the SHLAA had identified further deliverable and developable sites within Burntwood, including the Mount Road industrial estate. The remaining 38% of housing for Burntwood was to be accommodated within a new sustainable urban extension to the east of Burntwood bypass, to accommodate around 425 dwellings. Reigning back on the release of Green Belt sites was primarily in response to representations from local objectors, and further opportunities for using brownfield land being explored.
- **Fradley:** 12% of the District's housing growth to take place at Fradley, equating to around 1,000 dwellings. This quantum of development in this location was influenced by the desire to create a cohesive and sustainable community at Fradley and by the availability of sites, especially brownfield land at the former airfield. Thus the 1,000 dwellings were proposed to be accommodated within a Strategic Development Location centered on the former airfield, utilising the brownfield land with planning permission for employment and also within a Broad Development Location (CD1-17 p.37). Emphasis on the physical and social integration of new development with existing neighbourhoods and settlements of Fradley Village and Fradley South was a key rationale of the concept proposed. Appendix E: Fradley Strategic Development Location of Shaping our District set out further details of the concept for the proposed Fradley SDL (CD1-15 p.124-131).
- Through 'Shaping our District' the Council also committed to undertake community engagement and an urban design assessment to determine the appropriate location of future development at Fradley, led by the key objective of achieving a more cohesive community and well served by facilities and services (CD1-15 P.36). Thus at the start of 2011 the Council undertook a community engagement exercise, assisted by ATLAS (the Government's Advisory Team for Large Applications). This is detailed in the Fradley

Community Engagement Report April 2011 (CD2-72) which included a draft vision and guiding principles for Fradley that was tested with the community. Overall the consultation exercise demonstrated a level of support in Fradley for housing development on the former airfield and on land adjacent to the existing residential areas. There was little support for 'alternative settlements' near to Fradley (namely the 'New Settlement Option' located to the south-west of Fradley and to the north of Lichfield)(CD2-72 p.9-10).

- Further community consultation, technical work and evidence gathering following this report by ATLAS are set out in the Fradley Spatial Strategy Report May 2012 (CD2-71). This report recommended certain outputs for inclusion within the Local Plan, including an emerging key diagram for Fradley showing a preferred spatial option for managing the potential future directions of growth in housing, employment, community facilities and environment (CD2-71 Appendix 14). This key diagram indicated a Strategic Development Location to include housing and small employment units on brownfield land at the former airfield – formerly proposed as the Strategic Development Location and part of the Broad Development Location at Shaping our District stage. In addition the report proposed that the Strategic Development Location include land to the north of the Canal and to the west of Fradley Village for housing, with an overall housing provision of 1,000 units at Fradley. This area of land formerly fell within the Broad Development Location indicated at the 'Shaping our District' stage. Alternative sites for development at Fradley were considered and discounted for a number of reasons. The Fradley Spatial Strategy Report (CD2-71 p.21-25) details technical work undertaken to inform the strategy, including issues of landscape and ecology which were taken into consideration in refining the Broad Development Location down to the extended SDA.
- The Fradley key diagram in 'Shaping our District' also indicated options for the provision of services and facilities that would be required to meet the needs of the expanding population at Fradley, such as a new school/expanding the existing school and additional sports pitches. Including this area for housing and these options for the provision of services were previously consulted on with the community in November 2011 (CD2-71 p.29-30). The Fradley Spatial Strategy report also recommended a number of policies relating to housing, environment, services and facilities and economy for inclusion within the Local Plan (CD2-71 p.32-39) and a vision for Fradley.
- **East of Rugeley:** to assist in meeting the housing needs of neighbouring towns approximately 14% of the District's housing was to be focused to the East of Rugeley, providing 1,130 dwellings overall, including a SDL on brownfield land at Rugeley Power Station. This had effectively carried forward previous proposals but now proposed a Strategic Development Location centred on the Borrow Pit to provide 450 units, representing 5% of the District's housing growth and complementing the 700 units on the former Power Station site with planning permission.
- **Tamworth:** no percentage of housing growth was identified specifically to meet Tamworth Borough's needs, but Fazeley was identified as having a role in meeting those needs, where there was existing housing capacity within the settlement's limits and would also to continue to be a focus for community regeneration. In addition, land north of Tamworth was flagged as having the potential to deliver further home to meet Tamworth's local housing needs in the longer term. However, it was recognised that

the release of sites within this area would be dependent on key infrastructure being delivered within the Anker Valley and further consideration of the potential for land to be brought forward within North Warwickshire.

- **Rural Areas:** 15% of the District's housing development was proposed to be allocated between the remaining key rural settlements of Alrewas, Armitage with Handsacre, Fazeley, Little Aston, Shenstone and Whittington, with the remaining rural areas proposed to take 5% of housing growth in the District; either within village boundaries, through conversions or to meet identified local needs.

11.61 The findings of this stage of the SA are set out in 'Sustainability Appraisal: Shaping our District' (CD1-17). Some mixed effects were determined with regard to enhancing landscape and townscape quality, protecting the historic environment, mitigating and adapting to climate change, and for creating mixed and balanced communities and improving the health of the population. Some positive impacts were determined for promoting biodiversity due to mitigation proposed on some sites.

11.62 Overall positive impacts were determined for economic factors due to opportunities provided to reduce trips by car through locating development within and on the edge of settlements with good access to services and facilities. Also the economic strategy proposed sought to re-balance housing and the type of jobs available and was therefore scored positive for encouraging higher skilled economic sectors, employment consistent with local needs, e-business, local supply chains and indigenous and small businesses, as well as for providing for local retail needs through the hierarchy of retail centres and the provision of local retail facilities to be provided in the SDLs.

11.63 With regard to social impacts of the spatial strategy in 'Shaping our District' these were determined as mainly positive, especially for supporting healthy lifestyles, providing specialist and affordable housing and providing healthcare for the elderly.

11.64 Generally the SA found that overall the strategy proposed in 'Shaping our District' would have a generally positive impact upon the sustainability issues which had been identified in the Scoping Report (CD1-17 p.6-7).

Lichfield District Local Plan: Strategy Proposed Submission

11.65 Through feedback from the consultation exercise undertaken on the 'Shaping our District' document, findings of the SA process and further work with partners, stakeholders and communities the 'Lichfield District Local Plan: Strategy' (July 2012) included a further revised spatial strategy with Strategic Development Allocations (SDAs, formerly SDLs) and a Broad Development Location (BDL) for land to the North of Tamworth. The document also included revised policy wording and some new policies in the light of the NPPF and further work undertaken with rural communities. The LSWG reappraised the policies prior to the publication of the Plan and the results of the assessments are included in the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy' (CD1-10) and again within the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy' (Updated) (CD1-8).

11.66 The settlement hierarchy and spatial distribution of housing growth in the 'Lichfield District Local Plan: Strategy' was proposed to deliver 8,700 dwellings between 2008 - 2028 as set out in the following paragraphs:

11.67 Lichfield City: proposed to take around a third of the District's housing growth (32%), mainly focused within the urban area of the City. New areas of housing growth were still proposed to the south of Lichfield City for 550 units and at Streethay for 750 units, within two Strategic Development Allocations (SDA) (CD1-1 p. 101-102, Policies Lichfield 5 & 6). These strategic allocations corresponded to the original preferred directions of growth for Lichfield City, set out at 'Preferred Options' stage, albeit on a reduced scale.

11.68 Further details of the evolution of the spatial strategy for Lichfield City and the findings of the SA in relation to the Lichfield City policies, incorporating the SDA policies, are set out in Chapter 15 of this document. In justifying this strategy for Lichfield City, the District Council was of the opinion that it would improve existing key services, facilities and infrastructure, contribute to reducing the need to travel and provide better opportunities for travel by public transport. The strategy for the City was regarded by the District Council as the most appropriate when judged against reasonable alternatives, such as a more dispersed spatial housing distribution with greater housing growth in most rural settlements, or by concentrating the majority of the District's development in a new settlement.

11.69 Burntwood: The strategy for prioritising the development of brownfield land in Burntwood was carried through into the proposed submission Local Plan Strategy (CD1-1), with Burntwood proposed to take around 15% of the District's housing growth, mainly focused within the urban area of the town. A proposal to the East of Burntwood bypass for 375 housing units, within a Strategic Development Allocation (SDA)(CD1-1 p. 111-112 Policy Burntwood 4) supported by the analysis in the Employment Land Review to reallocate part of the Mount Road Industrial Estate (CD2-32 p.81-82 paras. 4.35 and 4.36).

11.70 Further details of the evolution of the spatial strategy for Burntwood and the findings of the SA in relation to the Burntwood City policies, incorporating the SDA policy, is set out in Chapter 16 of this document. In justifying this strategy for Burntwood the District Council was of the opinion that this SDA is a good location for development to help address the District's housing needs, and is sustainably located within walking distance of existing and proposed improved services and facilities in Burntwood. This in turn will encourage the use of local services, facilities and infrastructure and will contribute to reducing the need to travel. In contributing to the overall strategy for the District the Council regards this East of Burntwood Bypass SDA as most appropriate when judged against reasonable district-wide alternatives, such as a more dispersed spatial housing distribution with greater housing growth in most rural settlements, or by concentrating the majority of the District's development in a new settlement and also against alternatives for Burntwood which would entail the release of Green Belt land in less sustainable locations around the edge of the settlement .

11.71 Fradley: The recommended strategy for Fradley set out in the Fradley spatial strategy report (CD2-71) was carried through into the proposed submission Local Plan Strategy (CD1-1 p.125), with Fradley proposed to take around 12% of the District's housing growth (1,000 units) located within a Strategic Development Allocation on brownfield land situated between the Coventry Canal and Halifax Avenue (part of the former airfield) and extending north-eastwards to encompass land north of the Canal and north of Hay End Lane.

11.72 It should be noted that the desire to create a cohesive and sustainable community at Fradley has strongly influenced the Council's decision to allocate land for housing at Fradley. In addition the updated Employment Land Review of 2012 (CD2-32 p.91-93), on considering the future of the existing employment allocation at Fradley Park, noted that the distribution sector was forecasted to fall in demand over the Plan period and thus recommended that consideration is given to the re-allocation of this site for other uses including residential, small scale employment and community facilities. The proposed spatial strategy for Fradley was therefore supported by the most up to date employment evidence available at the time.

11.73 Further details of the evolution of the spatial strategy for Fradley are set out in the 'Fradley Spatial Strategy Report and Appendices' (CD2-71) and the findings of the SA in relation to the Fradley policies of the Local Plan, incorporating the SDA policy, is set out in Chapter 19 of this document. In justifying this strategy for Fradley the District Council was of the opinion that the Fradley SDA is a good location for housing development to help address the District's housing needs, and is sustainably located with good access to employment, services and facilities.

11.74 In contributing to the overall strategy for the District the Council regarded the SDA at Fradley as the most appropriate when judged against reasonable alternatives. Alternatives to the SDA at Fradley had been put forward by a number of representors throughout the Plan process, including land to the west of the Gorse Lane (the Fradley West proposal) and the 'New Village Option: North East Lichfield' on land between Fradley and Lichfield. The Fradley West proposal was also promoted as an addition to the Plan's SDA at Fradley, for a mixture of housing and employment uses, and when it was assessed in conjunction with the Fradley Park site scored positively through the SA process (CD1-8 p.117 & 229). Without the Fradley Park housing development it was determined that this site would lack integration with the main settlements at Fradley and would contribute little to the community cohesion that the Council and residents are keen to achieve.

11.75 East of Rugeley: a Strategic Development Allocation to the east of Rugeley to take around 12% of the District's housing growth, equating to 1,125 dwellings, which encompasses land at the Power Station with planning permission, the Borrow Pit land and the former British Waterways site (CD1-1 p. 118-119).

11.76 Further details of the evolution of the SDA to the east of Rugeley and the findings of the SA are set out in Chapter 18 of this document. The Council's view was that this SDA is a good location for development to help address Lichfield District's housing needs, and to accommodate 500 units to assist in meeting the needs arising in Rugeley, within Cannock Chase District. The site is brownfield land and has sustainable access, through walking, cycling and public transport means, to a range of existing services and facilities in Rugeley, Brereton, Armitage with Handsacre and also in the new Hawkesyard development which forms part of this SDA. This will particularly assist in meeting strategic priorities 3, 4, 5 and 6 of the Plan (CD1-1 p.19). The District Council therefore regards this east of Rugeley SDA as forming part of the most appropriate strategy when judged against reasonable alternatives, as this is potentially the only location within Lichfield District suitable for assisting in the delivery of housing to meet needs arising within Rugeley.

11.77 North of Tamworth: a Broad Development Location to the north of Tamworth to take around 12% of the District's housing growth, equating to around 1,000 dwellings (500 of which were identified to assist in meeting Tamworth's needs), which mostly encompassed land to the east of the railway (CD1-1 p. 115-116). The Policy 'North of Tamworth' set out certain requirements for the development, which notably included that the development shall not cause coalescence with Wigginton village. Housing growth for Fazeley now formed part of the provision for the rural areas and the range of dwellings set out in Policy Faz4 (CD1-1 p.138) was mainly comprised of urban capacity sites; thus limiting Green Belt release with further details to be set out at Allocations stage.

11.78 Further details of the evolution of the BDL to the north of Tamworth and the findings of the SA are set out in Chapter 17 of this document. This details the process of selection undertaken, as the Council and the LSWG appraised a number of options comprising a combination of sites to bring forward 1,000 dwellings to the north of Tamworth within Lichfield District. Appendix D Map D.2 indicates spatially the sites assessed. The most sustainable options were found to be two options: land at Arkall Farm (1,000 dwellings) in combination with the Anker Valley Sustainable Urban Neighbourhood (1,150) and land at Arkall Farm (750 dwellings), plus land to the north of Browns Lane (250 dwellings), in combination with the Anker Valley sustainable Urban Neighbourhood (1,150). Thus the BDL shown in the Local Plan was flexible to allow for either of these most sustainable options. The Council considered that this North of Tamworth BDL was a good location for development in the longer term to help address Lichfield District's housing needs, and to assist in meeting the needs arising in Tamworth Borough and regarded this north of Tamworth BDL as forming part of the most appropriate strategy when judged against reasonable alternatives.

11.79 Other rural areas: 18% of the District's housing development proposed to be allocated between the remaining key rural settlements of Armitage with Handsacre, Alrewas, Fazeley, Shenstone and Whittington, and the remaining rural areas. 440 (9%) of the dwellings proposed to be split between the key rural settlements through Local Plan Allocations or community led plans. Work to inform this part of the spatial strategy was informed by an intense programme of community engagement which ran throughout 2011. The plan proposed specific policies for each of the key rural settlements and further detail on the development of these and the findings of the SA of these policies is set out in Chapter 19 of this document.

Post Publication

11.80 The 'Lichfield District Local Plan: Strategy' (July 2012) (CD1-1) was published for representations to be submitted from July to September 2012 along with the Sustainability Appraisal: Proposed Submission Local Plan Strategy (CD1-10). During this period a further alternative site of strategic significance was submitted to the Local Plan process - the Brookhay Villages and Twin Rivers Park proposal. Having been submitted at such a late stage, this proposal had never previously been subject to sustainability appraisal and was therefore not included within the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy' (CD1-10). The District Council therefore undertook an SA of this proposal and published an update to the SA to incorporate an assessment of this proposal; the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated)' (CD1-8).

11.81 Chapter 14 of the 'Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated)' (CD1-8) details the SA of the Brookhay proposal and other alternative options for development considered by the Council, including an updated proposal for the New Village NE Lichfield for 2,000 dwellings. A summary of the results of the appraisal of the Brookhay Villages and Twin Rivers Park proposal is set out in CD1-8 p.115-116 and full details of the scorings set out in Table F.1 of Appendix F of CD1-8 (p.258-259). In general the SA score for this proposal was positive, particularly with regard to the effects on mitigating and adapting to the effects of climate change, reducing flood risk, encouraging sustainable distribution and communication systems, promoting safe communities and enabling improved community participation. However a number of uncertain impacts were also determined with regard to biodiversity, historic assets and natural resources, with some mixed impacts determined in relation to impact on transport (particularly road infrastructure) and air quality.

11.82 Other options considered and discounted in the preparation of the Local Plan were the Fradley West proposal; Fradley West combined with the remaining land at Fradley Park (proposed for employment development within the Fradley SDA in the Local Plan); a proposal for the New Village NE Lichfield for 2,000 dwellings and an updated version of this proposal; the New Village NE Lichfield for 4,000 dwellings; two alternative spatial distributions of housing growth put forward by JVH Planning Consultancy Ltd (combining a number of sites across the District, including many in the rural areas). The overall findings of the SA in relation to these alternatives are contained in CD1-8 Chapter 14 p.116-118 and the scores for each set out in Table A.1 Appendix A Spatial Options Matrix of CD1-8 (p.229). In addition a 'Do Nothing' option was also assessed with the SA findings for this set out in CD1-8 (p.117-118)

11.83 The findings of the updated SA in relation to the comparison of these alternatives with the Council's preferred spatial strategy found that none of the alternative spatial strategies appraised would be as sustainable as the District Council's strategy proposed within the Plan, mainly due to their inability to meet local housing, economic and infrastructure requirements across the District. Further details are set out in CD1-8 Ch.14 p.116-117 showing that for many of these alternatives the effects were impossible to determine, or potentially negative, due to insufficient information and lack of mitigation strategies, particularly with regard to biodiversity, landscape impact and transport.

11.84 In order to demonstrate that through the Local Plan process all reasonable alternatives had been considered, including differing levels of housing and employment growth, the updated SA (CD1-8) also included an appraisal of the housing growth scenarios considered in the Southern Staffordshire Districts Housing Needs Study & SHMA Update by NLP (2012) (CD2-20) and the economic scenarios development in the Employment Land Review by GVA (2012) (CD2-32). For the appraisal of differing levels of housing growth each scenario was considered in terms of how it could be delivered by the Strategic Development Locations set out in the Local Plan and additional proposed sites (Curborough/new settlement NE Lichfield and Brookhay Villages and Twin Rivers Park). It was noted that in most cases various combinations of sites could potentially deliver each option. Variants of site combinations were developed to deliver each scenario in different ways, as shown in tables 14.1 - 14.10 of CD1-8 (p.123-127), with several assumptions made about the infrastructure that is likely to be delivered at each site.

11.85 Details of these housing growth appraisals are set out in Chapter 14 of CD1-8 p.118-131, with the effects and scorings for each variant set out in Appendix F Table F.2 'Appraisal of Housing Growth Options' (CD1-8 p.260-262) and the effects and scorings for each scenario set out in Appendix F Table F.3 'Appraisal of Housing Growth Options/Scenarios' (CD1-8 p.263-268).

11.86 Each of the housing growth scenarios was appraised against the SA framework of objectives and criteria, to assess the likely impact of the scenario on the achievement of each objective. The scenarios were first appraised in terms of the different combinations of development sites (i.e. variants i to vi) that could be used to deliver a growth scenario, to assess the potential impacts that the specific sites would have in combination.

11.87 Then the scenarios were appraised in terms of their broader impact, to assess their effects where these were less site-specific and more related to the overall levels of growth. The two rounds of appraisal were then combined to make an assessment of the likely overall effects of the scenarios, drawing on site-specific effects and effects from levels of growth overall - CD1-8 Appendix F Table F.3 'Appraisal of Housing Options/Scenarios'.

11.88 CD1-8 Appendix F Table F.2 examined the likely impacts of development at the various sites within each of the variants. The purpose of table F.2 was to understand the likely impacts of each of the variants, not to select the best performing variant. Table F.2 was not used as a filter to whittle down the variants to one for each growth scenario. It was used to build up an overall picture of the potential impacts at site level of the scenarios given the likely impacts of the potential combinations of sites to deliver each scenario.

11.89 The information in table F.2 was used to make an overall assessment of each of the scenarios in table F.3 in Appendix F, as follows:

- For each scenario, the information on likely impacts for the relevant variants (Table F.2) was considered;
- Any of the relevant variants could be used to deliver the levels of growth for the scenario, therefore the impacts of all the relevant variants were taken into account. No one variant is selected and none are ruled out. So for example, for scenario A, impacts of all of the variants i, ii and iii were taken into account;
- A judgement was made of the likely impact of each scenario, taking into account that any of the identified variants could deliver the scenarios, so any of the impacts identified for each variant in table F.2 could occur;
- The judgement about likely impacts of the scenarios was made qualitatively. No arithmetic was used; and
- Table F.3 also built in an assessment of impacts that are not dependent on the configuration of sites. These impacts are not dependent on the likely impacts of any of the variants.

11.90 Table F.3 presents the overall conclusions about the likely significant impacts of the housing options, while table F.2 is a means by which to draw some overall conclusions. Table F.3 used the information in table F.2 to make an overall assessment of each option based on an understanding of the possible impacts of the three variants that might be used to deliver the option. However, Table F.3 also builds in an assessment of impacts that are not dependent on the configuration of sites in Table F.2.

11.91 In undertaking the appraisal of housing growth scenarios, the economic growth scenarios were also considered, to assess the synergies between the two sets of options and the likely impact of housing growth in light of potential levels of economic growth - CD1-8 Appendix F Table F.4 Appraisal of Employment Options/Scenarios.

11.92 Where possible, effects were assessed quantitatively. However, for most appraisal objectives a quantitative assessment was not possible, and a more qualitative assessment was made. Quantitative assessments were used in appraising against objectives D, E, G and I.

11.93 CD1-8 Chapter 14 also summarised the findings of the above appraisals (Appendix F Table F.3) concluding that Scenario J for 8,000 dwellings producing the best results, due to the scenario being aligned to the projections for employment growth and therefore having the best impact in terms of reducing both in-commuting and out-commuting. Scenario A for 8,724 dwellings (a similar number to that proposed by the Local Plan) also scored well, due to the fact that it would deliver higher levels of affordable housing.

Inspector's Interim Findings

11.94 The 'Lichfield District Local Plan: Strategy' (July 2012) (CD1-1) was submitted to the Secretary of State (SoS) for independent examination on 22nd March 2013, with hearing sessions held in June/July 2013. The 'Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated)'(CD1-8) was submitted alongside the Local Plan Strategy.

11.95 Through these hearing sessions the Inspector identified a concern that the submitted Local Plan did not provide for enough housing to meet the District's 'objectively assessed need' and to rectify this the Inspector has suggested that a site (or sites) for an additional 900 houses to 2028 be found, and that this is a strategic matter which should be dealt with through the Plan itself, rather than through the forthcoming Allocations document. The Inspector also recommended that the Council considers extending the end of the date of the Plan to 2029 and making the necessary adjustment to housing numbers i.e. an additional 430 for the extra year (1,330 additional in total). This would mean that the Council would need to deliver a minimum of 10,030 dwellings by 2029 (1,000 of which would assist in meeting the needs arising with Rugeley & Tamworth).

11.96 To address the identified shortfall in housing provision the further SA work has been undertaken to assess key strategic sites/locations put forward through the Local Plan process. The results of this appraisal has informed, in part, the main modifications now being proposed in relation to the spatial strategy of the Local Plan and relevant policies. The findings of the sustainability appraisal in relation to the assessment of these key strategic sites/alternative options is set out in Appendix A and the sustainability appraisal of the plan itself (incorporating both 'main' and 'other' modifications) is contained within chapters 12 to 19 inclusive.

11.97 To address the shortfall in housing provision identified by the Inspector, SA was undertaken of the larger strategic sites submitted through the Local Plan process which were not originally progressed as part of the submitted Local Plan Strategy, together with a range of options which would involve dispersing the additional development across a variety of communities. In assessing the options, submitted information was used with a cut-off point

of 10th July 2013 i.e. when the Hearing Sessions ended. This was to ensure all parties were treated fairly and equitably using information which the Inspector had already seen through the EiP process.

11.98 The key strategic sites / locations assessed were (in no particular order):

1. Lichfield Deans Slade Farm (450 homes)
2. Lichfield Cricket Lane (450 homes with approx 12ha employment use)
3. NE Lichfield Watery Lane (750 homes)
4. Burtwood South East (500 homes)
5. Burntwood South (250 homes)
6. Burntwood Rake Hill & Meg Lane (567 homes)
7. Burntwood Meg Lane (445 homes)
8. Burntwood East of Rugeley Road (149 homes)
9. Burntwood North of Church Road (440 homes)
10. East Burntwood Farewell Lane (367 homes)
11. Burntwood Bleak House Farm (694 homes)
12. Fradley Gorse Lane - re-allocation of part of the Fradley SDA from employment to residential (250 homes)
13. Fradley Hay End Lane Pig Farm (425 homes)
14. Fradley South of Fradley Lane (258 homes)
15. Fradley North of Fradley Lane (272 homes)
16. Fradley West (850 homes)
17. The New Village Option NE Lichfield (2,000 homes)
18. Brookhay Village and Twin Rivers Park (BV & TRP) (7,500 homes but 3,600 homes to 2028).

11.99 The sites above are set out in Appendix D at Map D.1.

11.100 The results of the SA of these sites is set out in Appendix A and show that both sites to the south of Lichfield City (Cricket Lane and Deans Slade Farm) score far better than any others, being located on the edge of the most sustainable settlement in the District and both providing services and facilities that would serve both the new and existing population.

11.101 As part of the Local Plan process the Strategic Housing Land Availability Assessment has been updated to November 2013. This identified further urban capacity of approximately 200 dwellings and thus a range of options and combinations of sites to deliver an additional 1,130 dwellings were then assessed against the sustainability framework objectives. The information from the SA of the sites was used to inform the selection of options, as set out below. This included a 'do nothing' option (i.e. do not allocate any additional dwellings). The options appraised were as follows:

- **Option 1:** 'Do nothing' i.e. don't allocate the 1,130 dwellings
- **Option 2:** Increase housing numbers in the same proportions as the housing distribution settlement hierarchy set out in the submitted Plan (Table 4.1 p.26 CD1-1)

- **Option 3:** New settlement option - 1,130 homes delivered within the Plan period at the New Village Option NE Lichfield or at Bookhay Villages & Twin Rivers Park (with delivery in the Plan estimated at 3,600 homes)
- **Option 4:** Allocate all 1,130 dwellings in/around Lichfield City (as most sustainable settlement) utilising a mixture of any additional brownfield sites and Green Belt release to the South of the City
- **Option 5:** allocate sites in/around main settlements of Lichfield, Burntwood & Fradley and possibly some additional housing at Tamworth & to Rugeley (to meet Lichfield's District's needs) - utilising a mixture of brownfield land and Green Belt release
- **Option 6:** more dispersed approach allocating additional housing numbers to Key Rural Settlements and other rural areas (excludes Fradley)
- **Option 7:** allocate the additional 900 & leave the additional 430 to be split among the rural areas as Allocations stage, or split between the rural settlements as in the same proportions as in the submitted Plan

11.102 In relation to Option 5, four different combinations of achieving this option were tested:

- **Option 5a:** combine the most sustainable sites: both sites from Lichfield City, and the most sustainable site in Burntwood
- **Option 5b:** combine the most sustainable sites: both sites from Lichfield City, and the most sustainable site in Fradley
- **Option 5c:** increase the capacity of the North of Tamworth BDL the SHLAA identifies the total capacity of the site as 1,909 dwellings at Arkall Farm and 250 dwellings at north of Brown's Lane i.e. Sites 3, 4 & 5 which are options A, B, E and F, this would utilise the increased urban capacity to address the total shortfall and deliver 1,330 dwellings
- **Option 5d:** increase the scale of development at Fradley by a further 1,130 dwellings comprising an extension to the SDA for a further 250 and the addition of the 850 dwellings at Fradley West.

11.103 To inform the latest iteration of the Plan (i.e. The Local Plan Strategy incorporating modifications), in addition to the SA process, all of the above options were analysed having regard to the following:

- The strategic fit with the National Planning Policy Framework;
- How well each option addressed the 15 strategic priorities of the Local Plan Strategy; and
- The deliverability of the options, based on the information submitted by the cut-off date of 10th July 2013.

11.104 The results of the SA of these options is set out in Appendix A , which details the environmental, economic and social impacts of each, together with an assessment of any mitigation and maximisation of effects, uncertainties and risks, short/medium and long term impacts and cumulative and synergistic impacts.

11.105 In addition to this work, as sites within the Green Belt formed part of some of the options, those applicable were also considered within the context of a Green Belt review (Lichfield District Local Plan Strategy Green Belt Review - Supplementary Report, December 2013).

11.106 The sites which have scored the best, both through the sustainability appraisal and in terms of the range of aforementioned objectives, are Deans Slade Farm and Cricket Lane, both to the south of Lichfield City. Whilst both of these sites are in Green Belt, they fit well with the existing strategy which is to locate the majority of development to the main settlement of the District. Both sites are within walking distance of Lichfield City, would be accessible by public transport (including by rail) and would be able to deliver additional infrastructure which would not only serve the needs of each site independently but would also cumulatively be able to address the wider needs of Lichfield City. This is particularly the case in terms of new primary schools and the completion of Lichfield Southern Bypass: both key infrastructure priorities as defined in the Local Plan and the Infrastructure Delivery Plan.

11.107 Both sites are deliverable in the short term, assisting the Council in the crucial need to achieve a 5 year supply (to prevent other, inappropriate sites from coming forward for development over which the Authority would have little control), and developers for each site have prepared detailed and substantive evidence in support of their proposals.

11.108 The Green Belt Review showed that Cricket Lane in particular is of only 'moderate' significance in its role and function as defined by the NPPF. It has no function in preventing Lichfield from merging with the West Midlands conurbation, and does not play a particularly significant role in contributing to the open aspect of the City, being bounded already by major roads (the A38 and London Road).

11.109 Deans Slade Farm scores higher in terms of Green Belt function, as it blends into the wider open countryside having no such well defined boundaries to the south and west. However, the site being proposed has two distinct parts to it due to its situation within the natural bowl in which the City lies. There is a lower level, and a higher level which rises upwards to the south. The lower level has the potential to achieve high quality development with minimal impact upon the open aspect and views towards the city. It also provides the opportunity to construct the access point for the underbridge linking to the final section of the Lichfield Southern Bypass and complete the bypass without the need to use Compulsory Purchase powers. Additionally, a 'district park' is proposed over the area which rises upwards to the south which, provided this is implemented in an informal way to soften the edges of the development, would provide a new, and strong edge to the Green Belt (all open space elements of the scheme would be retained within the Green Belt). It would also provide new public access to an area currently used as farmland (and therefore inaccessible), with the potential for opening up new views across the City for all Lichfield's residents, not just those contained within any new development.

11.110 It should be noted that both Deans Slade and Cricket Lane were originally proposed within a direction of growth at the 'Preferred Options' stage of Local Plan development, as it was considered that growth to the south of Lichfield would have little impact upon the setting of the City overall (compared to other directions of growth) and there were few

limitations beyond the policy constraint of Green Belt. However, it was concern over loss of Green Belt which led to public objection at this point and a subsequent Council response, meaning that the Plan was revised to reduce the amount of growth in this direction.

11.111 Cumulatively, however, these sites only total 900 homes, which addresses the additional number required up to 2028. But it does not make an allowance for the additional year – leaving a shortfall of 430 if the plan needs to include an additional year up to 2029.

11.112 It is the case that no other option would allow for an additional strategic site of this size to be delivered.

11.113 With regard to Fradley the Masterplanning exercise, undertaken in 2011, identified 12 hectares of employment land to the north west of the recently consented Evans of Leeds proposal for 750 homes. This employment land could potentially be converted to a residential allocation as, whilst the additional employment aspect would be lost to Fradley, this would be offset by the provision of a similar level of employment land which is included within the Cricket Lane proposal.

11.114 Originally, it was not felt through the Fradley masterplanning exercise that further expansion of the Evans of Leeds site to the north west would be appropriate for residential development as this would further expand Fradley village out on a 'limb' to the north west, away from the school and community facilities, when the exercise was attempting to consolidate the village around a hub which featured a single expanded school. A single expanded school at St Stephens school would lead to a limit on development of 1,000 homes. However, vehement opposition locally to the option of delivering a single, larger school has led to the option of a second primary school being pursued to serve the new community on the Evans of Leeds site, removing the 1,000 limit to the amount of housing development. In addition, with a second school being located within the western quadrant of the consented Evans of Leeds site, extending residential development further (to Gorse Lane) would now not be so isolated from local services and facilities, meaning that this is now a viable and deliverable option.

11.115 Thus Option 5b (a combination of the most sustainable sites at Lichfield city and Fradley - as identified in Appendix A 'Spatial Options Appraisal'), was selected as the Council's preferred option to deliver the shortfall in housing provision identified by the Inspector and has been incorporated into the the submitted Local Plan Strategy as modifications.

11.116 However it was recognised that in progressing this option (i.e. extra housing on the Evans of Leeds site and the two sites to the south of Lichfield City) there would be a shortfall of 180 homes to address the overall 1,330 required and further urban capacity (approximately 200 additional homes) has been identified through the most recent Strategic Housing Land Availability Assessment. There would also be the opportunity to identify smaller (non-strategic) sites through the Allocations stage of the Local Plan.

Alternatives considered & discounted to meet additional housing growth to 2029

11.117 This assessment also included consideration of dispersing more homes to the rural areas and Rugeley. These options were discounted as being undeliverable in the short term due to the need to defer decisions to the Allocations stage of the Local Plan, as a package of smaller sites would be required to deliver these options. It was considered that allocating additional growth to the rural areas would have a disproportionate impact upon rural villages, as much work has already been undertaken to assess the capacity of the larger rural settlements to ensure appropriate levels of growth, and the smaller areas would be negatively impacted in terms of character and levels of infrastructure needed to support growth as well as increasing local dependency upon car travel to access jobs, services and facilities.

11.118 Additional sites to the north of Tamworth have also been discounted as the infrastructure in this area is unlikely to be able to support growth in excess of that planned for within the submitted Local Plan.

Brookhay Village and Twin Rivers Park

11.119 This option scored reasonably well in the updated sustainability appraisal (CD1-8) particularly given that its size would allow for delivery of a range of services and facilities including public transport and rail access. It would also comply with the NPPF support for 'garden cities' and would not involve the loss of Green Belt, but there remains a number of issues which mean that there would be concerns with this option as the short term deliverable solution the Council is currently required to produce in order to gain a 'sound' plan.

11.120 Although this option would be able to deliver all of the required homes in one location within the plan period (the proposal states that 3,600 could be delivered by 2028), the scheme has been put forward to be considered as a whole and would need the support of East Staffordshire Borough Council, as the employment provision would be located in East Staffordshire. Further work is required as part of a cross boundary arrangement with both local authorities, neither of which have this currently specified in their respective Local Plans given the late stage in the process (particularly for Lichfield) that this proposal was submitted, and because (due to the size and nature of the scheme) it represented a completely different spatial strategy to the one which has already been proposed and indicated as sound through examination.

11.121 However the Brookhay proposal is unlikely to deliver many (if any) homes in the next 5 years due to the significant infrastructure required to make the location function in a sustainable manner. It should also be noted that a significant area where the homes would be delivered within this proposal requires the removal of minerals.

11.122 In relation to Brookhay providing the 1,330 dwellings, it is clear that the scheme would deliver significantly more than this and that this would require adjustments to other elements of the spatial strategy e.g. employment land, retail, infrastructure. These could potentially be delivered and then the development 'left' as a stand alone scheme without

delivering any of the associated infrastructure, resulting in an isolated and poorly served community. However, the scheme can only work as a whole: which would require it to be advanced jointly with East Staffordshire.

11.123 The Council therefore decided that this is a longer term option which could potentially be explored (along with other options put forward for consideration) for a future plan period and which, potentially could meet some of the needs arising from Birmingham, **if** Lichfield District is required to do so. The Brookhay proposal was not considered sufficiently advanced or certain to be progressed as a comprehensive scheme at this stage and does not relate well to the strategic priorities set out in the submitted Local Plan. For these reasons this alternative has not been included as a way of delivering the 1,330 additional dwellings and does not form part of the Council's preferred spatial strategy to 2029.

The 'New Village' Option

11.124 Two options were put forward through the Local Plan process for new villages: a scheme for 2,000 homes, and a scheme for 4,000 homes to the north east of Lichfield. For both options detail remains lacking and whilst conceptual diagrams have been produced, there is no evidence to suggest that the development is deliverable within the plan period.

11.125 As with Brookhay, this has the potential to be put forward as an alternative spatial strategy for a later plan period. It should be noted, however that the option of a new settlement in this general location was discounted early in the process of developing the Local Plan as, being so close to Lichfield City, it would still depend on local services and facilities in the City but would still be relatively isolated, not being within walking distance of these and with no existing infrastructure to support linkages. This option scores very poorly in terms of the SA, the NPPF and in terms of how it fits with the Local Plan's strategic objectives.

Fradley West

11.126 This proposal for 750 homes to the west of Gorse Lane scores poorly, especially in terms of local strategic fit, and short term deliverability. It would further expand Fradley westwards to such an extent that it would require its own 'hub' of services and facilities, in effect creating another 'arm' to a community which the Local Plan is aiming to make more cohesive, so it does not 'fit' well with the existing spatial strategy. A further 750 homes would also create significant impacts upon the highway infrastructure which would require mitigation and a solution to this issue has not been put forward at this point so this would be a potential longer term option rather than being deliverable in the short term.

Burntwood

11.127 A number of different strategic sites were appraised at Burntwood which mainly scored poorly through the overall assessment for similar reasons. All sites are in Green Belt and perform with important Green Belt functions especially in protecting the countryside from encroachment, and in preventing coalescence (the merger of Burntwood with Walsall to the south, and Burntwood and Hammerwich to the south east). Additionally, the sites have significant environmental constraints with all having the potential to negatively impact upon priority habitats (Cannock Chase SAC, SSSIs, AONB at Gentleshaw Common).

Reasons for the main modifications to the Local Plan

11.128 Spatial Strategy and Housing Numbers: In terms of the Green Belt sites assessed, the highest score assigned to the Cricket Lane site was that it has a moderate rating in terms of safeguarding the countryside from encroachment but a minor role in all other aspects, largely because it is a self contained area of land bounded by major roads. Deans Slade Farm scored more highly in terms of its role in safeguarding the countryside from encroachment and preserving the character and setting of historic towns. However, the review takes the parcel of land as a whole, whereas its topography means that there are two distinct parts to it, a lower level and a higher level which rises upwards to the south. This means that the site contains opportunities to deliver the built development at the lower end of the site there would be less impact upon the character and setting of Lichfield City. There would be an opportunity to deliver a district park on the rising and higher levels of the site, enabling this element to be retained within the Green Belt, providing a new, clear and defensible Green Belt boundary to the City. It would also provide new public access to an area currently used as farmland, with the potential for opening up new views across Lichfield for all Lichfield's residents, not just those of any new development.

11.129 As mentioned earlier, it should be noted that the Green Belt Review sits alongside other assessments relating to strategic fit (national and local), opportunities and constraints, and the sustainability appraisal which have led to the conclusion that together, Cricket Lane and Deans Slade Farm represent the best opportunities for achieving sustainable and deliverable growth within the context of a sound spatial strategy and which makes the best use of existing infrastructure whilst being able to deliver new services and facilities (school, open space, employment, completion of the Lichfield Southern Bypass).

11.130 Main modifications have been identified to increase the plan period by an additional year to 2029 (MM10) and to increase the housing requirement over the plan period from 8,700 to 10,030 to address the 'unsoundness' (MM11). Furthermore the housing requirement is proposed to be referred to as a minimum (MM2).

11.131 Work undertaken since the hearing sessions highlights that the most sustainable solution to rectify the shortfall of homes is to allocate the homes to Lichfield City, and the following new strategic allocations (SDAs) are identified as main modifications within the Lichfield District Local Plan Strategy:

- Cricket Lane: a sustainable, well designed, mixed-use development to provide a minimum of 450 dwellings, approximately 12 ha of employment, appropriate associated facilities and transport, social and physical infrastructure (MM12);
- Deans Slade Farm: a sustainable, well designed, mixed-use development to provide a minimum of 450 dwellings and appropriate associated facilities and transport, social and physical infrastructure (including a new primary school) (MM13); and.
- Fradley SDA: amend to replace the proposed the majority of employment uses with further residential development. The area identified for employment measures approximately 12ha, which would be sufficient to deliver around a further 250 homes within the already identified SDA (MM14).

11.132 The inclusion of these sites would be now reflected in an updated Core Policy 6, and also result in main modifications to Policy Lichfield 6 (MM15), Policy Fradley (MM16), Core Policy 7 (MM18), Core Policy 1 (MM19) and the spatial distribution of development as set out in Table 4.1 (MM21) and Table 8.1 (MM21). New Concept Statements have been prepared for the proposed sites to the south of Lichfield (MM22 & MM23) and it is proposed to replace the Fradley SDA Concept Statement (MM24) with an updated version.

11.133 These changes to the spatial strategy have a limited effect on the overall spatial distribution of growth. In line with the submitted strategy, development is focused to the most sustainable settlements, in particular the strategic centre of Lichfield City and the spatial distribution of new housing growth is now 38% to Lichfield City, 13% to Burntwood, 11% to East of Rugeley, 10% to North of Tamworth, 12% to Fradley and 16% to the rural areas, including the Key Rural Settlements.

11.134 A further modification (MM4) was also proposed to ensure a 5 year housing supply in line with Government policy by removing the phasing from the delivery of the Strategic Development Allocations, to significantly boost housing land supply in the short term. Thus modifications were also proposed to remove the phasing of housing in the concept statements for South of Lichfield SDA (MM5), East of Lichfield (Streethay) (MM6) and East of Burntwood Bypass (MM8).

11.135 With regard to economic development the main modification to allow further residential development within the Fradley SDA would result in the loss of approximately 10 to 12 hectares of employment land from the employment portfolio. It is proposed to make up this loss within the Cricket Lane SDA (MM15). Further technical work was undertaken by the District Council, which considered the suitability of Cricket Lane for the delivery of employment provision (Cricket Lane, Lichfield - Employment Assessment Report, December 2013). This showed that as a location Cricket Lane scored well when compared to other potential employment sites that have been put to the District Council.

11.136 Sustainable Communities: a main modification (MM3) to Policy SC2 (Renewable Energy) to clarify the purpose of the 'opportunities for wind energy' areas identified and to identify these areas on the Policies Map that accompanies the Local Plan Strategy.

11.137 Natural Resources: the District Council has redrafted the wording of Policy NR7 (Cannock Chase Special Area of Conservation) to address concerns relating to the lack of detail contained within the Policy, particularly in relation to the area to which mitigation measures would apply and the type of measures that would be appropriate to mitigate such impacts on Cannock Chase SAC. Thus the District Council has redrafted this policy and agreed this proposed wording with the Cannock Chase SAC Partnership which includes Natural England, Staffordshire Country Council, Cannock Chase AONB Partnership, the Forestry Commission and the relevant Local Planning Authorities. The proposed main modification (MM9) makes it clear that the policy relates to an area within a 15km radius of the SAC and sets out a range of potential measures to mitigate for any impact arising from development within that area.

11.138 The findings of the sustainability appraisal of the Local Plan, encompassing these main modifications, together with other minor modifications, is set out in chapters 12 to 19 of this document.

Table 11.2 Evolution of the Spatial Strategy

	Stage of Plan Preparation							
	Local Plan Strategy (Inc. Modifications) 2014	Local Plan Strategy (proposed submission) 2012	Shaping Our District 2010	Policy Directions 2009	Preferred Options 2008	Issues & Options 2007		
						Options		
						1 (xix)	2 (xx)	3 (xxi)
Lichfield	38%	32%	41%	Still main focus of growth for District (consider reducing growth to south of City)	50%	40%	30%	20%
Burmwood	13%	15%	13%	Consider brownfield sites as alternatives to Green Belt release	12.25%	20%	15%	10%
Rugeley	11%	12%	14%	Around 1,000 dwellings	12.5%	10%	0%	0%
Tamworth	10%	12% (Fazeley now in other rural)	North Tamworth flagged for long term growth but no % applied	Need to consider Tamworth's housing needs	5% (Fazeley only)	20%	0%	0%
Fradley	12%	12%	12%	1,000 dwellings		0%		40% (4% Fazeley only)
Rural	16%	18% (12% Key Rural & 6% Other Rural)	20% (15% Key Rural & 5% Other Rural)	Further work needed	20%	0%	55%	10%
New Settlement	0%	0%	0%	0%	0%	0%	0%	60%

xxii New Settlement

xxi Dispersed Development

xx Town & Key Rural Village Focused

xix Town Focused

12 Strategic Priorities

12.1 The 'Issues' and the 'Issues and Options' consultation included Strategic Objectives (now called Strategic Priorities) and the LSWG compared these to the SFO, the findings were published in the ICSSA (table 5.1).

12.2 The Strategic Priorities in the 'Preferred Options' consultation were called 'Spatial Objectives' and had been amended to include the need to broaden the approach to climate change and make them more specific. An additional objective which related to regeneration issues within existing communities was also added and the objectives simplified. Since this time the Strategic Objectives have been renumbered and redrafted following representations, the SA process and evidence.

12.3 The 'Policy Directions' document did not include Spatial Objectives or Strategic Priorities, as it was primarily a document focusing on policy development, rather than strategy. The 'Shaping our District' consultation did include Strategic Objectives and these are similar to the Strategic Priorities within the 'Local Plan: Strategy'. The changes between these two documents have arisen through working with our partners, the SA, the NPPF and representations received. They now provide greater protection to the character of our rural communities by requiring employment and housing development to be locally relevant; the character of the countryside has been strengthened positively by including a requirement to preserve the openness of the Green Belt; greater clarity is now afforded by Strategic Priority 14 to include protection and enhancement of heritage assets including Lichfield Cathedral; Strategic Priority 11 now includes 'To create an environment that promotes and supports healthy choices' and Strategic Priority 13 now seeks to expand as well as protect and enhance our natural resources.

12.4 A comparison between the Local Plan Strategy Strategic Priorities and the Strategic Framework Objectives of the Scoping Report is set out in the table below. A greater level of detail in the plan has enabled greater certainty of the scorings and a greater understanding of how our communities function through widening the LSWG and the evidence gathered through the Rural Masterplanning exercise has enabled improved scores. The table now shows no negative effects. All the sustainability framework objectives have been addressed and the scoring shows the Local Plan should have a positive effect on the Sustainability Framework Objectives. These overarching principles of the plan will deliver the vision of the Plan and should achieve sustainable development. There have been no changes to the Strategic Priorities through the Main Modifications to the Plan and so scoring remains unchanged.

Table 12.1 Comparison of Strategic Priorities against Sustainability Framework Objectives

Local Plan: Strategy Strategic Priorities	Sustainability Framework Objectives													
	A	B	C	D	E	F	G Ec	H	I Ec	G Soc	I Soc	J	K	L
1				+	+		+	+	+	+	+		+	+
2	+						+		+	+	+			+
3	+	+		+	+	+								
4	+										+	+	+	+
5							+			+	+			
6											+			
7								+	+					
8								+	+					
9	+		+	+	+		+	+	+		+	+	+	+
10	+	+	+					+	+		+			
11		+	+		+						+	+	+	+
12	+													
13	+	+		+		+								
14	+	+	+								+			
15	+	+	+				+	+		+				

13 The Spatial Strategy

13.1 The spatial strategy for Lichfield District has been developing since consideration of 'Issues and Options' in 2007. The development of the strategy from then until its final iteration (i.e. The Local Plan Strategy proposed submission incorporating modifications), is set out in Section 11 of this report (Background to Lichfield District Local Plan). The spatial strategy included within the Local Plan directs development towards the most sustainable locations, and plans for making the best use of, safeguarding and improving our existing facilities and infrastructure to create and maintain sustainable communities.

13.2 The spatial strategy seeks to deliver a minimum of 10,030 dwellings between 2008 & 2029 within the District boundary, and directs approx. 38% of housing growth to Lichfield City, which includes to development of four Strategic Development Allocations (SDAs) - three to the South of Lichfield and one to the East of Lichfield, at Streethay, as well as the redevelopment or infilling of sites within the urban area.

13.3 Approximately 13% of the District's housing is apportioned to Burntwood, including a SDA to the East of Burntwood bypass.

13.4 To assist in meeting the housing needs of neighbouring towns approximately 11% of the District's housing will be focused to the East of Rugeley, including a SDA on brownfield land at Rugeley Power Station and also approximately 10% of housing to the north of Tamworth, adjacent to the Anker Valley development with a Broad Development Location (BDL).

13.5 Within the key rural settlements approximately 12% of housing growth is directed towards the Fradley area, which includes an SDA focused on the former Fradley airfield. Around a further 16% is to be allocated in the rural areas, including in the remaining key rural settlements of Alrewas, Armitage with Handsacre, Fazeley, Shenstone and Whittington.

Table 13.1 Proposed Settlement Hierarchy

Area	Hierarchy	Residential	Employment	Centres
Lichfield	Strategic Centre	Approx. 38% of housing including Strategic Development Allocations (SDAs) to South of Lichfield and E. of Lichfield (Streethay)	Employment through implementation of existing commitments and redevelopment. Cricket Lane SDA to deliver approx. 12 hectare of employment development	Major growth in town/City Centre uses: Limit of 36,000m ² gross additional retail within City Centre. A target of 30,000m ² office provision within City Centre

Area	Hierarchy	Residential	Employment	Centres
				Focus for District's leisure activities.
Burntwood	Other Large Centre	Approx. 13% of housing including Strategic Development Allocation (SDA) to E. of Burntwood Bypass	Employment through implementation of existing commitments and redevelopment. Release of poor quality employment sites from the employment land portfolio	Town centre uses to meet local needs: Limit of 14,000m ² gross additional retail within Town Centre. Up to 5,000m ² office provision within Town Centre.
Rugeley	Neighbouring Town	Approx. 11% of housing focused to the East of Rugeley on brownfield land, including Strategic Development Allocation (SDA) ^(xxiii)	Employment through implementation of existing commitments.	Not covered within Lichfield District Local Plan
Tamworth	Neighbouring Town	Approx. 10% of housing focused to the north of Anker Valley within a Broad Development Location. ^(xxiv)	Not covered within Lichfield District Local Plan	Not covered within Lichfield District Local Plan
Fradley	Key Rural Settlements	Approx. 12% of housing including Strategic Development Allocation (SDA) focused on former airfield.	Focus for rural employment creation. Employment through implementation of existing commitments at Fradley and redevelopment. Release of poor quality employment sites from the employment land portfolio	Retention of local services and facilities to meet needs of local population and smaller outlying villages.
Fazeley				
Shenstone				
Armitage with Handsacre				
Whittington				
Alrewas		Approx. 16% of housing including 440 yet to be allocated between settlements within the Local Plan: Land Allocations		

xxiii 500 to assist in meeting the needs arising within Rugeley

xxiv 50% to assist in meeting Lichfield District's needs and 50% to assist in meeting needs arising within Tamworth Borough

Area	Hierarchy	Residential	Employment	Centres
Clifton Campville; Colton; Drayton Bassett; Edingale; Elford; Hamstall Ridware; Harlaston; Hill Ridware; Hopwas; Kings Bromley; Little Aston; Longdon; Stonnall; Upper Longdon; Wigginton	Other Rural		Rural employment diversification. Release of poor quality employment sites from the employment land portfolio	Look to key rural settlements for local services and facilities.

13.6 The proposed spatial strategy is set out in Core Policy 1 of the Local Plan. The table below sets out the scorings for the spatial strategy contained within the Lichfield District Local Plan Strategy (incorporating modifications) Core Policy 1. Overall this spatial strategy scores better through the SA process than any strategy proposed previously. The strategy is strong in promoting the environmental impacts of sustainability. Clear and strong positive scores were determined for maintaining and enhancing landscape and townscape quality, for promoting biodiversity and geodiversity through the protection, enhancement and management of species and habitats and for reducing flood risk.

13.7 With regard to economic impacts the strategy has scored positively, particularly with regard to encouraging higher skilled economic sectors and sustainable distribution and communication systems.

13.8 Additionally the strategy scores positively with regard to social impacts, especially upon creating mixed and balanced communities, and particularly in relation to improving levels of housing consistent with local employment opportunities and in reducing trips by car. It has scored more positive than previously with regard to improving the health of the population, as modifications to the Plan have located the majority of additional housing development adjacent to Lichfield City - the strategic centre with the widest range of services and facilities.

13.9 The Plan will deliver sustainable development within Lichfield District and assist in increasing the sustainability of Lichfield District.

Table 13.2 Core Policy 1: The Spatial Strategy

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	++	+?	+	+	++	+	+	+	+	++	+?	+?	+?
Assessment of Effects	Environmental: Clear and strong positive impacts for maintaining & enhancing landscape and townscape quality, due to quantum of development on edge of Lichfield City (housing numbers in proposed SDAs) & strongly worded policies to shape the way in which development takes place. Clear and strong positive impact on promoting biodiversity as strategy seeks to													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>enhance connectivity and diversity of habitats & wildlife corridors. Also mitigation proposed for all SDAs & minimisation of any impacts on designated wildlife sites. Spatial strategy does not impact on RIGS site & protection afforded through policy.</p> <p>Policies will afford string protection of historic environment, but some uncertainty remains over impact on archaeological & heritage assets in villages, as specific sites will not be determined until Allocations stage of Local Plan.</p> <p>Positive on encouraging energy efficiency & enabling opportunities for renewables, due to impact of policies within the Plan.</p> <p>Economic: Economic impacts are positive due to clear economic strategy which defines specific growth sectors in relation to high value professional services, R & D (including health & medical technologies), tourism, construction, social care, education, logistics.</p> <p>Social: social effects of improving availability of sustainable transport to jobs and services is positive.</p> <p>Clear & strong positive effects with regard to creating mixed & balanced communities, as required dwelling mix & provision for specialist housing is specified in strategy.</p> <p>Overall strategy positive in encouraging cultural activity, home-based businesses, & improved service provision for young & elderly.</p> <p>Potentially positive for enabling community participation through development of SDAs with community facilities and policies which specifically mention working with Parish Councils & other local groups.</p>													
Local Plan Strategy (inc. Modifications)	++	++	+?	+	+	++	+	+	+	+	++	+?	++	+?
Assessment of impact of Modifications	<p>Environmental: There will be an increased loss of greenfield sites. However the sites are able to mitigate for their own impacts and will result in an enhanced opportunity for biodiversity through the provision of a district park. As SFO B already scored ++ (which is the maximum available) the overall scoring remains unchanged.</p> <p>Economic: The addition of 12 hectares of employment within the Cricket Lane SDA and the removal of the phrase 'to serve Lichfield City' in relation to the provision of an additional 10 hectares of land for employment purposes (as set out in the submitted Plan) will give greater opportunities to reduce trips by car, However the unknown location(s) of the 10 hectares means that impacts are impossible to determine and as such the scores have remained unchanged.</p> <p>Social: Now double positive (clear and strong positive effect) for SFO K (to improve the health of the population) as modifications to the strategy have allocated the required additional housing to Lichfield City; the most sustainable settlement in the District, with access to the widest range of services and facilities, and include increased land available for open space and biodiversity accessible to the city, which will benefit the health and well being of future residents.</p>													
Mitigation & maximisation	<p>The strategy seeks to maximise development in areas of greatest accessibility by sustainable means of transport, namely in Lichfield City, Burntwood and the Key Rural Settlements. SDAs will mean that economies of scale are created enabling greater opportunities for key infrastructure such as primary schools, community hubs, local retail provision, public transport</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>services and low carbon energy generation. Concentrating development in Lichfield, Burntwood and in the Fradley area will assist the growth of local businesses and enterprise. The Strategy seeks to maximise the reuse of previously developed land, as evidenced by many of the SDAs - Fradley, East of Burntwood Bypass & East of Rugeley.</p> <p>In concentrating the majority of housing growth in the more sustainable settlements the strategy seeks to minimise the impacts of development on smaller communities, where high levels of growth would have significant detrimental effects, and on environmental issues in particular. In addition sensitive areas for biodiversity, landscape, heritage assets, mineral deposits and flood risk have been avoided where possible, with policies and concept statements to ensure mitigation and to minimise impacts where this has not been possible.</p>													
Uncertainties & risks	<p>Development of large scale housing, infrastructure and the delivery of enhanced retail and leisure facilities are all, to differing extents, dependant upon the national and global economy, which may affect the viability of the spatial strategy.</p>													
Short/ Medium & Long term impacts	<p>Cumulatively and in the long term the impacts of the proposed strategy will also be very positive, as per the overall scorings for the strategy. In some cases however, until a certain quantum of development exists, enabling the required infrastructure to be provided, mixed impacts will result, particularly in the short term.</p> <p>This was considered to be the case for environmental impacts, particularly with regard to effects on biodiversity through loss of habitats, where mitigation measures will take time to achieve positive benefits. This was also considered to be relevant in relation to creating mixed and balanced communities and to improving the availability of transport options to jobs and services, as many public transport improvements and provision of additional community, healthcare and educational facilities and improvements will be realised in the medium and long term.</p>													
Cumulative & Synergistic impacts	<p>Overall it was determined that there would be a positive impact with regard to the effects of the strategy on cross-boundary issues. This is especially the case in relation to social impacts, and with regard to the provision of affordable housing in particular, as a joint housing evidence base has been developed with neighbouring Southern Staffordshire authorities and the strategy will provide housing to meet Tamworth and Cannock's needs. Additionally through the impact of the strategy, in combination with the County Council's transport strategies and plans, it was considered that there would be greatly improved access to increased opportunities for walking and cycling and provision of access for those without access to a car, as improvements are planned at Rugeley Trent Valley station and also highway improvements in Tamworth.</p> <p>Also it was determined that there would be clear and strong positive impacts upon biodiversity through policies effecting the SAC, AONB and Biodiversity Opportunity Mapping which has considered cross boundary habitat and species movement.</p> <p>However, some effects were considered impossible to determine at present with regard to cross-boundary issues. For example in relation to reducing the overall impact on traffic sensitive areas work is still being considered as part of the joint working arrangements put in place between Lichfield District Council, Tamworth Borough Council, Staffordshire County Council and the development industry.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	Another cross-boundary effect which will have to be assessed for sustainability impacts in the longer term is that of HS2. This may have implications on environmental objectives such as landscape, biodiversity, heritage assets and air quality, as well as social and economic impacts on connectivity & transport networks other than rail. Until more details are known about route and the mitigation proposed these impacts are impossible to determine at the local level.													

Interrelationship Between Effects

13.10 Many of the effects identified will not occur in isolation and will have impacts which overlap with each other. For example it is considered that protection and enhancement of biodiversity and improvement of wildlife connectivity could help to improve landscape quality and the setting of Lichfield District’s city, towns and villages. This in turn will protect and enhance green spaces, which will be of benefit to human health and quality of life, encouraging active lifestyles. It may also help to promote sustainable travel by encouraging people to walk or cycle rather than using the car. By protecting green spaces, the Local Plan Strategy will retain land with water absorbing capacity, which will contribute to flood risk alleviation. It may also help to protect and improve water quality, in part by alleviating flood risk, but also where the habitats to be protected and enhanced are aquatic.

13.11 Protection and enhancement of historic features and assets will contribute to maintaining landscape quality within both urban and rural areas. This will add to quality of life for people in Lichfield District.

13.12 Reducing the amount of waste needing treatment and disposal will help to reduce air emissions from the transport and management of waste, including greenhouse gas emissions, although it may reduce the amount of renewable energy generated from waste. It may also encourage more prudent use of natural resources by reusing waste as a resource and reducing the amount of virgin resources consumed.

13.13 Changes in air quality can have significant consequences for human health and biodiversity, and any decline in air quality arising in Lichfield due to an increase in traffic and congestion could adversely affect human health, vulnerable species and ecosystems. Changes in water quality also have the potential to significantly affect species and ecosystems. By promoting water efficiency the Local Plan Strategy will help to ensure prudent use of natural resources and help to safeguard water quality, with benefits for ecosystems. It will also benefit the economy by reducing the cost of water treatment.

13.14 Flood risk reduction will help to protect and enhance water quality by reducing the risk of overload of the sewerage system. It will also have economic benefits by protecting homes and businesses from having to deal with the financial consequences of flooding.

13.15 By locating most new development near to the main settlements in Lichfield District, the Local Plan Strategy will promote the use of sustainable modes of travel, which will reduce the reliance on the private car. This in turn will have benefits in terms of improved air quality

and reduced congestion, which will lead to improved health and road safety. It will also help to promote more active lifestyles with the associated health benefits, and support accessibility to services and facilities.

14 The Policies

Development of Policy

14.1 This section relates to the development of policies which are referred to in the Local Plan Strategy as the General Policies; this is essentially core policies 2-14 and their associated development management policies. The development of Core Policy 1 (The Spatial Strategy) has been explained in Chapter 11 (Background to Lichfield District Local Plan) and the findings of the SA in relation to this policy are set out in Chapter 13.

14.2 Chapter 11, in explaining the history of the development of the plan, also includes general information on the development of the policies. Sustainability appraisal of emerging policies has been undertaken throughout the development of the Local Plan Strategy, and details of the appraisal of the policies contained within the Lichfield District Local Plan Strategy was published in Chapter 15 of 'Sustainability Appraisal: Proposed Submission Local Plan Strategy' (Updated) (CD1-8).

14.3 Through the Examination in Public hearing sessions were held which have resulted in modifications to the policies and in addition the Inspector advised on 5th September that "Having completed my Initial Findings on what are probably the most contentious parts of the Plan I will now set about drafting the remaining sections of the report. This will cover matters such as Housing Supply, Balanced Housing Market, Affordable Housing, Gypsies and Travellers, Greenbelt, Biodiversity, Employment, Renewable Energy and Sustainable Development Policy. These will be incorporated into my report which will be published after the Council has done the further work which it has agreed to do on the question of housing provision" (Interim Findings Response LDC - HD64).

14.4 Following the Inspector's initial findings on the Council's proposed main modifications to two matters - Renewable Energy and Biodiversity - the Council has appraised policy SC2 'Renewable Energy' as modified by MM3, which the Inspector regarded helps clarify the purpose of identifying sites having the greatest opportunity for wind energy, and has assessed Policy NR7 'Cannock Chase Special Area of Conservation' as modified by MM9, which the Inspector regarded clarified the extent of the area to which this policy will apply.

14.5 Chapter 11 details the further work that has been undertaken by the Council to make the Plan 'sound' since the Inspector issued his initial findings. Policies incorporating modifications, both 'main' and 'other', that have resulted from this work have been appraised as follows.

Appraisal of Policies

14.6 All core policies and development management policies now have an individual table assessing their likely effects. The tables also include any mitigation and maximisation of likely impacts; uncertainties and risks; short, medium and long term impacts; and also cumulative and synergistic impacts including cross boundary effects. The tables show the assessment of effects for each policy and the assessment of effects having regard to any modifications to the policy.

14.7 Policies with no changes proposed: Where there are no modifications to individual policies, the implications of the other modifications to the Plan have been considered. Where it is considered that there will be no change in the impact of the policy to that previously assessed in the sustainability appraisal, it has been concluded that there is no need for further appraisal. This is noted in the 'SA Implications' column in Table 14.1 below and is also denoted by the phrase 'no change from previous appraisal' wherever relevant in each individual policy table (i.e. Tables 14.2 - 14.35 inclusive).

14.8 'Other' Modifications: Where minor or 'other' modifications are proposed to the policy, the implications of the modifications have been considered along with the cumulative (including cross boundary), synergistic, short, medium and long term impacts, uncertainties, risks, and any mitigation and maximisation. Often these 'other' modifications proposed are typographical errors. Where it is considered that there will be no change in the impact of the policy to that previously assessed in the sustainability appraisal, it has been concluded that there is no need for further appraisal. This is noted in the 'SA Implications' column in Table 14.1 below and is also denoted by the phrase 'no change from previous appraisal' wherever relevant in each individual policy table where a minor or 'other' amendment has been made. Conversely, where these 'other' modifications to a policy has resulted in different sustainability impacts these are also included in the relevant policy table.

14.9 'Main' Modifications: The table below shows the list of policies and whether they were the subject of none, 'other' or 'main' modifications and whether these have resulted in revised implications for the sustainability appraisal.

Table 14.1 Identification of Policy Modifications

Policy	Modification (Type)	SA Implications
CP2	Other	Yes
CP3	Other	Yes
SC1	Other	Yes
SC2	Main	No. The modifications relate to the removal of a map and the incorporation of some information from it to the policies map and clarification to the policy wording. There are no implications for the SA and no need for further appraisal.
CP4	None ('other' change to para 6.1)	No. Reference to places of worship has been added to the list of possible examples of social and community infrastructure. There are no implications for the SA and no need for further appraisal.
IP1	None	No need for further appraisal
CP5	Other	Yes
ST1	Other	Yes
ST2	None	No need for further appraisal
CP6	Main	Yes

Policy	Modification (Type)	SA Implications
H1	Main	No need for further appraisal
H2	Other	No need for further appraisal
H3	Other	Yes
CP7	Other	Yes
CP8	Other	Yes
CP9	Other	Yes
E1	None	No need for further appraisal
CP10	Other	Yes
CP11	Other	Yes
CP12	Other	Yes
HSC1	None	No need for further appraisal
HSC2	Other	No need for further appraisal
CP13	Other	Yes
NR1	Other	No need for further appraisal
NR2	Other	Yes
NR3	Other	No need for further appraisal
NR4	None	No need for further appraisal
NR5	Other	No need for further appraisal
NR6	None	No need for further appraisal
NR7	Main	Yes
NR8	None	No need for further appraisal
NR9	None	No need for further appraisal
CP14	None	No need for further appraisal
BE1	Minor	No need for further appraisal

Appraisals of Policies with Modifications

Sustainable Communities

Core Policy 2: Presumption in Favour of Sustainable Development

14.10 Following the publication of the National Planning Policy Framework (NPPF) in March 2012 a new policy was inserted at the 'Local Plan: Strategy' stage (July 2012) to meet national requirements. Through representations made to this policy a minor amendment was proposed to add a 3rd paragraph to ensure full consistency with national policy.

14.11 The modified policy has been appraised against the policy within the 'Local Plan: Strategy document'.

14.12 The SA has found that the policy will have a positive effect on the sustainable development of the District by ensuring a proactive approach is taken to plan-making that improves the environmental, economic and social conditions of those that live in, work in and visit the District. The modifications have given greater clarity to development where the Plan is silent or out of date and add to achieving sustainable development.

Table 14.2 Core Policy 2: Presumption in favour of Sustainable Development

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+	+	+	-	-	+	+	+	+	+	+	+	+	+
Assessment of Effects	<p>Environmental: Overall positive impact when considered with the policies within the document. Development uses resources and creates waste which can have negative impacts upon mitigating for the effects of climate change and primary resources.</p> <p>Economic: Positive economic impacts.</p> <p>Social: Policy seeks to secure improvements to the social conditions of the area and incorporates policies in neighbourhood plans which enables greater community involvement.</p>													
Local Plan Strategy (inc. Modifications)	+	+	+	-	-	+	+	+	+	+	+	+	+	+
Assessment of impact of Modifications	<p>Environmental: Indicates how development will be considered where the Plan is silent or out of date. This will enable more positive protection of environmental factors.</p> <p>Economic: Indicates how development will be considered where the Plan is silent or out of date. This will enable more positive protection of economic factors and support positive planning.</p> <p>Social: Implies control over development will be taken out of local control, however policy is still overall positive for enabling community participation as it supports neighbourhood planning.</p>													
Mitigation & maximisation	Mitigation of impacts will be delivered through the policies in the Local Plan. Policy needs to work with other policies to achieve objectives. (No change from previous appraisal)													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Uncertainties & risks	The policy relies on the effectiveness of the policies in the Plan to deliver sustainable development. Uncertainty has been removed for development not considered in the Plan or where the Plan is silent or out of date. (No change from previous appraisal)													
Short/ Medium & Long term impacts	The effects will be throughout the Plan period. (No change from previous appraisal)													
Cumulative & Synergistic impacts	The effects of the policy are considered to have a nationwide beneficial effect on encouraging sustainable development. (No change from previous appraisal)													

Core Policy 3: Delivering Sustainable Development

14.13 A policy direction on this issue was first incorporated within the 'Policy Directions' consultation entitled 'Sustainable Development', within a section on Climate Change. The 'Policy Directions' document was the first publication which sought to incorporate all the guiding principles for development into a single policy. The policy was informed by national requirements and by the response received from the public consultation to the 'Issues and Options' stage. The intention was that this would be an overarching policy and a guide to assessing future proposals.

14.14 The SA determined that the environmental impacts were generally positive, but identified that there was a need to strengthen the policy to protect built assets, improve lower landscape areas and achieve quality development and to consider waste. Generally the policy was found to have a positive economic impact but there was a need to incorporate more reference to encouraging business to use sustainable means of travel. The social impacts were considered as positive as it included a bullet point 'Protecting the amenity of our residents and seeking to improve the overall quality of life', as the SA process had previously identified that protection of amenity needed to be addressed within the Core Strategy.

14.15 The 'Shaping our District' consultation document incorporated a chapter on 'Sustainable Communities' which included two core policies 'Core Policy 2: Principles for Sustainable Development' and 'Core Policy 3: Use of Energy and Resources'. Both policies incorporated a bullet point list against which all new development would be assessed for compatibility. These core policies had been informed by the deficiencies identified through the SA process and had a wider scope than policies previously included in the 'Policy Directions' document, with extra criteria including: protecting and enhancing local distinctiveness; using prudent use of natural resources; enhancing the natural, built and historic environment; reducing the need to travel; fostering links between the environment and the economy; promoting community cohesion; and the avoidance of sterilising minerals. Core Policy 2 was also clearer on mitigating for the effects of climate change than previously and the policies scored high for sustainability (Ch.15 Table 15.2 p.140-141 Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated) CD1-8 refers).

14.16 The 'Local Plan: Strategy' combined Core Policies 2 & 3 into one Core Policy 'CP3: Delivering Sustainable Development'. Whilst the format remained the same further refinements were made to the policy to clarify certain requirements and this resulted in a more positive scoring from the SA group.

14.17 Minor modifications have been proposed to Policy CP3 which have strengthened the support for energy conservation. However this has resulted in no overall changes to the scoring as SFO E (prudent use of natural resources) already scored double positive. Overall it was determined that the policy would make a positive contribution to the delivery of sustainable development.

Table 14.3 Core Policy 3: Delivering Sustainable Development

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	++	++	++	++	++	+	+	+	+	+	+	+	+
Assessment of Effects	<p>Environmental: Clear and strong positive impact on all environmental effects.</p> <p>Economic: Positive impacts on safeguarding local jobs and thus indigenous business and encouraging business to use sustainable means of transport.</p> <p>Social: Clear and strong positive effects in relation to providing affordable homes and on reducing inequalities including safeguarding local jobs.</p>													
Local Plan Strategy (inc. Modifications)	++	++	++	++	++	++	+	+	+	+	+	+	+	+
Assessment of impact of Modifications	<p>Environmental: Strengthens the support for energy conservation, no change to the overall scoring as SFO E (prudent use of natural resources) as it already scores ++.</p> <p>Economic: No criteria affected by modifications and no additional effects arising from the other modifications.</p> <p>Social: No criteria effected by modifications and no additional effects arising from the other modifications.</p>													
Mitigation & maximisation	Seeks to minimise the impact of development to meet the needs of the present without compromising the ability of future generations to meet their own needs. Strength of policy is recognising the range of aspects that contribute to sustainable development and identifying that other policies are needed to deliver this and maintain the local distinctiveness of Lichfield District. (No change from previous appraisal)													
Uncertainties & risks	Policy should not conflict with other objectives and needs to remain relevant for entire plan period. Needs other policies to be effective to retain qualities and attractiveness of the area and enable the effects of climate change to be minimised. (No change from previous appraisal)													
Short/ Medium & Long term impacts	The effects of the policy will be evident in the short term and have greater influence as the plan period progresses, the effects should be permanent. (No change from previous appraisal)													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Cumulative & Synergistic impacts	The effects of the policy will have beneficial cumulative impacts and synergistic impacts especially upon natural resources and improving the environment, these impacts will have positive cross boundary implications. (No change from previous appraisal)													

Policy SC1: Sustainability Standards for Development

14.18 The policy 'Development & Sustainable Construction' was first included in the Core Strategy at the 'Shaping our District' stage. This was informed by the Staffordshire County-wide Renewable / Low Carbon Energy Study', undertaken by Camco on behalf of Staffordshire authorities in response to the requirements of Government guidance on addressing climate change through planning, as then contained in Planning Policy Statements 1 & 22, and the West Midlands Regional Spatial Strategy. The study was published in September 2010, and the proposed carbon standards for new development recommended were incorporated within Policy SC2 of 'Shaping our District'.

14.19 In the 'Local Plan: Strategy' policies SC1 & SC2 had been swapped round as it was considered that standards for development, incorporating carbon reduction targets, should come before the renewables policy, as utilising renewable energy is only one way in which carbon targets can be achieved.

14.20 Policy SC2 in 'Shaping our District', which set minimum and maximum standards for all new build and retrofitted development to ensure development minimises environmental impact, was refined and updated in the Local Plan: Strategy as Policy SC1 'Sustainability Standards for Development'.

14.21 The minor modifications to Policy SC1 update the policy by deleting preceding years; ensure conformity with the NPPF; add clarification through other minor wording changes and deletion of superfluous text. Although there is no change to the overall scoring of the policy in the sustainability appraisal, overall it was determined that the modifications will add to the sustainability of the plan.

Table 14.4 Policy SC1: Sustainability Standards for Development

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	-?	0	-?	++	++	++	0	+?	+?	0	0	0	+	?
Assessment of Effects	<p>Environmental: Clear and strong environmental impact on SFO D (mitigating and adapting to climate change), SFO E (prudent use of natural resources) and SFO F (reducing flood risk). Potential harm to the historic assets including conservation areas (SFOs A & C) but could be mitigated through guidance in SPD and other plan policies.</p> <p>Economic: Potential positive impact upon growth in small businesses to meet technological demand.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Social: Positive social impact as will result in better quality housing and lower energy bills addressing fuel poverty and providing good quality homes and workplaces. Potential for community participation through local groups like WFE (Whittington and Fisherwick Environmental Group) & possibly from Carbon Community Fund.</p>													
Local Plan Strategy (inc. Modifications)	-?	0	-?	++	++	++	0	+	+	0	0	0	+	?
Assessment of impact of Modifications	<p>Environmental: Changes in line with the NPPF have made the policy more achievable. No overall change to the scoring.</p> <p>Economic: No criteria affected by modifications and no additional effects arising from the other modifications.</p> <p>Social: No criteria effected by modifications and no additional effects arising from the other modifications.</p>													
Mitigation & maximisation	Policy seeks to minimise the impact of development on the environment without affecting the viability of development. (No change from previous appraisal)													
Uncertainties & risks	Viability in the current economic climate and the effectiveness of technologies in reducing carbon emissions may affect the deliverability of the policy. (No change from previous appraisal)													
Short/ Medium & Long term impacts	Viability in the short term may be impacted upon by the levels of growth, however this may result in more development having to reach a higher standard in the medium and long term of the plan, having a greater permanent beneficial impact. (No change from previous appraisal)													
Cumulative & Synergistic impacts	The policy incorporates a range of targets for different types of development. The policy requires the maximum standard to be achieved without undermining the viability of development. The viability in Lichfield District may differ from those within neighbouring authorities and the policy therefore supports development within neighbouring authorities. (No change from previous appraisal)													

Policy SC2: Renewable Energy

14.22 'Issues and Options' consultation sought opinions on which types of renewable energy would be preferred in the District and gave examples. It also sought opinions as to whether all new development should be required to generate a proportion of its energy use on-site from renewable sources. These options were assessed using the methodology set out in the Scoping Report. The LSWG determined that the scoping report does not exclude any types of renewable energy, but sets objectives which development should follow, including development for renewable energy. It also identified potential areas of conflict, such as Sustainability Objective A: To maintain and enhance landscape and townscape quality, and Sustainability Objective B: To promote biodiversity and geodiversity through protection, enhancement and management of species and habitats. In relation to new developments generating energy on-site, the LSWG commented that where energy generation is economically viable there should be a requirement to generate energy on-site, and there should be a strong obligation to justify why energy should not be generated on-site. It was

also determined that a threshold such as that of the Merton rule should be investigated to assist in meeting the target of reduction in CO₂ emissions in Lichfield District identified in the Scoping Report and in relation to the Government target of achieving 15% of electricity produced from renewable sources by 2020.

14.23 The 'Policy Directions' document identified the need for a core policy on energy consumption and renewable energy and identified options on whether the policy should seek to achieve the minimum government targets for electricity generation through renewable sources or whether Lichfield District should set a more ambitious target and whether the requirement for renewable energy generation should vary according to the type or size of development. The SA found the policy would have positive environmental impacts and may protect the highest quality areas but would not promote lower quality areas. The LSWG also found some aspects impossible to assess, such as how renewable energy could achieve high quality development. It also determined that there would be a mixed impact on biodiversity as the policy only relates to impact on designated sites and there was a need to strengthen references to historic environment. The LSWG also found that the policy was impossible to assess with regard to the impact upon waste and that there was a need to strengthen the policy to minimise the impact of pollution. It was considered that there would be no effects upon economic and social factors.

14.24 Following responses to the approach advocated in 'Policy Directions' a policy on renewable energy was then included in the Core Strategy at the 'Shaping our District' stage. Again this was informed by the Staffordshire County-wide Renewable / Low Carbon Energy Study', which estimated resource potential within the study area, breaking it down to local authority level, for a variety of different technologies. The evidence determined that Lichfield appeared amongst the most capable of partner authorities of meeting its energy needs locally, primarily from biomass sources and secondly from wind energy. This evidence was incorporated within Policy SC1 of Shaping our District.

14.25 In the 'Local Plan: Strategy' policies SC1 & SC2 had been swapped round as it was considered that standards for development, incorporating carbon reduction targets, should come before the renewables policy, as utilising renewable energy is only one way in which carbon targets can be achieved.

14.26 The 'Local Plan: Strategy' Policy SC2 refined the renewable energy policy to strengthen reference to the impact of such development on historic assets and to encourage biomass energy developments to be locally sourced from sustainably managed woodlands such as the National Forest, Cannock Chase and Forest of Mercia. The policy was amended to be less prescriptive in terms of the definition of the size of wind turbines referred to and overall this improved the SA scoring.

14.27 A main modification to the policy deletes Map 5.1 of the submitted Local Plan and incorporates the 'Wind Potential' areas identified on this map on the Policies Map that accompanies the Local Plan Strategy. The modifications, whilst adding clarity result in no change to the sustainability appraisal scoring for the policy and overall it was determined that the policy will help deliver more sustainable development across the District, whilst protecting the environment.

Table 14.5 Sustainability appraisal scoring for Policy SC2: Renewable Energy

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	+	++	++	+	0	0	+	+	0	+	-	0	0
Assessment of Effects	<p>Environmental: clear and strong positive effects on enhancing landscape & townscape quality, protecting the historic environment and mitigating & adapting to the effects of climate change. Scores remain positive for promoting biodiversity and for prudent use of natural resources and again no impact on reducing flood risk as not relevant to this policy.</p> <p>Economic: Positive for supporting local supply chains and encouraging business to use more sustainable forms of transport by seeking to exploit the District's biomass resources and sustainably managed woodlands. Will also encourage new employment through new technologies, such as renewable energy.</p> <p>Social: Potential positive impact upon healthy lifestyles through the provision of greener energy leading to an improvement in air quality and thus health benefits.</p>													
Local Plan Strategy (inc. Modifications)	++	+	++	++	+	0	0	+	+	0	+	-	0	0
Assessment of impact of Modifications	<p>Environmental: The modifications to this policy have added clarity for users of the document and there are no additional effects arising from the other modifications.</p> <p>Economic: The modifications to this policy have added clarity for users of the document and there are no additional effects arising from the other modifications.</p> <p>Social: The modifications to this policy have added clarity for users of the document and there are no additional effects arising from the other modifications.</p>													
Mitigation & maximisation	Criteria based policy which seeks to meet targets for renewable / low carbon energy, whilst minimising the impact of development on the environment. (No change from previous appraisal)													
Uncertainties & risks	The District is constrained by many environmental factors, including landscape, townscape and heritage assets. All of these may affect the deliverability of certain types of renewable technologies. In addition the effectiveness of technologies in reducing carbon emissions may effect the deliverability of the policy. (No change from previous appraisal)													
Short/ Medium & Long term impacts	Viability of biomass may be impacted upon in the short term, due to economic conditions, and phasing of developments. Biomass energy may be more viable in the longer term as the larger sites reach capacity. Short/medium/long terms impacts difficult to determine for wind energy, as maximum of 6 turbines across the District could come forward at any time. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Wind turbines can be large structures which may have implications for landscape impacts across local authority boundaries. The policy therefore incorporates a criteria requiring the cumulative impact of wind energy proposals to be assessed. (No change from previous appraisal)													

Infrastructure

14.28 As part of the Issues and Options consultation the issues raised covered a range of infrastructure needs including access to services and facilities, and the change in demographics particularly relating to the ageing population. The scoping report identified that the need for the promotion of local community facilities is evident in many of the sustainability objectives, especially in order to create mixed and balanced communities (SFO I), promote safe communities (SFO J) and enable improved community participation (SFO L). Strategic Objective 5 of the 'Issues and Options' consultation specifically related this to new housing and whether it should make provision for transport, education, health, open space and social and community facilities. An assessment using a compatibility matrix showed this would have a positive effect on creating mixed and balanced communities, promoting safe communities and improving the health of the population.

14.29 The 'Policy Directions' document incorporated a preferred policy direction and sought opinions on alternative options, including the potential use of CIL (Community Infrastructure Levy) as a means of funding infrastructure. Following discussions with stakeholders the 'Policy Directions' consultation incorporated a core policy with a development management policy and the formulation of an Infrastructure Delivery Plan to identify and deliver necessary infrastructure, services and facilities. The SA of the 'Policy Directions' found that the policy could and should deliver many environmental benefits set out in the Infrastructure Delivery Plan (IDP), particularly in relation to green infrastructure, and also found there would also be economic benefits arising from the improvement of infrastructure. The SA found that the social effects needed to be strengthened.

14.30 The 'Shaping our District' policy added a development management policy IP1: Supporting and Providing our Infrastructure and IP2: Carbon Investment Fund. A SA of the policy and development management policies was undertaken and published in the 'Sustainability Appraisal: Shaping our District'.

14.31 The 'Local Plan: Strategy' has a core policy and a development management policy as the Carbon Investment Fund has now been subsumed within the IDP. A list of key elements of strategic infrastructure to be delivered as priorities has been included, and the policy was updated to reflect the changing guidance in relation to CIL regulations and the NPPF. The policies are appraised in the tables below.

14.32 Policy IP1 is closely linked to CP4 and delivers its benefits through requiring to provide appropriate infrastructure in line with other policies in the Plan, the policy was strengthened in the Local Plan: Strategy through minor wording changes to reflect the changes in legislation and to ensure any replacement community facility serves the community affected by the loss and is in an accessible and sustainable location. The scoring is largely as for the Core Policy for the environmental and economic impacts, however the social impacts differ slightly as policy IP1 does not refer to community participation in decision making.

14.33 There are no modifications to these policies however there is the addition of 'places of worship' to the list of possible examples of social and community infrastructure. There are no implications for the sustainability appraisal than has been previously appraised and the policy will assist in the delivery of sustainable development across the District.

Table 14.6 Core Policy 4: Delivering our Infrastructure

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+	+	+	+	++	++	++	++	++	++	+/-	+	++
Assessment of Effects	<p>Environmental: Positive impacts upon landscape and biodiversity. No impact on historic environment, although there may be potential to broaden access to, and understanding of, the historic environment. Positive for climate change with the reference to renewables giving greater clarity. The priority list has given greater clarity to reducing flood risk through reference to water improvements.</p> <p>Economic: Clear and strong positive economic impact by making development more accessible and attractive to new investment and encouraging indigenous businesses. The inclusion of the priority schemes gives greater clarity to transport improvements.</p> <p>Social: More positive as the inclusion of the priority schemes gives greater clarity and the completion of the bypass which will relieve congestion on the historic core. The widening to include housing gives greater clarity and is more positive effect. Wording changes have enabled more certainty to replacement facilities being sited to serve the community affected, this has a more positive impact. Reference to cross boundary working and working with new and existing communities has improved the positive impact of the policy</p>													
Local Plan Strategy (inc. Modifications)	+?	+	+	+	+	++	++	++	++	++	++	+/-	+	++
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications.</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications.</p> <p>Social: There are no modifications to this policy and no additional effects arising from the other modifications.</p>													
Mitigation & maximisation	Policy enables the consequences of development to be mitigated for and partners to identify how benefits arising from new development can be planned for and maximised. (No change from previous appraisal)													
Uncertainties & risks	The Infrastructure Delivery Plan contains information from outside agencies whose plans may change. Delivery is dependent upon viability of schemes which may change over time. (No change from previous appraisal)													
Short/ Medium & Long term impacts	The effects short term may be limited as they will be largely felt as the larger schemes are built and become established. Medium impacts will relieve traffic congestion in the city centre as the completion of the Lichfield Southern Bypass and other associated infrastructure is delivered. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Policy will have synergistic beneficial effects through cross boundary working especially to the delivery of infrastructure and the greater benefit of biodiversity by allowing resources to be targeted and maximised. (No change from previous appraisal)													

Table 14.7 Policy IP1: Supporting & Providing our Infrastructure

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+?	+?	+	+	++	++	++	++	++	++	+/-	+	0
Assessment of Effects	<p>Environmental: Positive impacts upon landscape and biodiversity. No impact on historic environment, although there may be potential to broaden access to and understanding of the historic environment. Positive for climate change with the reference to renewables giving greater clarity. The priority list has given greater clarity to reducing flood risk through reference to water improvements.</p> <p>Economic: Clear and strong positive economic impact by making development more accessible and attractive to new investment and encouraging indigenous businesses. The inclusion of the priority schemes gives greater clarity to transport improvements.</p> <p>Social: Clear and strong positive effects as the inclusion of the priority schemes gives greater clarity and the completion of the bypass which will relieve congestion. The widening to include housing gives greater clarity and is more positive effect. Wording changes have enabled more certainty to replacement facilities being sited to serve the community affected, this has a more positive impact. Reference to cross boundary working and working with new and existing communities has improved the positive impact of the policy</p>													
Local Plan Strategy (inc. Modifications)	+?	+?	+?	+	+	++	++	++	++	++	++	+/-	+	0
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications.</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications.</p> <p>Social: There are no modifications to this policy and no additional effects arising from the other modifications.</p>													
Mitigation & maximisation	Policy enables the consequences of development to be mitigated for and partners to identify how benefits arising from new development can be planned for and maximised. (No change from previous appraisal)													
Uncertainties & risks	The Infrastructure Delivery Plan contains information from outside agencies whose plans may change. Delivery is dependent upon viability of schemes which may change over time. (No change from previous appraisal)													
Short/ Medium & Long term impacts	The effects short term may be limited as they will be largely felt as the larger schemes are built and become established. Medium impacts will relieve traffic congestion in the city centre as the completion of the Lichfield Southern Bypass and other associated infrastructure is delivered. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Policy will have synergistic beneficial effects through cross boundary working especially to the delivery of infrastructure and the greater benefit of biodiversity by allowing resources to be targeted and maximised. (No change from previous appraisal)													

Sustainable Transport

14.34 As part of the 'Issues and Options' consultation a number of questions were asked in relation to sustainable transport. These sought opinions on whether the current policy for a park and ride at Trent Valley Railway station should be encouraged and whether there were any other appropriate locations e.g. Shenstone, Blake Street, Rugeley Trent Valley. The proposal was assessed using the Sustainability Framework and concluded that measures to reduce the length of car borne trips, (which park and ride schemes can do as they encourage shift in mode from car to train) would contribute to an efficient use of energy. However it could be in conflict with Sustainability Objective I which encourages new employment to meet local need and thus discourages travel, as traffic would be generated to access the rail stations.

14.35 The 'Issues and Options' consultation also asked if there was a need for more rail stations. From the evidence in the Scoping Report the LSWG were not able to offer any information on this matter.

14.36 The 'Policy Directions' consultation included a preferred policy option which focused on existing transport issues, the Local Transport Plan schemes and modal shift. Other alternatives considered were a rail/bus based strategy with little or no future highways investment, this would include positive proposals for the re-opening of rail lines and new stations and new bus service provision. However due to the level of investment it was unclear whether this could be achieved. In addition a car based strategy that concentrated on securing highway improvements and better access to employment and town centres by car could be an alternative however this would not contribute to sustainable development objectives to any significant degree, including seeking to address climate change issues. The document included questions which sought any alternative options.

14.37 The SA of the 'Policy Directions' core policy was found to have a positive impact upon environmental issues. However there was a negative impact upon enhancing landscape and townscape quality as there was not enough local distinctiveness. The SA found the policy could be improved if it was linked to sustainable development policy to encourage use of SuDS and realise biodiversity benefits, positive benefits to reducing congestion and through traffic in city centre and thus improving air quality. The economic impacts were positive as there were clear and strong statements to reduce trips by car, encouraging sustainable travel and e-business but the policy could be improved by encouraging home working. The social impacts were generally positive as there were clear and strong statements to increase access, walking and reduce traffic impact in sensitive areas, which would have health benefits and improve safety. The policy could also be improved by linking to policy to realise the potential to reduce crime through design.

14.38 The 'Shaping our District' consultation added two development management policies (ST1 and ST2) and appraised the policies as a section, and the results of this are set out in table 15.6 in the Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated) (CD1-8 in the Examination Library).

14.39 The 'Local Plan Strategy' consultation retained the format of 3 policies but refined the wordings and resulted in a better overall score for the policies. Changes were made in response to the Shaping our District consultation, the NPPF, more up to date statistics and

the SA. Transport has a major influence upon the sustainability of development in Lichfield District, and a major focus of the Local Plan is to minimise the effects of the private car and mitigate for them. The plan policies seek to deliver a better network than exists at present and offer a wide range of accessible alternative transport modes. The tables below show the SA scoring of Core Policy 5 Sustainable Transport, and development management policies ST1 and ST2.

14.40 The modifications to these policies have been appraised below, and include the creation of attractive gateways around our railway stations, the widening of the support to initiatives related to public transport to include sustainable transport improvements and specifically improved walking and cycling links in rural communities; also the updating of information in relation to the A38 and Lichfield Southern Bypass. The policies will greatly assist in the delivery of sustainable development.

Table 14.8 Core Policy 5: Sustainable Transport

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+/-	+/-	+/-?	+	+	0?	++	++	+	++	++	+	+	+
Assessment of Effects	<p>Environmental: Overall positive environmental impacts as it seeks to reducing the need to travel. Improvements to other policies have reduced the uncertainty of the effects on wildlife connectivity and air quality and legislative changes as well as policy changes have negated the need for reference to SuDs within this policy therefore the policy scores better for mitigating and adapting to climate change. There will be clear and strong positive impacts on carbon reduction, arising from reducing petrol consumption and through supporting alternative fuel sources. The addition of schemes which lie within the historic core has led to uncertainty on protecting the historic environment, however other policies will protect and improve the historic environment and investment in the historic core will protect it in the long term, hence the potential mixed impact.</p> <p>Economic: The objective of the policy to reduce trips by car and will have positive impacts by encouraging e-business, the growth of indigenous businesses and the growth of higher skilled economic sectors, to meet the needs of population and provide for local retail needs.</p> <p>Social: Clear and strong statements to increase access, walking, cycling and public transport and reduce traffic impact in sensitive areas, which will have health and well being benefits. There will be greater surveillance and this could have a positive impact upon reducing anti-social behaviour, accompanied by Policy BE1.</p>													
Local Plan Strategy (inc. Modifications)	+	+/-	+/-?	+	+/-	0?	++	++	+	++	++	+	+	+
Assessment of impact of Modifications	<p>Environmental: The modifications have included the creation of attractive gateways which has resulted in a more positive score for enhancing townscape quality (SFO A). A lower score has been given for SFO E (prudent use of natural resources) due to the alteration of the policy to be more realistic in its ability to improve air quality as it now seeks to ensure that development does not contribute to unacceptable levels of air quality.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Economic: The modifications will give greater clarity to the improvements in sustainable transport available through defining the possible extent of the longer route arising from the re-opening of the Walsall - Lichfield rail line. The modifications also give greater clarity to the highway improvements by bringing the information up to date which gives greater clarity to developers and encourages city centre regeneration. The sustainability scorings remain unchanged as the economic SFO's which seek to reduce trips by car (SFO G Ec) and SFO H which encourages sustainable distribution and communication systems already score ++, the highest score available.</p> <p>Social: The policy will deliver clear and strong positive impacts upon increasing access to walking, cycling and sustainable means of transport. The modifications have increased the beneficial social impacts particularly for the rural areas, however the scoring remains unchanged for the sustainability appraisal as this objective, improving the availability of sustainable transport to jobs and services (SFO G) and creating mixed and balanced communities (SFO I) already scores the highest available a ++.</p>													
Mitigation & maximisation	Policy seeks to maximise alternative transport options to the private car and reduce the need to travel. (No change from previous appraisal).													
Uncertainties & risks	The Strategic Road Network (A5 and A38) is influenced at national level and improvements and upgrades are determined accordingly albeit informed by local evidence. Behavioural change is very difficult to influence, especially when sustainable transport options are limited and have been so for a long time. The explanation to the policy has been updated to reflect the known improvements to Wall Island as this scheme now has greater certainty.													
Short/ Medium & Long term impacts	Will depend upon positive influences of the spatial strategy to reduce congestion in the city centre through the completion of the Southern Bypass, creation of walk/cycle networks, improvements to bus and rail stations and city centre. Directing development to areas served by public transport will safeguard the attractive nature of the District, reduce isolation and direct investment to developed areas. Continuing improvement of alternatives to private car through the reopening of train line and improved sustainable transport services and influences on behavioural change should begin to be realised and continue to improve from the medium term of the plan period onwards.													
Cumulative & Synergistic impacts	There is a risk that the net increases in development will result in increased use of the private car, however if reliance upon the private car can be reduced along with carbon emissions and air pollution this could begin to slow the rate of climate change. There could be greater benefits to biodiversity through the use of the new cycle/footpath networks as corridors for new biodiversity habitat and movement, increasing accessibility to the natural environment and quality of life and also reducing flood risk. Protection of the rail lines and long distance corridors for movement will have positive cross boundary benefits by reducing congestion and thus increasing investment potential within and beyond the District. (No change from previous appraisal).													

14.41 Policy ST1 Sustainable Travel: This was not scored separately within the SA of the 'Shaping our District' consultation document, but was combined within the scoring for the core policy. There have been few changes to the wording and explanation to this policy and these have included; the addition of services to bullet point 1, so that schemes to improve services and facilities for non-car based transport are now included and the policy has been updated to reflect the NPPF and more up to date statistics. In addition the reference to travel plans now makes specific mention of their requirement on employers and educational establishments. When appraised the only negative scores were found within the environmental

impacts section. These were with regard to the potential impact upon the historic city centre. This is however safeguarded by other policies and the phrase 'where it can be made compatible with the transport infrastructure in the area.' A mixed impact upon trees and biodiversity was found as, whilst schemes can result in loss, there are potential benefits especially with the creation of walking and cycle networks and thus overall the environmental impact would be mitigated and would result in no loss of diversity of habitats. Due to other policies (Core Policy 3 and policies within the Natural Environment Section) there would be no loss of priority habitats and with clear and strong statements to improve air quality there would be an overall positive impact upon environmental impacts of the policy. There would be positive economic impacts and social impacts by locating development in areas which are easily accessible and widening choice of transport.

14.42 The modifications have added a new list item to clarify the role of transport assessments required on developments which will have an impact on the highways network. The implications for the SA arising from this change have been considered and whilst the changes improve the economic and social factors on the impact of development on the surrounding area and will require new development to mitigate for its impacts this has resulted in no change to the overall scoring for the development management policy and explanation as the SFO's which consider reducing trips by car (SFO G Ec) and on improving the availability of sustainable transport to jobs and services (SFO G Soc) as they already score ++. The modifications to the policy give greater certainty to the delivery of positive sustainable development.

Table 14.9 Policy ST1: Sustainable Travel

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+/-?	+/-?	+/-?	++?	+	0	++	+	0	++	+	0	+	+
Assessment of Effects	<p>Environmental: Potential clear and strong positive impact upon mitigating and adapting to climate change (SFO D) as it supports measure for non-car based travel and the development of infrastructure for electric and hybrid vehicles, this also results in a positive score for prudent use of natural resources (SFO E). Improvements resulting from development could have both positive and negative impacts upon landscape and townscape quality, biodiversity and the historic environment, however these matters are addressed in other policies.</p> <p>Economic: The policy will have a clear and strong positive impact upon reducing trips by car and encouraging sustainable distribution and communications systems, by requiring development needing access to a large number of people to be located where it can be accessible by non-car means.</p> <p>Social: The policy seeks to improve the availability of sustainable transport to jobs and services. Which contributes to the delivery of mixed and balanced communities and healthy lifestyles.</p>													
Local Plan Strategy (inc. Modifications)	+/-?	+/-?	+/-?	++?	+	0	++	+	0	++	+	0	+	+

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Assessment of impact of Modifications	<p>Environmental: The modifications have resulted in no change in the impact identified above.</p> <p>Economic: The modifications to the policy will have a more positive impact upon reducing the need to travel and encouraging sustainable distribution and communication systems, however the modifications add clarity and are not considered sufficient to alter the sustainability appraisal scorings, (SFO G Ec) as this already scores the highest score available of ++.</p> <p>Social: The modifications to the policy will have a greater positive impact upon improving the availability of sustainable transport to jobs and services however as this SFO (G Soc) already scores ++ this is the highest score available. The modifications will contribute to the delivery of mixed and balanced communities and healthy lifestyles and help redress health inequalities.</p>													
Mitigation & maximisation	Policy seeks to maximise alternative transport options to the private car, more sustainable methods of private car travel (such as providing facilities for electric vehicles) and reduce the need to travel.													
Uncertainties & risks	The policy is not site specific and the effectiveness of it will depend upon what schemes are brought forward and how they are operated and utilised.													
Short/ Medium & Long term impacts	The policy is flexible enabling a range of options to encourage sustainable travel patterns. In the short to medium term provision will be made to deliver a range of initiatives such as electric charging points, travel plans, new and enhanced public transport options and over the medium to long term the impact of this will be to achieve significant modal shift from the private car to more sustainable means of transport													
Cumulative & Synergistic impacts	New development has a cumulative impact on the transport infrastructure network both within and beyond the District and needs to mitigate for this along with other cumulative and synergistic impacts which may result such as a deterioration in air quality at particular traffic 'bottle necks' or an increase in traffic noise or accidents due to increasing vehicles on the roads with longer term potential negative impacts on health and wellbeing. By achieving modal shift (in combination with other policies) alternative forms of sustainable transport and reduced need to travel will mitigate for potential negative impacts over the plan period.													

14.43 Policy ST2 Parking Provision: This was not scored separately within the SA at the 'Shaping our District' consultation, but was combined within the scoring for the core policy. Since then the policy wording has been changed to include provision for alternative fuels including electric charging points and has added residential amenity following pressures which have arisen locally from representation to the 'Shaping our District' consultation and the Lichfield District Strategic Partnership Carbon Reduction Plan and the LSWG and has also now specified the SPD where standards will be set out. The explanation has also been widened to improve the sustainability by including reference to reducing carbon emissions and also to reflect the local distinctiveness of the area by enabling community led plans to influence car parking standards locally. The policy was appraised by the LSWG and was found to have an overall positive effect. There was some potential concern with regard to landscape and townscape quality and protection and enhancement of buildings and features of archaeological, cultural and historic value and their settings, however the changes to the policy and reference to the SPD and Policy BE1 will enable satisfactory protection and mitigation. The addition of charging points in assisting reducing carbon emissions enabled positive scoring for mitigating for the effects of climate change and use of natural resources. The policy was scored positively for economic impacts as whilst it restricts use of the car it

recognises its importance and strengthens existing centres. The policy scores positively for social impacts especially for cycling and community participation with its reference to the facilities for cycle parking and community led plans.

14.44 There are no modifications proposed to this policy. The changes to the remainder of the Strategy have been considered and have not been found to change the impact of this policy as already appraised in this sustainability appraisal. The policy will assist in the delivery of sustainable development.

Table 14.10 Policy ST2: Parking Provision

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+/-?	0	+/-	+	+	0	++	+	+	++	+	0	+	
Assessment of Effects	<p>Environmental: Mixed impact on the landscape and townscape quality (SFO A) and the historic environment (SFO C) car parking is often in centres with sensitive townscape and historic environments as the policy is not site specific the immediate impact is unknown but will be reliant upon other policies to deliver quality. The policy will have positive impact upon mitigating and adapting to climate change (SFO D) and prudent use of natural resources (SFOE) as it encourages more sustainable car travel through the provision of electric charging points. It will also reduce congestion in the City centre by directing cars to the periphery of the historic core of Lichfield.</p> <p>Economic: The policy will have clear and strong economic impacts by ensuring adequate parking to serve town centre uses, considering the potential to reduce individual on site parking requirements and encouraging alternative means of transport and cycle parking and supports the creation of mixed and balanced communities.</p> <p>Social: The policy has clear and strong positive impacts upon improving the availability of a range of means of sustainable transport to jobs and services (including electric cars), and creating mixed and balanced communities as it will support local centres, reduce the impacts of on street parking including that in residential areas, improving and preserving out-of centre amenity and traffic safety and providing increased accessibility (eg through disabled parking provision).</p>													
Local Plan Strategy (inc. Modifications)	+/-?	0	+/-	+	+	0	++	+	+	++	+	0	+	
Assessment of impact of Modifications	<p>Environmental: No modifications to the policy and no additional effects arising from the other modifications</p> <p>Economic: No modifications to the policy and no additional effects arising from the other modifications.</p> <p>Social: No modifications to the policy and no additional effects arising from the other modifications.</p>													
Mitigation & maximisation	<p>Policy seeks to ensure that travel by private car is strategically managed in such a way to avoid / reduce congestion particularly in centres and on-street parking in outlying areas, and to facilitate travel by more sustainable means eg via electric charging points and reducing the need for on-site parking.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Uncertainties & risks	The effectiveness of the policy will depend upon what schemes are brought forward and how these are managed and utilised.													
Short/ Medium & Long term impacts	In the short to medium term, the policy aims to ensure that car parking is managed in such a way to reduce congestion in centres and reduce on-street parking with the potential to improve road safety, reduce accidents, reduce pollution and improve health and wellbeing. It will reduce the burden on individual developments to provide on site parking whilst still ensuring adequate provision is made with resultant benefits for the local economy over the medium to long term. Provision of electric charging points will help encourage electric cars, contribution to modal shift to more sustainable transport means over the long term.													
Cumulative & Synergistic impacts	New development has a cumulative impact on the transport infrastructure network, including parking provision. By mitigating for its own impact, development will encourage more travel to centres by sustainable means however the increased number of cars from developments will still result in increased car-borne traffic with resultant increased pressures upon parking in centres, congestion, noise, pollution, loss of amenity and negative impacts on health and wellbeing. This policy will mitigate for these impacts by encouraging parking and associated congestion to be managed more effectively, and facilitating travel by more sustainable means.													

Homes for the Future

14.45 As part of the 'Issues and Options' consultation the issue of housing affordability was considered as was the accommodation needs of Gypsies and Travellers, young and older people. Opinions were sought on the options of where affordable housing was needed: Lichfield/Burntwood and/or the Rural areas, what proportion of new housing in the District should be built as affordable, whether this should vary between different parts of the District and whether if the evidence showed a need whether some sites should be identified solely for affordable housing. The options were assessed using the sustainability framework and it was considered that there was a need for affordable housing across the entire District. This did vary for different parts of the District, however there was insufficient evidence to establish the exact requirement and it needed to be considered alongside issues of demand, deliverability and viability.

14.46 The publication of the 'Policy Directions' document incorporated a preferred policy direction and sought opinions on alternative options. In the Homes for the Future section this resulted in 3 policies: Phasing and Trajectory, Housing Mix and Affordable Housing and Gypsy and Travellers.

14.47 The 'Policy Directions' consultation identified alternatives of having no phasing which would allow the market to determine when housing would be delivered in the District, however this was considered as not the most appropriate method to meet identified housing needs that arise during the plan period nor as the best way of delivering the required infrastructure. Another alternative was to make no strategic allocations within the strategy document however this was considered out of step with National Guidance by not enabling a 10 year supply of housing to be identified. The Preferred policy option was to incorporate a phasing policy which could assist in the implementation of the overall spatial strategy having regard to the identified housing needs and infrastructure requirements. The trajectory is required as part of the monitoring framework and review process, including the need to release or hold back

development, depending upon the circumstances. The 'Policy Directions' sought opinions on whether there were alternatives that should be considered and whether this approach was acceptable.

14.48 The SA of the 'Policy Directions' core policy showed a negative impact upon environmental issues as there was no reference to landscape or heritage protection and the policy also needed better reference to locally distinctive character, heritage, biodiversity, flood risk, climate change mitigation, infrastructure delivery, and prudent use of natural resources. There was an overall positive impact in relation to economic impacts which relates to the identified spatial strategy which seeks to reduce trips by private car and provide for improved levels of housing consistent with local needs. The SA showed a positive response with regard to social impacts but there was a need to link better to other policies to secure infrastructure, sport and recreation, transport and well being, but it was noted that the policy strongly supports delivery of affordable housing and specialist housing, other than for gypsies and travellers which is dealt with separately.

14.49 The 'Shaping our District' consultation replaced the Phasing and Trajectory policy with CP6 Housing Delivery which apportioned residential growth across the District during the plan period, within a range of strategic development locations, broad development locations and by settlement. Three development management policies were also included relating to a balanced housing market, affordable homes and gypsies, travellers and travelling showpeople.

14.50 The 'Local Plan: Strategy' consultation retained this format of policies but refined wordings and numbers in light of new evidence, responses to the Shaping our District consultation and the SA. The Strategic Development Locations are now called Strategic Development Allocations, Fradley was altered from a Broad Development Location to a Strategic Development Allocation, and North of Tamworth was added as a new Broad Development Location. The capacity of some of the Strategic Development Allocations was altered and the number of homes to be built in the rural settlements increased although the % increase is the same. The policy in the Proposed submission document of July 2012 included reference to allow the early release of sites to maintain a rolling 5 year supply of housing (+buffer). There was also added reference to small scale development being supported where they brought forward development through community led plans, which reflected the emphasis on localism of the plan and supports SFO L: enabling improved community participation. The addition of support for the delivery of pitches to meet the needs of gypsies, travellers and travelling showpeople within the policy widened the scope of the policy to meet the variety of needs within our communities. Overall the impact of the policy was considered positive and had been strengthened so would deliver more sustainable outcomes than previously proposed.

14.51 The modifications to the policy are in response to the Inspectors findings in that the plan does not make adequate provision for the objectively assessed need and the requirement to identify a site or sites for an additional 900 houses with an additional year to enable a 15 year period of housing supply. The housing requirement is therefore expressed as a minimum, and has increased to 10,030, the plan period extended to 2029 and the housing requirement increased to 478 new homes each year. Main modifications also include the addition of 2 further SDAs at Deans Slade Farm, South Lichfield and Cricket Lane, South Lichfield, and an amendment to the Fradley SDA to replace the proposed majority of employment uses

within the SDA (formerly 12 ha) with a further 250 homes. The phasing of strategic development allocations has also been removed, this is considered necessary to ensure housing supply is significantly boosted in the short term and was put forward through the Hearing sessions. The policy also includes a minor modification which adds the phrase 'a minimum' in reference to the provision of 14 residential pitches and 5 transit pitches for gypsies travellers and travelling show people. The overall impact of the policy is considered positive for the delivery of more homes within Lichfield District and will assist in the achievement of a more sustainable District.

Table 14.11 Core Policy 6: Housing Delivery

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	+/-	+?	--	+	+	+	+?	++	+	++	-	+	+
Assessment of Effects	<p>Environmental: The policy is closely aligned with the spatial strategy and will have a clear and strong positive impact upon landscape and townscape quality as it has avoided areas of highest landscape quality, utilised areas of lowest landscape quality (brownfield land), avoided important views and conservation areas and has had regard to the locally distinctive settlement pattern of the District. The impacts upon biodiversity are mixed as some of the sites have biodiversity interest on them however this can be mitigated. The impacts upon the historic environment should be positive but will be subject to detail and consideration of other policies. The scoring for adapting and mitigating for the effects of climate change is mixed as whilst new housing will enable opportunities for renewable energy and greater energy efficiency, they will still result in an increase in energy consumption in the short term and increase the amount of waste. With regard to the prudent use of resources, as most of the homes will be in brick this will have a negative effect upon natural resources, however, reducing the need to travel will reduce the need for fuel etc. The locations identified will enable flood risk to be reduced as they use brownfield land and will deliver investment in local infrastructure.</p> <p>Economic: The policy is closely aligned with the spatial strategy and other policies in the plan. Whilst car trips could be generated with new development the new evidence and additional information with the SDAs, schemes in the IDP and CP5 sustainable transport have enabled a more positive economic impact than previously appraised.</p> <p>Social: Social impacts have all been scored now and largely improved. The policy is closely aligned with the spatial strategy and other policies in the plan. New evidence and additional information with the SDAs, schemes in the IDP has resulted in more positive effects in relation to availability of sustainable transport to jobs and services across th District, not just from the SDAs. More housing will assist in meeting deficiencies for housing, services and facilities and supporting existing communities which will promote the health and well being of our communities and the district wide economy by providing homes for people consistent with local employment opportunities. The addition within the policy regarding 'small scale development supported by local communities and 'community led plans' reflects the work already being undertaken within our rural settlements and new legislation. The only negative is with regard to promoting safe communities as whilst new homes will be built to high security standards and with cycle and pedestrian routes, more homes provides more opportunities for burglary and more cars could result in a greater potential for road casualties.</p>													
Local Plan Strategy (inc. Modifications)	++	+	+?	+/-	+	+	+	+?	++	+	++	-	++	+

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Assessment of impact of Modifications	<p>Environmental: The policy is closely aligned with the spatial strategy and will have a clear and strong positive impact upon landscape and townscape quality as it has avoided areas of highest landscape quality, utilised areas of lowest landscape quality (brownfield land), avoided important views and conservation areas and has had regard to the locally distinctive settlement pattern of the District, the new SDA at Deans Slade Farm will enable a new view of the Cathedral from a publicly accessible location. The impact on biodiversity has been enhanced positively through the provision of the district park within the new SDA and other sites are able to mitigate for their own impact. The impacts upon the historic environment should be positive but will be subject to detail and consideration of other policies. The scoring for adapting and mitigating for the effects of climate change is mixed as whilst new housing will enable opportunities for renewable energy and greater energy efficiency, they will still result in an increase in energy consumption in the short term and increase the amount of waste. With regard to the prudent use of resources, as most of the homes will be in brick this will have a negative effect upon natural resources, however, reducing the need to travel will reduce the need for fuel etc. The locations identified will enable flood risk to be reduced as they will enable enhancements in local infrastructure.</p> <p>Economic: The policy is closely aligned with the spatial strategy and other policies in the plan. Whilst car trips could be generated with new development the provision of a greater proportion of housing in areas which are accessible to Lichfield City centre and employment opportunities will give a more positive economic impact upon Lichfield City.</p> <p>Social: More housing will assist in meeting deficiencies for housing, services and facilities and supporting existing communities which will promote the health and well being of our communities and the district wide economy by providing homes for people consistent with local employment opportunities. Greater provision within Lichfield City where there is access to the widest range of will improve the health and well being of the existing and new populations. The only negative is with regard to promoting safe communities as whilst new homes will be built to high security standards and with cycle and pedestrian routes, more homes provides more opportunities for burglary and more cars could result in a greater potential for road casualties. The modifications to the policy enables the number of pitches for gypsies, travellers and travelling showpeople to be increased to meet the needs of this community, which is more positive for creating mixed and a balanced community however as this scores ++ (I Soc) there is no change in the overall scoring shown within the table.</p>													
Mitigation & maximisation	Policy seeks to deliver a continual supply of the right type of housing / accommodation and maximise the resources such as land available, and mitigate for the impacts of development through the delivery of appropriate infrastructure.													
Uncertainties & risks	Reduces the risk of under providing housing land and pitches.													
Short/ Medium & Long term impacts	The lead in time for large scale development can result in the beneficial impacts taking longer to realise. The development will facilitate a number of key infrastructure improvements which will benefit the District and support the economy of the City centre and District as a whole. The removal of the phasing from the policy will significantly boost the supply of housing land in the short term.													
Cumulative & Synergistic impacts	The delivery of housing on greenfield sites would result in the permanent loss of some areas of greenfield land and the cumulative impacts of this will increase as more sites are built upon, however this should be temporary as other policies require mitigation and the habitat gains will be permanent. Developments near to the boundaries of Rugeley and Tamworth will have beneficial economic impacts and alignment to these settlements rather than for centres within Lichfield District. (No change from previous appraisal)													

Housing Mix & Affordable Housing

14.52 The 'Policy Directions' consultation identified 4 alternative options which incorporated reducing thresholds or seeking contributions towards affordable housing on all sites; a blanket percentage across Lichfield District with only site specific viability tests at the point of a planning application; targets that vary within the District (as between more and less viable parts of the District, for example); no set target in the strategy but simply ad hoc targets based on viability; and set in SPD from period to period (say 6 month ones during periods of rapid change) Opinions were sought on these, however it was decided not to proceed with these options as they were either not considered to conform with national guidance, would be complex and difficult to administer, would not be supported by evidence or would not provide clarity or consistency to house builders and landowners.

14.53 The preferred policy direction sought to achieve a balanced housing market through the provision of a mix of house types, size and tenure. It proposed an upper target of 40% for affordable housing on sites of over 15 dwellings in Lichfield and Burntwood and for 5 dwellings elsewhere. The percentage requested would respond to the market at the time as part of a 'dynamic model' providing flexibility and the ability to maximise the delivery of affordable homes in the District to meet our significant locally derived affordable housing needs. The 'Policy Directions' consultation sought opinions on whether this should be the preferred policy option, should the thresholds in urban areas be reduced, and to what level, whether all housing development should make contributions to affordable housing provision in the District and if there were any other alternatives that should be considered.

14.54 The SA of the Policy Directions Housing Mix and Affordable Housing policy was considered to have an overall negative impact upon environmental issues. The SA identified negative impacts loss of gardens, trees, quality buildings, archaeology, no minimisation of flood risk as there is no cross referencing to other policies. However it did consider that affordable housing and smaller housing will have positive impact on climate change and prudent use of resources as they use less materials to build and use less energy to heat. In addition, affordable housing has a higher minimum standard for energy efficiency. With regard to economic impact this would be mixed as there are economic impacts for providing the the right kinds of homes for those who work locally. Social impacts would be positive for provision of affordable housing and specialist housing and mixing social groups, but there was a need for more information on increasing accessibility as there could be negative impact for generating more car traffic in areas where there are more people potentially increasing road casualties.

14.55 In the 'Shaping our District' consultation this policy was split into two development management policies (H1: A balanced housing market and H2: Provision of affordable homes). The SA matrix of the Shaping our District version of these policies was not included within the Sustainability Appraisal: Shaping our District.

14.56 The overall impact of policy H1 has improved in the 'Local Plan: Strategy' document and since the 'Shaping our District' consultation. This is detailed in the Sustainability Appraisal of the Proposed Submission Local Plan Strategy (Updated) document which is CD1-8 in the Examination library. The changes improved the policy to reflect the information from the robust and up to date evidence base for housing needs and the needs of gypsies, travellers and travelling showpeople and made the policy more locally distinctive and able to respond

to specific locally identified needs. There has been a main modification to the policy since the proposed submission in July 2012 which has increased the length of the plan period by 1 year to 2029, in order to achieve a 15 year plan from the point of adoption. Overall the impact of the policy is positive and will deliver sustainable development.

14.57 Policy H2 was amended from the 'Shaping our District' plan following the availability of more up to date evidence which identified that by creating a balanced housing market and addressing significantly locally derived housing needs is key to encouraging young and locally economically active to stay within the District. In addition greater emphasis on addressing locally identified needs of privately delivered schemes when considering tenure, size and type and widening of policy to facilitate affordable housing on small rural exception sites has improved the social effects of the policy.

14.58 The modifications to policy H2 Provision of Affordable Homes arose through the Hearing Sessions and has given clarity to developers with regard to the implications of the policy upon the viability of schemes where there may be site specific exceptional circumstances. The policy will have a positive impact upon increasing the sustainability of the District.

Table 14.12 Policy H1: A Balanced Housing Market

SFO:	Environmental						Economic			Social					
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Local Plan Strategy	+	0	0	--	-	0	+	+	+	+	+	+/?	+/-?	+/?	+
Assessment of Effects	<p>Environmental: The policy scores positively for enhancing landscape and townscape policy as the reference to SPD and gives greater emphasis to design. Negative impact to mitigating and adapting to the effects of climate change as more houses means more waste will be produced, and the effects are unknown of the impact of this at the time - the potential for utilising this energy is currently outside the District. Negative score for prudent use of natural resources as the majority of homes will be built from brick to match the local vernacular.</p> <p>Economic: Positive economic effects as the policy will deliver housing consistent with local employment opportunities and reduce trips by car through homeworking. Positive economic effect with the growth of e-commerce and homeworking having greater influence.</p> <p>Social: Positive social impact on delivering specialist housing and reducing health inequalities. Seeks to balance needs for ageing population and retention of economically active. Negative score for promoting safe communities as more persons could result in greater road casualties however reference to SPD will enable positive impact upon crime sensitive design and inclusion of reference to support for neighbourhood/parish housing needs survey enables improved community participation</p>														
Local Plan Strategy (inc. Modifications)	+	0	0	--	-	0	+	+	+	+	+	+/?	+/-?	+/?	+
Assessment of impact of Modifications	<p>Environmental: No change in the impact upon the sustainability scorings and no additional effects arising from the other modifications.</p>														

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Economic: No change in the impact upon the sustainability scorings and no additional effects arising from the other modifications.</p> <p>Social: No change in the impact upon the sustainability scorings and no additional effects arising from the other modifications.</p>													
Mitigation & maximisation	The policy seeks to mitigate for the current imbalance in the housing market, by maximising opportunity to address local need and emerging needs during the plan period. (No change from previous appraisal)													
Uncertainties & risks	Provision is largely through private house building industry which can be an unpredictable market. (No change from previous appraisal)													
Short/ Medium & Long term impacts	The delivery of large scale development will have the greatest influence on redressing the imbalance. Neighbourhood plans could play valuable part in meeting local need throughout the plan period. The benefits of the policy should increase during the plan period.													
Cumulative & Synergistic impacts	It is important that the wider housing needs of the area can be achieved having regard to the needs of neighbouring authorities. The joint evidence base with Tamworth and Cannock Chase highlights the needs of south east Staffordshire which are met in part by this policy. By enabling residents to continue to live where their support networks are will improve the health of the population. (No change from previous appraisal)													

Table 14.13 Policy H2: Provision of Affordable Homes

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+	0	?	--	-	0	+	+	+	+	+	+	+	+
Assessment of Effects	<p>Environmental: The policy scores positive for enhancing landscape and townscape policy as other policies should mitigate for the impact upon conservation areas. Other policies will address the impact upon biodiversity and flood risk. More negative effect as more waste will be produced and the potential for utilising this for energy is outside the District. Also negative for prudent use of natural resources as the majority of homes will be built from brick to match the local vernacular.</p> <p>Economic: Positive economic effects as the policy will deliver housing consistent with local employment opportunities and reduce trips by car through homeworking. Positive economic effect with the growth of e-commerce and homeworking having greater influence.</p> <p>Social: Positive social impact on delivering affordable housing and reducing health inequalities. More positive social impact as the policy relates to reflecting the housing needs in the locality when assessing tenure, size and type. New evidence has reduced uncertainty in how to achieve a sustainable, mixed and balanced community. Reference to widening support for neighbourhood/parish housing provision enables a positive impact upon improving community participation and reference to other policies to deliver safe communities will also assist in achieving positive impacts.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy (inc. Modifications)	+	0	?	--	-	0	+	+?	+	+	+	+?	+?	+
Assessment of impact of Modifications	<p>Environmental: No change in the impact upon the sustainability scorings and no additional effects arising from the other modifications.</p> <p>Economic: No change in the impact upon the sustainability scorings and no additional effects arising from the other modifications.</p> <p>Social: No change in the impact upon the sustainability scorings and no additional effects arising from the other modifications.</p>													
Mitigation & maximisation	The policy seeks to mitigate the current imbalance in the housing market, by maximising opportunity to address local need and emerging needs during the plan period, without affecting the viability of schemes.													
Uncertainties & risks	As provision is largely through private house building industry a dynamic viability model will be used to ensure affordable housing is delivered in the plan period. The policy includes reference to small exception sites which may have a greater environmental impact however the social impacts in redressing the affordability imbalance which exists in the rural areas and the policies safeguarding environmental issues should be sufficient to deliver social benefits without environmental cost. The changes to the policy will give greater certainty to developers.													
Short/ Medium & Long term impacts	The delivery of large scale development will have the greatest influence on addressing affordable housing needs and the continual supply of affordable units will be crucial. Parishes could play valuable part in meeting local need throughout the plan period. The benefits of the policy should increase during the plan period. The removal of the phasing policy will enable the housing imbalance to be addressed in the shorter term.													
Cumulative & Synergistic impacts	It is important that the wider housing needs of the area can be achieved having regard to the needs of neighbouring authorities. The joint evidence base with Tamworth and Cannock Chase highlights the needs of south east Staffordshire which are met in part by this policy. By enabling persons to live in their locality and local support network there are greater health well being benefits to those communities. (No change from previous appraisal)													

Gypsies, Travellers and Travelling Showpeople

14.59 The 'Issues and Options' consultation included reference to the commissioning of a Gypsy and Traveller Needs Assessment. The Scoping report incorporates a need to consider the needs of Gypsy and Travellers as part of creating mixed and balanced communities, which relates to SFO I.

14.60 The 'Policy Directions' identified a preferred policy incorporating areas of search and listed policy criteria. The policy directions identified alternative options as: potentially identifying specific sites for gypsy and traveller accommodation or rely on a criteria based policy. It was considered neither of these alternatives were viable, and it sought opinion on the preferred policy and if there were any alternatives that could be considered.

14.61 An SA was undertaken on the preferred policy option. The SA found the policy would have an overall positive environmental impact and should be beneficial to protecting landscape, biodiversity, historic views, green corridors, historic environment and controlled waters with no impact upon reducing flood risk. The locations identified would enable car

based trips to be reduced which would have a positive economic impact. Overall there would be a positive social impact as locations could encourage walking/ cycling to local facilities and increase accessibility to these e.g health care. It was considered to be clear and strong in meeting specialist housing needs for gypsies, travellers and travelling showpeople and beneficial for providing social integration with other communities.

14.62 The SA matrix of the 'Shaping our District' version of these policies was not included within the Sustainability Appraisal: Shaping our District, but is included in the Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated) document which is CD1-8 within the Examination library.

14.63 The overall impact of Policy H3 improved since the 'Shaping our District' consultation. The policy within the Local Plan: Strategy was expanded to include the A5 and A38 corridors which were identified in the GTAA as the main corridors of gypsy and traveller movement within Lichfield District. Other changes reflected the need to protect floodplain, consider the size of site in relation to settlements, protection of local amenity and environment and access.

14.64 Other modifications have been made to the policy through the hearing sessions to recognise that the national guidance may not provide the best layout solution in all cases and recognise that there is a need for sites. Overall the impact of the policy is positive and has been strengthened and will deliver more sustainable outcomes than previously proposed.

Table 14.14 Policy H3: Gypsies, Travellers & Travelling Showpeople

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+/-	+?	--	0	+	+?	0	+?	+?	+?	+	+?	?
Assessment of Effects	<p>Environmental: The policy will have a potentially positive impact upon the environment when considered with other policies within the plan and the criteria set out in the policy. There is little scope to mitigate for the impacts of climate change and more waste will be created.</p> <p>Economic: Policy supports small businesses and home based business and reduces trips by car, although reference to A5 and A38 corridors adds uncertainty to this criteria.</p> <p>Social: The reduction in illegal sites will enable a reduction in road casualties. Reference to sites not putting unacceptable strain on infrastructure will result in a positive impact upon health and wellbeing for new residents and existing residents.</p>													
Local Plan Strategy (inc. Modifications)	+?	+/-	+?	--	0	+	+?	0	+?	+?	+?	+	+?	?
Assessment of impact of Modifications	<p>Environment: The policy will have a potentially positive impact upon the environment and the modifications allow for greater flexibility in the consideration of local influences. As no sites are identified within the policy the effects remain uncertain</p> <p>Economic: There are no further economic influences arising from the modifications. The policy is potentially positive for economic factors.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	Social: The policy is potentially positive for social factors by allowing greater local flexibility, the modifications were not considered sufficient to change the overall scoring for this section.													
Mitigation & maximisation	Flexibility is incorporated in the policy approach and integration of communities will help cultural cohesion. (No change from previous appraisal)													
Uncertainties & risks	As no sites have been identified there is potential for the non-delivery of this policy until an 'Allocations' document is in place, which would leave gypsies etc in need. However inclusion of the policy enables early delivery of a site and greater flexibility in providing a policy framework to consider proposals on a site by site basis. (No change from previous appraisal)													
Short/ Medium & Long term impacts	Impacts will be dependent upon when the needs of the gypsy community are met and when the needs arise. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Considerable cross boundary influences due to the transient nature of gypsies, travellers and travelling show people. (No change from previous appraisal)													

Economic Development and Enterprise

14.65 Employment and Economic Development: As part of the 'Issues and Options' consultation a number of questions were asked in relation to Economic Development and Enterprise. These sought opinions on how to ensure there was sufficient employment land available to meet local needs when the current committed supply is equivalent of the District's strategic requirement, and opinion on whether the committed but undeveloped sites should be considered for re-allocation for alternative uses such as housing. The document also sought opinion as to whether there are any existing employment sites or industrial estates which should be protected. These questions were assessed using the Sustainability Framework which concluded that there was no specific information in the Scoping Report to address these issues. However the SA process did identify that provision of employment land was needed to support the creation of mixed and balanced communities, and as a principle, employment sites and industrial estates need to be safeguarded. It was considered that further research should be undertaken to establish current viability and long term suitability of retaining all sites. The Scoping Report supports sites for distribution and warehousing being close to main transport networks.

14.66 Additional questions were asked seeking opinion on 'Where should offices in the District be directed, if the strategic requirements of 30,000sqm cannot be met within Lichfield City Centre and suggested options of peripheral city centre locations/ outskirts of Lichfield City/ Burntwood Town Centre/ Elsewhere.' These options/locations were assessed using the SA Framework and it was found that Lichfield City Centre scored well especially with regard to accessibility and on providing a wide range of jobs, thereby fulfilling local needs. However there were some negatives with regard to impact on townscape. Burntwood town centre scored highest where this would involve redevelopment of existing employment sites rather than peripheral development near to sites with biodiversity interest. The option which was least sustainable was office development in countryside locations especially with regard

to improving the availability of sustainable transport to jobs and services and in creating mixed and balanced communities. Development on the edge of Lichfield City and on the periphery of the City Parish boundary scored less well than options in Burntwood and Lichfield City Centre, but were more sustainable than countryside locations.

14.67 Further questions sought opinion on whether employment development, housing and other development should be encouraged where there are good public transport links – such as close to railway stations or key bus routes. The response from the LSWG was that this approach supports sustainability framework objectives (SFO's) I: To create mixed and balanced communities, SFO H To encourage sustainable distribution and communication systems, SFO G: To improve the availability of sustainable transport options to jobs and services and SFO D: To mitigate and adapt to the effects of climate change.

14.68 The 'Policy Directions' consultation included a preferred policy option which incorporated an employment strategy of attracting high earning office and business, education and research sectors and directing this towards the town centres, and a sequential approach to those uses with other requirements. The proposed policy direction considered protection of existing employment areas and permitting their modernisation. However there may be limited opportunities to fulfil the obligations of the spatial strategy, although it does state that this should not be for office use which should be directed to the town centre.

14.69 The policy direction sought to encourage new business and survival and sought to include measures that ensure that those in the most deprived communities can access local economic opportunities and sought to develop the economy to positively address climate change. The policy also recognised the role of the rural economy and the need to protect mineral resources, sought to maintain the rural sustainable settlements by being the focus for rural employment creation, improving rural access to technology, diversification of rural employment into uses appropriate to a rural area including opportunities within the Central Rivers Project Area (now entitled the Central Rivers Initiative). The policy also recognised the contributions made to the economy by key tourist attractions.

14.70 Alternatives considered were to direct all employment investment to the urban areas where there are the greatest opportunities for accessing public transport. It also sought opinion on any alternative options, any need for related facilities to serve existing or proposed employment sites and which employment sites need to be protected for future employment uses.

14.71 The core policy within the 'Policy Directions' document included reference to general employment land and space for new office development, rural enterprise and tourism. The SA of the 'Policy Directions' found the employment policies to have an overall positive impact on environmental, economic and social effects. The environmental effects of the policy were that there would be no effect on landscape, and there would be a beneficial effect on conservation areas, historic buildings, and access to tourism. Views, especially of Lichfield City, could be stronger on quality of build and their settings. The policy would be beneficial for green corridors Central Rivers Project (now entitled the Central Rivers Initiative) and Chasewater and for habitat diversity. Opportunities for renewable energy could be improved by linking this policy to a sustainable design policy. There was also found to be a positive impact upon reducing waste through redevelopment of out date stock and its replacement with high quality offices which could reduce out commuting and assist with carbon reduction,

as new build would be more energy efficient. The policy included clear and strong statements on preventing sterilisation of mineral reserves. The SA found there were no negative economic impacts arising from the policy, as it sought to reduce trips by car through encouraging jobs to match residents needs; encourage local supply chains through shared locations and encourage distribution to be close to transport networks. The policy was found to be clear and strong for encouraging research and development and new employment consistent with local needs, and was also positive for encouraging indigenous business and small business, but could be more specific to achieve balanced portfolio including 'high tech' and farm diversification in rural areas. No negative impacts arose with regard to social impacts of the policy. Due to the locations and through design, there should be an improvement in the accessibility of jobs and this would assist in reducing car traffic, especially in sensitive areas such as Lichfield's historic core. Encouraging tourism would also have beneficial social impacts through increasing the cultural / recreational offer in the District.

14.72 The 'Shaping our District' consultation included a separate policy for tourism Core Policy 9: Tourism along with Core Policy 7: Employment and Economic Development and Core Policy 8: Our Centres and these policies are appraised in the Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated), which is Examination document CD1-8.

14.73 Core Policy 7: Employment and Economic Development in the 'Shaping our District' included a list of the employment locations for general employment and land available for redevelopment. This has positive environmental impacts on safeguarding locally distinctive settlement character, landscape impact, clear and strong positive economic impacts and social impacts on increasing the availability of sustainable transport to jobs and services. The policy within the Local Plan: Strategy was informed by more up to date evidence provided by the employment land review. The policy was amended and site specific reference was removed from the policy and partly included within the our settlements section, this reduced the clarity on the impact upon landscape and townscape quality and resulted in a lower sustainability appraisal scoring than the previous policy, it also included reference to the need for 10 hectares to be identified in the Local Plan: Allocations document to allow flexibility and this should be to serve Lichfield City, this added uncertainty and gave a lower sustainability scoring for townscape and landscape, biodiversity, a mixed impact upon archaeology and mitigating for the impacts of climate change due to the potential impact arising due to the historic nature of Lichfield City. The economic impacts were still considered clear, strong and positive and the social impacts were considered as generally positive.

14.74 The modifications to the policy have included the 12 hectares of land within the Cricket Lane SDA for employment uses and removal of reference to the 10 hectares of land required for flexibility of provision to specifically serve Lichfield City, with this being widened to provide flexibility to the portfolio as a whole. Other changes clarify that it is not just the allocation of land on its own that will deliver the employment growth referred to in the policy and to clarify employment uses; changes also include providing a positive flexible approach in line with the NPPF to encourage working with local economic partnerships and to prevent misinterpretation of the policy being focused on rural buildings rather than the wider rural economy. Whilst the modifications have resulted in no changes to the overall scoring of the sustainability of the policy, largely due to the remaining uncertain nature of the location of the 10 hectares required to ensure flexibility of provision, the policy will result in positive impacts in relation to increasing the sustainability of Lichfield District.

14.75 Our Centres: As part of the Issues and options consultation, one of the spatial objectives was to improve town centres. The Scoping Report identified that this objective would positively contribute to the creation of mixed and balanced communities. As part of the preferred option consultation, alternative options were proposed for the consideration of somewhat larger growth of shopping for Burntwood, so that even less trade goes out of the town than would occur with the levels of growth recommended. However this growth level was considered as potentially having a detrimental impact on neighbouring centres and at the time would not have been in conformity with the RSS. Questions were also asked if there were any further options which should be considered and if the preferred policy direction was agreed with.

14.76 The SA of the 'Policy Directions' policy for Town Centres and Local and Village Centres was found to have an overall positive impact upon sustainability. With regard to environmental effects, the SA found the policy could have mixed effects on rural and city centre archaeology and heritage buildings by focusing development in these locations and this would depend upon implementation / policy linkage. The policy could be beneficial if linked to quality design, climate change and sustainable design and including a reference to scale of growth would help the villages. The economic impacts were overall found to be positive but the SA considered that the policy could be improved as it was clear and positive for meeting local retail needs and, whilst it would encourage more trips, these could be by public transport. The policy could support local supply chains for local businesses, by encouraging business to use sustainable forms of transport, encouraging employment consistent with local needs, and for encouraging small businesses by providing space for retail as part of the Strategic Development Locations (now Strategic Development Allocations). The social impact of the policy was mixed: The SA found the policy was positive as the centres are the most accessible locations by non-car transport, although this could worsen the impact of traffic in areas sensitive to traffic impact such as the Conservation Areas and residential areas. The policy could improve safety aspects if it was linked to other policies. However it was considered that the policy may lead to potential conflict as more housing in the town centre could result in more conflict with late night uses, and may increase potential for road casualties, and more opportunities for drug and alcohol abuse unless the focus shifts to family entertainment and leisure uses, once the Friarsgate scheme has been implemented.

14.77 The policy within the 'Shaping our District' document included a table of the hierarchy of centres, and updated figures for growth within Lichfield City and Burntwood, as well as reference to office growth within Burntwood town centre, and a development management policy in line with PPS4 (now superseded by the NPPF) which set thresholds for retail assessments.

14.78 The Local Plan: Strategy included the definition of town centre boundaries and removed the figures on levels of growth in Lichfield City and Burntwood to the Our Settlements section of the plan.

14.79 The modifications to the plan have added a neighbourhood centre within the SDA at Cricket Lane and have added a reference to having regard to centres outside the District, which was a modification arising from representations from Walsall Council. The modifications

have resulted in no change to the overall scoring for the sustainability appraisal of this policy. The new centre will mitigate for the impact arising from the associated new developments and the regard to centres outside the District has cross boundary influences.

14.80 Tourism: Within the 'Issues and Options' document tourism had previously been incorporated in the Recreation, Leisure, Culture and Tourism section. Specific questions within the 'Issues and Options' consultation sought opinions on whether the Council should aim to identify and protect key public open spaces from development and if so which ones. It also asked where new facilities are created or existing ones expanded, should they maximise the use of sustainable transport modes. Other questions posed included: what would make Chasewater a more popular visitor destination and should Drayton Manor Park be expanded to permit year round visitor accommodation?

14.81 The responses to these questions by the LSWG are detailed in the Interim Core Strategy Sustainability Appraisal (ICSSA) paras 5.24 to 5.29, this is CD1-19 in the Examination library.

14.82 In the 'Policy Directions' document as part of the preferred policy direction, tourism was included within the policy relating to General Employment land and space for new office development.

14.83 The SA of 'Policy Directions' found the proposed policy to have an overall positive impact on environmental, economic and social effects. The environmental effects of the policy were that there would be no effect on landscape, and there would be a beneficial effect on conservation areas, historic buildings access to tourism. Views, especially of Lichfield City, could be stronger on quality of build and their settings. The policy would be beneficial for green corridors, Central Rivers Project (now entitled Central Rivers Initiative) and Chasewater and for habitat diversity. Renewable energy could be improved by linking this policy to a sustainable design policy. There would be a positive impact upon reducing waste through redevelopment of out date stock and its replacement with high quality offices which could reduce out commuting and new build would be more energy efficient, (more akin to the now Core Policy 7). The policy included clear and strong statements on preventing sterilisation of mineral reserves. The SA found there were no negative economic impacts arising from the policy, as it sought to reduce trips by car by encouraging jobs to match residents skills and needs; shared locations encourage local supply chains and encouraging distribution close to transport networks (more akin to the modified Core Policy 7). The policy was clear and strong for encouraging research and development and new employment consistent with local needs, and was also positive for encouraging indigenous business and small business, but could be more specific to achieve balanced portfolio including 'high tech' in rural areas, (more akin to the modified Core Policy 7) and farm diversification. No negative impacts arose with regard to social impacts of the policy. Due to the locations and through design there should be an improvement in the accessibility of jobs and this would reduce car traffic, especially in sensitive areas such as the historic core. Encouraging tourism would have beneficial cultural / recreational effects.

14.84 The 'Shaping our District' consultation removed reference to minerals from the policy as this was more satisfactorily dealt with in other policies. It split the policy from the employment element but retained it within the economic development and enterprise section.

The policy included reference to sustainable tourism, the link between the rural economy and tourism and the need to safeguard the rural areas to ensure development is of a scale and nature appropriate to the area.

14.85 The 'Local Plan: Strategy' SA of Core Policy 9: Tourism retained the format of 'Shaping our District' but refined the wordings slightly and added further schemes to the policy. Of note is the inclusion of the Saxon Hoard following its discovery, and Lichfield District's role as part of the Mercian Trail.

14.86 Modifications to the policy have added clarity especially with regard to the Lichfield Canal heritage towpath trail. Whilst this has clarified the impact of these proposals on the Cannock Extension SAC (Special Area of Conservation) this has not resulted in a change to the overall impact of the policy on biodiversity (SFO B). Previously the sustainability appraisal had considered there would be no impact of the policy upon improving health and improving community participation, however these scores have been reappraised as potentially positive due to the opportunities which arise through volunteering, using, and being part of the many organisations referred to within the policy such as National Forest, Central Rivers Initiative, National Memorial Arboretum and Lichfield Canal and heritage towpath trail. The policy will make a positive contribution to the sustainability of the District.

Table 14.15 Core Policy 7: Employment & Economic Development

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	?	+/-?	+/-	+/-	+?	+	++	++	++	++	+	0	+	+
Assessment of Effects	<p>Environmental: The policy now sets employment creation targets and the locations have been removed from the policy and partly included within the 'our settlement' policies. No specific location had been identified for the 10 hectares serving Lichfield City and this added an element of uncertainty, which is reflected in an apparent lower score for SFO A, (landscape and townscape) SFO B (biodiversity) and retention of the same score for SFO C (historic environment). Inclusion within the policy of links between the environment and the economy, supporting a low carbon economy, redevelopment and encouraging energy efficiency and reducing the need to travel have enabled positive scoring for SFO E (prudent use of natural resources) and would have shown positive scoring for SFO D (mitigating and adapting to climate change), however more jobs will have a negative impact as there will be more waste which negates the positive impact.</p> <p>Economic: Clear and strong positive impacts upon economic issues and considered to be an improvement upon the 'Shaping our District' policy as it includes reference to relocating business within the District.</p> <p>Social: Clear and strong positive impact with regard to improving sustainable transport to jobs and services (SFO G). More positive with regard to mixed and balanced communities (SFO I) as a wider range of supporting infrastructure identified, and greater emphasis on working with partners including community organisations. Reference to catering for future requirements of resident population and expansion of the care industry related to the ageing population and reference to youth employment and new business formation in more deprived areas, access to employment is a key influence on reducing health inequalities, therefore positive scores for SFO K (improving health) and SFO L (community participation)</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy (inc. Modifications)	?	+/-?	+/-	+/-	+?	+	++	++	++	++	+	0	+	+
Assessment of impact of Modifications	<p>Environmental: The scorings have remained unchanged. No certainty exists with regard to the location of the 10 hectares required to ensure flexibility of provision as shown by the ? for SFO A, enhancing landscape and townscape quality. The policy will have a positive impact upon prudent use of natural resources as encourages redevelopment and modernisation, referring especially to improving energy efficiency. New development in association with other policies will have to mitigate for its own impacts.</p> <p>Economic: The policy will have clear and strong economic impacts, the modifications by locating more development in Lichfield City have increased the ability to reduce trips by car and encourage sustainable distribution and communication systems (SFO H) and creating mixed and balanced communities, however no change to the sustainability scoring has resulted as the policy [previously scored the maximum ++ for these effects.</p> <p>Social: The modifications to the policy will have clear and strong positive impact upon improving availability of sustainable transport to jobs and services due to the proximity of a greater amount of employment land in Lichfield City, the score can however not be increased as it already score the maximum of ++. The policy will have a positive impact upon social factors. The policy still encourages working in partnership to promote opportunities for employing local people and clarifies the support for the diversification of the rural economy to not refer to just the re use of rural buildings.</p>													
Mitigation & maximisation	Commuting is a major factor in contributing to carbon emissions and the reduction in the distance commuted or move to non-car based transport is a fundamental aim of the policy as well as maximising the potential of the resident population. The policy seeks to mitigate the impact of growth through redevelopment. (No change from previous appraisal)													
Uncertainties & risks	Delivery is subject to nuances of the global economy, not just the local economy in all aspects of employment from the need, the availability of broadband will be a major influence particularly in the rural areas. (No change from previous appraisal)													
Short/ Medium & Long term impacts	By supporting our employers and investment in our existing employment areas our economy will be supported from the short term onwards. Due to the amount of land within the District which currently has planning permission and is available, the timing of effects will be more greatly influence by other factors such as infrastructure (transport improvements and broadband), population growth/movements and the wider economy. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Growth within Lichfield District is restricted in order to not undermine urban renaissance of Birmingham and the Black Country. Lichfield is part of the Greater Birmingham & Solihull LEP and Staffs and Stoke LEP. The policy will also assist in the funding bids for economic/housing growth and transport infrastructure. (No change from previous appraisal)													

Table 14.16 Core Policy 8: Our Centres

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	-	+?	+/-	+/-	0	+	+	+?	+	+?	0?	+	0
Assessment of Effects	<p>Environmental: Policy is reliant on other policies in the plan to deliver mitigation/ enhancement for the environment. There will be potentially positive environmental impacts found for safeguarding locally distinctive settlement character and conservation areas. (SFO A) There could be potentially negative impact on archaeology as unknown locations and importance of City centre, however effects with other policies would have a positive impact upon continued use of listed buildings and potential for broadening access to and understanding of historic environment. Policy is negative with regard to biodiversity (SFO B) as it does not link to other policies. Redevelopment and improving traffic management are positives for SFO E (prudent use of resources). Policy would have shown positive scoring for SFO D (mitigating and adapting to climate change) however more development will have a negative impact as there will be more waste which negates the positive impact, although clustering of development does provide opportunities for waste reuse.</p> <p>Economic: The policy will have a positive economic impact. The policy has clear and strong economic impact upon providing for local retail needs, it will support local retailers and local supply chains and provide opportunities to reduce trips by car</p> <p>Social: Positive social impact upon improving sustainable transport to jobs and services, although a mixed impact upon reducing traffic impact in traffic sensitive areas such as the City and town centres. Positive effect for creating mixed and balanced communities, especially for cultural experiences (SFO I). Policy doesn't include level of growth now for Lichfield City nor Burntwood town centre these are included within the Our Settlements section. Policy includes reference to environmental enhancements and attractive spaces and creating a balanced night time economy. Access to facilities, employment and an attractive environment influence reducing health inequalities and result in a positive score.</p>													
Local Plan Strategy (inc. Modifications)	+?	-	+?	+/-	+/-	0	+	+	+?	+	+?	0?	+	0
Assessment of impact of Modifications	<p>Environmental: The proposed new centres will be reliant on other policies to deliver the mitigation / enhancement for the environment, overall the policy will mitigate for its impacts and could positively encourage improvements in the townscape and historic environment.</p> <p>Economic: The modifications have no impact upon the sustainability scorings, the proposed neighbourhood centres will give more opportunities for employment however this was not considered sufficient to alter the scoring. Overall the policy will have positive impact upon the economy of Lichfield District.</p> <p>Social: The proposed neighbourhood centres will encourage healthy lifestyles and mitigate for the impacts arising from the new SDA's, but are not considered sufficient to alter the scorings. Supporting the existing and new centres also supports the variety of uses within the centres and the well being of our communities.</p>													
Mitigation & maximisation	Maximises existing resources – town centre, transport. Mitigates impact beyond town centres. Mitigates for detrimental impact of fluctuations in economy by making centres more multi-functional. (No change from previous appraisal)													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Uncertainties & risks	Large schemes influenced by economy, reliant on other policies to secure quality of design and protect historic nature of City Centre and village centres. (No change from previous appraisal)													
Short/ Medium & Long term impacts	Protection and widening of the functionality of our centres will support them through difficult economic times in the short term and protect their ability to expand to serve our residents needs and our economy in the medium and long term, whilst protecting the wider environment of the District. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Supporting our centres will support the wider economy of the District and should not be to the detriment of other centres in neighbouring areas. (No change from previous appraisal)													

Table 14.17 Core Policy 9: Tourism

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+?	+	-	+/-	+	+?	+	+	+?	+	0	0	0
Assessment of Effects	<p>Environmental: Positive environmental impact upon landscape, conservation areas, improving areas of lower landscape quality (Central Rivers Initiative (CRI)), biodiversity especially green corridors, subject to implementation. Positive for interpretation of the historic environment - Saxon Hoard. Whilst encouraging sustainable transport may result in a prudent use of energy, more visitors will produce more waste, although more visitors should not result in a reduction in air quality. Opportunities for flood risk reduction exist within the CRI, National Memorial Arboretum and green corridors.</p> <p>Economic: Overall the policy will have positive economic impacts. The policy will also encourage small and indigenous business.</p> <p>Social: Policy will enable greater cultural activity and by supporting existing centres will support greater transport provision and accessibility. Policy may generate additional trips which may be contrary to reducing road casualties, this does not show in the scoring as there may be benefits in reducing Anti Social Behaviour with greater use of the City centre for overnight stays. Other policies will address road safety.</p>													
Local Plan Strategy (inc. Modifications)	+?	+?	+	-	+/-	+	+?	+	+	+?	+	0	+?	+?
Assessment of impact of Modifications	<p>Environmental: The modifications have added clarity to the impact upon Cannock Extension Canal SAC (explanatory text), but have resulted in no change to the scoring and overall positive impact on the environmental impacts of this policy.</p> <p>Economic: The modifications have resulted in no further economic impacts than has previously been appraised. The overall impact is positive upon the economy of Lichfield District and improving the sustainability of the District.</p> <p>Social: The policy will add to the cultural and recreational opportunities within the District supporting healthy lifestyles and increasing the opportunities for community participation.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Mitigation & maximisation	Maximises existing resources – town centre, transport, tourism, hotels and safeguards their future. Mitigates impact on the rural area. (No change from previous appraisal)													
Uncertainties & risks	Implementation is dependent upon the wider economy. Large scale projects such as the national and community forests. Lichfield Canal and CRI are long term projects and rely on accessing funding. (No change from previous appraisal)													
Short/ Medium & Long term impacts	Short term impacts will support existing tourism and give certainty to new investment and bids for funding to enable larger schemes to be delivered in the medium and long term and have a beneficial permanent impact. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Regional assets are key to the growth of tourism within the Region. The cumulative impacts of projects such as national and community forests and CRI has wider environmental benefits than just for Lichfield District. Synergistic benefits: as the Mercian Trail is developed this will benefit other authorities as well as Lichfield District. (No change from previous appraisal)													

14.87 The Development Management **Policy E1: Retail Assessments** has not changed in substance between the Shaping our District document and the 'Local Plan Strategy' document. Its environmental impact is mitigated by other policies and it would only have indirect beneficial social impact through supporting existing centres. Its greatest benefit will be the economic effect of directing retail to the town centres and thus protecting indigenous business and small businesses that exist in the centres. It will therefore contribute positively to the sustainability of the Plan.

Table 14.18 Policy E1: Retail Assessments

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	0	0	0	0	0	0	0	0	+	+	+	0	0	0
Assessment of Effects	<p>Environmental: None</p> <p>Economic: Positive impact upon directing retail to the town centres and thus protecting indigenous business and small business.</p> <p>Social: By supporting our centres this supports the variety of uses within the centres and the health and well being of the population by focusing development in areas with a variety of services and which are most accessible by sustainable transport.</p>													
Local Plan Strategy (inc. Modifications)	0	0	0	0	0	0	0	0	+	+	+	0	0	0
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications. The policy has no direct environmental effects.</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	Social: There are no modifications to this policy and no additional effects arising from the other modifications.													
Mitigation & maximisation	The policy seeks to enable development and investment within our centres without resulting in undue harm to them.													
Uncertainties & risks	The policy clarifies for developers the levels at which a retail assessment will be required.													
Short/ Medium & Long term impacts	The impacts of the assessments should not change through the plan period: the assessments are designed to ensure the sustainability of centres.													
Cumulative & Synergistic impacts	The policy requires consideration of larger proposals and their impact on the centre. The policy is designed to ensure that development in one area does not negatively impact upon another.													

Healthy and Safe Communities

14.88 Within the 'Issues and Options' consultation the following issues were raised: should key public open spaces be protected and should new facilities maximise the use of public transport. In addition specific questions were asked with regard to Chasewater, especially what would make Chasewater a more popular destination and also about Drayton Manor Park and whether it should provide for year round use to include visitor accommodation. The LSWG advised that, as nowhere within the District had a surplus of open space, all open space should be protected, in order to create mixed and balanced communities, improve health, maintain and enhance landscape and townscape quality and to protect and enhance buildings, features and areas of archaeological, cultural and historic value and their settings. New facilities should maximise sustainable transport modes to help create mixed and balanced communities and to improve the health of the population. The LSWG considered the Draft Chasewater SPD which identified a number of issues, and when the group had assessed this they had commented that there was a need for high quality build, a need to avoid inappropriate new attractions in relation to the nature conservation and to address the accessibility to the site by public transport.

14.89 The 'Policy Directions' document contained draft policy areas relating to recreation, leisure and culture. These sought to protect, retain and enhance existing sports pitches, open space, play space and leisure and recreation facilities and provide new good quality facilities to meet identified need. The SA found there would be a mainly positive environmental effect, however there was a need to cross reference to the sustainable development policy and climate change policy to deliver sustainable drainage. The policy could be stronger and needed to link to natural assets so Ancient Woodlands would be safeguarded and buffered. Links to culture and recreation also needed improving. The economic impacts were small but it was considered the policy could contribute if it linked green corridors to bus stops, etc. It could also be strengthened with better links to economic development policies and sustainable transport policies. The social impacts of the policy should have positive benefits if green corridors are linked to bus stops etc, and if it supported the creation of cultural

activities such as allotments. Other improvements suggested were around green corridor creation, designing out crime and the policy may need to strengthen cross referencing to address these issues.

14.90 The 'Shaping our District' document was appraised and the combined SA of the four policies showed an improvement to those previously assessed. The policies were found to have a mostly positive impact, and just SFO C (historic environment) was considered to have a mixed impact.

14.91 The 'Local Plan: Strategy' retained the same format as the 'Shaping our District' document, however renamed Core Policy 12 to Provision for Arts and Culture and added a development management policy HSC2: Playing Pitch and Sports Facility Standards. The changes were in response to more up to date evidence, the SA process, working closely with our partners, stakeholders and representations and resulted in changes to the policy.

14.92 Policy CP10 Healthy and Safe Lifestyles was amended for the Local Plan: Strategy. The changes required replacement facilities prior to loss of existing facilities, support for initiatives to address wards where poor health indicators and antisocial behaviour are identified, support for volunteering and access to healthy food, improved links to other policies to address designing out crime and antisocial behaviour and creating an environment where the healthy choice is the easy choice. Overall the policy scored positively and was considered to contribute to the local distinctiveness of the District and its sustainability.

14.93 The modifications to policy CP10 relate to clearer reference to preserving and improving footpath and cycle connections and greater reference to green corridors as multi-functional green spaces. This has improved the sustainability scorings for SFO B (promoting biodiversity) and SFO G Soc which looks to improve the availability of sustainable transport to jobs and services and SFO K (improving health). The policy will result in a greater benefit to the health and well being of our communities, positively contributing to the sustainability and locally distinctiveness to the District.

14.94 Policy CP11 Participation in Sport and Physical Activity was amended for the Local Plan: Strategy as evidence had been updated and the policy widened to enable greater use of facilities such as school facilities, recognise the potential offered by other infrastructure such as skate parks, allotments, and encourage increased participation levels in under represented groups. The modifications have strengthened the policy by adding clarification, requiring consideration of the extent and quality of existing facilities and assets and requiring the alternative to be of an equivalent or better standard in terms of quantity. The explanation has also been changed to show a wider context and the significance of facilities in a cross boundary context. The policy will have an overall positive impact upon the sustainability of the District.

14.95 Core Policy CP12 Provision for Arts and Culture was altered in the Local Plan: Strategy to give greater recognition to the importance of art, and to require new strategic developments to incorporate public art. It also included reference to encouraging levels of participation in under represented groups which widens the influence of the policy. Overall the policy scores positive for environmental, economic and social factors. The modifications to the policy add clarity by including cross referencing to other policies, especially CP8 Our

Centres. The additional SDA's will enable the provision of further public art which will add to the portfolio but are not considered sufficient to alter the scorings. The policy will positively add to the local distinctiveness of Lichfield District and to its sustainability.

Table 14.19 Core Policy 10: Healthy & Safe Lifestyles

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+	+?	+	+	0	+	+	+	+	+	++	++	+
Assessment of Effects	<p>Environmental: The policy will have positive environmental effects. There is potential for an unknown impact upon the built and historic fabric with regard to the promotion of better insulation of buildings, this should be safeguarded for however by other policies within the Built Environment chapter.</p> <p>Economic: Greater economic effects as policy encourages provision of open space, walk and cycle ways for new commercial and industrial developments. Policy also now encourages new employment consistent with local needs, and local retail needs by supporting local food cooperatives.</p> <p>Social: Positive impacts as reference to walk and cycle ways now specifically included. Clear and strong positive impacts upon addressing sport and recreational needs and improving services and facilities with reference to a broader range of the population. Clear and strong positive impact upon SFO J (promoting safe communities) by targeting hot spots and including cross referencing to BE1. Policy has been improved with regard to SFO K (improving health) with reference to access to healthy foods. Inclusion of reference to supporting initiatives to support participation and volunteering and food cooperatives has given a more positive scoring to SFO L (community participation).</p>													
Local Plan Strategy (inc. Modifications)	+?	+	+?	+	+	0	+	+	+	+	+	++	++	+
Assessment of impact of Modifications	<p>Environmental: The modifications include reference to multi-functional greenspaces and thus have improved the impacts upon SFO B which promotes biodiversity but this is not considered sufficient to change the overall scoring.</p> <p>Economic: No change from impacts listed above.</p> <p>Social: The policy includes clearer reference to preserving and improving footpath and cycle connections and this will result in greater opportunities for walking and cycling to services and improved opportunities for improving health and having a healthy lifestyle. However no changes to the overall scoring occur as SFO K already has the highest score.</p>													
Mitigation & maximisation	Policies seeks to mitigate for existing issues and the impact of development on those communities and enables communities to maximise their own potential. (No change from previous appraisal)													
Uncertainties & risks	Policies reduce the risk of loss of facilities to communities and the footpath and cycle connections, and encourages their safeguarding. The areas where improvements are needed may not be where development is proposed so delivery is uncertain.													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Short/ Medium & Long term impacts	As deficiencies are addressed during the plan period the sustainability of the District will improve and new development will result in a greater range of local assets. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Better air quality will have positive impacts beyond Lichfield District. Safeguarding our communities and improving the health and well being of residents through improving the physical environments of communities, the provision and safeguarding of sports facilities and art and cultural facilities and footpath and cycle connections will have beneficial impacts for our partners especially those dealing in matters relating to health, well being and community safety.													

Table 14.20 Core Policy 11: Participation in Sport & Physical Activity

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+	+?	-	+	0	+	0	+?	+	+	+/-	+?	+?
Assessment of Effects	<p>Environmental: Positive environmental effects as potential for enhancing SFO A (landscape and townscape) and SFO C (historic environment) as it safeguards the many community buildings and local character of an area. Positive for biodiversity through potential for green corridors. Overall negative for SFO D (mitigating and adapting to climate change) as may be opportunities for renewables but negative for waste, positive for air quality.</p> <p>Economic: Provision of new or improved sports hall and swimming provision to serve Lichfield City and its hinterland and meeting other deficiencies would enable opportunities to reduce trips by car and encourage new employment consistent with local needs.</p> <p>Social: Provision of new or improved sports hall and swimming provision to serve Lichfield City and its hinterland and specific inclusion within the policy of providing for a wide range of needs, abilities and especially underrepresented groups scores positively. Safeguarding facilities and provision of new facilities to meet identified needs can reduce anti-social behaviour especially if linked to other policies (Built Environment chapter) and can reduce health inequalities. Safeguarding of village halls and other community facilities enables/safeguards opportunity for community participation.</p>													
Local Plan Strategy (inc. Modifications)	+?	+	+?	-	+	0	+	0	+?	+	+	+/-	+?	+?
Assessment of impact of Modifications	<p>Environmental: The modifications widen the scope of protection from playing pitches to playing fields which could have a positive impact upon biodiversity, but this is not considered significant enough to alter the overall scoring for SFO B (promoting biodiversity). The impacts identified above have remained unchanged.</p> <p>Economic: The greater recognition of the uses which serve a wider area than Lichfield District supports these where they are private enterprises, however it is not sufficient to alter the overall scoring for the economic impacts of this policy already identified above.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Social: The modifications will positively contribute to the creation of mixed and balanced communities (SFO I Soc) however as this is only one aspect of creating mixed and balanced communities it is not sufficient to alter the overall scoring for this sustainability objective. The policy will have an overall positive impact upon health and well being of residents, as specified above.</p>													
Mitigation & maximisation	Policies seeks to mitigate for existing issues and the impact of development on those communities and enables communities to maximise their own potential. (No change from previous appraisal)													
Uncertainties & risks	Policies reduce the risk of loss of facilities to communities, and encourages their safeguarding. The areas where improvements are needed may not be where development is proposed so delivery is uncertain. (No change from previous appraisal)													
Short/ Medium & Long term impacts	As deficiencies are addressed during the plan period the sustainability of the District will improve and new development will result in a greater range of local assets. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Better air quality will have positive impacts beyond Lichfield District. Safeguarding our communities and improving the health and well being of residents through improving the physical environments of communities, the provision and safeguarding of sports facilities and cultural facilities will have beneficial impacts for our partners especially those dealing in matters relating to health, well being and community safety. The modifications have given greater recognition to the significance of uses which serve the areas beyond Lichfield District.													

Table 14.21 Core Policy 12: Provision for Arts & Culture

SFO:	Environment						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	0	+	0	0	0	0	+?	+	+	+?	+	+	+
Assessment of Effects	<p>Environmental: Positive environmental effects as recognises contribution to a high quality built environment and local distinctiveness.</p> <p>Economic: Positive economic benefits through encouraging tourism, which is particularly relevant to small business and local supply chains.</p> <p>Social: Safeguards assets for art and culture which can encourage community participation and promote social inclusion especially as policy refers to encouraging levels of participation in under represented groups and in areas where a shortfall has been identified.</p>													
Local Plan Strategy (inc. Modifications)	+?	0	+	0	0	0	0	+?	+	+	+?	+	+	+

SFO:	Environment						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Assessment of impact of Modifications	<p>Environmental: The minor modifications do not alter the previous effects identified above, the inclusion of greater reference to our centres will support the townscape quality (SFO A) and historic environment (SFO C) often found within our centres, but as no sites are identified the impact remains only potentially positive.</p> <p>Economic: The minor modifications give clarity to the support for our centres as identified above, so no greater impact than already identified.</p> <p>Social: No additional effects than those previously identified, the policy will have a positive impact upon the health and well being of residents.</p>													
Mitigation & maximisation	Policies seeks to mitigate for existing issues and the impact of development on those communities and enables communities to maximise their own potential. (No change from previous appraisal)													
Uncertainties & risks	Policies reduce the risk of loss of facilities to communities, and encourages their safeguarding. The areas where improvements are needed may not be where development ids proposed so delivery is uncertain. (No change from previous appraisal)													
Short/ Medium & Long term impacts	As deficiencies are addressed during the plan period the sustainability of the District will improve and new development will result in a greater range of local assets. (No change from previous appraisal)													
Cumulative & Synergistic impacts	Safeguarding our communities and improving the health and well being of residents through improving the physical environments of communities, the provision and safeguarding of art and cultural facilities will have beneficial impacts for our partners especially those dealing in matters relating to health, well being and community safety.													

14.96 Policies HSC1 and HSC2: Since the 'Shaping our District' consultation evidence has been updated and new evidence collected which has enabled standards to be included within Policy HSC1 and the creation of HSC2. HSC2 has now been split from HSC1 and relates to playing pitches and sports facilities stating their loss or displacement will be resisted where there is an identified existing and future need.

14.97 Policy HSC1 is a development management policy and defines the open space standards. There are no modifications to this policy proposed, and the policy is appraised below.

14.98 Policy HSC2 is a development management policy relating to playing pitch and sport facility standards. The minor modifications to this policy add clarity and update the policy to reflect the correct title of the evidence supporting the policy.

14.99 Overall the policies add clarity to developers and will have positive effects in relation to environmental, economic and social influences and assist in making the District more sustainable by enabling a wide range of easily accessible open spaces which will enhance the health and well being of those who live, work and visit the District whilst protecting our natural resources.

Table 14.22 Policy HSC1: Open Space Assessment

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	++	+	+	+	+	+	+	+	+	+	+	+	+
Assessment of Effects	<p>Environmental: The policy will have positive environmental impacts enabling the identification of areas with deficiencies and requiring new development to meet these standards. The policy will have clear and strong positive impact upon biodiversity as it specifically sets standards for natural and semi-natural green space.</p> <p>Economic: The policy refers to the creation of green spaces which strengthen links between services and facilities which includes for work, this will positively assist in reducing trips by car (G Ec), encouraging business to use sustainable means of transport (SFO H) and creating mixed and balanced communities (I Ec).</p> <p>Social: The policy will have positive impacts in addressing deficiencies in all types of open space contributing to the provision of new green space which will be well linked to services and facilities and will positively contribute to creating mixed and balanced communities to the benefit of the health and well being of communities.</p>													
Local Plan Strategy (inc. Modifications)	+?	++	+	+	+	+	+	+	+	+	+	+	+	+
Assessment of impact of Modifications	<p>Environmental: There are no modifications to the policy and no additional effects arising from the other modifications than those covered previously. The policy will have a positive environmental impact when implemented alongside other policies within the Plan.</p> <p>Economic: There are no modifications to the policy and no additional effects arising from the other modifications than those covered previously. The policy will have a positive economic impact when implemented alongside other policies within the Plan.</p> <p>Social: There are no modifications to the policy and no additional effects arising from the other modifications than those covered previously. The policy will have a positive social impact when implemented alongside other policies within the Plan.</p>													
Mitigation & maximisation	The policy sets the levels of mitigation required for development to meet its own impacts and enables the maximisation of assets.													
Uncertainties & risks	The areas where improvements are needed may not be were development is proposed so delivery may be uncertain.													
Short/ Medium & Long term impacts	As deficiencies are addressed during the plan period the sustainability of the District will improve. Addressing shortfalls in provision and accessibility will have benefits in the longer term in improving the health and wellbeing of the population.													
Cumulative & Synergistic impacts	Addressing deficiencies will have beneficial effects for communities with resultant improved levels of health and wellbeing. Addressing shortfalls in a variety of open space types and improving linkages between different kinds of spaces will also improve biodiversity, creating new wildlife corridors and reducing pollution.													

Table 14.23 Policy HSC2: Playing Pitch & Sport Facility Standards

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+	+	0	+	0	0	0	+	+	+	+	+	+
Assessment of Effects	<p>Environmental: The policy will have positive impacts upon environmental factors.</p> <p>Economic: The policy will assist in the economic benefits of creating mixed and balanced communities.</p> <p>Social: The policy will have positive impacts upon social factors through the safeguarding and provision playing pitches and sports facilities enabling healthier and more active lifestyles and participation.</p>													
Local Plan Strategy (inc. Modifications)	+?	+	+	0	+	0	0	0	+	+	+	+	+	+
Assessment of impact of Modifications	<p>Environmental: No modifications to the policy, no additional impacts arising from the other modifications and no change to the overall positive impacts of the policy upon environmental factors.</p> <p>Economic: No modifications to the policy, no additional impacts arising from the other modifications and no change to the overall positive impacts of the policy upon economic factors.</p> <p>Social: No modifications to the policy, no additional impacts arising from the other modifications and no change to the overall positive impacts of the policy upon social factors.</p>													
Mitigation & maximisation	The policy seeks mitigation for the loss of playing pitches and sports facilities and seeks to maximise assets.													
Uncertainties & risks	The policy reduces the risk and uncertainty of the loss of facilities to communities.													
Short/ Medium & Long term impacts	The policy will result in the enhancement of playing pitches and sports facilities through the plan period.													
Cumulative & Synergistic impacts	The improvements to playing pitch and sports facilities will have beneficial effects to the health of communities. There may be positive cross boundary influences in enabling competition to continue between clubs.													

Natural Resources

14.100 The 'Issues and Options' consultation raised issues as to whether there was a need to protect other areas of Lichfield District's countryside. The LSWG considered the proposals and considered that a general statement would be preferable rather than to try and list individual assets. In addition with regard to the historic landscape character analysis there was a need for further work.

14.101 The publication of the 'Policy Directions' document incorporated a preferred policy direction and sought opinions on alternative options. For natural assets this included a 'do the minimum' required by the legislation, this was considered unacceptable as such an approach would not lead to an enhanced biodiversity resource for the residents of the District and there was a risk of a continued loss of habitat and species.

14.102 The SA of the preferred policy direction for the sole natural assets policy was found to have an overall positive impact upon the environmental aspects of the sustainability framework as it sought opportunities for natural assets to be protected and created as well as creating corridors of movement for species, habitat and people. However, the SA considered that the policy could be strengthened to include Tree Preservation Orders (TPOs) and the benefits of ordinary street trees for urban cooling, shade, reduction in air conditioning and locally significant nature conservation sites (Sites of Biological Importance: SBIs). Also considered to be missing were opportunities for energy crops, short rotation coppicing, sustainable drainage, etc. to help mitigate for the effects of climate change and assist in reducing flood risk, if linked to a climate change policy. There were no economic impacts or they were too tenuous, and with regard to social impacts there was potential for positive enhancement if the policy resulted in making environments more attractive for sport and recreation, walking/ cycling which would generally enhance the feeling of wellbeing for residents, increase interaction and slow traffic. It was also noted that trees can create problems for CCTV.

14.103 The natural assets policy within the 'Shaping our District' document was transformed into an overarching core policy, with 7 development management policies.

14.104 Within the 'Shaping our District' document the Development Management Policies NR 1-7 relate to countryside management; biodiversity, protected species and their habitat; trees, woodland and hedgerows; natural and historic landscapes; linked habitat corridors and multi-functional greenspaces; Cannock Chase SAC; and water quality. The policies were amended in order to consider reducing health inequalities, Green Belt, ancient woodland, veteran trees cross boundary influences and an SPD on Biodiversity and Development.- The development management policies within the 'Local Plan: Strategy' document were increased to nine to include policies on countryside management; development in the Green Belt; biodiversity, protected species and their habitats; trees woodland and hedgerows; natural and historic landscapes; linked habitat corridors and multi-functional greenspaces; Cannock Chase SAC; River Mease SAC; and water quality. The new policies added were NR2: Development in relation to Green Belt inserted in response to the NPPF and NR8 :River Mease SAC which had been included due to new evidence.

14.105 Modifications have since been made to Core Policy 13 (the overarching policy for Natural Resources) and its explanatory text which have added clarity to the impact of the project associated with the restoration of the Lichfield Canal and the Cannock Extension Canal SAC. Other modifications include correction of the names of documents and giving the correct terminology to Local Geological Sites. These changes whilst adding clarity, and adding further protection to the Cannock Extension Canal SAC result in no changes to the overall score for the sustainability appraisal than previously scored, this is due to SFO B (promoting biodiversity) already scoring a ++, which is the highest available. The policy will still have a clear and strong positive impact upon promoting biodiversity and geodiversity within Lichfield District and beyond.

14.106 At the hearing sessions the Inspector identified concern regarding the wording of Policy NR7 Cannock Chase Special Area of Conservation: amendments had been suggested through a Statement of Common Ground with Natural England. The main modification to this policy makes it clearer that the policy relates to an area within a 15km radius of the SAC and sets out a range of potential measures to mitigate for any impact arising from development within that area. This policy has been reappraised and the policy is now more positive for enhancing the landscape. The policy already scored the highest(a ++)for SFO B promoting biodiversity and geodiversity.

14.107 'Other' modifications related to Development Management policies NR1, NR2 and NR3 and / or their explanatory text. NR1 has been amended to reflect the updated title of an SPD. Policy NR2 has been modified to ensure conformity with the NPPF in terms of wording and adding clarification to the policy. NR3 has been slightly altered to reflect the correct terminology relating to the biodiversity action plan species and the National Forest. The explanatory text to NR5 has also been amended to clarify the evidence base. Cumulatively the policies are considered to have a positive impact upon the environment and have enhanced the effectiveness of the overarching core policy. Their economic impact is limited and is largely included within other policies such as tourism and renewable energy: the scorings have not changed within these policies. The social impacts have improved by targeting opportunities to reduce health inequalities. Overall the policy scored positively in assisting the delivery of sustainable development.

14.108 The development management policies scores show that they will have a positive effect upon the sustainability of the District. As expected they will principally deliver environmental benefits by protecting and enhancing landscape, biodiversity, water environment, but they do not stifle economic enterprise of existing or new business with opportunities for sport and recreation, multi-functional corridors and rural enterprise supported. Social benefits arise through cleaner air, increased accessibility and facilities in multi-functional corridors, as well as increased opportunities to enjoy open countryside and landscape visually through its protection and through increased accessibility. Enabling community enterprise through involvement in management of the open spaces (e.g. through societies such as Staffordshire Wildlife Trust and Friends of Gentleshaw Common) assists the health and well being of the population.

14.109 Overall the section has been strengthened and made more specific and locally relevant as more evidence has been completed. The policies within the chapter will assist in the delivery of sustainable development.

Table 14.24 Core Policy 13: Our Natural Resources

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	++	++	0	+	++	+	+	0/+	0/+?	+	0	+	+
Assessment of Effects	Environmental: The core policy is considered to have clear and strong positive impacts upon biodiversity.													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Economic: Positive economic impacts arising from the creation of green corridors and reducing the need to travel. The encouragement of local supply chains from sustainable woodland management.</p> <p>Social: Positive impacts for enhancing the relationship between people and the countryside, especially where there are opportunities to reduce health inequalities.</p>													
Local Plan Strategy (inc. Modifications)	++	++	++	0	+	++	+	+	0/+	0/+?	+	0	+	+
Assessment of impact of Modifications	<p>Modifications have added clarity to the impact of the project associated with the restoration of the Lichfield Canal and the Cannock Extension Canal SAC and corrected the names of documents and the name of Local Geological Sites.</p> <p>Environmental: Greater clarity and further protection to the Cannock Extension Canal SAC, however no changes to the overall score for the sustainability appraisal than previously scored, this is due to SFO B (promoting biodiversity) which has already scoring a ++, which is the highest available. The policy will still have a clear and strong positive impact upon promoting biodiversity and geodiversity, landscape and townscape (SFO A), protecting the historic environment (SFO C) and reducing flood risk (SFO F)</p> <p>Economic: Positive economic impacts arising from the creation of green corridors and reducing the need to travel. The encouragement of local supply chains from sustainable woodland management.</p> <p>Social: Positive impacts for enhancing the relationship between people and the countryside and especially where there are opportunities to reduce health inequalities.</p>													
Mitigation & maximisation	Policy seeks to mitigate for the impacts of development and recognises the potential within the District for enhancing the natural environment and for enhancing the well being of our residents.(No change from previous appraisal)													
Uncertainties & risks	Delivery will be dependent on funding for many of the schemes and the long term benefits may not be fully realised within the life of the Plan.(No change from previous appraisal)													
Short/ Medium & Long term impacts	Protection will be evident within the short term and throughout the life of the plan, greater beneficial effects will be delivered through development of strategic sites and wider initiatives over the medium and long term of the Plan and potentially beyond this time frame. (No change from previous appraisal)													
Cumulative & Synergistic impacts	The safeguarding and delivery of cross boundary habitats and large scale landscape restoration projects and the investment within them during the Plan period will have positive influences and cumulatively will assist in contributing to combating the effects of climate change at a wider than District scale. (No change from previous appraisal). The policy has synergistic impacts by protecting and enhancing wildlife corridors and important habitats: without this, removal of a key habitat in one area could sever a key corridor of movement / habitat having a negative impact in another area.													

Table 14.25 Policy NR1: Countryside Management

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	++	+/-?	+	+	+	0	+?	+?	0	+?	0	+?	+
Assessment of Effects	<p>Environmental: Overall positive impact upon environmental factors. Clear and strong positive impact upon promoting biodiversity (SFO B).</p> <p>Economic: Policy recognises the important economic role of the countryside.</p> <p>Social: The policy seeks to safeguard the countryside's intrinsic character and beauty so it can be enjoyed by all. Recreation and enjoyment of the countryside has positive impacts upon health and well being.</p>													
Local Plan Strategy (inc. Modifications)	+?	++	+/-?	+	+	+	0	+?	+?	0	+?	0	+?	+
Assessment of impact of Modifications	<p>The modifications of the policy relate to the correction of the title of a document.</p> <p>Environmental: The modifications to the policy and the effect of the other modifications will result in no change to the impact previously appraised.</p> <p>Economic: The modifications to the policy and the effect of the other modifications will result in no change to the impact previously appraised.</p> <p>Social: The modifications to the policy and the effect of the other modifications will result in no change to the impact previously appraised.</p>													
Mitigation & maximisation	The policy seeks to enable the potential of the countryside to be maximised whilst allowing its protection.													
Uncertainties & risks	This policy reduces risk to the countryside by encouraging responsible and sustainable countryside management.													
Short/ Medium & Long term impacts	The impacts should result in the long term safeguarding of the countryside, enabling it to function in a sustainable manner with a range of short term and longer management practices.													
Cumulative & Synergistic impacts	Good management practise will have a range of cumulative and synergistic impacts including more sustainable countryside, agricultural and farm diversification practise with economic social and environmental benefits, for example the reduction of flood risk, improved access to the countryside with benefits for health and wellbeing and the rural economy and using resources more sustainably with long term impacts relating to climate change. Negative impacts will be mitigated for through other policies of the Plan.													

Table 14.26 Policy NR2: Development in the Green Belt

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+	+	+	0	0	0	0	0	+	+	+	0	+	+
Assessment of Effects	<p>Environmental: Positive impact upon townscape and landscape quality through promoting local distinctiveness and improving damaged and derelict land (SFO A). Biodiversity (SFO B) is mentioned specifically and limited infilling within Green Belt villages will protect the historic environment of these villages (SFO C).</p> <p>Economic: The economic impacts are limited to those associated with creating mixed and balanced communities.</p> <p>Social: The policy specifically refers to supporting opportunities to provide access to outdoor sport and recreation which can add to the health and well being of communities.</p>													
Local Plan Strategy (inc. Modifications)	+	+	+	0	0	0	0	0	+	+	+	0	+	+
Assessment of impact of Modifications	<p>Environmental: The modification to the policy relate to making the policy compliant with the NPPF. Results in no change to the effects identified previously.</p> <p>Economic: The modifications to the policy and the other modifications result in no change to the effects previously appraised.</p> <p>Social: The policy has strengthened the reference to community involvement by referring to community led plans not just community consultation, in addition to the effects previously identified.</p>													
Mitigation & maximisation	The policy seeks to clarify the potential of the Green Belt.													
Uncertainties & risks	The policy does not relate to a specific proposal so there is a great deal of uncertainty and will need other policies to mitigate for impacts.													
Short/ Medium & Long term impacts	The policy should result in the long term safeguarding of the Green Belt													
Cumulative & Synergistic impacts	The Green Belt is a cross boundary policy which is covered at national policy level, but required to be reiterated through Local Plans.													

Table 14.27 Policy NR3: Biodiversity, Protected Species & their Habitats

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	++	++	0	0	+	0	0	0	0	+	0	0	0
Assessment of Effects	<p>Environmental: The policy is clear and strong with regard to the protection and enhancement of biodiversity (SFO B), and by association landscape (SFO A) and historic environment (SFO C) which often contain sensitive habitats which is the primary focus of this policy, the restoration and enhancement of habitat could also result in reducing flood risk in areas such as the Central Rivers Initiative.</p> <p>Economic: There will be no direct economic influences arising from this policy</p> <p>Social: The creation of mixed and balanced communities should incorporate biodiversity which can have potentially positive impacts upon health and well being.</p>													
Local Plan Strategy (inc. Modifications)	++	++	++	0	0	+	0	0	0	0	+	0	0	0
Assessment of impact of Modifications	<p>Environmental: The modifications to the policy and the other modifications result in no change in the impact of the policy, from that previously appraised..</p> <p>Economic: The modifications to the policy and the other modifications result in no change in the impact of the policy from that previously appraised.</p> <p>Social: The modifications to the policy and the other modifications result in no change in the impact of the policy from that previously appraised.</p>													
Mitigation & maximisation	The policy seeks to mitigate for the impact of development on biodiversity, protected species and their habitats.													
Uncertainties & risks	All developments are site specific and the cumulative and synergistic impacts upon biodiversity will need careful consideration: this policy helps to remove that uncertainty and risk by requiring these issues to be taken into account.													
Short/ Medium & Long term impacts	The policy seeks to protect, enhance, restore and implement enhancements which over the plan period will result in a greater abundance of well managed and enhanced biodiversity and geodiversity assets.													
Cumulative & Synergistic impacts	The protection and enhancement of biodiversity has a greater cumulative and cross boundary impact given the need to adapt to the impacts of climate change. The policy has synergistic impacts by protecting and enhancing wildlife corridors and important habitats: without this, removal of a key habitat in one area could sever a key corridor of movement / habitat having a negative impact in another area.													

Table 14.28 Policy NR4: Trees, Woodland & Hedgerows

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	++	++	0	+	0	0	0	0	0	0	+	0	0
Assessment of Effects	<p>Environmental: The policy will have clear and strong positive impacts upon enhancing landscape and townscape quality (SFO A), biodiversity (SFO B) and the historic environment (SFO C). Trees and hedgerows make a significant contribution to delivering these objectives and this policy seeks their protection. Trees and hedgerows can also contribute to the prudent use of natural resources through providing shade and improving air quality.</p> <p>Economic: Any economic impacts are considered too tenuous to enable a scoring within the sustainability process.</p> <p>Social: Cross reference to policy BE1 will ensure trees will make a positive contribution to promoting safe and healthy communities.</p>													
Local Plan Strategy (inc. Modifications)	++	++	++	0	+	0	0	0	0	0	0	+	0	0
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications than listed above..</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications than listed above..</p> <p>Social: There are no modifications to this policy and and no additional effects arising from the other modifications than listed above..</p>													
Mitigation & maximisation	The policy seeks to maximise the potential of trees, woodland and hedgerows.													
Uncertainties & risks	Trees, woodland and hedgerows are vulnerable to disease. However, overall the policy will minimise uncertainty and risk relating to loss of trees woodland and hedgerows by requiring their protection and enhancement, mitigating for their loss and providing certainty for developers relating to their role in this.													
Short/ Medium & Long term impacts	Protection and enhancement of trees, woodland and hedgerows contributes to the visual attractiveness and ecological assets within towns, villages and countryside. Within new development the role of trees, woodland and hedgerows in enhancing and mitigating for the impacts of development will become apparent later in the plan period and beyond the plan period.													
Cumulative & Synergistic impacts	Trees, woodland and hedgerows have a cumulative and cross boundary impact given the need to adapt to the impacts of climate change and contribute to biodiversity. The policy has synergistic impacts by protecting and enhancing wildlife corridors and important habitats: without this, removal of a key habitat in one area could sever a key corridor of movement / habitat having a negative impact in another area.													

Table 14.29 Policy NR5: Natural & Historic Landscapes

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	++	++	0	+	0	0	0	0	0	+	0	+	+
Assessment of Effects	<p>Environmental: The policy will have clear and strong positive impacts upon enhancing landscape and townscape quality (SFO A), biodiversity (SFO B) and the historic environment (SFO C). Protection of the geological, archaeological and historic landscape is particularly referred to, and the policy will have positive impacts upon biodiversity through landscape based restoration and prudent use of resources.</p> <p>Economic: No economic impacts arising from this policy.</p> <p>Social: Social impacts are positive in relation to creating mixed and balanced communities, improving health and enabling improved community participation through partnership working.</p>													
Local Plan Strategy (inc. Modifications)	++	++	++	0	+	0	0	0	0	0	+	0	+	+
Assessment of impact of Modifications	<p>Environmental: The modifications result in no change in the impact of the policy.</p> <p>Economic: The modifications result in no change in the impact of the policy.</p> <p>Social: The modifications result in no change in the impact of the policy.</p>													
Mitigation & maximisation	The policy seeks to maximise natural and historic landscape assets, at both the very localised scale and at a more cumulative level, protecting and enhancing the character of the District and beyond.													
Uncertainties & risks	The policy reduces the risk to developers by advising them of what is expected in order to consider the impact upon landscape within their proposals.													
Short/ Medium & Long term impacts	The policy will have the short term impact of protecting individual parcels of land / views / landscape character etc which cumulatively will have the longer term impact of safeguarding of the overall natural and historic landscape and character of the District and surrounding areas.													
Cumulative & Synergistic impacts	The impact of development upon landscape can be cumulative including having cross boundary effects which can affect the characteristics of the natural and historic landscape. Synergistic impacts can occur where, for example, a development in one area can cause negative effects in another area through flooding or pollution for example. These potential impacts are mitigated through other policies of the plan.													

Table 14.30 Policy NR6: Linked Habitat Corridors & Multi-functional Greenspaces

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	++	++	0	+	++	+	0	0	+	+	0	+	0
Assessment of Effects	<p>Environmental: The policy will have clear and strong positive impacts upon enhancing landscape and townscape quality (SFO A), biodiversity (SFO B), the historic environment (SFO C) and reducing flood risk (SFO F) and a positive impact upon a prudent use of resources (SFO E). The policy specifically refers to enhancement of biodiversity, mitigating against climate change, integration of the natural and built environment, river corridors and flood storage.</p> <p>Economic: There are limited economic impacts, mainly arising in the ability to utilise multi-functional greenspace as a means of reducing trips by car.</p> <p>Social: The policy will result in beneficial impacts upon linking services and facilities, sport, recreation with resultant health benefits positively contributing to mixed and balanced communities and health and wellbeing.</p>													
Local Plan Strategy (inc. Modifications)	++	++	++	0	+	++	+	0	0	+	+	0	+	0
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Social: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p>													
Mitigation & maximisation	The policy seeks to maximise the potential arising from existing, enhanced and new corridors, ensuring that new development takes this issue into account.													
Uncertainties & risks	Linking sites has the potential to result in cumulative and synergistic impacts so it is important that this policy is implemented alongside other policies in the plan to ensure that impacts are positive.													
Short/ Medium & Long term impacts	The benefits of linking services and facilities etc will have a long term positive impact on biodiversity and human health.													
Cumulative & Synergistic impacts	The avoiding, repairing of fragmentation and reduction in isolated habitats will enable the priorities for a landscape scale approach to habitat movement including cross boundary influences to be realised, and help biodiversity mitigate for the impacts of climate change. The policy has synergistic impacts by protecting and enhancing wildlife corridors and important habitats: without this, removal of a key habitat in one area could sever a key corridor of movement / habitat having a negative impact in another area.													

Table 14.31 Policy NR7: Cannock Chase Special Area of Conservation

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+	++	0	0	+	0	0	0	0	+	+	0	+	0
Assessment of Effects	<p>Environmental: The policy will have a clear and strong positive impact upon biodiversity, and a positive impact upon landscape and the prudent use of natural resources. The policy will safeguard the integrity of the Cannock Chase SAC and the mitigation referred to will enhance the landscape, biodiversity and air quality of the area.</p> <p>Economic: There are no economic impacts arising from policy.</p> <p>Social: The policy will enable the continued use of Cannock Chase SAC for recreation and access to services and facilities which will contribute to health and well being.</p>													
Local Plan Strategy (inc. Modifications)	+	++	0	0	+	0	0	0	0	+	+	0	+	0
Assessment of impact of Modifications	<p>Environmental: There will be a more positive impact upon enhancing the landscape however this did not result in sufficient change to alter the overall scoring, in addition the SFO B which seeks to promote biodiversity and geodiversity already scores ++ so whilst the modifications add clarity to the policy the scoring can not be increased further.</p> <p>Economic: There are no economic impacts arising from policy.</p> <p>Social: The policy may positively impact upon communities through the provision of more recreational space than required by other policies, in addition to the impacts identified above.</p>													
Mitigation & maximisation	The policy ensures mitigation for this very sensitive habitat and contributes to the delivery of sustainable development													
Uncertainties & risks	The policy has been clarified and the risk to the SAC has been removed, and uncertainty for developers reduced.													
Short/ Medium & Long term impacts	The impact of development throughout the plan period upon the SAC has been removed. The policy in association with other schemes will result in an improvement to the condition of the SAC to meet the statutory requirements.													
Cumulative & Synergistic impacts	The cumulative, synergistic and cross boundary influences of the increase in visitor numbers and changes in air quality on the SAC have been considered and cross boundary working has been established to mitigate for any impact.													

Table 14.32 Policy NR8: River Mease Special Area of Conservation

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+	++	0	0	+	+	0	0	0	0	0	0	0	+
Assessment of Effects	<p>Environmental: The policy will have a clear and strong positive impact upon biodiversity, and a positive impact upon landscape, the prudent use of natural resources and reducing flood risk. The policy will safeguard the integrity of the River Mease SAC and the mitigation referred to will enhance the landscape, biodiversity, improve water quality and reduce flood risk.</p> <p>Economic: There are no economic impacts arising from the policy.</p> <p>Social: The policy refers to publicity, education and awareness raising which will lead to improved community participation.</p>													
Local Plan Strategy (inc. Modifications)	+	++	0	0	+	+	0	0	0	0	0	0	0	+
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Social: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p>													
Mitigation & maximisation	The policy ensures mitigation for this very sensitive habitat and contributes to the delivery of sustainable development													
Uncertainties & risks	The risk to the SAC has been removed and the policy gives certainty to developers.													
Short/ Medium & Long term impacts	The impact of development throughout the plan period upon the SAC has been removed. The policy in association with other schemes will result in an improvement of the water quality to meet the requirements of the water framework directive.													
Cumulative & Synergistic impacts	The cumulative, synergistic and cross boundary influences of the development on the SAC have been considered and cross boundary working has been established to mitigate for any impact.													

Table 14.33 Policy NR9: Water Quality

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	0?	+	0?	0	+	+	0	0	0	0	+/-	0	0	0

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Assessment of Effects	<p>Environmental: The policy will have a positive impact in relation to improving water quality and reducing flood risk and potentially could improve the biodiversity of the watercourse catchments. There may be potential for impacts upon the landscape and historic environment through works associated with development, however as no sites are identified this is unknown.</p> <p>Economic: There are no economic impacts arising from this policy.</p> <p>Social: There is a mixed impact upon creating mixed and balanced communities due to the unknown impacts arising from improvements needed to facilitate development and whether any benefit in access to recreation will be delivered in association.</p>													
Local Plan Strategy (inc. Modifications)	0?	+?	0?	0	+	+	0	0	0	0	+/-	0	0	0
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Social: There are no modifications to this policy and and no additional effects arising from the other modifications than listed above.</p>													
Mitigation & maximisation	The policy ensures mitigation and contributes to the delivery of sustainable development													
Uncertainties & risks	The policy identifies the catchments likely to be impacted and removes risk and uncertainty by requiring further analysis to be undertaken.													
Short/ Medium & Long term impacts	The policy will ensure the development will have no negative impact upon water quality and this will assist in meeting the objectives of the water framework directive.													
Cumulative & Synergistic impacts	The watercourse catchments extend cross boundary, with development having the potential to have cumulative and synergistic impacts. This could have profound effects upon water quality elsewhere unless mitigated: this policy will ensure no reduction in water quality and will assist in meeting the objectives of the water framework directive.													

Built and Historic Environment

14.110 The 'Issues and Options' Consultation sought opinions on issues such as 'How can the District Council encourage the re-use of historic buildings?' The consultation and scoping report identified that there was a need to maintain and enhance landscape quality and protect and enhance buildings, features and areas of cultural and historic value and their settings. It also identified that there was potential conflict with types of renewable energy and maintaining and enhancing landscape and townscape quality, and in aiming to identify and protect key public open spaces.

14.111 The 'Policy Directions' document incorporated a preferred policy direction and sought opinions on alternative options. For the built environment this included a more passive approach which set out criteria against which proposals for changes to the built environment would be considered; or a more pro-active policy which would give rise to implementation and financial considerations within existing communities. The SA found the policy was clear and strong for conservation areas, however there was a need to strengthen the policy with regard to areas of highest landscape quality and views, link better to climate change policies and reusing buildings, incorporate cross reference to biodiversity and the policy could be improved with regard to accessibility and education. There was very little influence of the policy on the economic effects, however the social impacts were that the policy can positively influence health through civic spaces and linkages, there was a need to strengthen reference to safety, although the policy did recognise partnership working and was overall considered to contribute positively to sustainable development.

14.112 The 'Sustainability Appraisal: Shaping our District' considered the Core Policy with the development management policy on high quality development Policy BE1 and gave greater recognition to the positive role the built environment has upon health and well being.

14.113 The 'Local Plan: Strategy' retained the same format as the 'Shaping our District' document with a Core Policy and a development management policy. Both policies were amended in light of the new NPPF, comments from the SA, representations and working with partners.

14.114 The development management policy BE1 has been appraised separately and is scored in a separate table below. The scoring shows that the policy will have a positive effect upon the sustainability of the District. The policy will deliver environmental benefits by permitting development which will have a positive impact upon the landscape, townscape, natural environment and historic assets of the District ensuring a high build quality. The policy seeks to encourage positive economic impacts through reducing the need to travel and by requiring high quality development will support tourism and the attractiveness of centres especially Lichfield City Centre. The social benefits include supporting the latest designing out crime principles and requiring development to have a positive impact upon public safety, health and reducing inequality.

14.115 There are no modifications to Core Policy 14, with a minor change to BE1 to reflect amendments to the title of an SPD and to update and correct the local evidence base. The policies will result in more sustainable development and a more attractive built environment adding to the overall sustainability of the District.

Table 14.34 Core Policy 14: Our Built & Historic Environment

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	+	++	-?	+	+	++	+	+	++	+	+	++	0

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Assessment of Effects	<p>Environmental: Positive environmental impact. Clear and strong for SFO A (landscape and townscape) and SFO C (historic environment), potential for improvement on education. Scores negatively for enabling opportunities for renewable energy and prudent use of energy as historic environment opportunities are more restricted.</p> <p>Economic: Clear and strong statements on improving the availability of transport to jobs and services through linkages. Repair of buildings will encourage small business and employment consistent with local needs.</p> <p>Social: Clear and strong reference to promoting safe communities and access through linkages, addressing health inequalities by improving the built environment. Policy includes reference to environmental improvement schemes assisting in the health and well being of the community and reducing health inequalities enabling positive scoring.</p>													
Local Plan Strategy (inc. Modifications)	++	+	++	-?	+	+	++	+	+	++	+	+	++	0
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Social: There are no modifications to this policy and and no additional effects arising from the other modifications than listed above.</p>													
Mitigation & maximisation	The policy seeks to protect and enhance our historic assets and guide development to consider the built environment as an area for social interaction with not just buildings but the natural environment as well and the role this has in creating attractive areas whilst addressing the needs for climate change and ensuring it remains vital and viable in the future. (No change from previous appraisal)													
Uncertainties & risks	Lack of investment in historic buildings can result in buildings being at risk. (No change from previous appraisal)													
Short/ Medium & Long term impacts	The impact of the policy will become more apparent later in the plan period as more development and retrofitting takes place and the environmental improvements to the areas of poorer quality are completed. (No change from previous appraisal)													
Cumulative & Synergistic impacts	The policy will be most effective when used in combination with other plan policies, and other plan policies will rely on this policy to safeguard and enhance the historic landscape which extends beyond the boundaries of Lichfield District. (No change from previous appraisal)													

Table 14.35 Policy BE1: High Quality Development

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	++	++	++	+	+	0	+	+	+	++?	+	+	+	0
Assessment of Effects	<p>Environmental: The policy will have a clear and strong positive impact upon SFO A, landscape and townscape quality,SFO B Promoting biodiversity and and SFO C Protecting the historic environment. The policy includes specific reference to ensuring high quality development having a positive impact upon the historic landscape and environment, hard and soft landscaping and green corridors. The policy will also have a positive impact upon prudent use of natural resources (SFO E) as it seeks a positive impact upon reducing carbon emissions.</p> <p>Economic: Positive impact upon economic impacts by reducing trips by car through the use of the car and creating attractive and safe environments.</p> <p>Social: Clear and strong positive impact upon linkages to jobs and services, creating mixed and balanced communities and encouraging crime sensitive design and a positive impact upon amenity which will promote safe communities and healthy lifestyles improving health and well being.</p>													
Local Plan Strategy (inc. Modifications)	++	++	++	+	+	0	+	+	+	++?	+	+	+	0
Assessment of impact of Modifications	<p>Environmental: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Economic: There are no modifications to this policy and no additional effects arising from the other modifications than listed above.</p> <p>Social: There are no modifications to this policy and and no additional effects arising from the other modifications than listed above.</p>													
Mitigation & maximisation	The policy seeks to protect and enhance historic assets and guide development to consider the built environment as an area for social interaction with not just buildings but the natural environment as well and the role this has in creating attractive areas whilst addressing the needs for climate change and ensuring it remains vital and viable in the future.													
Uncertainties & risks	Developments have to be assessed on a scheme by scheme basis, and while encouraging high quality development on an individual site, other areas which need improvement may not be those affected by development. However this policy needs to be applied in tandem with other policies in the Plan which should minimise risk and uncertainty.													
Short/ Medium & Long term impacts	The policy will ensure the quality of the built environment is improved and becomes more sustainable throughout the plan period.													
Cumulative & Synergistic impacts	A high quality of development can result in greater levels of investment beyond the development site itself and this can lead to greater public confidence and enjoyment of the assets and the built environment as a whole.													

15 Lichfield City (inc. Streethay)

15.1 Through consultation on the 'Issues' document, published in August 2007, issues facing Lichfield City were identified as:

- *'Protection of the character of Lichfield City from large scale development pressure;*
- *Lichfield southern bypass remains incomplete;*
- *Lichfield City is a popular destination for day visitors but there is a desire to encourage longer stays; and*
- *Lichfield City's role as a strategic centre in terms of services, facilities, retail and employment;*
- *Transport movement and accessibility'.*

15.2 Following on from this, these issues were published in the 'Core Strategy Issues and Options' document and questions were asked to gauge whether these were the main issues, what others needed to be addressed. The 'Issues and Options' document also included a draft vision for Lichfield District in 2026 at paragraphs 8.5 to 8.14. This included specific reference to Lichfield City in the following way:

- *'Existing employment allocations at Fradley, Lichfield and Burntwood will be largely developed to provide a range of new jobs, with new office jobs being created principally in Lichfield.'*
- *'Existing poorer quality residential environments in Burntwood, Lichfield, Fazeley and Armitage with Handsacre will have been improved to provide sustainable, safe and vibrant local communities'.*
- *'Both Lichfield and Burntwood will have improved urban public transport networks. Lichfield Southern Bypass will have been completed and there will be an improved access to rail services including park and ride facilities on the Cross- City line'.*
- *'Lichfield City will be a place which treasures its rich historic, cultural and architectural heritage, while embracing visionary new landmark developments serving all of our residents. The parks forming the green heart of the City will be improved providing a venue for play, leisure events and activities. Lichfield will be the strategic focus for a wide range of services, shopping, cultural and leisure activities which will be accessible by the improvement in quality and quantity of sustainable routes into the City. Lichfield City Centre will be vibrant day and night, with increased City Centre living and an improved pedestrian environment. All of these factors will help Lichfield be an important regional tourist destination with the facilities to support increase in tourism.'*

15.3 The portrait of the District set out in 'Issues & Options' identified Lichfield City as one of the main urban areas within Lichfield District, which was also identified as having local pockets of severe deprivation. Issues identified within this document were informed by research and via feedback on those set out in the 'Issues' consultation document. At a District-wide level the 'Issues and Options' document identified that public transport was focused on Lichfield and Burntwood, although internal bus services did not reach all parts of the urban areas, and that there was potential to improve rail facilities, particularly on the

cross city line. In addition demand for affordable housing in Lichfield City was identified, and a need for a wider range of jobs in Lichfield to reduce commuting. Also identified was the need to protect the historic core of Lichfield City and the need to improve access to open space and links to the countryside, as well as improving the quality of open spaces, sports and play facilities and giving better access to indoor sports facilities.

15.4 In addition the 'Issues and Options' document also included Strategic Objectives, with Strategic Objective 3 being 'To focus residential, employment and town centre facilities into high quality developments within the most sustainable locations whilst protecting the quality and character of existing residential environments'. Other relevant Strategic Objectives included 8: 'reduce the need to travel'; 9: 'to improve our town centres to provide better local opportunities for shopping, leisure, culture and improved accessibility, by providing a wider range of facilities within Lichfield City and through creation of an enlarged town centre at Burntwood' and 14: 'to protect the District's natural and built environmental assets from loss or damage by development and the effects of traffic, and secure enhancements in their conservation and management, having particular regard to the historic environment of Lichfield City, the conservation areas and the wide ranging landscape character of the District'.

15.5 The 'Issues and Options' document considered the spatial distribution of housing across Lichfield District to 2026 and looked at variety of different levels of growth for Lichfield City. Spatial Option 1 (Town focused development) apportioned 50% of the District's housing growth to Lichfield City, Option 2 (Town and key rural village focused development) 40%, Option 3 (Dispersed development) 30% and Option 4 (New Settlement) 20%.

15.6 The 'Issues & Options' document also considered how Lichfield City would be affected by these options, with each of the option for growth identifying Lichfield City as a Strategic Centre where major retail developments, large scale leisure, offices and other uses to attract large numbers of people should be focused. In 2007 Core Strategies need to be in conformity with Regional Spatial Strategies, and the West Midlands Regional Spatial Strategy Preferred Option suggested a target of 30,000 sq. metres of new office development should be provided within Lichfield City Centre. The 'Issues & Options' document also noted that significant change would take place within the City Centre by 2026, which would include a substantial mixed-use development at Birmingham Road (now known as 'Friarsgate'). In considering levels of housing growth within the city of between 20-50% across the four spatial options, the document recognised that the development of brownfield sites within the existing built-up area would be a priority for all options, but that Options 1 & 2 would necessitate some greenfield extensions on the edge of the City and that urban extensions to meet employment requirements may also be necessary. Spatial Options 3 & 4 were identified as reducing new housing levels within Lichfield City, containing housing within the existing urban area. It was recognised that in Spatial Option 4 a new settlement would be expected to incorporate a range of services and facilities to meet its needs, and that these might be located within Lichfield City under other options, thus having the potential to relieve some pressure on the City through this option. However, many leisure, cultural and business needs would still be provided by Lichfield City.

15.7 The SA considered each of the four spatial options published in the 'Issues and Options' document and the findings are set out in the ICSSA paras 5.31-5.44

15.8 In addition the ICSSA published an SA of potential directions of housing growth around settlements following the submission of potential housing sites through the SHLAA process. Specific boundaries and sites were not identified and sites were often amalgamated to form a direction of growth/broad location. The findings of this work were published in the ICSSA and are in Section 6, with the conclusions set out in Section 7. The document was published for consultation alongside the 'Core Strategy: Preferred Options' document in December 2008.

15.9 The 'Core Strategy: Preferred Options' document identified a preferred spatial option for Lichfield City and identified key proposals as follows:

- *'Lichfield's role as a strategic centre will be promoted and strengthened;*
- *Around 4,000 additional dwellings will be accommodated between 2006-2026 (with 2,500 required on new sites);*
- *Development of sustainable urban neighbourhoods on the edge of Lichfield City - including 850 dwellings to the East of the City around Streethay and 1650 dwellings to south Lichfield, to possibly include local retail facilities, leisure & recreation provision, open space & green corridors, education & community uses;*
- *Affordable and specialist housing to be distributed throughout preferred locations for growth;*
- *Retention / redevelopment /modernisation of employment areas as appropriate;*
- *City centre development to accommodate offices and around 25,000sqm gross of comparison goods shopping to 2021 (majority within Friarsgate development);*
- *Other office locations around Trent Valley Station area & incorporated within south Lichfield sustainable urban neighbourhood;*
- *Improvements to Lichfield Trent Valley station;*
- *Completion of Lichfield Southern Bypass; and*
- *Potential for renewable energy schemes'.*

15.10 The findings of the SA were included within the 'Core Strategy Preferred Options' document at para 8.20 indicating that future development around Lichfield was sustainable, due to its accessibility and wide range of services and facilities. With regard to the SA of the directions of growth around Lichfield City the appraisal concluded that the direction to the south of Lichfield would give the greatest number of benefits and the least number of negative impacts, for all directions assessed across the District. Land to the east of Lichfield (around Streethay) scored well in relation to providing opportunities to reduce trips by car to jobs and services, and was relatively sustainable, recognising that careful mitigation may be required in relation to archaeological assets associated with the Scheduled Ancient Monument.

15.11 Other options for growth around Lichfield City considered during the Core Strategy process and appraised by the LSWG included a direction to the north-east of Lichfield and to the west. Development to the north-east of the City would breach the ridge, meaning that any development beyond this would cause significant harm to the setting of the City and be detrimental to the quality of the landscape. This option therefore scored poorly in relation to environmental effects, but its good access to jobs, services, sport and recreation facilities and being well served by public transport meant that it scored better for economic and social effects, but still lower overall than the two preferred directions of growth. Although development to the west of Lichfield was found to have some positive impacts in terms of

accessibility, it was also found to be potentially the most damaging in terms of its impact upon the historic landscape, and on the views and skyline of this historic city. The potential for strong negative impacts were also found upon priority habitats and protected species and overall the SA found this to be the least favoured direction of growth around Lichfield City.

15.12 The 'Policy Directions' consultation in April 2009 included a revised preferred spatial strategy. For Lichfield City, still considered to be the most sustainable settlement in the District, urban extensions were proposed to the south of Lichfield (1,650 dwellings) and to the east, around Streethay (850 dwellings). As a response to the consultation on the 'Core Strategy Preferred Options' document, the Policy Directions document stated that further consideration would be given to whether the proportions of housing growth in the urban extensions should be amended to reduce the scale of growth to the south of the city. 'Policy Directions' acknowledged the limitations of Lichfield City Centre, due to the historic core, of accommodating 30,000m² of office development and therefore indicated that a further 15,000m² offices should be located elsewhere within the City, possibly including redevelopment of existing employment land around Trent Valley station and a limited area associated with the southern urban housing extension.

15.13 In addition, the policy directions within the document sought opinions on proposals affecting Lichfield City such as:

- Lichfield Southern bypass;
- Lichfield Trent Valley rail station improvements;
- Improvements to the cross city line and a park and ride facility;
- Protection of future rail reopening opportunities by safeguarding the Walsall-Lichfield rail line;
- Improvements to the A38;
- Protecting existing jobs and encouraging high wage opportunities in growth sectors of business, education and research;
- Supporting tourism in Lichfield City;
- Limiting the retail floorspace growth of Lichfield City Centre to 35,000sqm gross (including Friarsgate); and
- Improving the physical quality of Lichfield City centre.

15.14 The 'Core Strategy: Shaping our District', published in November 2010, included reference to Lichfield City within 'Core Policy 1: The Spatial Strategy'. This apportioned 41% of the District's housing growth to 2026 in and around Lichfield City, but scaled back the amount of housing growth to the south of the City, following consultation feedback on 'Core Strategy Preferred Options' and 'Policy Directions'. Thus the revised strategy apportioned 59% of the Lichfield allocation to within the urban area and 41% through the development of sustainable urban extensions to the south of the city (approx. 550 dwellings) and to the east, around Streethay (approx. 850 dwellings). The SA of this element of Core Policy 1 was published in the 'Sustainability Appraisal: Shaping our District' as part of the overall SA of Core Policy 1, and alongside the SA of the other policies.

15.15 The 'Local Plan: Strategy' has again revised the spatial strategy following consultation and further evidence; in particular evidence in relation to housing in the form of the Southern Staffordshire Districts Housing Needs Study & SHMA Update (May 2012) and economic evidence in the form of the Employment Land Review (February 2012). The 'Local Plan: Strategy' now includes a vision and our settlements policies for the settlements across the District, with policies on environment, services and facilities, housing and economy.

15.16 The spatial strategy incorporating modifications now allocates 38% of the District's housing growth to 2029 to Lichfield City, 3,900 of the 10,030 dwellings for the District as a whole. Of this figure around 46% of this is located within the urban area (either completed or as windfalls), with the remaining 54% to be delivered through urban extensions. These Strategic Development Allocations (SDAs) will be located to the south of the city for around 1,350 dwellings (Deans Slade Farm, South Lichfield and Cricket Lane SDAs) and to the east, around Streethay, for approximately 750 dwellings. Specific 'Our Settlements' policies for East of Lichfield (Streethay) and South Lichfield are set out in the plan which detail the requirements for each site, together with Concept Statements for each of these SDAs, setting out the concept rationale, key design principles and infrastructure required.

15.17 In terms of the economy Lichfield City is to remain as a strategic centre, and the policy seeks to improve the range of shopping, leisure, business, cultural, education and tourist facilities. Whilst office development is still encouraged within the city centre, up to 30,000m², the policy recognises the limited capacity due to heritage constraints, and sets out a sequential approach to office site selection. The policy also supports up to 36,000m² of retail development - of which 31,000m² will be for comparison goods, with a further 5,000m² outside the town centre boundary specifically for comparison bulky goods.

15.18 Further housing and economic development in Lichfield City is to be supported by a range of infrastructure. As well as the completion of the Southern Bypass and improvements to Trent Valley Station (with particular focus on increased parking provision) first highlighted in the 'Core Strategy: Preferred Options' document of December 2008, 'Policy Lichfield 2: Lichfield Services and Facilities' now includes reference to the provision of improved leisure facilities, improvements to open space and playing pitch provision, as well as improvements to arts and cultural facilities.

15.19 The 'Local Plan Strategy' through 'Policy Lichfield 1: Environment' has also strengthened the protection afforded to the built historic environment of the city, as well as to the natural environment and landscape surrounding the city.

15.20 The LSWG has appraised the spatial strategy as it relates to Lichfield City as a whole, and the table below indicates the scores given.

Table 15.1 Lichfield City Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+	++	+/-?	+	-	0	+	++	++	+	++?	+	+	+

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Assessment of Effects	<p>Environmental: Positive effect upon utilising redundant sites and reducing areas of lower landscape quality, however does involve the loss of greenfield land, but highest quality is safeguarded and can mitigate for the impact on views. New development to the south of the City will not breach the ridge line, protecting distinctive settlement character. Friarsgate will have a positive impact upon the Conservation area and involve no loss of high quality buildings.</p> <p>Clear and strong positive effect upon biodiversity as includes protection of the linear park and enhancement to the network of green space including links to open countryside and the SDAs include requirements for protection of local areas and habitats of biological interest, landscaping and green infrastructure provision, with specific reference to hedgerows, tree canopy, a landscape buffer and Lichfield Canal.</p> <p>There is a mixed impact upon the historic environment as archaeology and listed buildings are affected by the SDAs. There is also uncertainty as to the impact of focusing development within the historic core. However by retaining the focus on Lichfield City as a strategic centre this will ensure continued investment in the historic environment, and with policies in the plan which seek its protection and enhancement, the effects will be mitigated.</p> <p>The SDAs will be required to be built to high energy efficiency standards through other policies and consideration given to the use of renewable energy technologies. However development within Lichfield City will result in a negative impact upon waste, as more development will inevitably result in more waste.</p> <p>There will be an overall negative impact upon primary resources as the proposals will result in brick being used for houses, and there will need to be mitigation for any decline in air quality through the increased visitor numbers to the City centre. There is no impact upon known mineral deposits and policies will ensure protection of controlled waters and the efficient use of water.</p> <p>Flooding is considered in the level 2 SWMP and issues can be addressed where opportunities arise. The SDAs also incorporate SuDs to mitigate for the loss of greenfield land as well as and flood mitigation measures where appropriate.</p> <p>Economic: Policies include improvements to Trent Valley Station and improvements to cycle routes and pedestrian links which will provide opportunities to reduce trips by car.</p> <p>Good accessibility to the A38 and improvements to the transport network, including completion of the Southern bypass, will assist in encouraging sustainable distribution and communication systems.</p> <p>Lichfield City is the focus for many indigenous businesses and is an attractive location for research and development. The employment policy encourages delivery of offices within the City centre and appropriate housing to attract and retain entrepreneurs and local business including the many retailers in the City centre and neighbourhood centres.</p> <p>Social: Lichfield City offers the widest range of services and facilities and is the most accessible major settlement within Lichfield District. The policies require the SDAs to provide public transport to within 350m of each new dwelling, smarter travel choices, and pedestrian and cycle networks throughout the site linking services, facilities within the site and beyond, which will also assist in reducing traffic in sensitive areas such as Lichfield City centre and residential neighbourhoods.</p> <p>The polices will assist in the creation of mixed and balanced communities and look to redress any imbalances through the provision of a range of house types and increased range of facilities. This will include the delivery of improved leisure facilities, allotments and improving</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>the quality, quantity and accessibility of open space, supporting arts and cultural facilities and requiring the SDAs to incorporate public art. Provision of improved pedestrian and cycle links, including the Lichfield Canal, will improve transport provision and accessibility.</p> <p>Any increase in traffic could affect road safety, however this should be mitigated by other policies within the Plan. Provision of more open space and leisure opportunities will assist in improving the health of the population and reducing health inequalities and can provide diversion from crime and anti-social behaviour, and along with the provision of community space will enable improved community participation.</p>													
Local Plan Strategy (inc. Modifications)	++	++	+/-?	+	+/-?	0	+	++	++	++	++?	+	++	+
Assessment of impact of Modifications	<p>Environmental: Now strongly positive for A due to additional sites to the south of the City will not breach the ridge line, protecting distinctive settlement character. District park proposed for Deans Slade site on the higher ground will afford new views of the city and Cathedral from publicly accessible locations. Overall strategy results in greater opportunities for biodiversity but score for B unchanged as was already a double positive.</p> <p>Economic: Now strongly positive for G Soc due to improved mechanisms for the delivery of bypass via Deans Slade site: will reduce impact of traffic in sensitive historic City centre. City centre will be more attractive for business and accessible for visitors / shoppers as a positive economic benefit.</p> <p>Social: Now strongly positive for K due to additional sites: will deliver affordable housing in a location with existing need and the widest range of services and facilities including more land available for open space and biodiversity accessible to city, which benefit the health and well being of future residents.</p>													
Mitigation and Maximisation	<p>The policies seek to support the existing economy of Lichfield City and maximise the continuing investment in the city centre, creating and safeguarding jobs and services and provide a range of housing including affordable housing to the benefit of the health and wellbeing of existing and new residents. The policies seek to mitigate for their impact upon landscape and maximise opportunities for biodiversity and maximise on the opportunities for non car based transport.</p>													
Uncertainties and Risks	<p>The rate of development and investment will determine when larger projects which have wider benefits such as the Lichfield southern bypass, improvements at Trent Valley Station, city centre redevelopment and enhanced provision for indoor sport are delivered.</p>													
Short/ Medium/ Long terms impacts	<p>The delivery of key infrastructure provision and enhancements will be delivered in relation to the rate of delivery of development. There is potential within the short term for large scale investment within the City centre and Trent Valley Station, and dependent upon the rate of development other key facilities within the medium term. The long term impact of the overall strategy will deliver enhanced biodiversity through the provision of district park and a route for the Lichfield Canal the benefits of which will result in enhancements within and beyond the plan period.</p>													
Cumulative and Synergistic impacts	<p>The cumulative impacts of the developments will mitigate for their own impacts and will cumulatively assist in the wider delivery of an enhanced range of housing, services and facilities which will benefit the economy, environment, health and well being of existing and future</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	residents of Lichfield City. Both Synergistic and cumulative impacts may result from individual developments for example impacts from development upon Cannock Chase SAC, and these will be mitigated for through other policies of the plan.													

15.21 The SA demonstrates that the policies relating to Lichfield City will have a positive economic and social impact. Through mitigation proposed, and in conjunction with other policies, there will also be an overall positive impact upon the landscape, townscape and historic environment, and a clear and strong positive effect upon biodiversity. The policies incorporating modifications will result in the delivery of more sustainable development in Lichfield City with the overall impact of increasing the sustainability of Lichfield City and Lichfield District.

16 Burntwood

16.1 In August 2007 a consultation on 'Issues' was undertaken. This identified the following issues facing Burntwood:

- *'Need for facilities to complement planned improvements to the town centre'*
- *'Not enough local jobs for local people'*
- *'Are we making the most of Chasewater?'*

16.2 These issues were further tested through the 'Core Strategy Issues and Options' document which provided an opportunity to confirm these issues and identify further issues which needed to be addressed or explored further. The 'Issues and Options' document included a draft vision for Lichfield District in 2026 which included specific reference to Burntwood in the following way:

- *"Existing employment allocations at Burntwood will be largely developed to provide a range of new jobs;*
- *Existing poorer quality residential environments in Burntwood will have been improved to provide sustainable, safe and vibrant local communities;*
- *Burntwood will have improved urban public transport networks; and*
- *Burntwood will be a more sustainable and self contained settlement with a range of services and an improved town centre to meet local needs for shopping, community services and facilities. The town will be promoted as an area of increased and more diverse economic activity, to include new retail, employment, recreational, health and educational resources, further assisting in the regeneration of the area and helping to meet the needs of the resident population of the town. It will be a focus for investment, including external funding and, where available, the Council's capital programme, which will concentrate on projects to improve the town's infrastructure and environmental quality. Burntwood will benefit from improved local public and sustainable transport links focused on the town centre and improved access to other urban areas. Chasewater will be of increased tourism importance and a place for local people to access the countryside and enjoy its biodiversity. It will lead on alternative renewable energy and green technologies".*

16.3 The portrait of the District contained within the 'Issues and Options' document identified Burntwood as one of the two main urban areas in Lichfield District with pockets of severe deprivation, having two super output areas ranked within the top 30% most deprived in England of local authorities in 2004. In the year 2000 parts of Burntwood were in the top 20% most deprived wards for education, skills, training, poor health and low incomes. At a District-wide level the 'Issues and Options' identified that public transport was focused on Burntwood, although internal bus services do not reach all parts of the urban area. In addition there was a particular need for affordable housing and a need to increase the availability of public transport. In terms of employment it was recognised that the number of jobs in Burntwood needed to be increased to assist in reducing high levels of out commuting. Also

identified was the need to improve access to green and open spaces, and links to the countryside, as well a need to improve the quality of outdoor sports and play facilities and to secure improved access to indoor sports facilities.

16.4 The 'Issues and Options' document considered the spatial distribution of housing across Lichfield District to 2026 and looked at variety of different levels of growth for Burntwood. Spatial Option 1 (Town focused development) and Option 2 (Town and key rural village focused development) apportioned 20% of the District's housing growth to Burntwood, Option 3 (Dispersed development) apportioned 15% and Option 4 (New Settlement) only apportioned 10%.

16.5 The 'Issues and Options' document also considered how Burntwood would be affected by the options. The overall strategy was similar for all four options with an emphasis on creating facilities and infrastructure to meet the local needs of the town and eliminating existing deficiencies in infrastructure and facilities. Burntwood would maintain its role as a complementary settlement to Lichfield City with an improved range of facilities and jobs to make it more self contained. Provision of an enlarged town centre with a broad range of facilities would assist in meeting local needs. Burntwood would assist in meeting future housing needs, but because of the urban capacity this is expected to be more limited. The document identified that there may be a need for some greenfield development for housing on the edge of the town in highly accessible areas if Options 1 or 2 (relating to the apportionment of 20% of the District's housing) were chosen. Growth would need to be directed away from more sensitive areas on the periphery of the town, in particular SSSI and AONB at Gentleshaw Common, although the strategy should promote accessibility to areas of the countryside and improvements to walking and cycling. It recognised that partnership working would be needed to tackle some of the issues facing Burntwood, including issues of health deprivation and environmental enhancement. Under spatial Option 4 the population of the town would be likely to remain static or experience a slight overall decline.

16.6 The SA considered each of the four options published in the 'Issues and Options' document and the findings are set out in the ICSSA paras 5.31-5.44.

16.7 In addition, the ICSSA published an SA of potential directions of housing growth around settlements following the submission of potential housing sites through the SHLAA process. Specific boundaries and sites were not identified and sites were often amalgamated to form a direction of growth/broad location. The findings of this work were published in the ICSSA, Section 6, with the conclusions set out in Section 7. The ICSSA was published for consultation alongside the 'Core Strategy: Preferred Options' document in December 2008.

16.8 The 'Core Strategy: Preferred Options' consultation document identified a preferred spatial option for Burntwood and identified the following key proposals:

- A focus on developing the town centre to meet local needs;
- Around 1,000 additional dwellings to be accommodated between 2006-2026 (with approximately 750 to be delivered within directions of growth and the remaining homes to be accommodated as part of a mixed use development in the town centre or through redevelopment elsewhere in the urban area);

- Development of two sustainable urban neighbourhoods with 250 dwellings to the south of Burntwood and 500 dwellings to the south east of Burntwood (both within the Parish of Hammerwich). These sustainable urban neighbourhoods could possibly include leisure and recreation provision, open space, green corridors and community uses;
- Town centre development to comprise around 17,000m² of gross retail floorspace to 2021 (of which around 10,000m² within the approved Brendewood scheme and around 3,000m² as an extension to Morrisons supermarket);
- Improvements to public transport, walking and cycling infrastructure;
- Improvements to the quantity and quality of open spaces;
- Retention of existing employment areas with potential for redevelopment and modernisation of some;
- Potential for renewables;
- Continuing improvements to the quality of the heathland SSSI through their management, including heathland restoration and recreation; and
- Further improvements to facilities and attractions at Chasewater Country Park.

16.9 The findings of the SA were included in the 'Core Strategy Preferred Options' document indicating that all directions of growth around Burntwood would have a positive impact upon the provision of affordable housing. However, of the three considered directions of growth around Burntwood, the direction to the south and to the north both scored as many negative impacts as positive impacts. However the direction of growth to the south adjoining the settlement would have the least number of negative impacts and was considered to have a positive impact upon providing increased opportunities and facilities for walking and cycling to jobs and services; providing affordable housing for local people in need of a home and improving choice of transport mode as it has easier access to existing bus/cycle routes. Negative impacts were identified in relation to protecting locally distinctive character due to the potential coalescence with the conurbation, thus any development in this direction should be limited.

16.10 Other options of growth were appraised around Burntwood and with regard to growth in a north easterly direction to the settlement, positive results were comparable to those for the south-easterly direction of growth. It was noted that greater negative impacts were identified in relation to the effect on priority habitats and also the potential to reduce flood risk. In addition, negatives were also scored in relation to the ability to provide opportunities to reduce trips by car; provide access to new development for those without a car and reducing the overall impact of traffic sensitive areas, due to poor bus penetration at present. The directions of growth to the south-east of Burntwood, towards and incorporating Hammerwich, showed a negative impact with potential impacts being similar to other directions. For this direction of growth significant negatives identified were in relation to priority habitats, the potential to reduce flood risk and in relation to the locally distinctive character, especially with regard to Hammerwich village. This direction also scored negatively

in relation to providing increased opportunities for walking/cycling and improving transport provision and accessibility; due partly to the narrow carriageway through Hammerwich village, which restricted bus access. The SA process also identified that cumulative development to the east and south of Burntwood along with development to the west of Lichfield was likely to result in congestion at Pipehill road junction (even after its scheduled improvements, which at the time were due shortly and which have now been completed).

16.11 The 'Policy Directions' consultation in April 2009 included a revised spatial strategy. For Burntwood this resulted in a lesser role in accommodating new growth, with further work to identify where new development can be delivered on brownfield land and redevelopment sites to avoid the need for additional expansion of the town limits into Green Belt locations. It was still considered necessary for Burntwood to accommodate a fair proportion of the required housing for the District, taking account of existing facilities and potential to create an expanded town centre, including up to a further 5,000m² of office space.

16.12 In addition the document sought opinions on proposals affecting Burntwood such as:

- Protecting existing jobs and encouraging high wage opportunities in growth sectors of business, education and research;
- Supporting tourism at Chasewater;
- Limiting the appropriate floorspace to the committed LCP scheme, the Morrison's extension and the additional floorspace capacity identified by 2021 on the Olaf Johnson site, which amounted to 16,000m² gross of which 13,000m² would be in comparison goods;
- Improving the physical environment of Burntwood; and
- Managing our nationally important heathland in a sustainable way and contributing to the management and protection of Cannock Chase AONB;

16.13 The 'Core Strategy: Shaping our District' published in November 2010 included reference to Burntwood in 'Core Policy1: The Spatial Strategy'. This apportioned 13% of the District's housing growth to 2026 to Burntwood and removed the Green Belt sites previously identified following consultation feedback. The strategy instead identified a sustainable urban extension to the East of Burntwood Bypass for approx 425 dwellings on a brownfield site, within the existing settlement limits. In addition, the potential for limited housing development in the Green Belt to the south of Chasewater (at Highfields Farm) was identified. Other aspects of Core Policy 1 were the delivery of employment through implementation of existing commitments and redevelopment and a limit of 16,000m² gross retail floorspace, (of which 13,000m² should be comparison) and up to 5,000m² of office floorspace. These town centre uses were to meet local needs and town centre regeneration measures. Finally there was support for the promotion of Chasewater as a local and regional tourist and recreational facility.

16.14 The SA of Core Policy 1 was published in the 'Sustainability Appraisal: Shaping our District' along with the sustainability appraisal of the policies. An addendum to this SA was published in January 2011 which considered the impact of potential housing development at Chasewater (Highfields Farm). This impact was negative in terms of the promotion of biodiversity and geodiversity, coalescence and archaeology. In terms of positives, these

related to mitigating and adapting for the effects of climate change. With regards to meeting local housing needs, there were concerns that, due to the location, this site would not be best placed to meet needs arising within Burntwood.

16.15 The 'Local Plan: Strategy' revised that spatial strategy following consultation and further evidence. The evidence in relation to housing in the form of the Southern Staffordshire Districts Housing Needs Survey and SHMA update (May 2012) and economic evidence in the form of the Employment Land Review (February 2012) are key. The 'Local Plan: Strategy' now includes a vision and our settlements policies for each of the main settlements across the District, with policies on environment, services and facilities, economy and housing. This provides a much clearer spatial strategy for Burntwood.

16.16 The spatial strategy (with main modifications) now allocates 13% of the District's housing growth to 2029 to Burntwood. This equates to 1,350 of the 10,030 dwellings for the District as a whole. Of this figure, 375 dwellings would be delivered in a Strategic Development Allocation (SDA) to the East of Burntwood Bypass, to be reallocated from its previous allocation as employment land (zone 5 of the Burntwood Business Park). A specific policy sets out the detailed requirements for this site and a concept plan sets out the concept rationale, key design principles, infrastructure required and proposed phasing. Mitigation for the effects upon habitat is particularly relevant and through further detailed consideration, it has been found to be achievable without the site becoming unviable.

16.17 Burntwood's town centre proposals have also been revised and policy seeks to encourage new retail development up to 14,000m² gross of which 13,000m² will be comparison goods together with up to 5,000m² gross office floorspace. The role and function of the Mount Road Industrial Estate will be considered through the Local Plan: Allocations document, but has been removed from the portfolio of employment land within Lichfield District. Development within Burntwood would need to consider the impact upon Cannock Chase AONB and SAC, and it is stated that Green Belt boundaries need regularising to take account of the housing development that has taken place in recent years at the former hospital at St Matthews Hospital, however the precise boundaries to be determined through the subsequent Local Plan Allocations document.

16.18 The LSWG has appraised the spatial strategy as it relates to Burntwood as a whole, and the scores given are set out in the table below:

Table 16.1 Burntwood Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+++	+	+?	+	+	0	+	+	+?	++	+	+	+?	+
Assessment of Effects	Environmental: Overall a potential positive impact upon environmental effects. Clear and strong positive impact upon landscape and townscape quality, with the encouragement of sites for redevelopment, policy is reliant on other policies in the Plan to ensure quality of development is delivered.													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Positive impact upon biodiversity, policy requires development to mitigate for impacts upon the wealth of ecological diversity naming the Cannock Chase AONB, SAC and Chasewater Country Park specifically. And also the protection and enhancement of local areas of recreational value and habitats of biological interest. Development of land to the east of Burntwood Bypass will involve some loss of habitat however adequate mitigation and compensation is can be delivered without effecting the viability of the scheme.</p> <p>No listed buildings or known archaeological sites will be affected and there is potentially a positive impact through provision of interpretation material with regard to St Anne's Church arising from the development East of Burntwood Bypass.</p> <p>Development will be required to be built to high energy efficiency standards by other policies and consideration of renewable energy technologies, however development in Burntwood will result in a negative impact upon waste as more development will result in more waste.</p> <p>There will be a mixed impact upon resources as whilst a reduction in the need to travel will improve air quality and redevelopment of the town centre and other areas within the employment portfolio will enable opportunities to reduce contaminates and protect controlled waters. There will be a negative impact upon resources as development is likely to utilise brick etc and further evidence is required with regard to any mineral deposits under the site, although no objections to this site have been received previously with regard to mineral deposits.</p> <p>Development will have no impact upon reducing flood risk.</p> <p>Economic: There will be an overall positive effect upon the economic effects. The policies include improvements to the transport network including the provision of a new bus terminus, and the modernisation of the employment land portfolio and the encouragement within the enlarged town centre for retail and office development to help meet local needs and encourage new employment consistent with local needs. There may be an impact on the future of the Mount Road Industrial Estate, however other policies in the Plan look to safeguard local employment and allow for inward investment and redevelopment. The area has excellent links via the M6 Toll to the national highway network for distribution services.</p> <p>Social: There will be an overall clear and strong positive impact upon social effects although there is an unknown with regard to the effect of the policies upon reducing drug and alcohol abuse, as with the Plan as a whole. The policies include improvements to walking and cycling links and encourage wider sustainable travel by sustainable travel. The SDA will deliver a range of housing and open space sport and recreational facilities, including allotments along with supporting other improvements to open space and playing pitch provision which will assist in meeting known deficiencies. Investment in the town centre will encourage cultural activity which are further supported in Policy Burntwood 2 and will deliver an more sustainable mixed and balanced community. By investment in services and facilities and infrastructure and safeguarding existing there will be improvements in the health of the population, by supporting healthy lifestyles especially through the provision of a new health centre and a reduction in health inequalities. Safeguarding of existing community facilities will enable the continued high number of local clubs to operate and enable enhanced community participation.</p>													
Local Plan Strategy (inc. Modifications)	+++	+	++	+	+	0	+	+	++	++	+	+	++	+

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Assessment of impact of Modifications	<p>Environmental: The modifications to the policies and concept statement result in no greater environmental impact than previously identified. The site lies within 15km of the boundary of the Cannock Chase SAC, however modifications to Policy NR7 will ensure there are no significant effects arising from development in Burntwood. There are no additional effects arising from the other modifications proposed than those listed above.</p> <p>Economic: The modifications to the policies and concept statement result in no greater economic impact than previously identified. The town centre will still achieve the enlarged town centre for retail and office development to help meet local needs and encourage new employment consistent with local needs, the other modifications have no additional effects other than those listed above.</p> <p>Social: The modifications to the policies and concept statement result in no greater social impact than previously identified and there are no additional effects arising from the other modifications proposed than previously identified.</p>													
Mitigation and Maximisation	The policies maximise the use of brownfield land and existing assets while mitigating for their impacts and supporting a sustainable community.													
Uncertainties and Risks	The uncertainty has been reduced through Policy NR7 in relation to the impacts of development upon the Cannock Chase SAC. There remains some uncertainty about the delivery of the town centre proposals and with regard to the future of the Mount Road Industrial Estate, which will be largely dependent upon national and global economic conditions.													
Short/ Medium/ Long Term impacts	The policies will assist in the delivery of a more sustainable settlement and the impacts will be partly dependent upon the rate at which development takes place.													
Cumulative and Synergistic impacts	The policies in combination will assist in the delivery of a more sustainable, healthier and self contained town, supporting the surrounding residents who rely on Burntwood for their services and facilities. Policy CP8 will enable growth whilst having regard to centres outside the District and in line with the settlement hierarchy thus not resulting in development which will be detrimental to the sustainability of other settlements. The natural environment including Cannock Chase SAC will be enhanced and protected and no significant environmental impacts on the SAC will arise from development.													

16.19 The SA demonstrates that the policies relating to Burntwood will have a positive economic and social impact. Through mitigation proposed and in conjunction with other policies there will also be a positive impact upon environment. The Local Plan will have a positive impact upon the sustainability of this settlement and contribute to the sustainable development of the District.

17 North of Tamworth

17.1 Development options to the North of Tamworth were first included as part of the 'Issues and Options' consultation in 2007. This document considered providing a strategic housing site in this location as part of the Core Strategy range of housing sites. An SA was undertaken of the option and the findings published in the Interim Core Strategy Sustainability Appraisal (ICSSA). In summary the findings were that there would be a negative impact upon retaining distinctive settlement character and a negative impact upon the Wigginton Conservation area to the North. Accessibility was also an issue as there would be a negative impact upon Fountains Junction and approaches to Tamworth town centre, particularly via Gungate. In addition it was considered that the site would meet more of the housing needs arising from Tamworth than within Lichfield District.

17.2 Further evidence in the form of the 'Tamworth Future Development and Infrastructure Study', published in 2009, was commissioned jointly by Lichfield District Council, Tamworth Borough Council and North Warwickshire Borough Council to examine how the scale of housing development identified within the emerging Regional Spatial Strategy could be most effectively accommodated, with a particular focus on Tamworth, considering the infrastructure requirements arising from housing and employment growth. The study assessed a range of sites in and around Tamworth, including areas within Lichfield District and North Warwickshire and identified that the best performing site fell within North Warwickshire, followed by land around Fazeley. Sites to the north of the Tamworth Urban Area generally performed less well by comparison, particularly against highways capacity and impact criteria. The poorest performing option was that to the south of the urban area (comprising of land west of Tamworth Road and land South of Hockley). The weaker performance of this option was largely due to its relatively low scores against environmental protection and deliverability considerations. The study scoring reflects the information and evidence available at the time.

17.3 The abolition of Regional Spatial Strategies under the Localism Act of 2011 has meant that authorities no longer adhere to regional housing figures. More local evidence since 2009 including the Housing Needs Study and SHMA update has shown that there are complex migration patterns across both Lichfield District and Tamworth Borough that are both heavily influenced by in-migration from the conurbation, particularly Birmingham. There are also parts of the rural south and east of Lichfield District which look to Tamworth for services and facilities and administrative boundaries should not be considered as restrictive to meeting these needs.

17.4 Tamworth Borough Council published their Local Plan in June 2012, which included a Sustainable Urban Extension (SUE) in the Anker Valley (Policy SP6) which incorporated 1,150-1,400 homes with associated infrastructure including footpath links, improvements in public transport and road improvements to the town centre. This was essentially the only strategic housing site within Tamworth Borough as the administrative area is severely constrained by physical parameters, such as flood plain, and by policy designations such as Green Belt. Following submission in November 2012 an exploratory meeting was held in February 2013. The outcome of this exploratory meeting resulted in Tamworth Borough Council withdrawing the Plan from Examination.

17.5 The Localism Act 2011 and the National Planning Policy Framework (NPPF) has introduced a Duty to Co-operate on public bodies regarding planning issues that cross administrative boundaries, to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. The NPPF regards this joint working as enabling local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas, possibly due to lack of physical capacity. To comply with this duty Lichfield District Council has agreed a Memorandum of Understanding (MoU) relating to the delivery of housing to meet Tamworth's needs. This MoU has been signed by Tamworth Borough Council, Lichfield District Council and North Warwickshire Borough Council and allows for the Local Plans of these three authorities to be aligned and consistent on the matter of housing.

17.6 The MoU agrees a broad objective for Lichfield District to deliver 500 homes to assist in meeting the needs arising from within Tamworth's borough boundary. It also agrees that the delivery of these 500 new homes will not commence until 2021, or until the necessary linkages have been delivered within Tamworth, whichever represents the later date. In addition a clause is also included agreeing that Lichfield District Council will be the sole collecting authority for the New Homes Bonus and Section 106/CIL monies resulting from delivering these homes within its administrative boundary.

17.7 In the light of these changed circumstances and additional evidence further appraisal of options for the location of new homes to the North of Tamworth in Lichfield District was therefore undertaken by the LSWG. Appraisal of options included a combination of sites to bring forward 1,000 homes in Lichfield District, with 500 to help address housing needs in Tamworth Borough, and 500 to help address housing needs in Lichfield District. A map showing six options appraised is included at Appendix D and in summary are:

- A. Land at Arkall Farm (1,000 dwellings)
- B. Land at Arkall Farm (1,000 dwellings) & Anker Valley Sustainable Urban Extension (1,150 dwellings)
- C. Land to the North of Browns Lane & land west of Main Road, Wigginton (1,000 dwellings)
- D. Land to the North of Browns Lane & land west of Main Road, Wigginton (1,000 dwellings) & Anker Valley Sustainable Urban Extension (1,150 dwellings)
- E. Land at Arkall Farm (750 dwellings) & land to the North of Browns Lane (250 dwellings)
- F. Land at Arkall Farm (750 dwellings) & land to the North of Browns Lane (250 dwellings) & Anker Valley Sustainable Urban Extension (1,150 dwellings)

17.8 The following table shows the revised scoring. The totals show the most sustainable options are options B and F, where development within Lichfield District is accompanied by development of the Anker Valley, as the scorings also show that development within Lichfield District without development of the Anker Valley score as the least sustainable. In addition, the group considered that the delivery of the Anker Valley prior to the development of land within Lichfield District would deliver the most sustainable option.

17.9 Due to the close proximity of the sites there are similarities between them. For example SFO D (To mitigate and adapt to the effects of climate change) found that for all options new development will generate more waste, but that there may be potential for opportunities for

renewable energy arising due to the scale of the development. In addition all sites will use greenfield land and within their design use water efficiently, improve air quality as there is less need to use the private car, and incorporate crime sensitive design principles.

17.10 Similar environmental impacts determined were that there is unknown impact upon archaeology and that impact upon listed buildings should be able to be mitigated; there would be no impact upon access to heritage; there would be no impact upon reducing flood risk as sustainable drainage will be incorporated within any scheme and the sites are not within a flood plain. All these sites will have limited economic impacts as no employment is proposed within them, however existing employment areas are in close proximity to the sites and development will encourage indigenous business by improving levels of housing consistent with local employment opportunities. Similar social impacts found were that all sites would improve the range of housing available including affordable housing due to the scale of development, and all sites will address the sport and recreational needs of the new communities. However, no details have been included with regard to community participation, such as the provision of a community hub, although community centre provision has been identified by Tamworth within their Anker Valley Sustainable Urban Extension (SUE).

17.11 There are also similarities between the sites when scored with the Anker Valley SUE, relating mostly to economic impacts as the Anker Valley site is in close proximity to employment and retail provision and would also improve transport provision and accessibility. Social impacts have also scored positively for options combined with the Anker Valley site, as this development proposes the incorporation of community facilities. In addition the scale of development will deliver the range of housing required to meet local needs, provide affordable and specialist accommodation and the increased accessibility will encourage healthy lifestyles.

17.12 There are considerable differences between the sites and some important considerations are detailed in the accompanying text. In summary, the differences relate primarily to environmental effects and social effects. The environmental effects within Lichfield District mainly relate to their impact upon Wigginton, as it is considered that whilst different sites have different impacts upon biodiversity, these can be mitigated through the implementation of the policies within the Local Plan. It is recognised that there may be some impact upon coal deposits and further consultation will be necessary. The economic impacts relate to accessibility and Option C which lies to the west of Main Road would have a negative influence upon accessibility by bus for existing residents as it would require a re-routing of an existing service. Other options score better when combined with the Anker Valley SUE. Accessibility is a key influence on the scoring on the social effects as well. The accessibility and connectivity to services and facilities improves when the sites within Lichfield District are combined with the Anker Valley SUE, as this facilitates access to local services and facilities within the Anker Valley SUE and to wider employment, services and facilities within Tamworth town centre. It also enables improvements to the Fountains Junction/Gungate corridor. Options A, C and E have the poorest connectivity to Tamworth which would result in a negative impact upon social effects, such as access to services, facilities and cultural activities. This, in turn, could result in a negative impact upon health especially for the elderly, healthy lifestyles and potentially a rise in anti-social behaviour.

Table 17.1 Policy: North of Tamworth

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	-	+/-?	+/-?	-?	+?	+/-	++	+	+	+++?	+++?	+/-?	+?	+?
Assessment of Effects	<p>Environmental: Negative impact upon maintaining a diverse and attractive landscape and mixed impact upon Wigginton Conservation Area and on protecting diverse and locally distinctive settlement character.</p> <p>Potential to positively increase the number and diversity of biodiversity habitats. However there is greater potential for harm to the watercourse, but opportunities for strategic green infrastructure links and the hedgerows should be able to be retained. Mixed impact upon heritage as development will be in closer proximity to Grade II Listed Amington Hall , but this offers greater opportunity for broadening access to, and understanding of, heritage assets.</p> <p>No impact upon minerals.</p> <p>Economic: Clear and strong positive in reducing trips by car with the improvement of the Amington link and access to the rail station and town centre.</p> <p>Social: Clear and strong for improving services particularly transport and encouraging cultural activity with the increased accessibility to the town centre and river. Potential to reduce anti-social behaviour and promote healthy lifestyles if are facilities delivered, including a new leisure centre and were well linked. Scale of development would result in enough demand for a new doctors practice, however access to health provision on land to the north of Browns Lane may be more restricted. Clear and strong positive impact on promoting healthy lifestyles if facilities delivered including new leisure centre and access to natural open space result in an overall positive impact on improving health.</p>													
Local Plan Strategy (inc. Modifications)	-	+/-?	+/-?	-?	+?	+/-	++	+	+	+++?	+++?	+/-?	+?	+?
Assessment of impact of Modifications	<p>Environmental: The modifications to the policy and explanation result in no greater environmental impact than has been previously identified however the removal of the specific reference to the delivery of housing and infrastructure within Tamworth Borough reflects the request to remove barriers to early delivery/phasing and the further work committed to inform a comprehensive masterplan for the wider Anker Valley SUE that will inform the Tamworth Local Plan and the Lichfield District Local Plan Allocations document. There are no additional environmental effects arising from the other modifications proposed than identified above.</p> <p>Economic: The modifications to the policy and explanation result in no greater economic impact than has been previously identified however the removal of the specific reference to the delivery of housing and infrastructure within Tamworth Borough reflects the request to remove barriers to early delivery/phasing and the further work committed to inform a comprehensive masterplan for the wider Anker Valley SUE that will inform the Tamworth Local Plan and the Lichfield District Local Plan Allocations document. There are no additional effects arising from the other modifications proposed than identified above.</p> <p>Social: The modifications to the policy and explanation result in no greater social impact than has been previously identified however the removal of the specific reference to the delivery of housing and infrastructure within Tamworth Borough reflects the request to remove barriers to early delivery/phasing and the further work committed to inform a comprehensive masterplan</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	for the wider Anker Valley SUE that will inform the Tamworth Local Plan and the Lichfield District Local Plan Allocations document. There are no additional effects arising from the other modifications proposed than identified above.													
Mitigation and Maximisation	The development will maximise the potential afforded by large scale development and maximise the existing assets available within Tamworth to deliver sustainable development to this sustainable settlement.													
Uncertainties and Risks	The final allocation is not yet determined and further consideration will be considered through the Local Plan Allocations document and Tamworth Local Plan													
Short/ Medium/ Long term impacts	The impact will be determined through the Local Plan Allocations document, reducing the likelihood of short term impacts. The delivery of infrastructure provision and enhancements will be delivered in relation to the rate of delivery of development.													
Cumulative and Synergistic impacts	The continuing investment in Tamworth generated by new development and new residents will assist in the economic viability and sustainability of this settlements and the health and well being of its residents and the residents of Lichfield District who rely on the services and facilities in Tamworth.													

Table 17.2 Sustainability Appraisal of Tamworth Options

Tamworth options	A	B	C	D	E	F	G Ec	H	I Ec	G Soc	I Soc	J	K	L	Total
A	-	+?	+/-?	-?	+?	0	+/-?	+	+	+/-?	+	-?	--?	?	0
	<p>Environmental: Negative impact upon maintaining a diverse and attractive landscape and locally distinctive character.</p> <p>Potential to positively increase the number and diversity of habitats, as areas do contain some areas of priority habitat - poor semi-improved grassland and hedgerows - mitigation is considered possible.</p> <p>The area has previous coal workings including deep working between 50-1200m.</p> <p>Economic: Mixed impact upon reducing trips by car as no information on how bus services would increase & the service at present is infrequent. Sites are relatively isolated & not well connected to enable safe walking routes.</p> <p>Social: Will improve access for those without access to a car, but unknown impact on traffic sensitive areas such as Fountains junction and would have a positive impact upon improving transport choice. Development is isolated and there are no nearby and accessible health care facilities for the elderly, which would have an overall negative impact on the health of the population.</p>														
B	-	+/-	+/-?	-?	+?	+/-	++	+	+	++?	++?	+/-?	+	+	9
	<p>Environmental: Mixed impact upon maintaining a diverse and attractive landscape, locally distinctive character and preserving/ enhancing the Amington Conservation Area- mitigation is considered possible.</p>														

Tamworth options	A	B	C	D	E	F	G Ec	H	I Ec	G Soc	I Soc	J	K	L	Total
	<p>The effect upon biodiversity is as for option A above, however there are greater potential for harm to the watercourse, but opportunities for strategic green infrastructure linkages.</p> <p>Mixed impact upon heritage as development will be in closer proximity to Amington Hall which is Grade II Listed, but this offers greater opportunity for broadening access to, and understanding of, heritage assets.</p> <p>The area has previous coal workings, including deep working between 50-1200m.</p> <p>Economic: Clear and strong positive effect in reducing trips by car with the improvement of the Amington link and improved access to the rail station and town centre.</p> <p>Social: Clear and strong for improving services particularly transport and encouraging cultural activity, due to increased accessibility to the town centre and river. Potential to reduce anti-social behaviour and promote healthy lifestyles if facilities are delivered, including a new leisure centre elsewhere in Tamworth. Scale of development would result in enough demand for a new doctors practice which therefore gives a positive score for improving health inequalities and standards of healthcare.</p>														
C	-	+?	+/-?	-?	+?	0	+/-	+	+	+?	+	-?	--?	?	0
	<p>Environmental: Clear and strong negative impact upon maintaining a diverse and attractive landscape, on protecting diverse & locally distinctive settlement character and on preserving / enhancing the Wigginton Conservation Area due to the coalescence of Wigginton and Tamworth.</p> <p>Potential to positively increase the number and diversity of habitats, as this area does contain some areas of priority habitat - poor semi-improved grassland and hedgerows - mitigation is considered possible.</p> <p>No impact upon minerals.</p> <p>Economic: Positive for providing opportunities for reducing trips by car, as sites along Browns Lane have a half hourly service. However there would be a negative impact from the site west of Main Road, Wigginton as the bus service would need rerouting to access this development.</p> <p>Social: Positive for providing increasing opportunities for walking and cycling as Browns Lane is traffic calmed, although access for those without access to a car is not good from land west of Main Road, Wigginton (cf economic section). Traffic would still use Fountains junction and an assessment of the impact on this traffic sensitive area will be required. No impact upon transport choice. Existing services are unlikely to be able to cope with growth, leading to a negative impact upon health, especially for the elderly.</p>														
D	-	+/-?	+/-?	-?	+?	+/-	+	+	+	++?	++?	-?	+/-?	+?	5
	<p>Environmental: Clear and strong negative impact upon maintaining a diverse and attractive landscape, on protecting diverse & locally distinctive settlement character and on preserving / enhancing the Wigginton Conservation Area due to the coalescence of Wigginton and Tamworth.</p>														

Tamworth options	A	B	C	D	E	F	G Ec	H	I Ec	G Soc	I Soc	J	K	L	Total
	<p>The effect upon biodiversity is the same as for Option C above, however there is greater potential for harm to the watercourse and opportunities for strategic green infrastructure links (although not considered as good as Option B).</p> <p>No impact upon minerals.</p> <p>Economic: Positive for providing opportunities for reducing trips by car, as a half hourly bus service would need to be provided.</p> <p>Social: Positive for providing increasing opportunities for walking and cycling as Browns Lane is traffic calmed, although access for those without access to a car is not good from land west of Main Road, Wigginton (cf economic section). Traffic would still use Fountains junction and an assessment of the impact on this traffic sensitive area will be required. Clear and strong for improving services particularly transport, however as the two locations are separate there is likely to be a mixed impact upon anti-social behaviour and upon health service provision, although the development on the Anker Valley will have a clear and strong positive influence on healthy lifestyles due to its increased accessibility to natural open space, community facilities, employment and the town centre.</p>														
E	-	+?	+/-?	-?	+?	0	+?	+	+	+?	+?	-?	--?	?	2
	<p>Environmental: Negative impact upon maintaining a diverse and attractive landscape and mixed impact upon Wigginton Conservation Area and locally distinctive character.</p> <p>Potential to positively increase the number and diversity of habitats, there are no priority habitats and the hedgerows should be able to be retained.</p> <p>No impact upon minerals.</p> <p>Economic: Potentially positive for reducing the number of trips by private car as part of site has access to an existing half hourly service and no information on how services. Service at present is infrequent along Ashby Road and the Arkall Farm site is not well connected to enable safe walking routes.</p> <p>Social: Will improve access for those without access to a car, but unknown impact on traffic sensitive areas such as Fountains junction and an assessment on the impact on this traffic sensitive area will be required. Will have a positive impact upon improving transport choice. Development is partly isolated and accessibility to health care facilities for the elderly would be more difficult. Existing facilities are unlikely to cope with housing growth in these locations, which would have an overall negative impact on the health of the population.</p>														
F	-	+/-?	+/-?	-?	+?	+/-	++	+	+	++?	++?	+/-?	+	+	9
	<p>Environmental: Negative impact upon maintaining a diverse and attractive landscape and mixed impact upon Wigginton Conservation Area and on protecting diverse and locally distinctive settlement character.</p> <p>Potential to positively increase the number and diversity of biodiversity habitats. However there is greater potential for harm to the watercourse, but opportunities for strategic green infrastructure links and the hedgerows should be able to be retained. Mixed impact upon heritage as development will be in closer proximity to Grade II Listed Amington Hall , but this offers greater opportunity for broadening access to, and understanding of, heritage assets.</p> <p>No impact upon minerals.</p>														

Tamworth options	A	B	C	D	E	F	G Ec	H	I Ec	G Soc	I Soc	J	K	L	Total
	<p>Economic: Clear and strong positive in reducing trips by car with the improvement of the Amington link and access to the rail station and town centre.</p> <p>Social: Clear and strong for improving services particularly transport and encouraging cultural activity with the increased accessibility to the town centre and river. Potential to reduce anti-social behaviour and promote healthy lifestyles if are facilities delivered, including a new leisure centre and were well linked. Scale of development would result in enough demand for a new doctors practice, however access to health provision on land to the north of Browns Lane may be more restricted. Clear and strong positive impact on promoting healthy lifestyles if facilities delivered including new leisure centre and access to natural open space result in an overall positive impact on improving health.</p>														

17.13 Informed by the results of the SA process the Broad Development Location within the 'Local Plan: Strategy' has included the most sustainable options set out above. The Local Plan 'Policy North of Tamworth' has included criteria for development in this area, such as proximity to bus stops; requirements for open space, sport and recreation; pedestrian and cycle routes linking to green infrastructure; services and facilities beyond the site's boundaries; new biodiversity habitats; and the delivery of a range of housing. The wider development within the Anker Valley area will be informed through further joint working, currently being undertaken by Tamworth Borough Council, Lichfield District Council, Staffordshire County Council and the development industry. A comprehensive Masterplan will inform Tamworth's Local Plan and the Lichfield District Local plan Allocations document.

17.14 The 'Local Plan:Strategy' has included the most sustainable option for development in this location and development will contribute to the sustainability of Tamworth Borough and Lichfield District.

18 East of Rugeley

18.1 Development to the east of Rugeley was first considered as part of the 'Core Strategy Issues and Options' consultation (December 2007). Of the four spatial development options 'Option 1: Town focused development' was the only option to include potential development relating to settlements outside the District through urban extensions in Lichfield District. This option apportioned 10% of Lichfield District's housing to accommodate growth for Rugeley, and although was not site specific, indicated a potential area of land adjacent to Cannock Chase District's boundary in the vicinity of Rugeley Power Station. The SA considered this as part of Option 1, against the other three options and the findings of the SA were published in the ICSSA.

18.2 The ICSSA was published alongside the 'Core Strategy: Preferred Options' document (December 2008) and in addition included appraisals of various directions of growth around the District's main settlements. East of Rugeley was appraised as a direction of growth within the ICSSA (the findings are set out in Appendix i of the ICSSA). No details were included as to the scale of growth or boundaries so the SA highlights potential areas of benefit and conflict. In summary the findings were that development to the East of Rugeley showed a positive impact for providing opportunities for reducing trips by car and improving transport provision, and would thus provide increased opportunities/ facilities for walking and cycling providing access to new developments for those without access to a car and reducing the overall impact of traffic sensitive areas. It would have a mixed impact upon priority habitats and a negative impact upon the Trent and Mersey Canal Conservation Area and a clear and strong negative impact upon locally distinctive settlement character. This is because there would be the potential for coalescence between Rugeley and Armitage with Handsacre. In addition it was considered that development here would meet more of the housing needs, including affordable housing needs, arising from Cannock Chase District than from within Lichfield District.

18.3 However, no defined site boundary was given and from the comments contained within the ICSSA the implication is that the scale appraised at this time was significantly larger than the areas included within either the 'Preferred Options' or subsequent documents.

18.4 Taking this forward the 'Preferred Options' document (December 2008) included redevelopment of parts of former Lea Hall Colliery lying within Lichfield District to the east of Rugeley, which had previously been part of the Rugeley Eastern Redevelopment Zone in the Staffordshire and Stoke-on-Trent Structure Plan. At this time permission had been granted for 680 dwellings, but development had not commenced. The SHLAA identified further potential options in the same general location that could provide for longer-term development needs related to Rugeley, to provide around a further 380 dwellings, together with local shopping and community facilities. At para 11.9 the 'Preferred Options' document reported the findings of the SA as a location of strategic scale which performed well against the strategic objectives.

18.5 Thus the preferred spatial strategy set out in 'Core Strategy Preferred Options' identified 1,000 new dwellings to be built at Rugeley in total, representing 12.5% of Lichfield District's overall housing figure of 8,350. This comprised the 680 dwellings with permission

in the Rugeley Eastern Redevelopment Zone, which would contribute to meeting the needs of Rugeley, with the remaining 320 from land at the Borrow Pit site and former British Waterways land, to meet medium to longer term housing needs.

18.6 Within the Core Strategy 'Policy Directions' document the preferred spatial strategy continued with the proposal for 1,000 dwellings on brownfield land at Rugeley Power Station within Armitage with Handsacre Parish.

18.7 Within the 'Shaping our District' document the proposed housing provision at Rugeley had increased to 1,150 dwellings centred on brownfield land to the East of Rugeley, within a Strategic Development Location (SDL). This was to consolidate the proposals for a mixed-used development which had the benefit of outline planning permission and an approved masterplan, with 700 dwellings coming from the former Power Station site and an additional 450 dwellings as before. This 450 represented 5% of Lichfield District's housing growth.

18.8 Evidence since this time, including the Housing Needs Study and SHMA update, has shown that there are complex migration patterns across both Lichfield District and Cannock Chase Borough that are both heavily influenced by in-migration from the conurbation. There are also parts of the rural north and west of Lichfield District which look to Rugeley for services and facilities and administrative boundaries should not be considered as restrictive to meeting these needs.

18.9 The Localism Act 2011 and the National Planning Policy Framework (NPPF) introduced a duty to co-operate on public bodies regarding planning issues that cross administrative boundaries, to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. The NPPF regards this joint working as enabling local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. To comply with this duty Lichfield District Council agreed a Memorandum of Understanding (MoU) relating to the delivery of future housing requirement in south-east Staffordshire, together with Cannock Chase Council and Tamworth Borough Council.

18.10 The MoU agreed a broad objective to deliver an identified housing requirement of 19,800 new houses between 2006 and 2028 within south-east Staffordshire in the three authority areas as follows:

- Cannock Chase District 5,300
- Lichfield District 8,700 (between 2008 and 2028)
- Tamworth Borough Council 4,500.

18.11 Of the original 8,700 figure for Lichfield District from 2008-2028, 500 were to help for the needs arising within Tamworth and 500 to help provide for the needs arising in Rugeley. In addition a clause was also included agreeing that Lichfield District Council would be the sole collecting authority for the New Homes Bonus and Section 106/CIL monies resulting from delivering these homes within its administrative boundary.

18.12 In the light of the above circumstances the 'Local Plan: Strategy' incorporated a strategic housing allocation to the East of Rugeley, within Armitage with Handsacre Parish. Allowing for the increased overall housing figure of 10,030 from 2008 - 2029 the modified spatial strategy now apportions 11% (previously 13%) of the District's housing growth (1,130 dwellings) focused to the East of Rugeley on a brownfield land SDA (NB whilst the *percentage* of the overall housing figure has been modified the actual *number* of homes in relation to the SDA remains broadly the same). The LSWG has appraised the SDA and the overall impact is positive, demonstrating that the location is a sustainable option for delivering future housing development. The findings are set out in the table below:

Table 18.1 Policy: East of Rugeley

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+	0	+/-	+?	+	+	0	0	+	+?	+?	+?	+
Assessment of Effects	<p>Environmental: Positive impacts upon maintaining an attractive and diverse landscape , protecting areas of highest landscape quality, improving areas of lower landscape quality and achieving high quality and sustainable design as site is brownfield land. No impact now on locally distinctive character as the site does not coalesce with Armitage and Handsacre and any impact upon the Conservation area can be mitigated.</p> <p>Positive for biodiversity especially for the creation of green corridors.</p> <p>No impact upon heritage assets.</p> <p>Mixed impact for mitigating for the effects on climate change as whilst the scale of development will enable positive impacts upon the prudent use of energy and opportunities for renewables, but all new development will generate waste.</p> <p>As the site is a brownfield site there are positive impacts upon protecting controlled waters and reducing flood risk through its reclamation. Policies within the plan will require the development to use water efficiently, however there will be a negative impact upon using resources prudently as the dwellings will primarily be built from brick.</p> <p>Economic: Positive impact upon reducing trips by car as Rugeley is a sustainable settlement with a range of employment, retail and recreational facilities, and new population will support the existing economy in Rugeley. No impacts on encouraging sustainable distribution and communication systems and on encouraging different types of new businesses as residential development proposed.</p> <p>Social: Positive impact upon reducing trips by car as Rugeley has a range of facilities and services, including sport and recreation facilities, a theatre and is accessible by walking, cycling and public transport. There will be a positive impact in providing affordable homes for those in need and specialist housing due to the scale of the development proposed.</p> <p>There will be a positive impact upon the health of the community and safety as through the provision of design policies, open space and community buildings supporting healthy lifestyles, reducing ASB and health inequalities and enabling community engagement.</p>													
Local Plan Strategy (inc. Modifications)	+?	+	0	+/-	+?	+	+	0	0	+	+?	+?	+?	+

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Assessment of impact of Modifications	<p>Environmental: The modifications to the policy result in no greater environmental impact than has been previously identified. The site lies within 15km of the boundary of the Cannock Chase SAC, however the modifications to policy NR7 will ensure there are no significant effects arising from the development on the Cannock Chase SAC.</p> <p>Economic: The modifications to the policy result in no greater economic impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above.</p> <p>Social: The modifications to the policy result in no greater social impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above.</p>													
Mitigation and Maximisation	The development will deliver sustainable development in a sustainable location and meet the needs of Lichfield District and Cannock Chase District and maximises the use of brownfield land.													
Uncertainties and Risks	Whilst significant progress has been made in delivering a large proportion of the SDA to date, the latter stages of the development are dependent upon reclamation of the Borrow Pit.													
Short/ Medium/ Long term effects	The development will deliver sustainable development from its commencement and in the longer term assist in the vitality of the surrounding services and facilities, especially those within Rugeley.													
Cumulative and Synergistic impacts	The continuing investment in Rugeley generated by new development and new residents will assist the economic viability of this settlement and the health and well being of its residents and the residents of Lichfield District who rely on the services and facilities in Rugeley. The cumulative and synergistic impact of development upon the Cannock Chase SAC is able to be mitigated for and overall will have a positive impact upon biodiversity in the area.													

19 Rural

19.1 Through consultation on the 'Issues' document, published in August 2007, issues facing the rural areas of the District were identified as:

- *'Declining number of rural key services and facilities, including shops, post offices, doctors, village halls and public houses.'*
- *'Many areas are not well served by public transport providing poor access to services and facilities.'*
- *'Affordable rural housing supply does not meet demand.'*
- *'Role of rural settlements in contributing towards strategic requirements'.*

19.2 Following on from this, these issues were published in the 'Core Strategy Issues and Options' document and questions were asked to gauge whether these were the main issues and what others needed to be addressed. The 'Issues and Options' document also included a draft vision for Lichfield District in 2026. This included specific reference to the rural areas in the following way:

- *'The rural areas of the District will contain prosperous rural village centres which are a focal point for local people to access facilities, services and for meeting local housing needs. They will be part of a working and tranquil countryside which remains unmistakably part of Staffordshire and where the character of the landscape is enhanced.'*
- *'An enhanced community transport network will enable easier access to key rural services and the towns, with a particular emphasis on connecting the clusters of smaller rural settlements in the east and the north of the District.'*
- *'The countryside will be more accessible as a recreational and biodiversity resource through a better connected footpath network and a greater level of informal rural recreation opportunities, particularly in the Tame and Trent Valleys through the Central Rivers Initiative, and by enhancing our canal network that connects urban and rural communities to the countryside. There will be enhanced protection of and controlled access to the Cannock Chase Area of Outstanding Natural Beauty, that retains its landscape quality but also its tranquillity'.*

19.3 The portrait of the District set out in 'Issues & Options' identified the District as having a large rural area, particularly to the north and east with many villages of significant character and several high quality, contrasting rural landscapes, with Green Belt covering over half the District - mainly between the West Coast Mainline and the edge of the West Midlands Conurbation.

19.4 In addition the 'Issues and Options' document also included Strategic Objectives, with Strategic Objective 10 being to protect the quality of the countryside and the villages it contains from inappropriate development whilst still allowing identified development needs arising in these areas to be met. Other relevant Strategic Objectives included 8 - to reduce the need to travel, 11 - ensuring that rural settlements contain an adequate or improved range of services and facilities to meet the needs of their areas and 12 - to reduce the relative isolation of rural areas through improvements to public transport facilities and rural services. Other objectives included protecting the District's natural and built environmental assets from loss or damage by development, improving biodiversity resources and increase the attraction of Lichfield District as tourist destination.

19.5 The 'Issues and Options' document considered the spatial distribution of housing across Lichfield District to 2026 and looked at variety of different levels of growth for the rural areas. Spatial Option 1 (Town focused development) apportioned 0% of the District's housing growth to the rural areas, Option 2 (Town and key rural village focused development) 40%, Option 3 (Dispersed development) 55% and Option 4 (New Settlement) 10%.

19.6 The 'Issues & Options' document also considered how the rural areas would be affected by these options, with options 1, 2 and 4 affording only limited development in villages for affordable housing only, but with Option 2 concentrating development in the rural areas to larger key settlements with a range of services and facilities. Option 3 gave a greater focus on local and village services and facilities, to support their retention, help tackle pockets of deprivation in rural wards by decreasing barriers to housing, jobs and services and assist in meeting rural housing needs with provision closer to where need arises.

19.7 The SA considered each of the four spatial options published in the 'Issues and Options' document and the findings are set out in the ICSSA in Section 6, with the conclusions set out in Section 7. The document was published for consultation alongside the 'Core Strategy: Preferred Options' document in December 2008. The findings of the SA were also included within the 'Core Strategy Preferred Options' document at para 10.34 indicating that the Option 2 approach would tend towards greater car use, and may impact on the historic environment as most of the Key Rural Settlements have Conservation Areas. The SA also determined that Option 3 would have an even greater impact on increased car usage, as sustainable transport facilities are poorer in the smaller villages and that the scale of growth may adversely harm the character of these settlements. This was therefore found to be the least sustainable option.

19.8 The 'Core Strategy: Preferred Options' document identified a preferred spatial option for the rural villages and identified key proposals as:

- *Maintaining the rural character of the District and to enable the countryside to function as a successful part of the agricultural economy whilst providing increased opportunities for countryside access and appropriate attractions;*
- *Providing homes and jobs, related in scale to access to services and facilities, particularly public transport;*
- *Amending the settlement hierarchy to include Fradley as a key rural settlement, based on the findings of the Rural Settlements Sustainability Study and allocated a significant scale of development focused on brownfield land at the former airfield ;*
- *20% of housing growth, 1,400 new dwellings, principally in the Key Rural Settlements (Armitage with Handsacre, Alrewas, Fazeley, Fradley, Little Aston, Shenstone and Whittington), depending on individual constraints and further evidence;*
- *400 apportioned to Fazeley to contribute to the Tamworth housing market, and considered as part of Cross-boundary issues;*
- *support for rural employment;*
- *Other smaller villages to meet identified local needs only for housing, whilst enhancing community facilities and services and supporting small-scale new employment;*
- *Further development generally inappropriate in the open countryside, unless for essential local needs and rural activities.*

19.9 The 'Policy Directions' consultation in April 2009 included a revised preferred spatial strategy. For the rural areas this set out that new rural housing would be concentrated within identified Key Rural Settlements; Alrewas, Armitage with Handscare, Fazeley, Fradley, Little Aston, Shenstone and Whittington, with further work to be undertaken to assess the growth potential in each. 1,000 new dwellings were apportioned to Fradley, utilising brownfield land, with further work to be carried out to determine appropriate level of growth for Fradley. Fazeley was identified as having a role on meeting Tamworth's housing needs, but that any final decision on this issue would await the outcome of a further study on Tamworth. The smaller villages would only accommodate local housing needs, mainly within existing settlement limits.

19.10 The 'Shaping our District' document, published in November 2010, included reference to the rural areas within 'Core Policy 1: The Spatial Strategy'. This apportioned 32% of the District's housing growth to 2026 to the rural areas, with 12% to Fradley, 15% to the other Key Rural Settlements and 5% to the other rural villages. The SA of this element of Core Policy 1 was published in the 'Sustainability Appraisal: Shaping our District' as part of the overall SA of Core Policy 1, alongside the SA of the other policies.

19.11 The 'Local Plan: Strategy' again revised the spatial strategy following consultation and further evidence; in particular evidence in relation to housing in the form of the Southern Staffordshire Districts Housing Needs Study & SHMA Update (May 2012) and economic evidence in the form of the Employment Land Review (February 2012). Other recent evidence of relevance to the rural areas included the Playing Pitch Strategy 2012.

19.12 In relation to the rural areas significant work had been undertaken since 'Shaping our District' with the Key Rural Settlements via the Rural Planning Project and, for Fradley, via a specific Fradley Rural Masterplanning project. This work enabled identification of whether these villages could accommodate growth, and to a certain extent to what scale, and enabled more on local distinctiveness to be included in the Plan, taking into account the views of those communities and local representative groups.

19.13 The 'Local Plan: Strategy' published in July 2012 included a vision and place policies for the settlements across the District, including the Key Rural Settlements, with policies on environment, services and facilities, housing and economy for each and apportioned around 30% of new housing development to the rural areas. 12% of the District's housing was proposed at Fradley (1,000 dwellings), 12% to the other Key Rural Settlements and 6% to the remaining rural areas. For Fradley the housing growth was proposed to be located within a Strategic Development Allocation on brownfield land situated between the Coventry Canal and Halifax Avenue (part of the former airfield) and extending north-eastwards to encompass land north of the Canal and north of Hay End Lane, together with an area of employment land located north of the canal and west of the proposed housing on the former airfield (CD1-1 Map E.2 Fradley Concept Diagram p.168 refers).

19.14 Following receipt of the Inspector's Interim Findings and the need to find land for an additional 1,330 dwellings to 2029, the Council considered this 12 hectares of employment land to the north west of the recently consented Evans of Leeds proposal for 750 homes. The Council took the view that this employment land could potentially be converted to a

residential allocation, and that whilst the additional employment aspect would be lost to Fradley, this would be offset by the provision of a similar level of employment land which is included within the Cricket Lane SDA.

19.15 Originally, it was not felt through the Fradley masterplanning exercise that further expansion of the Evans of Leeds site to the north west would be appropriate for residential development as this would further expand Fradley village out on a 'limb' to the north west, away from the school and community facilities, when the exercise was attempting to consolidate the village around a hub which featured a single expanded school. A single expanded St Stephens school would lead to a limit on development of 1,000 homes. However, vehement opposition locally to the option of delivering a single, larger school has led to the option of a second primary school being pursued to serve the new community on the Evans of Leeds site, removing the 1,000 limit to the amount of housing development. In addition, with a second school being located within the western quadrant of the consented Evans of Leeds site, extending residential development further (to Gorse Lane) would now not be so isolated from local services and facilities, meaning that the re-allocation of this land from employment to housing is now considered a viable and deliverable option. The Lichfield District Local Plan : Strategy (EiP Changes) now includes modifications to this effect - MM14, MM16, MM17 and MM24.

19.16 Thus the modified spatial strategy in the Lichfield District Local Plan : Strategy (EiP Changes) includes reference to the rural areas within 'Core Policy 1: The Spatial Strategy' and now apportions 28% of the District's housing growth to 2029 to the rural areas, with 12% to Fradley (1,250 dwellings), and 16% to the other Key Rural Settlements (now excluding Little Aston) and other rural areas.

Findings

19.17 The SA of this section of the 'Local Plan: Strategy' found that all the Key Rural Settlements are strong communities with a reasonable range of facilities and services and act as focus for rural hinterland, particularly for services such as schools, doctors, and chemists. However, it has also highlighted that significant differences are borne out by their characteristics and the impacts of the spatial strategy will differ for each.

19.18 Fradley for example will benefit from more development to continue the delivery of an improved range of services and facilities and improve the connectivity between Fradley Village and the area of the former RAF airfield housing which has now been redeveloped (Fradley South). In contrast Armitage with Handsacre and Fazeley are affected by their close proximity to Rugeley and Tamworth, and also have issues relating to improving community cohesion.

19.19 Alrewas has a sensitive historic core and generally high quality environment, set within a valued landscape which contains areas of floodplain, but also has opportunities relating to National Memorial Arboretum (NMA), National Forest and the Central Rivers Initiative (CRI). Shenstone and Whittington are also significantly influenced by their high quality built environments and Conservation Areas and commercial factors such as their existing employment areas, Defence Military Services and St Giles Hospice. Fazeley is also affected by the significant economic effect of Drayton Manor Park and Drayton Manor Business Park.

19.20 Whilst development in the villages does not reflect the most sustainable option and does not add greatly to the overall sustainability of the District, improvements to their individual sustainability and self-sufficiency in relation to supporting the quality of life of rural residents is important, especially as many of the villages have high proportions of older persons who are significantly affected by mobility and accessibility issues. Opportunities exist to support the continued survival of these villages which are important for their own population and the hinterland which surrounds them. However further work is required to establish specific sites which can best direct development to achieve the most suitable and sustainable solution for these villages, and this SA shows the scale of growth identified for each settlement can be achieved but will require further detailed consideration through the Local Plan: Allocations document or potentially through a community led plan, such as a Neighbourhood Plan.

19.21 The findings of the SA for the Local Plan in relation to the specific Key Rural Settlements are set out below, with the assessment of the impact of the modifications also included. The modifications have improved the sustainability of Fradley and continue to positively support the self-sufficiency and quality of life of the residents of the villages and their hinterland.

Table 19.1 Fradley Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+/-?	+?	+/-?	+	+?	+	+/+/-	+	+	+/+/-	+	+	+	+
Assessment of Effects	<p>Environmental: Overall a positive impact upon environmental issues, however there is a degree of uncertainty as the impact will be dependent upon the detail which is beyond the scope of policy.</p> <p>Mixed impact upon maintaining and enhancing landscape and townscape quality as parts of the sites identified for development are of high historic landscape value and other elements are brownfield and of lower landscape quality, positive for aiding coalescence of settlement to facilitate locally distinctive character.</p> <p>Potential positive effect upon biodiversity through the provision of high quality green infrastructure and green corridor adjacent to the Canal.</p> <p>Mixed impact upon protecting and enhancing buildings of historic significance as a scheduled ancient monument is affected by development and there are locally significant pillboxes which remain, however any impact should be able to mitigated.</p> <p>Positive impact upon mitigating for the effects of climate change as whilst there will be an increase in the amount of waste, as more development produces more waste, the scale of development and policies require prudent use of energy and opportunities for renewable energy to be considered subject to viability.</p> <p>Positive impact for air quality, especially within the existing residential areas as there will be a reduction in the amount of HGV movements as housing site has been reallocated from employment land, the policies include improvements to local and strategic highway network and an alternative vehicular route to Turnbull Road through Fradley. Positive improvement to controlled waters as Curborough Brook is poor water quality at present and improvements are required to facilitate waste water treatment to serve development in this area, which will improve the water quality overall, mitigation is feasible and viable. Part of the SDA lies within</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>a mineral consultation zone and whilst this could have a negative impact upon the prudent use of resources, mitigation is possible. The development will result in the use of resources for construction e.g the houses are likely to be built in brick. Water efficiency will be enhanced through implementation of other policies within the Plan. As the site is adjacent to a large employment area there may be potential for encouraging alternative methods of waste reuse and recovery.</p> <p>Work through improvements to the Curborough Brook will lead to reduction in flood risk.</p> <p>Economic: Overall positive impact upon economic factors.</p> <p>There will be a mixed to positive opportunity to reduce trips by car, the area has a relatively frequent bus service and had a degree of local self containment with the increasing number of facilities available, bus service and proximity to Lichfield but does not have the wide range of facilities of Lichfield City and Burntwood and would thus not score as highly as these settlements. The accessibility to the A38 encourages sustainable distribution and warehousing. The scale and range of employment in this location provides local clustering and is positive in encouraging local economy, especially with reference to small units and incubator units, the provision of range of housing types nearby will encourage more sustainable working/living patterns. Development of further housing in this location will support the new and establishing local centre, which serves both the local residential and employment needs for local shops and includes a gym.</p> <p>Social: Overall positive impact upon social factors.</p> <p>There will be a positive impact upon providing increased opportunities for walking and cycling to jobs and services. A mixed response to reducing trips by car, providing access to new developments for those without a car and for reducing the impact on traffic sensitive areas as the area has a relatively frequent bus service and has a degree of local self containment with the increasing number of facilities available and proximity to Lichfield but does not have the wide range of facilities of Lichfield City and Burntwood and would thus not score as highly as these settlements. The A38 is traffic sensitive.</p> <p>Specific policies in the Fradley Key Rural Settlements policy seek to deliver the range of housing specifically for Fradley so will have a clear and strong positive influence upon the sustainability of the settlement. The scale of development will enable existing deficiencies for play to be met and policies seek to deliver a new community hall and doctors (or health outreach services) which will improve health care and prevent health inequalities in this developing community and facilitate a more cohesive community. Improved frequency of bus services and additional provision of cycle and pedestrian routes which provide safe and convenient accessibility between facilities will support healthy lifestyles.</p>													
Local Plan Strategy (inc. Modifications)	+/-?	+?	+/-?	+	+?	+	+/+/-	+	+	+/+/-	+	+	++?	+
Assessment of impact of Modifications	<p>Environmental: No additional land take. Policies will safeguard heritage assets within the development. Further loss of employment land may assist in the improvement of air quality as there will be fewer HGV traffic. However no change in the overall scorings and no further additional effects than identified above.</p> <p>Economic: The reduction in the amount of employment land available will not result in the reduction in the economic sustainability of Fradley as a village. There is no change in the overall scorings and no additional effects than those identified above.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	Social: Now more positive due to increasing housing numbers in Fradley which may result in the delivery of a doctor's practice / outreach service which will benefit the health and well being of the existing and new residents.													
Mitigation and Maximisation	The policies maximise the use of brownfield land and will enable mitigation for its previous uses and impact upon the water environment.													
Uncertainties and Risks	The impact on the Highways Agency network will require consideration of the capacity of the A38 and relevant junctions and will require liaison with the Highways Agency													
Short/Medium/ Long term impacts	The new development will mitigate for its own impact in the short term through the provision of infrastructure as set out in the concept statements. The sustainability of the area will increase through the reduction in the amount of brownfield land and provision of enhanced green spaces, services and facilities. In the long term the settlement will become more sustainable and contribute positively to the sustainability of Lichfield District.													
Cumulative and synergistic impacts	There will be positive cumulative and synergistic impacts arising from development at Fradley through the reduction in brownfield land mitigating for the impact of the previous uses on the water environment. Fradley makes a positive contribution to the District's employment land portfolio and will result in a increase in the sustainability of Lichfield District. The village lies within the Cannock Chase SAC Zone of Influence and impacts will be mitigated for through other policies of the Plan.													

Table 19.2 Alrewas Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+?	+/-?	+/-?	+/-?	?	+/-	+	+?	-?	+?	+/-?	+?	+?
Assessment of Effects	<p>Environment: Generally a potential positive or mixed impact upon environmental factors.</p> <p>Positive impact upon prioritising use of infill sites, before land on the edge of the settlement, impacts are impossible to assess as they are not site specific and will be considered through Land Allocations, however a scale of development given has been considered and as it would be subject to policies in the Local Plan and any impact would be able to be mitigated in a suitable location and the detailed design of a scheme, however the LSWG noted that the larger the scheme the greater the likely impact upon the Alrewas Conservation Area and this would be more difficult to mitigate.</p> <p>Positive for the impacts upon green corridors through the emphasis on the Trent and Mersey canal, Central Rivers Initiative and NMA which is part of the National Forest. Unknown on other impacts as it will depend on the location of new development.</p> <p>Mixed impact upon historic environment, the high quality design and significance of the Conservation Areas are recognised in policy and any impact should be able to be mitigated for.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>The limited scale of the development proposed will limit the opportunities for renewable energy, however any development will be required to be built to policies within the Local Plan and use energy and water efficiently, although it is acknowledged new development will result in more waste and use of primary resources such as brick.</p> <p>Alrewas does have areas of floodplain and further work would be required through the Land Allocations document to identify if reduction of flood risk is opportune.</p> <p>Economic: Overall a potential positive impact upon economic factors.</p> <p>There is likely to be a mixed impact upon improving the availability of sustainable transport to jobs and services as there are limited opportunities to improve pedestrian access to the historic core of the village and this is a traffic sensitive area as it has narrow streets, however the size of the village enables easy access to services and facilities for those without access to a car.</p> <p>The policies will encourage indigenous business and growth of tourism, and enable improved levels of housing consistent with local needs.</p> <p>Social: The safeguarding, enhancement and improved range of facilities which will address existing deficiencies and improved range of housing to meet locally identified needs while safeguarding the character of the village and its community cohesion will have positive impacts upon social factors.</p>													
Local Plan Strategy (inc. Modifications)	+?	+?	+/-?	+/-?	+/-?	?	+/-	+	+?	-?	+?	+/-?	+?	+?
Assessment of impact of Modifications	<p>Environmental: The modifications to these policies relate to greater recognition of the relationship of Alrewas with the National Forest and result in no change to the overall scoring for these policies and no additional effects arising from the other modifications than listed above.</p> <p>Economic: The modifications relate to a more generalised statement within the explanation to policy Alr1: Alrewas Environment regarding improvements to safe and sustainable transport. They result in no change to the overall scores for these policies and no additional effects arising from the other modifications than listed above.</p> <p>Social: The modifications relate to a more generalised statement within the explanation to policy Alr1: Alrewas Environment regarding improvements to safe and sustainable transport. They result in no change to the overall scores for these policies and no additional effects arising from the other modifications than listed above.</p>													
Mitigation and Maximisation	The policies seek to maximise the use of the assets available through encouraging greater connectivity whilst minimising the impact on the historic environment.													
Uncertainties and Risks	No sites are identified within the plan and there is uncertainty as to the location and timescale for delivery.													
Short/ Medium/ Long term impacts	The timescale of the impact of development are difficult to estimate as no allocations exist, however the continuing investment in the National Forest, National Memorial Arboretum and Central Rivers Initiative will have long term beneficial impacts upon the health and wellbeing of the residents and businesses in Alrewas.													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Cumulative and Synergistic impacts	There is a synergistic relationship between Alrewas village, its rural hinterland, and the National Forest, National Memorial Arboretum and Central Rivers Initiative which will have long term beneficial impacts upon the health and wellbeing of the residents and businesses within the region. The western half of the village lies within the Cannock Chase SAC Zone of Influence and impacts will be mitigated for through other policies of the Plan.													

Table 19.3 Armitage with Handsacre Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+	+?	+/-?	+/-?	+/-?	+	+	+?	+?	+?	+?	+/-?	+?	+?
Assessment of Effects	<p>Environment: Overall a potential positive or mixed impact upon environmental factors.</p> <p>Policy supports enhancement of the Canal conservation area and generally the physical environment of the area, and prioritises infill although loss of greenfield reduces positive impact.</p> <p>Potential benefit to biodiversity through enhancement of the canal and other areas of open space.</p> <p>Unknown impact upon the historic environment however any impact should be able to be mitigated for, there are known archaeological deposits in the area.</p> <p>The limited scale of the development proposed will limit the opportunities for renewable energy, however any development will be required to be built to policies within the Local Plan and use energy and water efficiently, although it is acknowledged new development will result in more waste and use of primary resources such as brick.</p> <p>Positive impact upon reducing flood risk as policies specifically refer to addressing local flooding issues.</p> <p>Economic: Policy supports new and existing business and settlement has a reasonable public transport service.</p> <p>Social: The safeguarding, enhancement and improved range of facilities which will address existing deficiencies and improved range of housing to meet locally identified needs while safeguarding the character of the village and promoting community cohesion will have positive impacts upon social factors.</p>													
Local Plan Strategy (inc. Modifications)	+	+?	+/-?	+/-?	+/-?	+	+	+?	+?	+?	+?	+/-?	+?	+?
Assessment of impact of Modifications	<p>Environmental: The modifications to the explanation to the policy result in no greater environmental impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p> <p>Economic: The modifications to the explanation to the policy result in no greater economic impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Social: The modifications to the explanation to the policy result in no greater social impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above.</p>													
Mitigation and Maximisation	The plan seeks to mitigate for existing deficiencies and maximise the use of existing assets.													
Uncertainties and Risks	No sites are identified within the plan and there is uncertainty as to the location and timescale for delivery.													
Short/ Medium and Long term impacts	The timescale of the impact of development are difficult to estimate as no allocations exist, policies will assist in addressing deficiencies within the settlement and in the long term result in a more cohesive settlement and support the self sufficiency and quality of life of residents and the hinterland of Armitage enhancing their health and well being.													
Cumulative and Synergistic impacts	There is a close relationship between Rugeley and Armitage and the rural hinterland around Armitage. The village lies within the Cannock Chase SAC Zone of Influence and impacts will be mitigated for through other policies of the Plan.													

Table 19.4 Fazeley Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+?	+?	+/-?	+/-?	?	+	+	+?	+?	+?	+?	+/-?	?
Assessment of Effects	<p>Environment: Overall a potential positive or mixed impact upon environmental factors.</p> <p>Policy prioritises infill development and reuse of existing buildings and brownfield land over greenfield or Green Belt sites and seeks to protect the distinct character of Fazeley, Deer Park, Bonehill and Mile Oak through coalescence. Policy supports improvement of the Conservation Area. The impact however is cautious as until final locations are known there is uncertainty as to the impact.</p> <p>Potential positive impact upon biodiversity, through improvements to the Canal and green infrastructure.</p> <p>There are existing underused historic buildings and by prioritising development of these this will assist in protecting and enhancing the historic environment.</p> <p>The limited scale of the development proposed and as it will involve reuse of historic buildings will limit the opportunities for renewable energy, however any development will be required to be accord to policies within the Local Plan and use energy and water efficiently, although it is acknowledged new development will result in more waste and use of primary resources such as brick, although it is acknowledged that this will involve recycling of buildings/ materials.</p> <p>The settlement is at risk of flooding and there may be potential to reduce flood risk through development, further work will be required as part of the Local Plan:Allocations.</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Economic: Overall positive impact upon economic factors. Policy supports initiatives to improve accessibility to nearby centres of employment, specifically Tamworth and refers to potential benefits of Wilnecote Regeneration Corridor. Policy supports the local rural centre and new business, which enhance the local economic sustainability and improve tourism.</p> <p>Social: Overall a positive social upon social factors. Policy seeks to improve accessibility for pedestrian and cyclists and specifically mentions accessibility to training and skills initiatives, projects which contribute towards health, especially for the elderly, reducing crime and anti-social behaviour, achieving a more balanced housing market and improvements to equipped play and sports pitches. The improved range of services, facilities and improved physical environment will achieve a reduction in health inequalities and have appositive impact upon social factors.</p>													
Local Plan Strategy (inc. Modifications)	+?	+?	+?	+/-?	+/-?	?	+	+	+?	+?	+?	+?	+/-?	?
Assessment of impact of Modifications	<p>Environmental: The modifications to the explanation to the policy result in no greater environmental impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p> <p>Economic: The modifications to the explanation to the policy result in no greater economic impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p> <p>Social: The modifications to the explanation to the policy result in no greater social impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above.</p>													
Mitigation and Maximisation	The plan seeks to mitigate for existing deficiencies and maximise the use of existing assets.													
Uncertainties and Risks	No sites are identified within the plan and there is uncertainty as to the location and timescale for delivery.													
Short/ Medium/ Long term impacts	The timescale of the impact of development are difficult to estimate as no allocations exist, policies will assist in addressing deficiencies within the settlement and in the long term result in a more cohesive settlement with an improved historic and physical environment which supports the self sufficiency and an improved quality of life of residents and the hinterland of Fazeley enhancing their health and well being and reducing inequalities.													
Cumulative and Synergistic impacts	There is a close relationship between Tamworth, Fazeley and its surrounding rural hinterland. The reduction in the number of buildings at risk will add to the historic assets within the District.													

Table 19.5 Shenstone Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	+?	+/-?	+/-?	+/-?	+/-?	+	+	+?	+	+?	+/-	+?	+?
Assessment of Effects	<p>Environmental: Overall a potential positive or mixed impact upon environmental factors.</p> <p>Policy prioritises infill and re-use of brownfield land, it recognises the importance of protecting the Conservation Area, however until the locations of new housing development are identified it is impossible to assess the impact upon landscape as there are areas of high historic landscape value close to the village. This work will form part of the Local Plan:Allocations document.</p> <p>No specific mention to biodiversity within policies, other policies within the Local Plan will protect and mitigate for any likely impact arising from the scale of development identified, potential benefit through provision of additional green space.</p> <p>Unknown impact upon the historic environment however any impact should be able to be mitigated for, parkland exists close to the village.</p> <p>The limited scale of the development proposed will limit the opportunities for renewable energy, however any development will be required to be built to policies within the Local Plan and use energy and water efficiently, although it is acknowledged new development will result in more waste and use of primary resources such as brick.</p> <p>Shenstone does have areas of floodplain and further work would be required through the Land Allocations document to identify if reduction of flood risk is opportune.</p> <p>Economic: Overall positive impact upon economic factors.</p> <p>Shenstone is an accessible location, and policy to encourage provision of more parking at the rail station, improved, walking and cycle routes will encourage employers to use more sustainable means of transport. Reference to the importance of local employment is recognised and supports small, micro and indigenous business which exists on the industrial estate and in the local rural centre, although uncertainty as to the future of the Birchbrook Industrial Estate and Shenstone Business Park is being considered through the Local Plan: Allocations document.</p> <p>Social: The safeguarding, enhancement and improved range of facilities which will address existing deficiencies and improved range of housing to meet locally identified needs while safeguarding the character of the village and its community cohesion will have positive impacts upon social factors. Shenstone is an area which is suffering from high rates of burglary at present and measures which address this should be considered in the Local Plan:Allocations document or a community led plan.</p>													
Local Plan Strategy (inc. Modifications)	+?	+?	+/-?	+/-?	+/-?	+/-?	+	+	+?	+	+?	+/-	+?	+?
Assessment of impact of Modifications	<p>Environmental: The modifications to the policy Shen1: Shenstone Environment result in no greater environmental impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Economic: The modifications to the policy Shen1: Shenstone Environment result in no greater economic impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p> <p>Social: The modifications to the policy Shen1: Shenstone Environment result in no greater social impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above.</p>													
Mitigation and Maximisation	The plan seeks to mitigate for existing deficiencies and maximise the use of existing assets.													
Uncertainties and Risks	No sites are identified within the plan and there is uncertainty as to the location and timescale for delivery.													
Short/ Medium/ Long term risks	The timescale of the impact of development are difficult to estimate as no allocations exist, policies will assist in addressing deficiencies within the settlement and in the long term result in a settlement with an improved historic and physical environment which supports the self sufficiency and an improved quality of life of residents and the hinterland of Shenstone enhancing their health and well being.													
Cumulative and Synergistic impacts	The continuing support for Shenstone to become more self sufficient and address its deficiencies will have beneficial impacts upon the surrounding rural hinterland. The village lies within the Cannock Chase SAC Zone of Influence and impacts will be mitigated for through other policies of the Plan.													

Table 19.6 Whittington Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	?	+?	+/-?	+/-?	+?	+	+	+	+/-?	+?	+/-?	0?	?
Assessment of Effects	<p>Environmental: Overall a potential positive impact upon environmental factors. policies seek improvement of the Conservation Area and physical environment. It prioritises infill although loss of greenfield and Green Belt is identified and reduces the positive impact.</p> <p>No specific mention to biodiversity within policies, other policies within the Local Plan will protect and mitigate for any likely impact arising from the scale of development identified.</p> <p>Unknown impact upon the historic environment however any impact should be able to be mitigated for and support for the Key rural centre will support the continued use of historic buildings which exist here.</p> <p>The limited scale of the development proposed will limit the opportunities for renewable energy, however any development will be required to be built to policies within the Local Plan and use energy and water efficiently, although it is acknowledged new development will result in more waste and use of primary resources such as brick.</p> <p>Whittington does have areas which are prone to flooding and further work would be required through the Land Allocations document to identify if reduction of flood risk is opportune. Policy supports measures to address localised flooding</p>													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
	<p>Economic: Overall positive impact upon economic factors.</p> <p>Whittington is an accessible location, policies support the local rural centre and indigenous business and recognition exists within the explanation of the importance of St Giles Hospice and Defence Medical Services.</p> <p>Social: Whittington has an historic centre with narrow streets and policy incorporates support for measures to improve traffic safety. The safeguarding, enhancement and improved range of facilities which will address existing deficiencies and improved range of housing to meet locally identified needs while safeguarding the character of the village and its community cohesion will have positive impacts upon social factors.</p>													
Local Plan Strategy (inc. Modifications)	+?	?	+?	+/-?	+/-?	+?	+	+	+	+/-?	+?	+/-?	0?	?
Assessment of impact of Modifications	<p>Environmental: There are no modifications to the policies and no greater environmental impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p> <p>Economic: There are no modifications to the policies and no greater economic impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p> <p>Social: There are no modifications to the policies and no greater social impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above.</p>													
Mitigation and Maximisation	The plan seeks to mitigate for existing deficiencies and maximise the use of existing assets.													
Uncertainties and Risks	No sites are identified within the plan and there is uncertainty as to the location and timescale for delivery.													
Short/ Medium/ Long term impacts	The timescale of the impact of development is difficult to estimate as no allocations exist at this stage. Policies support the existing local employment base and will assist in addressing deficiencies within the settlement. Policies over the long term will ensure a settlement with a protected historic and enhanced physical environment, which supports self sufficiency and an improved quality of life of residents both of the village and of the wider hinterland, enhancing their health and well being.													
Cumulative and Synergistic impacts	The continuing support for Whittington to become more self sufficient and address its deficiencies will have beneficial impacts upon the surrounding rural hinterland. The western edge of the village lies at the edge of the 15km Cannock Chase SAC Zone of Influence and impacts will be mitigated for through other policies of the Plan.													

Table 19.7 Other Rural Areas

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Local Plan Strategy	+?	?	?	-	?	?	+/-	?	+	?	+/-	+	+	+
Assessment of Effects	<p>Environmental: Overall a largely unknown environmental effect upon the villages. Many of the issues are site specific and impact would only be able to be determined once a site has been identified. There would be a negative impact upon mitigating for the effects of climate change as development will result in more waste and due to the limited scale of development and limited employment land available opportunities for and the viability for renewables may be lower, Due to the more limited sustainable transport available and more limited range of services and facilities a greater likelihood of use of the private car is also likely and as most of the villages have conservation areas within them it is likely new development will be required in traditional materials such as brick.</p> <p>Economic: Overall a potential positive impact upon economic effects.</p> <p>The policy supports rural employment and diversification, home working and tourism where these conform with the Core Policies of the Plan and new technology. Limited development within the villages also supports existing business such as the key rural centres.</p> <p>Social: Overall a positive impact upon social effects. Policy supports retention of and improvements to social, community and environmental infrastructure where these address the needs of the village, are sustainably located and do not conflict with other policies in the Local Plan, this will assist particularly in improving the healthy lifestyles of the population. The provision of new housing will only be for local needs and could assist in the delivery of infrastructure where there is a deficiency and if this has been identified through a community led plan this will improve community participation.</p>													
Local Plan Strategy (inc. Modifications)	+?	?	?	-	?	?	+/-	?	+	?	+/-	+	+	+
Assessment of impact of Modifications	<p>Environmental: There are no modifications to the policies and no greater environmental impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p> <p>Economic: There are no modifications to the policies and no greater economic impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above</p> <p>Social: There are no modifications to the policies and no greater social impact than has been previously identified and there are no additional effects arising from the other modifications proposed than those identified above.</p>													
Mitigation and Maximisation	The policies in the Plan seek to mitigate for the impacts of development in small rural settlements and rural areas whilst supporting local sustainability and protecting local character.													
Uncertainties and Risks	The policies are not site specific at this stage and may not address the detailed deficiencies which exist in the area.													

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
Short/Medium and Long term impacts	The timescale of the impacts of development are difficult to estimate as none are known at this stage. The long term impacts will be a continuation of the character of the rural settlements and rural areas which contribute to the character of Lichfield District													
Cumulative and Synergistic impacts	Supporting the many and varied small settlements and wider rural area will support the larger key rural settlements. Some of the villages lie within the 15km Cannock Chase SAC Zone of Influence and within the Mease SAC catchment and impacts will be mitigated for through other policies of the Plan.													

20 Monitoring Framework

20.1 Monitoring is essential in terms of assessing the sustainability impacts of the Local Plan and ensuring that issues have been properly taken account of, implemented, and adverse impacts mitigated for where these occur. It helps to ensure that any problems which arise during implementation, whether or not they were foreseen, can be identified and future predictions made more accurately. It is also important that a baseline is provided as the 'starting point' for monitoring as this provides the context against which such impacts can be compared.

20.2 Where possible, baseline information should relate to the situation before the plan period begins, i.e. before 2008. However in some instances this may not be possible - for example if certain pieces of evidence have been produced after this date.

20.3 Monitoring of impacts is carried out through the [Annual Monitoring Report \(AMR\)](#). Many of the indicators used have been monitored for a number of years and continue to be so due to their local relevance. New indicators will be added where the Sustainability Appraisal has show a gap, or otherwise the AMR will be cross referenced to other sources of information. The AMR uses information the District Council is able to monitor, it is acknowledged that some of the recommended indicators may be more difficult to research and/or rely on external information. Data will also be obtained from other sources and included within the AMR as new sources are identified.

Table 20.1 Monitoring Framework

Sustainability Objective	Recommended Monitoring Indicator	Applicable AMR Indicators
A. To maintain and enhance landscape and townscape quality	<ul style="list-style-type: none"> • Accessibility of green space by type • Percentage of residents satisfied with parks and gardens • Number of new tree preservation orders • Number of prosecutions for tree damage • Percentage of development on previously developed land • Number of Conservation Area improvement schemes completed. 	H5, HSC1, HSC3, BE4, NR1, NR4-NR14
B. To promote biodiversity and geodiversity through protection, enhancement and management of species and habitats.	<ul style="list-style-type: none"> • Changes in number and hectares of areas of biodiversity importance • Condition of SSSIs • Number of tree preservation orders deleted. • Monitoring procedures for SACs 	NR1, NR4-NR14
C. To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their settings.	<ul style="list-style-type: none"> • Number of Conservation Area improvement schemes completed • Number of heritage assets at risk (listed buildings, Conservation Areas, Scheduled Monuments) 	BE1, BE3, BE4

Sustainability Objective	Recommended Monitoring Indicator	Applicable AMR Indicators
	<ul style="list-style-type: none"> Number of heritage assets lost Number of planning permissions refused for major developments on poor design grounds 	
D. To mitigate and adapt to the effects of climate change.	<ul style="list-style-type: none"> CO₂ emissions per capita MWh of renewable energy generation capacity installed Tonnes of waste generated, by type Percentage of waste recycled Number of planning permissions granted for renewable energy schemes 	SC1
E. To encourage prudent use of natural resources.	<ul style="list-style-type: none"> Number of air quality monitoring sites exceeding standards Length of rivers of poor ecological or chemical quality. Percentage of recycled/secondary aggregates used in new developments. Percentage of waste recovered. Number of planning permissions granted for renewable energy schemes 	NR1, NR15, SC1
F. To reduce flood risk.	<ul style="list-style-type: none"> Number of properties at risk of flooding or flooded Percentage of developments with SuDS implemented Number of applications approved contrary to Environment Agency advice 	NR2
G. To improve availability of sustainable transport options to jobs and services.	<ul style="list-style-type: none"> Modal share by trip purpose (work, shopping, leisure, education) Job ratio Net additional dwellings Employment by SIC code, total and change Assessment of transport network capacity constraints and programmed infrastructure improvements Population within 350m of bus stop 	ST1, ST2, ST4, ST5, H2
H. To encourage sustainable distribution and communication systems.	<ul style="list-style-type: none"> Modal share for journeys to work Employment by SIC code 	ST3
I. To create mixed and balanced communities.	<ul style="list-style-type: none"> Employment by SIC code, total and change Job ratio Number of VAT registrations Amount of total and new employment floorspace, by type and settlement Vacancy rate in town centres Net additional dwellings by settlement Dwellings mix, percentage by type Gross affordable housing completions House price index 	E1-E7, H2-H12, St4, ST6, HSC3

Sustainability Objective	Recommended Monitoring Indicator	Applicable AMR Indicators
	<ul style="list-style-type: none"> • Net additional Gypsy and Traveller pitches • Number of homes built to Code for Sustainable Homes • Number and type of cultural facilities lost • Accessibility of new developments to services and facilities (medical, educational, employment, local retail) • Percentage of residents satisfied with sports and leisure facilities • Number and type of public transport infrastructure improvements 	
J. To promote safe communities, reduce crime and fear of crime.	<ul style="list-style-type: none"> • Number of crimes by type • Number of serious road casualties 	ST5
K. To improve the health of the population.	<ul style="list-style-type: none"> • Percentage of population with a long-term limiting illness • Percentage of adults/children participating in active sport • Percentage of residents satisfied with sports and leisure facilities 	HSC3
L. To enable improved community participation.	<ul style="list-style-type: none"> • Registered users on "Objective" • Number of developments with community consultation included • Number of Neighbourhood Plans progressing within the District 	NP1, CE1-CE6

Appendices

Appendix A Spatial Options Appraisal

Allocation of an additional 1,330 dwellings: options tested against the Sustainability Appraisal

A.1 Following the Inspector's initial findings on the Lichfield District Council Local Plan Strategy in response to discussion at the hearing session that took place in June/July 2013 (as set out in the Annex attached to the Inspector's letter to Lichfield District Council 3rd September 2013) the Inspector has stated his concerns that the Plan as submitted is unsound in that it does not make adequate provision for the objective assessment of housing need contained in the evidence base.

A.2 To rectify this unsoundness the Inspector has suggested that a site or sites for an additional 900 houses be found to 2028, and that this is a strategic matter which should be dealt with through the Plan itself, rather than through the forthcoming Allocations document. This would be a main modification to the Plan and the Inspector is aware that this would mean that the Plan would not be adopted before 2014 at the earliest and thus only have a 14 year life, rather than the 15 year time horizon which the Framework (NPPF) indicates would be preferable. The Inspector has therefore recommended that the Council consider extending the end of the date of the Plan to 2029 and making the necessary adjustment to housing numbers i.e. an additional 430 for the extra year (1,330 additional in total). This would mean that the Council will deliver a minimum of 10,030 dwellings by 2029 (1,000 of which are to assist in meeting needs arising in Rugeley & Tamworth).

A.3 In order to select an additional site, or sites, a sustainability appraisal of options is required. In addition, the Local Plan Strategy incorporating all main modifications, as well as minor modifications, will be the subject of SA/SEA. The final SA report will be published for consultation alongside the main modifications.

A.4 With regard to the SA and further work this is therefore a two stage process:

1. to SA sites/locations for the additional 1,330 dwellings; &
2. to SA the Local Plan Strategy, incorporating all major and minor modifications.

A.5 Following the publication of the Local Plan Strategy there has been an increase in the urban capacity available of a further 200 dwellings. This leaves a minimum requirement of 1,130 dwellings to find. In order to establish the most sustainable option, 7 different options were devised which either by themselves or in combination could deliver 1,330 dwellings when combined with the urban capacity. The method used to identify the options involves firstly assessing all the strategic sites.

A.6 The evidence used to inform the options was the Strategic Housing Land Availability Assessment (SHLAA) 2013 and information which has been submitted through the Examination process so far. This is therefore more up to date than was available for the Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated) November 2012 (CD1-8).

A.7 The appraisals were undertaken, as for all the sustainability appraisal work and as set out in the Scoping Report, using a group based approach utilising professionals from a range of disciplines including heritage, environment agency, biodiversity, highways, health commissioning, community development and housing. The assessment has then been verified by an independent consultant for consistency and legal compliance.

A.8 The Sustainability Objectives as contained in the SA Appraisal Framework are summarised as follows:

- **Objective A:** To maintain and enhance landscape and townscape quality;
- **Objective B:** To promote biodiversity and geodiversity through protection, enhancement and management of species and habitats;
- **Objective C:** To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their settings;
- **Objective D:** To mitigate and adapt to the effects of climate change;
- **Objective E:** To encourage prudent use of natural resources;
- **Objective F:** To reduce flood risk;
- **Objective G:** To improve availability of sustainability of sustainable transport options to jobs and services;
- **Objective H:** To encourage sustainable distribution and communication systems;
- **Objective I:** To create mixed and balanced communities;
- **Objective J:** To promote safe communities, reduce crime and fear of crime;
- **Objective K:** To improve the health of the population;
- **Objective L:** To enable improved community participation.

Table A.1 SA Scorings

++	Clear and positive effect in response to criterion
+	Positive effect
--	Clear and strong negative effect
-	Negative effect
+/-	Mixed effect
0	No effect
?	Effects impossible to determine from information

A.9 The following tables set out the scorings for each site assessed under the SA framework objectives. Site reference numbers from the SHLAA (November 2013) are referred to, with the capacity of each site also given in brackets.

Table A.2 Lichfield

Deans Slade Farm - SHLAA site 128 (450 - large site only)				
SFO:	Environmental	Economic	Social	

Watery Lane - part of SHLAA site 837 (750)															
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	Total
Score:	-?	-?	-?	+	-?	0	+/-	0	+	+/-	+	+/-?	+/-?	+/-?	-1
Comments	<p>Environmental: High HECA score due to loss of historic landscape and potential for archaeological deposits. Loss of greenfield land and negative impact protecting locally distinctive settlement & townscape character as would erode gap between Lichfield and Fradley but reference in masterplan giving consideration to minimise any potential impacts on setting/views of Lichfield City. Overall negative impact upon biodiversity as proposal affects Biodiversity Alert Site (BAS) hedgerow & other hedgerows.</p> <p>Economic: Transport – uncertainty over provision of opportunities to reduce trips by car due to diverted bus service (see 'Social' comments below) and as no employment proposed no effect determined in relation to encouraging sustainable distribution and communication systems and scores one positive in relation to improving levels of housing consistent with local employment opportunities but otherwise no effect in relation to providing economic aspects of creating mixed and balanced communities.</p> <p>Social: Retirement village proposed therefore positive in relation to provision of housing for elderly. Development will meet its own needs for sport and recreation as required by policy. No provision for indoor sport or health centre/doctors. The bus route indicated through the site is proposed as a diversion of other services through Streethay and some impacts are uncertain and possibly negative for reducing the overall impact in traffic sensitive areas.</p>														

Table A.5 Burntwood

SE Burntwood - SHLAA sites 69 and 70 (500)															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Score:	-	+	-?	+	+/-?	+/-?	--	+	++	+/-	+/-	+	++	+	+5
Comments	<p>Environmental: High HECA score and negative score for maintaining and enhancing landscape and townscape. Loss of greenfield land and negative impact protecting locally distinctive settlement & townscape character as would erode gap between Burntwood and Hammerwich. Potential for adverse impacts on St. John's Church and on archaeological deposits. Positive for promoting biodiversity as no loss of priority habitats and proposed creation of green corridor.</p> <p>Economic: Scores are negatively affected for G Ec because lane will be downgraded to cycle route to safeguard hedgerows and would mean loss of bus service on this route. Positive for encouraging sustainable distribution and communication systems as site would be able to access superfast broadband and local neighbourhood store and some small commercial, plus doctors surgery & vet proposed.</p> <p>Social: Development in this location would mean that needs of new residents could be met as Burntwood as a settlement has positive impact upon health and wellbeing due to range of employment, services and facilities, doctor's surgery, schools, clubs, open space etc and is an area of need for affordable housing.</p>														

Meg Lane - SHLAA Site 93 (445)															
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	Total
Score:	-	-?	-?	+	+/-?	+/-	-	0?	+	-	+	+	+++	+	+2
Comments	<p>Environmental: Negative impacts overall as very High HECA historic landscape value. Close to sensitive areas for biodiversity Gentshaw Common and contains sensitive habitat, with no mitigation proposed.</p> <p>Economic: Site does not provide opportunities to reduce trips by car, and as no employment proposed would have no effect on encouraging sustainable distribution and communication systems. Site would have a positive impact in relation to assisting with the economic aspects of creating mixed and balanced communities with regard to improving levels of housing consistent with local employment opportunities.</p> <p>Social: Development in this location would mean that needs of new residents could be met as Burntwood as a settlement has positive impact upon health and wellbeing due to range of employment, services and facilities, doctor's surgery, schools, clubs, open space etc and is an area of need for affordable housing.</p>														

Table A.9

East of Rugeley Road - SHLAA Site 404 (149)															
SFO:	Environmental						Economic			Social					
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	Total
Score:	-?	-	-?	+	+/-?	+/-	-	0?	+	-	+	+	+++	+	+2
Comments	<p>Environmental: High HECA score and potential for archaeology on the site. Contains sensitive habitat and with no known mitigation proposed.</p> <p>Economic: Site does not provide opportunities to reduce trips by car, and as no employment proposed would have no effect on encouraging sustainable distribution and communication systems. Site would have a positive impact in relation to assisting with the economic aspects of creating mixed and balanced communities with regard to improving levels of housing consistent with local employment opportunities and encouraging home based businesses.</p> <p>Social: Development in this location would mean that needs of new residents could be met as Burntwood as a settlement has positive impact upon health and wellbeing due to range of employment, services and facilities, doctor's surgery, schools, clubs, open space etc and is an area of need for affordable housing.</p>														

Table A.10

North of Church Road - SHLAA site 494 (440)															
SFO:	Environmental						Economic			Social					
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	Total
Scoring:	-?	-?	-	+	+/-?	+/-	-	+	+	-	+	+	+++	+	+3

North of Church Road - SHLAA site 494 (440)	
Comments	<p>Environmental: High HECA score and potential for archaeology on the site. Will almost fill gap between Burntwood and St Matthews – therefore negative impact on protecting locally distinctive settlement and townscape character. Contains sensitive habitat and with no known mitigation proposed.</p> <p>Economic: Not within 350metres of a bus service, therefore negative for providing opportunities to reduce trips by car. Positive for encouraging e-business and local supply chains, and therefore overall a positive for encouraging sustainable and communication systems.</p> <p>Social: Development in this location would mean that needs of new residents could be met as Burntwood as a settlement has positive impact upon health and wellbeing due to range of employment, services and facilities, doctor's surgery, schools, clubs, open space etc and is an area of need for affordable housing.</p>

Table A.11

East Burntwood Farewell Lane - SHLAA site 482 (367)															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	-?	-?	-	+	+/-?	+/-	+	+	+	+	+	+	++?	+	+7
Comments	<p>Environmental: High HECA score and potential for archaeology on the site.</p> <p>Negative impact on biodiversity as contains sensitive BAS hedgerow at north of site.</p> <p>Economic: Overall positive for economic impacts. Within 350metres of a bus service, therefore positive for providing opportunities to reduce trips by car. Positive for encouraging e-business and local supply chains, and therefore overall a positive for encouraging sustainable and communication systems – especially if site accesses superfast broadband.</p> <p>Social: Development in this location would mean that needs of new residents could be met as Burntwood as a settlement has positive impact upon health and wellbeing due to range of employment, services and facilities, doctor's surgery, schools, clubs, open space etc and is an area of need for affordable housing.</p>														

Table A.12

Bleak House Farm - SHLAA site 477 (694)															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	+/-?	-?	-?	+	+/-?	+/-	+/-	+	+	-	+	+	++?	+	+5
Comments	<p>Environmental: High HECA score and potential for archaeology. Site is also adjacent Gentleshaw Common. Negative impact on biodiversity many protected species near site and lots of potential to join Chasewater Heaths SSSI and Gentleshaw Common.</p>														

Bleak House Farm - SHLAA site 477 (694)	
Economic:	Mixed effects determined in relation to providing opportunities to reduce trips by car as area lacking in public transport services. Positive for encouraging e-business and local supply chains, and therefore overall a positive for encouraging sustainable and communication systems – especially if site accesses superfast broadband. Site would also have a positive impact in relation to assisting with the economic aspects of creating mixed and balanced communities with regard to improving levels of housing consistent with local employment opportunities and encouraging home based businesses.
Social:	Burntwood as a settlement has positive impact upon health and wellbeing due to range of employment, services and facilities including doctors, schools, clubs, open space etc and area of need for affordable housing. Negative in relation to improving the availability of sustainable transport options to jobs & services as site/area is poorly served by public transport.

Table A.13 Fradley

Land off Gorse Lane, Fradley Park - SHLAA site 426 (250)															
SFO:	Environmental						Economic			Social				Total	
	A	B	C	D	E	F	G	H	I	G	I	J	K		L
Scoring:	+	+/-?	-?	+?	+/-?	+	-?	+?	-	-	+	-?	++?	+?	+3
Comments	<p>Environmental: Overall positive for maintaining & enhancing landscape & townscape quality, as part of site is brownfield development will improve areas of lower landscape quality. With some surviving RAF structures there is potential to safeguard and enhance access to heritage. Potential to mitigate for habitat/biodiversity loss. Potential to reduce surface water run-off rates</p> <p>Economic: The proposal represents a loss of land from the employment portfolio which would have a negative impact upon encouraging sustainable distribution and communication systems e-business etc. and creating a mixed and balanced community as it is loss of land which could encourage higher skilled economic sectors such as Research and Development.</p> <p>Fradley has lost its hourly bus service and it is now only every 2 hours so a negative score for providing opportunities to reduce trips by car. (N.B. recent planning permission will increase the bus frequency to half hourly which could increase the accessibility score of this site if it is developed as combined site, however no details are known at present and as the phasing is not certain it is not possible to assume the other sites have already provided improvements.)</p> <p>No score able to be given for whether the development would be able to reduce overall impact on traffic sensitive areas (i.e. A38) until further work undertaken, as requested by Highways Agency. High potential for road casualties as short slip road onto A38 in this location & potentially more traffic utilising substandard Fradley junction.</p> <p>Social: Additional housing provision may encourage the delivery of a doctor's practice or outreach service, which will be beneficial to the existing health and well being of the population. In combination the additional facilities proposed at Fradley will benefit the existing community.</p>														

Table A.14

Hay End Lane Pig Farm - SHLAA site 436 (425)				
SFO:	Environmental		Economic	Social

Hay End Lane Pig Farm - SHLAA site 436 (425)															
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	Total
Scoring:	-	-?	-	+?	-?	0	-	0? to +?	+?	-?	+?	+/-?	++?	+?	0 to +1
Comments	<p>Environmental: Very high HECA score as loss of historic landscape and archaeology. Negative impact upon priority habitat.</p> <p>Economic: Fradley has lost its hourly bus service and it is now only every 2 hours so a negative score for providing opportunities to reduce trips by car. (N.B recent planning permission will increase the bus frequency to half hourly which could increase the accessibility score of this site. However no details are known at present and as the phasing is not certain it is not possible to assume the other sites have already provided improvements.) This site due to its location and relation to the canal and other sites means it is more awkward to serve with public transport.</p> <p>No score able to be given for whether the development would be able to reduce overall impact on traffic sensitive areas (i.e. A38) until further work undertaken, as requested by Highways Agency. High potential for road casualties as short slip road onto A38 in this location & potentially more traffic utilising substandard Fradley junction.</p> <p>Social: Additional housing provision may encourage the delivery of a doctor's practice or outreach service, which will be beneficial to the existing health and well being of the population. In combination the additional facilities proposed at Fradley will benefit the existing community.</p>														

Table A.15

South of Fradley Lane - SHLAA sites 412/131/438 (259)															
SFO:	Environmental						Economic				Social				Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	-?	--?	-	+?	-?	0	-	+?	+?	-?	+?	+/-?	++?	+?	0
Comments	<p>Environmental: High HECA score so loss of Historic landscape and potential for archaeology. Would have benefit of creating a more cohesive settlement but would lose distinct character of 2 areas. Very negative impact upon biodiversity due to impact upon SBI and semi-improved grassland.</p> <p>Economic: Fradley has lost its hourly bus service and it is now only every 2 hours so a negative score for providing opportunities to reduce trips by car. (N.B. the recent planning permission will increase the bus frequency to half hourly which could increase the accessibility score of this site. However no details are known at present and as the phasing is not certain it is not possible to assume the other sites have already provided improvements.</p> <p>No score able to be given for whether the development would be able to reduce overall impact on traffic sensitive areas (i.e. A38) until further work undertaken, as requested by Highways Agency. High potential for road casualties as short slip road onto A38 in this location & potentially more traffic utilising substandard Fradley junction.</p> <p>Social: Additional provision may encourage the delivery of a doctor's practice or outreach service, which will be beneficial to the existing health and well being of the population. In combination the additional facilities proposed at Fradley will benefit the existing community.</p>														

Table A.16

North of Fradley Lane - SHLAA site 87 (272)															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	+/-?	--?	-	+	-?	0	-	+	+	-?	+	+/-?	+++?	+	+1
Comments	<p>Environmental: High HECA score so loss of Historic landscape and potential for archaeology. Would have benefit of creating a more cohesive settlement but would lose distinct character of two areas. Very negative impact upon biodiversity due to impact upon SBI and semi-improve grassland.</p> <p>Economic: Fradley has lost its hourly bus service and it is now only every 2 hours so a negative score for providing opportunities to reduce trips by car N.B. the recent planning permission will increase the bus frequency to half hourly which could increase the accessibility score of this site. However no details are known at present and as the phasing is not certain it is not possible to assume the other sites have already provided improvements. No score able to be given for whether the development would be able to reduce overall impact on traffic sensitive areas (i.e. A38) until further work undertaken, as requested by Highways Agency. High potential for road casualties as short slip road onto A38 in this location & potentially more traffic utilising substandard Fradley junction.</p> <p>Social: Additional provision may encourage the delivery of a doctor's practice or outreach service, which will be beneficial to the existing health and well being of the population. In combination the additional facilities proposed at Fradley will benefit the existing community.</p>														

Table A.17

Fradley West - SHLAA site 838 (850)															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	+/-	--	-?	+	-?	0 to +	+/-	+	+	-?	+	+/-?	+	-?	0 to +1
Comments	<p>Environmental: Site includes land which is former airfield and greenfield pasture land and has a very high HECA score and thus is of high historic landscape value. Doesn't link directly to the SDA so would be isolated from Fradley's services and facilities.</p> <p>Site is adjacent to ancient woodland, SBI (canal) and BAS hedgerow so overall negative impact upon biodiversity.</p> <p>Economic: Potentially positive for economic impact upon encouraging sustainable distribution and communication systems e- business etc. and encouraging local supply chains if a range of unit sizes is proposed in the employment area and for creating a mixed and balanced community and land which will encourage higher skilled economic sectors such as R & D if there are no restrictions on B1 uses re: trip generation. No score able to be given for whether the development would be able to reduce overall impact on traffic sensitive areas (i.e. A38) until further work undertaken, as requested by Highways Agency. High potential for road casualties as short slip road onto A38 in this location & potentially more traffic utilising substandard Fradley junction.</p>														

Fradley West - SHLAA site 838 (850)	
	<p>Social: Would meet its own needs for sport and recreation and other services and facilities, but probably not to levels found in Fradley or Lichfield. Although due to scale of development may encourage a doctor's practice or outreach service in Fradley, which could benefit existing residents depending upon the location.</p> <p>(N.B. Fradley West scoring from CD1-8 is -1 to -6).</p>

Table A.18 New Settlements

New Village NE of Lichfield - SHLAA site 837 (2,000)															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	-?	--?	-?	++	+/-?	0 or +/-	+/-	+?	+?	+/-?	+?	+/-?	+?	+?	+3
Comments	<p>Environmental: High HECA score so loss of historic landscape and potential for archaeology, loss of greenfield and negative impact upon joining Lichfield and Fradley but reference in masterplan giving consideration to minimise any potential impacts on setting/views of Lichfield City. Whilst many biodiversity impacts can be mitigated SBI, BAS and Ancient woodland are affected by the proposed development, net negative impact. Anaerobic digester proposed for new village could have wider benefit as will take waste from beyond the development.</p> <p>Economic: Transport: should be able to mitigate for its own impact on Lichfield City junctions. The bus route indicated through the site will mean it is a diversion of other services through Streethay. At present the bus service through Fradley has been reduced to a 2 hourly service. Encourages local supply chains as new local centre is proposed around Curborough Craft centre.</p> <p>Social: Will meet its own needs for sport and recreation as required by policy. No provision for indoor sport, which is especially important for elderly. Health centre indicated, uncertain if this able to be delivered for this proposal or will be part of enhanced /new outreach service serving Fradley, so uncertain of location and impact on existing residents objectives for Fradley, effect on well being scored positively but could be uncertain. An excess in provision of residential could encourage greater out commuting and not address the job balance ratio.</p>														

Table A.19

Brookhay Villages & Twin Rivers Park - SHLAA site 819 (7,500 of which 3,600 to 2028)															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	-	-?	-	+	+?	?	++	+	+?	+++	+++	+?	+?	+/-?	+9
Comments	<p>Brookhay would require a commitment to large scale development over and above what is required within this plan period which would be a fundamental change to the submitted strategy. Site not included within the Publication East Staffs Local Plan so delivery of employment not secure. Uncertainty on effects of viability/deliverability of proposal.</p>														

Brookhay Villages & Twin Rivers Park - SHLAA site 819 (7,500 of which 3,600 to 2028)	
	<p>Environmental: High HECA score so loss of historic landscape. Area currently greenfield and would be restored to greenfield following mineral extraction as within Central Rivers Initiative (CRI) area. Large scale loss of open countryside. Net negative impact overall as represents loss of CRI area, close to Ancient woodland. Overall negative impact upon archaeology as whilst interpretation proposed there is a high likelihood of archaeological remains and resultant development or excavation for mineral extraction will result in loss of “in situ” potentially nationally significant archaeological remains (area already has known archaeological deposits woolly rhino found nearby and Scheduled Ancient monument). Whilst facility suggested to exhibit finds which would have a positive impact upon broadening access and understanding of local heritage, the technology is changing all the time as to how excavate and record findings so overall negative impact. Highway improvements will improve air quality on A38 with junction improvements and reduce road casualties. Provision of an anaerobic digester plant is shown on the Plan which has been scored positively for reducing waste however concern has been expressed over this with regard to the impact upon the water quality in the area and failing the Water Framework Directive target. Unknown impact on reducing flood risk due to lack of detailed information and conflicting advice from EA and promoter of the site.</p> <p>Economic Proposing significant rail, bus, walk and cycle improvements to serve its community and the reopening of the rail service would benefit wider District and is a strategic objective of the Plan. The employment areas are not included within Lichfield District however the information suggests that HQ's are being targeted, these tend to be multi nationals who use multinational supply chains and not local supply chains, so may not benefit other local employers but would meet R & D which is consistent with local employment needs. Employment is within walking/cycling distance of proposed new housing development. No accounting for phasing/delivery of the employment in relation to the release of housing has been considered.</p> <p>Social Would provide affordable housing, but not area of great need for affordable housing/specialist housing within the District. Would meet own needs for sport and recreation, the proposed rowing lake does not relate to any local demand so would not benefit local needs or address known deficiencies, however green infrastructure would. Retail, facilities, services (community hub) etc would meet own needs, no wider benefit. Balance of housing should not create health inequalities.</p>

Table A.20 Villages & Other Rural

Whittington															
SFO:	Environmental						Economic			Social				Total	
	A	B	C	D	E	F	G	H	I	G	I	J	K		L
Scoring:	-?	-?	-?	+	+/-?	0	+	+	+	+	+	+/-?	+	+	+5
Option 6 - 203 dwellings.	Scale of development would significantly alter the character of Whittington to the detriment of biodiversity, natural resources, the built environment and countryside character. May result in an increase in pressure for infilling within Conservation Area and potentially loss of non-residential uses, which may have adverse economic & social effects.														
Option 7 - 140 dwellings.															
(SHLAA capacity 169)															

Table A.21

Alrewas															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	-?	-?	-?	+	-?	?	+/-	+	+	-?	+	+/-?	+	+	+1
Option 6 - 340 dwellings.	Scale of development would significantly alter the character of Alrewas to the detriment of biodiversity, natural resources, the built environment and countryside character. May result in an increase in pressure for infilling within Conservation Area and potentially loss of non-residential uses, which may have adverse economic & social effects. Would also have adverse impact on traffic sensitive area i.e. historic core of village.														
Option 7 - 231 dwellings.	Impact of Option 6 would be slightly worse than Option 7 due to the amount of dwellings proposed.														
(SHLAA capacity 219)															

Table A.22

Armitage with Handscare															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	-?	-?	-?	+	-	+/-	+	+	+	+	+	+/-?	+	+	+4
Option 6 – 420 dwellings.	Unlikely that level of development required by option 6 could be accommodated without detrimental environmental impacts.														
Option 7 – 285 dwellings.															
(SHLAA capacity 2143 outside settlement boundary)															

Table A.23

Fazeley															
SFO:	Environmental						Economic			Social					Total
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	
Scoring:	-?	+/-?	-?	+	-?	?	+	+	+/-?	+	=	+/-?	+	+	+4

Other Rural Areas															
	A	B	C	D	E	F	G	H	I	G	I	J	K	L	Total
Scoring:	-?	-?	+/-?	+	-?	?	-?	-?	-?	-?	-?	-?	-?	-?	-10
Comments	<p>Less likely to deliver specialist and affordable housing requirement and accompanying range of facilities and necessary infrastructure. May create need for affordable housing where none exists at the moment.</p> <p>Lots of unknown impacts as sites are varied.</p> <p>Less likely to have access to high speed broadband, detrimental to home working and skills development which the strategy wants to encourage.</p> <p>Greater negative impact upon social factors relating to health impacts, especially for elderly and less mobile.</p> <p>Only large scale development would improve transport provision and choice however this may affect existing villages/ population if services are diverted.</p>														
Overall Comments															
<p>With regard to Option 6 Whittington does not have sufficient sites currently within the SHLAA to enable delivery of the scale of development required and this option would also require nearly all of the SHLAA sites submitted for Alrewas and Fazeley. This may be too ambitious to be achieved and would increase the impact upon the remaining villages of Shenstone and Armitage; further impacting upon the character of these settlements.</p> <p>Development in the villages does not reflect the most sustainable option and does not add to the overall sustainability of the District. Further increases in the levels of development in the villages could significantly alter the character of the villages to the detriment of biodiversity, the historic environment and landscape character of the District.</p> <p>The existing spatial strategy promotes improvements to the individual sustainability and self-sufficiency in relation to supporting the quality of life of our residents, especially as many of the villages have high proportions of older persons who are significantly affected by mobility and accessibility issues. Increasing the level of housing envisaged would not deliver an enhanced level of facilities or transport options and the existing level of services and facilities are not as high as the levels within the strategic centre of Lichfield or Burntwood Town Centre which can contribute to promoting health and well being. Due to the scale of the sites likely to be delivered there is concern that the need for specialist and affordable homes would not be realised if the strategy was too heavily reliant on delivery of housing in the villages.</p>															

Strategic Options

A.10 A reassessment of the submitted Local Plan Strategy has been undertaken and the summary of the findings are below. A number of alternative options have been appraised as differing ways of delivering the additional housing numbers identified by the Inspector as the shortfall Cumulative impacts and the interrelationship effects of each option have also been considered and are included below.

A.11 From the above assessment of the individual sites it is clear that the most sustainable sites are on the southern edge of Lichfield City. These deliver strategic objectives as well as being in the most sustainable locations. This information has been used to inform the options which have been appraised below. In addition, Rugeley SDA is not able to be

increased beyond the capacity identified within the existing Local Plan Strategy and therefore has been discounted from the options below. The available urban capacity has increased by an additional 200 dwellings and this enables allocations to be sought for a minimum of 1,130 dwellings, rather than the full 1,330 to meet the shortfall to 2029 identified by the Inspector.

A.12 Note: there are no scorings for the individual sustainability framework objectives or totals to avoid an over reliance on scores when decisions are being made and judgements can be made using a qualitative approach. No arithmetic has been used as it is considered this could be misleading and the details of the impacts of the options are detailed in the text beneath each option.

Table A.27 Local Plan Strategy (as submitted)

<p>Submitted Local Plan: Strategy (CD1-1)</p>	<p>Environmental: It utilises brownfield and contaminated land first, safeguarding areas of highest local historic landscape quality and biodiversity. It will lead to a reduction in flood risk.</p> <p>Economic: Locates development in the most accessible locations utilising and improving existing transport and infrastructure and addressing deficiencies. It will support our existing communities both residential and economic by allowing growth to support the retail centre at Lichfield and Burntwood and new and improved facilities at Fradley to support the growing population. The Strategy uses the existing transport infrastructure and seeks improvements to it which will benefit the population and increase the sustainability of the settlements.</p> <p>Social: A range and adequate supply of housing to meet both affordable, specialist and market needs will be delivered across the District supporting the settlement pattern, local character and health and well being of the area. By utilising existing capacity within existing services and facilities our rural area will continue to be able to adapt to change supported through the Allocations document and neighbourhood planning and can help meet its own deficiencies at a smaller scale.</p>
<p>Mitigation and Maximisation</p>	<p>The strategy seeks to maximise development in areas of greatest accessibility by sustainable means of transport, namely in Lichfield City, Burntwood and the Key Rural Settlements. SDAs will mean that economies of scale are created enabling greater opportunities for key infrastructure such a primary schools, community hubs, local retail provision, public transport services and low carbon energy generation. Concentrating development in Lichfield, Burntwood and in the Fradley area will assist the growth of local businesses and enterprise.</p> <p>In concentrating the majority of housing growth in the more sustainable settlements the strategy seeks to minimise the impacts of development on smaller communities, where high levels of growth would have significant detrimental effects, on environmental issues particularly. In addition sensitive areas for biodiversity, landscape, heritage assets, mineral deposits and flood risk have been avoided where possible, with policies and concept statements to ensure mitigation and to minimise impacts where this has not been possible.</p>
<p>Uncertainties and Risks</p>	<p>Development of large scale housing, infrastructure and the delivery of enhanced retail and leisure facilities are all, to differing extents, dependant upon the national and global economy, and may affect the viability of the spatial strategy.</p>
<p>Short/ Medium/ and Long term impacts</p>	<p>Cumulatively and in the long term the impacts of the proposed strategy will also be very positive. In some cases however, until a certain quantum of development exists, enabling the required infrastructure to be provided, mixed impacts will result, particularly in the short term.</p>

	<p>This was considered to be the case for environmental impacts, particularly with regard to effects on biodiversity through loss of habitats, where mitigation measures will take time to achieve positive benefits. This was also considered to be relevant in relation to creating mixed and balanced communities and to improving the availability of transport options to jobs and services, as many public transport improvements and provision of additional community, healthcare and educational facilities and improvements will be realised in the medium and long term.</p>
<p>Cumulative and Synergistic impacts</p>	<p>Overall it was determined that there would be a positive impact with regard to the effects of the strategy on cross-boundary issues. This is especially the case in relation to social impacts, and with regard to the provision of affordable housing in particular, as a joint housing evidence base has been developed with neighbouring Southern Staffordshire authorities and the strategy will provide housing to meet Tamworth and Cannock's needs. Additionally through the impact of the strategy, in combination with the County Council's transport strategies and plans, it was considered that there would be greatly improved access to increased opportunities for walking and cycling and provision of access for those without access to a car, as improvements are planned at Rugeley Trent Valley station and also highway improvements in Tamworth.</p> <p>Also it was determined that there would be clear and strong positive impacts upon biodiversity through policies effecting the SAC, AONB and Biodiversity Opportunity Mapping which has considered cross boundary habitat and species movement.</p> <p>However, some effects where considered impossible to determine at present with regard to cross-boundary issues, for example in relation to reducing the overall impact on traffic sensitive areas work is still being undertaken by the County Council on transport for Tamworth and the full impact of development outside of the District on the A38 is unknown.</p> <p>Another cross-boundary effect which will have to be assessed for sustainability impacts in the longer term is that of HS2. This may have implications on environmental objectives such as landscape, biodiversity, heritage assets and air quality, as well as social and economic impacts on connectivity & transport networks other than rail. Until more details are known about the route and the mitigation proposed these impacts are impossible to determine at the local level.</p>

Option 1: 'Do nothing' i.e. don't allocate the 1,130 dwellings.

Table A.28 Option 1

<p>Option 1</p>	<p>The non allocation of additional dwellings would lead to an insufficient supply of housing land and could lead to sites being determined by Appeal. This would give no control over the location of development or over phasing. This may have a negative influence on the delivery of services and facilities within the District and may undermine the urban regeneration of the conurbation. No certainty over where the additional housing development would go, and lack of certainty over the delivery of infrastructure as piecemeal development may result.</p> <p>Environmental: Could result in the loss of distinctiveness of settlements and there could be difficulty in defending locally significant biodiversity and historic landscapes. Development of larger sites could be delivered in a fragmented manner leading to problems connecting green infrastructure, addressing flood risk, maximising potential from renewables which can be influenced through economies of scale.</p> <p>Economic: Difficulty in co-ordinating highway improvements and ensuring cycle paths etc link through large developments. No control over employment or retail if a plan was unable to be adopted. This could result in development in locations which are difficult to access via public transport, loss of existing employment sites and lack of support for the City centre and other centres.</p>
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Social: Development of smaller sites may not deliver the required levels of affordable housing in the areas of most need and would negatively influence the ability to deliver services and facilities. No control over the location of development or over phasing may have a negative influence on delivering services and facilities or planning for increase in pressure.

Option 2: Increase housing numbers in same proportions as housing distributions settlement hierarchy set out in Plan (Table 4.1 page 26 of the Local Plan: Strategy CD1-1)

Table A.29 Option 2

Option 2	<p>This option would combine the most sustainable sites from Lichfield City, the most sustainable site at Burntwood, the most sustainable site at Fradley, none from Rugeley (as there is insufficient capacity to increase the size of the SDA) and an increase in the size of the BDL at North of Tamworth along with further provision from the key rural and other rural areas.</p> <p>Environmental: Loss of greenfield sites in Lichfield City and Burntwood, brownfield in Fradley. Development in Burntwood would reduce the gap to the conurbation. Further increasing the amount of development to the North of Tamworth in the proposed BDL would have a greater negative impact on landscape. Sites on the edge of the larger settlements could all mitigate for loss or improve the biodiversity of the area and mitigate for the impact upon the historic environment. Development in the rural areas has a range of impacts and is detailed in Option 6 below, but has increased negative impacts upon the environment in terms of landscape, biodiversity and historic environment.</p> <p>Economic: Development generally in locations easily accessible to existing employment and transport and can deliver improved sustainable transport options and enhancements to the wider population. This option results in changes in employment land portfolio as site proposed in Lichfield City includes the provision of employment and additional housing site in Fradley is on existing allocation for employment land. Further provision in the rural areas reduces the sustainability of the option. There may be an impact upon delivery of Southern Bypass to the south of Lichfield and restoration of Lichfield Canal heritage towpath trail, both of which deliver economic benefits.</p> <p>Social: Lichfield City, Burntwood and Tamworth provide the greatest benefit to the health and well being of the new populations. Further development at Fradley could result in better health care provision in Fradley to benefit of existing community. Further development in the rural areas on the scale proposed here will result in no change in the level of services and facilities in the rural area and are areas with the least amount of services and facilities as sufficient critical mass would not be achieved to deliver significant change</p>
Mitigation and Maximisation	<p>Seeks to maximise the use of existing assets, however increasing housing provision in the rural areas would give a reduction in the sustainability of the overall Plan.</p>
Uncertainties and Risks	<p>This strategy relies on an increased housing provision at a number of settlements and with regard to the rural areas specific sites would be confirmed at the Local Plan Allocations stage. There is therefore uncertainty at the current time with regard to biodiversity, landscape and historic assets within and adjacent to the rural settlements. There is uncertainty with regards to expanding the amount of development to the north of Tamworth as further technical work is currently underway which will inform the Tamworth Local Plan and the subsequent Lichfield District Local Plan Allocations document.</p>

Short/ Medium/ and Long term impacts	The phasing of sites has been removed so there is uncertainty with regard to their delivery. Development will mitigate for its own impact. Mixed impacts may result in the short term due to a certain quantum of development required to enable infrastructure to be provided, and mitigation for biodiversity will take time to establish, but in the long term this Option should achieve the Strategic objectives of the Plan.
Cumulative and Synergistic impacts	Cumulatively increasing levels of housing development in the main settlements of the District will assist in the delivery of an enhanced range of housing, services and facilities which will benefit the economy, environment, and social well being of existing and future residents. However, increased housing numbers in the rural areas will have a cumulative negative impact upon the environment in terms of landscape, biodiversity and historic environment.

Option 3: New Settlement/Community option – 1,130 delivered within the Plan period at New Village Option NE Lichfield or Brookhay Villages & Twin Rivers Park (N.B. Brookhay estimate they would deliver 3,600 to 2028)

A.13 N.B. The new villages proposed by BDW the Brookhay Villages and Twin Rivers Park (BV & TRP) proposal and the proposal for 2,000 dwellings to the NE of Lichfield City have been included in both the list of sites and as part of Option 3. It is important to note that when combined into options the effects of individual sites can sometimes alter due to cumulative and synergistic effects e.g. loss of employment proposed by one site can be mitigated by provision of employment on another site. It is therefore important to consider the narrative which accompanies each option.

Table A.30 Option 3: New Village Option NE Lichfield

New village NE Lichfield for 2,000 (SHLAA site 837)	<p>Environmental: High HECA score so loss of historic landscape and potential for archaeology, loss of greenfield and negative impact upon eroding gap between Lichfield and Fradley but reference in masterplan giving consideration to minimise any potential impacts on setting/views of Lichfield City. Whilst many biodiversity impacts can be mitigated SBI, BAS and Ancient woodland are affected by the proposed development, so there is a net negative impact. Anaerobic digester proposed for new village could have wider benefit as will take waste from beyond the development.</p> <p>Economic: Transport: should be able to mitigate for its own impact on Lichfield City junctions. The bus route indicated through the site will mean it is a diversion of other services through Streethay, to the detriment of existing residents in Streethay. Encourages local supply chains as new local centre is proposed around Curborough Craft centre.</p> <p>Social: The new settlement will meet its own needs for sport and recreation as required by policies within the Local Plan. No provision made for indoor sport, which is especially important for elderly. Health centre indicated, but uncertain if this will be able to be delivered for this proposal or will be part of enhanced /new outreach service serving Fradley, so uncertain of location and impact on existing residents of Fradley. Effect on well being scored positively but could be uncertain as will depend on further detail. An excess in provision of residential could encourage greater out commuting and not address the job balance ratio.</p>
Mitigation and Maximisation	Proposal maximises the opportunities which exist on a large new build scheme for renewables by proposing an anaerobic digester.
Uncertainties and Risks	Many uncertainties exist as proposal lacks detail with regard to mitigation for effects on biodiversity, transport, mixture of house types, and provision of sport and recreation and healthcare facilities.

	An excess in provision of residential could encourage greater out commuting and not address the job balance ratio.
Short/ Medium and Long term impacts	The short term development of the site will rely on accessing existing services and facilities in Lichfield City, creating an increase in car based travel with consequent detrimental impacts upon air quality and on the historic City Centre. This should reduce over the medium and longer term as the facilities which serve the new settlement are completed. There may be a diversion of the provision of infrastructure to serve other communities, especially bus services for Streethay and those serving Fradley, which could be detrimental to the sustainability of these communities.
Cumulative and Synergistic impacts	Cumulative impact of development in this location and at Fradley will erode the gap between the two settlements, leading to loss of local distinctiveness, as well as loss of significant amount of historic landscape within Lichfield District, an asset which once lost cannot be replaced. Additional development of this scale to the north of the City would mean a reliance on existing services and facilities, increase car based travel, especially for short trips, and leading to congestion and adverse impacts on the historic core of Lichfield City.

Table A.31 Option 3: BV&TRP

Brookhay Villages and Twin Rivers Park 7500 (3600 within plan period)	<p>Brookhay would require a commitment to large scale development over and above what is required within this plan period which would be a fundamental change to a sound strategy. Site not included within the Publication East Staffs Local Plan so delivery of employment not secure. Uncertainty on effects of viability/deliverability of proposal.</p> <p>Environmental: High HECA score so loss of historic landscape, area currently greenfield and would be restored to greenfield following mineral extraction as within Central Rivers Initiative (CRI) area. Large scale loss of open countryside. Net negative impact overall as represents loss of CRI area, close to Ancient woodland. Overall negative impact upon archaeology as whilst interpretation proposed there is a high likelihood of archaeological remains and resultant development or excavation for mineral extraction will result in loss of 'in situ' potentially nationally significant archaeological remains (area already has known archaeological deposits woolly rhino found nearby and Scheduled Ancient monument). Whilst facility suggested to exhibit finds which would have a positive impact upon broadening access and understanding of local heritage, the technology is changing all the time as to how excavate and record findings so overall negative impact. Highway improvements will improve air quality on A38 with junction improvements and reduce road casualties. Provision of an anaerobic digester plant is shown on the master plan which has been scored positively for reducing waste, however concern has been expressed over this with regard to the impact upon the water quality in the area and failing the Water Framework Directive (WFD) target. Unknown impact on reducing flood risk due to lack of detailed information and conflicting advice from EA and promoter of the site.</p> <p>Economic: Proposing significant rail, bus, walk and cycle improvements to serve its community and the reopening of the rail service would benefit wider District and is a strategic objective of the Plan. The employment areas are not included within Lichfield District however the information suggests that HQ's are being targeted, these tend to be multi nationals who use multinational supply chains and not local supply chains, so may not benefit other local employers but could deliver Research and Development (R & D) which is consistent with local employment needs. Employment is within walking/cycling distance of proposed new housing development. No accounting for phasing/delivery of the employment in relation to the release of housing has been considered.</p> <p>Social: Would provide affordable housing, but not area of great need for affordable housing/specialist housing within the District. Would meet own needs for sport and recreation and the proposed rowing lake does not relate to any local demand so would not benefit local</p>
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	needs or address known deficiencies, however green infrastructure would be locally beneficial. Retail, facilities, services (community hub) etc. would meet own needs but no wider benefit. Balance of housing should not create health inequalities.
Mitigation and Maximisation	The site maximises the use of the land by extracting minerals prior to reusing the site for development and maximises use of the existing rail line. The proposal maximises the opportunities which exist on a large new build scheme for renewables by proposing an anaerobic digester. Mitigation for increased congestion and air pollution arising on the A38 is proposed in the form of junction improvements.
Uncertainties and Risks	<p>There is uncertainty in the viability for this scale of development, especially as it is cross boundary and currently not included in the East Staffs Local Plan. There is a risk that the levels of infrastructure and jobs could not be delivered if development proceeded only within Lichfield District and uncertainty over the delivery of the housing in relation to the provision of the employment. There would also be an over provision in housing land within Lichfield District which could negatively impact upon the ability of the Plan to deliver other key pieces of infrastructure and strategic objectives.</p> <p>There is a risk to water quality in the area and the River failing its Water Framework Directive and a risk that the development will not reduce flooding.</p> <p>There is also a risk of losing important archaeological remains.</p>
Short/ Medium and Long term impacts	The short term delivery of housing is uncertain, as mineral extraction would need to be completed first and the large scale investment required to deliver the significant infrastructure identified to make the location function in a sustainable manner may not come forward in the short term. However the sustainability of the new settlement will improve over time as the range of services and facilities increases, and in the long term the overall impacts would be positive.
Cumulative and Synergistic impacts	<p>The settlement in its entirety would become the third largest settlement in Lichfield District and may result in a lack of housing and infrastructure provision in other areas of the District where there is an existing need.</p> <p>There would be a positive cumulative impact upon Lichfield District by reopening of the rail line should it be extended to Burton and also on improving air quality on the A38 through junction upgrades.</p> <p>The development results in the loss of land within the Central Rivers Initiative and would therefore have a negative impact on biodiversity, habitats and the overall health of the population, although some mitigation is proposed.</p> <p>There would be synergistic impact on water quality and the impact on the River Trent and River Humber SAC.</p>

Option 4 – allocate all additional 1,130 in/around Lichfield City (as most sustainable settlement) utilising a mixture of any additional brownfield sites and Green Belt release to the south of the City

Table A.32 Option 4

This option would combine the 2 strategic sites to the south of Lichfield City (Deans Slade Farm & Cricket Lane). However this would give insufficient capacity to accommodate all the additional growth requirement of 1,330 dwellings. There has been an increase in urban capacity of approximately 200 dwellings mostly within Lichfield City identified in the updated SHLAA which would assist in meeting the shortfall, but even with this additional

<p>number of dwellings a further allocation will be required. The closest option to Lichfield City would be the addition of the Watery Lane site for 750 dwellings (Phase 1 of the new village NE Lichfield). However it is important to note that an excess in provision of residential would result which may encourage greater out commuting and not address the job balance ratio.</p>	
Comments	<p>Environmental: Sites to the south of Lichfield City are positive overall for landscape, biodiversity and archaeology so whilst they represent the loss of greenfield land, the sites in Lichfield proposals do not breach ridge lines and offer a country park near to the higher ground which will afford new views of the Cathedral from publically accessible locations. The country park will increase the habitat diversity within the site and the provision of the bypass and Lichfield Canal will deliver the objectives of the Plan.</p> <p>To the north east of Lichfield the land has a high HECA score so would result in loss of historic landscape. This area also has potential for archaeology and would result in a loss of greenfield and would have a negative impact upon joining Lichfield and Fradley, however reference in masterplan gives consideration to minimising any potential impacts on setting/views of Lichfield City. Whilst many biodiversity impacts can be mitigated SBI, BAS and Ancient Woodland are affected by the proposed development, so there is a net negative impact. No anaerobic digester shown on masterplan for 750 homes, whereas this was included in the new village plan for 2,000 homes. If this was provided, then it could have wider benefit if it took waste from beyond the development.</p> <p>Economic; Development supports the existing Lichfield City centre and puts the majority of development within easily accessible locations to employment and transport. Results in changes to the employment land portfolio as one of the most sustainable sites proposed in Lichfield City includes the provision of employment land. This would result in an overprovision of employment land which could result in an in-migration for work from beyond Lichfield District and could negatively impact upon the urban regeneration of the conurbation. The bus route indicated through the site for 750 homes to the north of Lichfield will mean it is a diversion of other services which exist through Streethay to the detriment of those existing residents. Accessibility to the services and facilities within Lichfield City is more restricted from land to the north of the City beyond the railway.</p> <p>Social: Lichfield City has the greatest access to the widest range of services and facilities within Lichfield District. This supports the health and well being of residents having the widest range of health facilities, cultural facilities and community groups to support community participation and build mixed and balanced, strong and resilient communities. Development to the north east of Lichfield City is detached from the City and 750 homes alone are unlikely to deliver the range of services included within the original 2,000 dwellings scheme. The development would meet its own needs with regard to outdoor play provision but is unlikely to deliver a doctor's surgery and be beneficial to the wider communities. Accessibility to the services and facilities within Lichfield City is more restricted from land to the north of the City beyond the railway. The addition of this development would lead to an excess in provision of residential which could encourage greater out commuting and not address the job balance ratio.</p>
Mitigation and Maximisation	<p>This option would seek to maximise the use of existing assets by locating almost half of new housing development in the plan period in/around the most sustainable settlement in the District. For sites to the south of Lichfield mitigation proposals in the form of the bypass, the Lichfield Canal and the District Park will deliver the objectives of the Plan.</p>

Uncertainties and Risks	Uncertainties exist with regard to the delivery of infrastructure for the Watery Lane development. An excess in provision of residential would result may encourage greater out commuting and not address the job balance ratio.
Short/ Medium/ and Long term impacts	The phasing of sites has been removed so there is uncertainty with regard to their delivery. Mixed impacts may result in the short term due to a certain quantum of development required to enable infrastructure to be provided, and mitigation for biodiversity will take time to establish, but in the long term this Option should achieve the Strategic objectives of the Plan.
Cumulative and Synergistic impacts	Cumulatively increasing levels of housing development in/around the main settlement of the District will assist in the delivery of an enhanced range of housing, services and facilities which will benefit the economy, environment, and social well being of existing and future residents. However, development at Watery Lane to NE of Lichfield City, coupled with proposed developments at Fradley, will have a negative impact upon landscape as it would erode the gap between these settlements and negatively impact on local distinctiveness.

Option 5 – allocate sites in/around main settlements of Lichfield, Burntwood & Fradley and possibly some additional housing at Tamworth & Rugeley (to meet Lichfield District’s needs) – utilising a mixture of brownfield land and Green Belt release.

A.14 It became apparent through the process that no additional development is able to be delivered at Rugeley, hence one of the sub-options has considered the in-combination effect of the most sustainable sites scored above, which utilises development in Lichfield City and Burntwood. Also appraised were a combination of additional sites at Lichfield City and Fradley as this option fits with the most sustainable sites and addresses the resultant overprovision of employment land. In addition the SHLAA identifies that there is potential to increase the capacity of the Tamworth BDL by increasing the size of the BDL and combining the sites together and this option has therefore been included and is appraised below. In addition through combining sites at Lichfield with a site at Fradley the total 1,130 dwellings could also be delivered, and this option is also appraised below.

Table A.33 Option 5

Option 5a : This option would combine the most sustainable sites for Lichfield City (Cricket Lane & Deans Slade Farm) and the most sustainable site at Burntwood (South Burntwood)	
Comments	<p>Environmental: Sites within Lichfield City score positive overall for landscape, biodiversity and archaeology. Whilst this would mean loss of greenfield sites they do not breach ridge lines and one of the sites offers a District park near to the higher ground which will afford new views of the Cathedral from publically accessible locations. The District park will increase the habitat diversity within the site and the provision of the bypass and Lichfield Canal will deliver the objectives of the Plan. Development of the most sustainable site in Burntwood would reduce the gap to the conurbation.</p> <p>Economic: Supports the existing Lichfield City centre and centres at Chasetown and Burntwood. Development in locations easily accessible to existing employment and transport. Results in changes in employment land portfolio as site proposed in Lichfield includes the provision of employment. Cumulatively this would result in an overprovision of employment land which could result in an in-migration for work from beyond Lichfield District and could negatively impact upon the urban regeneration of the conurbation.</p>

Option 5a : This option would combine the most sustainable sites for Lichfield City (Cricket Lane & Deans Slade Farm) and the most sustainable site at Burntwood (South Burntwood)	
	Social: Lichfield City has the widest range of services and facilities within the District. It has access to health care and the widest range of cultural activities, sport and leisure facilities both indoor and outdoor and access to community groups. Burntwood provides almost as wide a range although with a more localised focus. Development will deliver affordable housing in areas of need which will benefit the health and well being of the future residents. The site at Burntwood also includes provision for a care facility for the elderly. Delivery of Southern Bypass to the south of Lichfield and restoration of Lichfield Canal and the proposed heritage towpath trail will have positive health and well being impacts for the existing population in Lichfield City. The development in Burntwood will meet its own needs and may address the deficiency for equipped play to the south of Burntwood which will result in an enhancement to the existing residents.
Mitigation and Maximisation	Seeks to maximise the use of existing assets in the major settlements of the District and will support the existing Lichfield City centre and centres at Chasetown and Burntwood. For sites to the south of Lichfield mitigation proposals in the form of the bypass, the Lichfield Canal and the District Park will deliver the objectives of the Plan.
Uncertainties and Risks	Development to the South of Burntwood may undermine the regeneration of the settlement.
Short/ Medium and Long term impacts	The phasing of sites has been removed so there is uncertainty with regard to their delivery. Mixed impacts may result in the short term due to a certain quantum of development required to enable infrastructure to be provided, and mitigation for biodiversity will take time to establish, but in the long term this Option should achieve the Strategic objectives of the Plan.
Cumulative and Synergistic impacts	Cumulatively increasing levels of housing development in the main settlements of the District will assist in the delivery of an enhanced range of housing, services and facilities which will benefit the economy, environment, and social well being of existing and future residents.

Table A.34

Option 5b: This option would combine the most sustainable sites for Lichfield City (Cricket Lane & Deans Slade Farm) and the most sustainable site at Fradley (land off Gorse Lane, Fradley Park)	
Comments	<p>Environmental: Sites within Lichfield City are positive overall for landscape, biodiversity and archaeology. Whilst this would mean loss of greenfield sites they do not breach ridge lines and one of the site offer a country park near to the higher ground which will afford new views of the Cathedral from publicly accessible locations. The country park will increase the habitat diversity within the site and the provision of the bypass and Lichfield Canal will deliver the objectives of the Plan.</p> <p>The site within Fradley is a brownfield site with some surviving RAF structures, there is potential to safeguard and enhance access to heritage but none included in the proposal yet (was included in the employment previously). Also potential to mitigate for habitat/biodiversity loss and to reduce surface water run-off rates.</p> <p>Economic: The Lichfield sites would support the existing city centre. Development in locations easily accessible to existing employment and transport. Would result in changes in employment land portfolio as site proposed in Lichfield includes the provision of employment and the site at Fradley represents a loss of employment land. With regard to the Fradley site - Fradley has lost its hourly bus service and it is now only every 2 hours so a negative score given for reducing trips by car. However the recent planning permission on adjacent land will increase the bus frequency to half hourly which could increase the accessibility score of this site if it is developed as a comprehensive site. No details are known at present however and as the phasing is not</p>

Option 5b: This option would combine the most sustainable sites for Lichfield City (Cricket Lane & Deans Slade Farm) and the most sustainable site at Fradley (land off Gorse Lane, Fradley Park)	
	<p>certain it is not possible to assume the other sites have already provided improvements. The main traffic impact for Fradley sites is onto the Highways Agency network and their recent letter stated that the traffic impact should be assessed, in the absence of that work the score is unable to be given.</p> <p>Social: Lichfield City has the widest range of services and facilities within the District. It has good access to health care and the widest range of cultural activities, sport and leisure facilities both indoor and outdoor, and good access to community groups. Development will deliver affordable housing in an area of need which will benefit the health and wellbeing of the future residents. Delivery of Southern Bypass to the south of Lichfield and restoration of Lichfield Canal and the proposed heritage towpath trail will have positive health and well being impacts for the existing population. Additional provision at Fradley may encourage the delivery of a doctor's practice or outreach service, which will be beneficial to the existing health and well being of the population. In combination with existing and others planned, the additional facilities proposed at Fradley will benefit the existing community. The main traffic impact for Fradley sites is onto the Highways Agency network and their recent letter stated that the traffic impact should be assessed. In the absence of that work the score is unknown and a precautionary strong and negative impact for reducing road casualties is given for the Fradley site. However, when taken with other proposed development in Fradley it is possible that mitigation measures will be delivered.</p>
Mitigation and Maximisation	Seeks to maximise the use of existing assets in the major settlement of the District and will support the existing Lichfield City centre. Mitigation proposals in the form of the bypass, the Lichfield Canal and the District Park will deliver the objectives of the Plan. Maximises use of previously developed land at Fradley and site has potential to mitigate for habitat/biodiversity loss and to reduce surface water run-off rates. Further development of this scale at Fradley may encourage GP/healthcare provision. Loss of employment land at Fradley will be compensated for by the additional employment land proposed within the Cricket Lane site.
Uncertainties and Risks	In the absence of further work by the Highways Agency, any required transport improvements to the A38 junctions at Fradley are at present unknown.
Short/ Medium and Long term impacts	The phasing of sites has been removed so there is uncertainty with regard to their delivery. Mixed impacts may result in the short term due to a certain quantum of development required to enable infrastructure to be provided, and mitigation for biodiversity will take time to establish, but in the long term this Option should achieve the Strategic objectives of the Plan.
Cumulative and Synergistic impacts	Cumulatively increasing levels of housing development in Lichfield and Fradley will assist in the delivery of an enhanced range of housing, services and facilities which will benefit the economy, environment and social well being of existing and future residents. Increased housing numbers at Fradley may facilitate greater social cohesion of the community through the delivery of more services and facilities, including possible healthcare provision within the settlement and enhanced educational/childcare facilities.

Table A.35

Option 5c: Increase the capacity of the North of Tamworth BDL the SHLAA identifies the total capacity of the site as 1,909 dwellings at Arkall Farm and 250 dwellings at north of Browns Lane. These are sites 3, 4 and 5 which are previously appraised spatial options A,B, E and F and would utilise the increased urban capacity to address the total shortfall to deliver 1,330 dwellings.	
Comments	N.B. It is important to note that the promoter of Arkall Farm has requested that the BDL policy be altered to refer to a minimum of 1,000 dwellings but has not indicated any more than 1,000 in their proposals. There is therefore some doubt over the ability to deliver an increase in numbers

<p>Option 5c: Increase the capacity of the North of Tamworth BDL the SHLAA identifies the total capacity of the site as 1,909 dwellings at Arkall Farm and 250 dwellings at north of Browns Lane. These are sites 3, 4 and 5 which are previously appraised spatial options A,B, E and F and would utilise the increased urban capacity to address the total shortfall to deliver 1,330 dwellings.</p>	
	<p>of this scale. Chapter 18 of the Sustainability Appraisal: Proposed Submission Local Plan Strategy (Updated) (CD1-8) considers the sites in detail and identifies options B and F as the most sustainable.</p> <p>Environmental: Negative impact upon maintaining a diverse and attractive landscape and locally distinctive character. Development is brought closer to Wigginton but utilises sites which preserve its character the most. The large scale nature of the development could breach a ridge line to the north which will have landscape impact and result in a negative impact upon the River Mease SAC and its wider biodiversity. Site has 3 SMR within it with considerable potential for 'beneath-ground' deposits. Could positively impact upon air quality if traffic congestion in Tamworth can be relieved. Also the site has the potential to affect known coal deposits.</p> <p>Economic: No information as to the impact of increasing the numbers through the sensitive traffic junctions. In combination with the development of land within Tamworth SUE there is potential to reduce trips by car with the improvement of the Amington link and improved access to the rail station and town centre. No employment proposed but sites have good access to employment opportunities in Tamworth.</p> <p>Social: Positive impact for improving services particularly transport and encouraging cultural activity, due to accessibility to Tamworth town centre and river. Potential to promote healthy lifestyles if facilities are delivered, including a new leisure centre in Tamworth. Scale of development could result in enough demand for a new doctor's practice which will be positive for reducing health inequalities and improving standards of health care.</p>
Mitigation and Maximisation	<p>Overall seeks to maximise the use of existing assets in the main settlements of the District, as well as at Tamworth - neighbouring large settlement. Social benefits may include greater opportunities/facilities for sport/leisure/recreation with associated health benefits & general well being. Mitigation proposals in the form of biodiversity and transport measures may be required.</p>
Uncertainties and Risks	<p>There is uncertainty with regards to increasing the amount of development to the north of Tamworth as further technical work on transport is currently underway which will inform the Tamworth Local Plan and the subsequent Lichfield District Local Plan Allocations document. Also uncertainties over impact upon the River Mease SAC and wider effects on biodiversity, as well as uncertainties with regard to archaeological deposits and potential sterilisation of mineral resources. Further work required in relation to all of these issues.</p>
Short/ Medium and Long term impacts	<p>The phasing of sites has been removed so there is uncertainty with regard to their delivery. Mixed impacts may result in the short term due to a certain quantum of development required to enable infrastructure to be provided, and mitigation for biodiversity and transport impacts will take time for effects to be fully realised.</p>
Cumulative and Synergistic impacts	<p>Cumulatively increasing the level of housing development to the north of Tamworth may assist in the delivery of an enhanced range of housing, services and facilities which will benefit the economy, environment, and social well being of existing and future residents. However further development in this location may have cumulative negative impacts upon the environment in terms of landscape, biodiversity and historic environment, especially with regard to the River Mease SAC.</p>

Table A.36

Option 5d. Increase in the scale of development at Fradley by a further 1,130 dwellings comprising housing, rather than employment, within the SDA for a further 250 and an additional 850 dwellings at Fradley West.	
Comments	<p>Environmental: The proposed extension to the Fradley SDA is a brownfield site with some surviving RAF structures. There is potential to safeguard and enhance access to heritage but none included in the proposal yet (this aspect was included in the employment proposals previously). Has potential to mitigate for habitat/biodiversity loss and potential to reduce surface water run-off rates. Fradley West incorporates some brownfield land as some of the site is former airfield, part of the site is, however, greenfield pastureland and has a very high HECA score and a high historic landscape value.</p> <p>Fradley West site is adjacent to ancient woodland. SBI (canal) and BAS hedgerow also impacted so overall negative impact upon biodiversity.</p> <p>Economic: Whilst there would be some loss of employment land from within the SDA this would be compensated for by provision on the Fradley West site and would cumulatively result in an overprovision of employment land which could result in an increase in in-commuting for employment and have a negative impact upon the urban regeneration of the conurbation. This may also add unnecessarily to the highway transport pressures – although more information would be required in relation to this issue to ensure deliverability.</p> <p>Transport impact is not known at present and likely to need further work to assess/reduce the impact upon the A38. Fradley has a 2 hourly bus service at present, this will increase to half hourly as part of the planning permission for housing for the currently proposed SDA. There is easy access to employment opportunities within the Fradley Park area. The main traffic impact for Fradley sites is onto the Highways Agency network and their recent letter stated that the traffic impact should be assessed. In the absence of that work the score is unknown.</p> <p>Social: This option would link the existing built development of Fradley, but would create a very elongated settlement contrary to the objectives of creating a cohesive and balanced community supporting and meeting local deficiencies for services and facilities. Fradley West would be isolated from Fradley’s key services and facilities, although would provide its own localised hub. The range of services and facilities would not be as great as is already available within the centres of Lichfield, Burntwood, Rugeley or Tamworth. The elongated nature of the settlement may give rise to difficulty in locating services and facilities in areas easily accessible to all. The main traffic impact for Fradley sites is onto the Highways Agency network and their recent letter stated that the traffic impact should be assessed. In the absence of that work the score is unknown and a precautionary strong and negative impact for reducing road casualties is given.</p>
Mitigation and Maximisation	Maximises use of previously developed land at Fradley. Potential to mitigate for habitat/biodiversity and heritage loss and to reduce surface water run-off rates. Further development of services and facilities for Fradley would result, but possible not in a centralised location for residents. Loss of employment land within Fradley SDA would be compensated for by the additional employment land proposed within the Fradley West site.
Uncertainties and Risks	In the absence of further work by the Highways Agency, any required transport improvements to the A38 junctions at Fradley are at present unknown.
Short/ Medium and Long term impacts	The phasing of sites has been removed so there is uncertainty with regard to their delivery. Mixed impacts may result in the short term due to a certain quantum of development required to enable infrastructure to be provided, and any mitigation for biodiversity and transport impacts will take time for effects to be fully realised.

Option 5d. Increase in the scale of development at Fradley by a further 1,130 dwellings comprising housing, rather than employment, within the SDA for a further 250 and an additional 850 dwellings at Fradley West.

Cumulative and Synergistic impacts

Cumulatively increasing levels of housing development in Fradley will assist in the delivery of an enhanced range of housing, services and facilities which will benefit the economy, environment and social well being of existing and future residents of Fradley, but may not address needs elsewhere within the District, especially at Lichfield City. Increased housing numbers at Fradley may facilitate greater social cohesion of the community through the delivery of more services and facilities. However if some of these are located within the Fradley West site this may lead to an elongated settlement and difficulties may arise with regard to the accessibility of services and facilities for all.

Option 6 – more dispersed approach allocating additional housing numbers to Key Rural Settlements and other rural areas – will include Green Belt release. (N.B. excludes Fradley)

Table A.37 Option 6

<p>This option focuses on further increases in the levels of development in the villages and rural areas and is the least sustainable option. Whittington does not have sufficient sites currently within the SHLAA to enable delivery of the scale of development envisaged by this option and this option would require nearly all of the sites identified within the SHLAA for Alrewas and Fazeley. This may be too ambitious to achieve and would increase the impact upon the remaining villages of Shenstone and Armitage, further adversely impacting upon the character of these settlements.</p>	
<p>Comments</p>	<p>Environmental: The scale of development required would significantly alter the character of the villages to the detriment of natural resources, biodiversity, the built environment and countryside character of the District. It would result in an increase in the pressure for infilling within the many conservation areas and potentially loss of non-residential uses.</p> <p>Economic: There are some limited employment opportunities in some of the villages this option may result in increased pressure to redevelop non-residential uses for dwellings which may affect the variety of land uses within the villages, including retail and employment opportunities etc. which would be detrimental to the sustainability of the villages.</p> <p>Social: Due to the scale of the sites likely to be delivered through this option there is concern that the need for specialist and affordable homes to serve District wide needs would not be realised. Increasing the level of housing would not be of sufficient scale to deliver an enhanced level of facilities or transport options within the villages or rural areas as sufficient critical mass would not be achieved to deliver significant change and the existing level of services and facilities are not as high as the levels within the strategic centre of Lichfield or Burntwood Town Centre. This option would therefore not contribute to promoting health and well being as much as some of the other options.</p>
<p>Mitigation and Maximisation</p>	<p>Existing strategy seeks to maximise the use of existing assets, however increasing housing provision in the rural areas would give a reduction in the sustainability of the overall Plan. Scale of development on some rural settlements may mean that loss of some assets are unable to be mitigated for.</p>
<p>Uncertainties and Risks</p>	<p>This strategy relies on an increased housing provision at a number of key rural settlements and with regard to the rural areas specific sites would be confirmed at the Local Plan Allocations stage. There is therefore uncertainty at the current time with regard to the likely impacts on biodiversity, landscape, natural resources</p>

	and historic assets within and adjacent to these settlements. However, due to the constraints of some key rural settlements, meaning that development would be limited, greater housing numbers would be directed towards other key rural settlements and may consequently risk immeasurably changing the character of these.
Short/ Medium and Long term impacts	The phasing of sites within the Plan has been removed so there is uncertainty with regard to their delivery. Mixed impacts may result, especially as a certain quantum of development is required to enable infrastructure to be provided. This may not be achieved in some key rural settlements where development is limited. Although development will mitigate for its own impact some mitigation may not be realised until the longer term.
Cumulative and Synergistic impacts	Cumulatively increasing levels of housing development in the key rural settlements may have a negative impact upon the environment in terms of landscape, biodiversity and historic environment.

Option 7 – allocate the additional 900 to the most sustainable sites & leave additional 430 to be split among the rural areas at Allocations stage, or split between the rural settlements as in same proportions as the Plan.

Table A.38 Option 7

This option utilises the most sustainable strategic sites within Lichfield District (i.e. Cricket Lane and Deans Slade Farm to the south of Lichfield City) and sites from within the rural areas.	
Comments	<p>Environmental: Sites within Lichfield City are positive overall for landscape, biodiversity and archaeology. Whilst this would mean loss of greenfield sites they do not breach ridge lines and one of the sites offers a country park near to the higher ground which will afford new views of the Cathedral from publically accessible locations. The country park will increase the habitat diversity within the site and the provision of the bypass and Lichfield Canal will deliver the objectives of the Plan.</p> <p>The scale of development required could significantly alter the character of the villages to the detriment of natural resources, biodiversity, the historic built environment and countryside character of the District. It would result in an increase in the pressure for infilling within the many conservation areas and potentially loss of non-residential uses.</p> <p>Economic: Supports the existing city centre. Development in Lichfield City is easily accessible to existing employment and transport. One of the sites incorporates employment land and would result in an overprovision of employment land which could result in an in-migration for work from beyond Lichfield District and could negatively impact upon the urban regeneration of the conurbation.</p> <p>Within the villages and rural areas there are some employment opportunities and this option may result in increased pressure to redevelop non-residential uses for dwellings which may affect the variety of land use within the villages their retail, employment opportunities which would be detrimental to the sustainability of the rural area.</p> <p>Social: Lichfield City has the widest range of services and facilities within the District, with access to health care and the widest range of cultural activities, sport and leisure facilities both indoor and outdoor and access to community groups. Development in Lichfield City will deliver affordable housing in an area of need which will benefit the health and wellbeing of the future residents. Delivery of Southern Bypass to the south of Lichfield and restoration of Lichfield Canal and proposed heritage towpath trail will have positive health and well being impacts for the existing population. Due to the scale of the sites likely to be delivered through this option there is concern that the need for specialist and affordable homes would not be realised in the rural areas. Increasing the level of housing in the villages and rural</p>

	<p>areas would not deliver an enhanced level of facilities or transport options due to lack of critical mass being achieved to deliver significant change and as within those areas the existing level of services and facilities are not as high as the levels within the strategic centre of Lichfield or Burntwood this would not contribute to promoting health and well being in the rural areas.</p>
Mitigation and Maximisation	<p>This option would seek to maximise the use of existing assets by locating the majority of new housing development in the plan period in/around the most sustainable settlement in the District. For sites to the south of Lichfield mitigation proposals in the form of the bypass, the Lichfield Canal and the District Park will deliver the objectives of the Plan, however increasing housing provision in the rural areas would give a reduction in the sustainability of the overall Plan.</p>
Uncertainties and Risks	<p>This strategy relies on an increased housing provision at a number of settlements and with regard to the rural areas specific sites would be confirmed at the Local Plan Allocations stage. There is therefore uncertainty at the current time with regard to biodiversity, landscape and historic assets within and adjacent to the rural settlements.</p>
Short/ Medium and Long term impacts	<p>The phasing of sites within the Plan has been removed so there is uncertainty with regard to their delivery. Mixed impacts may result in the short term due to a certain quantum of development required to enable infrastructure to be provided, and mitigation for biodiversity will take time to establish. Leaving the additional 430 dwellings to be allocated to the Key Rural Settlements at Allocations stage will mean that impacts of development in these villages will be long term. .</p>
Cumulative and Synergistic impacts	<p>Cumulatively increasing levels of housing development in the main settlement of the District (Lichfield) will assist in the delivery of an enhanced range of housing, services and facilities which will benefit the economy, environment, and social well being of existing and future residents. However, increased housing numbers in the Key Rural Settlements may have a cumulative negative impact upon the environment in terms of landscape, biodiversity and historic environment.</p>

Appendix B Policy Matrix

Table B.1 Summary Matrix of Policies

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
CP1	++	++	+?	+	+	++	+	+	+	+	+	+?	++	+?
CP2	+	+	+	-	-	+	+	+	+	+	+	+	+	+
CP3	++	++	++	++	++	++	+	+?	+?	+?	+	+?	+?	?
CP4	+?	+	+	+	+	++	++	++	++	++	++	+/-	+	++
CP5	+	+/-	+/-?	+	+/-	0?	++	++	+	++	++	+	+	+
CP6	++	+	+?	+/-	+	+	+	+?	++	+	++	-	++	+
CP7	?	+/-?	+/-	+/-	+?	+	++	++	++	++	+	0	+	+
CP8	+?	-	+?	+/-	+/-	0	+	+	+?	+	+?	0?	+	0
CP9	+?	+?	+	-	+/-	+	+?	+	+	+?	+	0	+?	+?
CP10	+?	+	+?	+	+	0	+	+	+	+	+	++	++	+
CP11	+?	+	+?	-	+	0	+	0	+?	+	+	+/-	+?	+?
CP12	+?	0	+	0	0	0	0	+?	+	+	+?	+	+	+
CP13	++	++	++	0	+	++	+	+/?	0/+	0/+?	+	0	+	+
CP14	++	+	++	-?	+	+	++	+?	+?	++	+	+?	++	0
SC1	-?	0	-?	++	++	++	0	+?	+?	0	0	0	+	?
SC2	++	+	++	++	+	0	0	+	+	0	+?	-	0	0
IP1	+?	+?	+?	+	+	++	++	++	++	++	++	+/-	+	0
ST1	+/-?	+/-?	+/-?	+++?	+	0	++	+	0	++	+	0	+	+
ST2	+/-?	0	+/-	+	+	0	++	+	+?	++	+?	+	0	+
H1	+	0	0	--	-	0	+	+	+	+	+?	+/-?	+?	+
H2	+	0	?	--	-	0	+	+?	+	+	+	+?	+?	+
H3	+?	+/-	+?	--	0	+	+?	0	+?	+?	+?	+	+?	?
E1	0	0	0	0	0	0	0	0	+	+	+	0	0	0
HSC1	+?	++	+	+	+	+	+	+	+	+	+	+	+	+
HSC2	+?	+	+	0	+	0	0	0	+	+	+	+	+	+

SFO:	Environmental						Economic			Social				
	A	B	C	D	E	F	G	H	I	G	I	J	K	L
NR1	+?	++	+/-?	+	+	+	0	+?	+?	0	+?	0	+?	+
NR2	+	+	+	0	0	0	0	0	+	+	+	0	+	+
NR3	++	++	++	0	0	+	0	0	0	0	+?	0	0	0
NR4	++	++	++	0	+	0	0	0	0	0	0	+	0	0
NR5	++	++	++	0	+	0	0	0	0	0	+	0	+	+
NR6	++	++	++	0	+?	++	+?	0	0	+?	+	0	+?	0
NR7	+	++	0	0	+	0	0	0	0	+	+	0	+?	0
NR8	+	++	0	0	+	+	0	0	0	0	0	0	0	+
NR9	0?	+?	0?	0	+	+	0	0	0	0	+/-	0	0	0
BE1	++	++	++	+	+	0	+	+?	+?	++?	+	+	+	0

Appendix C Summary of Consultation Responses

Draft Scoping Report SEA

Table C.1 General Comments

Consultee Details	Summary
Planning Officer Derbyshire Gypsy Liaison Group	Suggest amendments to SA Objectives and questions.
Conservation Adviser Natural England	Subject to comments made on Appendices, consider proposed Sustainability Objectives should provide an effective template against which to assess the principles and policies of the Core Strategy.
AONB Office Manager Cannock Chase AONB Unit	Importance of AONB well acknowledged within overall scoping exercise.
Planner English Heritage	Overall, the Scoping Report provides a clear explanation of the appraisal process, the work carried out to date and planned future work.
Carillion-Trine	Draft document fails to recognise the extent of new development that may be required to be catered for.
Planning Liaison Officer Environment Agency	Findings of your SFRA should be included in the evidence base used to measure the sustainability of your LDF.

Table C.2 Chapter 1

	Consultee Details	Summary
Table 1.1	Senior Planning Manager Sport England	P30 - should include reference to PPS1 requirement to increase physical activity
Table 1.1	Senior Planning Manager Sport England	P45 - Choosing Health - Reference should be made to Physical Activity Action Plan
Table 1.1	Senior Planning Manager Sport England	P67 - Sign up for Sport to be reviewed in 2007/08
Table 1.1	Senior Planning Manager Sport England	P72 - Should refer to valid documents and those under consultation
Table 1.1	Senior Planning Manager Sport England	P73 - Should remove reference to NPFA standards
Table 1.1	Conservation Adviser Natural England	Suggests additions and amendments
Table 1.1	AONB Office Manager Cannock Chase AONB Unit	Information regarding Cannock Chase AONB Management Plan requires some expansion.

Table C.3 Chapter 2

	Consultee Details	Summary
Table 2.1	Senior Planning Manager Sport England	Objective A - should include clearer measure or urban townscapes

	Consultee Details	Summary
Table 2.1	Senior Planning Manager Sport England	Objective G - should include access to sports facilities 30 minutes travel time does not relate to recent CPA KPI
Table 2.1	Senior Planning Manager Sport England	Objective I - indicators should refer to other disadvantaged groups Baseline figure of 73% does not correspond to CPA KPI
Table 2.1	Senior Planning Manager Sport England	Objective K - Welcome inclusion of physical activity indicator

Table C.4 Chapter 3

	Consultee Details	Summary
3	Planner English Heritage	Useful to include a written summary of main findings of this stage as part of the main body of the report
3	Planner English Heritage	Welcome summary description in terms of its social, economic and environmental characteristics in conjunction with Appendix 2. However, summary and scope of baseline data on historic environment resource of District should be strengthened.
3	Planner English Heritage	Paras 3.24-3.32 - Key issues less clearly analysed in the environment section. Recommend this section should also seek to identify opportunities as well as problems.
3.1	Planning Liaison Officer Environment Agency	Believe list of relevant plans, programmes and policies are all relevant but would see further points included.
3.3	Planning Liaison Officer Environment Agency	Support the SA/SEA Baseline Trends and Indicators.
3.4	Planner English Heritage	Welcome commitment to keep under review the data sources during subsequent stages of the appraisal.
3.6	Planner English Heritage	Welcome recognition of gaps in baseline data.
3.22	Senior Planning Manager Sport England	Should also refer to healthy lifestyles and physical activity to improve health
3.24	Senior Planning Manager Sport England	Refer to role open space has in providing a quality environment
Table 3.1	Planner English Heritage	Suggest additions to Table 3.1 Add European Landscape Convention
Table 3.2	Senior Planning Manager Sport England	"Choosing Health - Choosing Activity Action Plan" should be included within Table 3.2 - Social
Table 3.2	Senior Planning Manager Sport England	PPG17 should be referred to in Environment section

	Consultee Details	Summary
Table 3.2	Planner English Heritage	Suggestion additions to Table 3.2 Add Heritage Protection White Paper, The Historic Environment - A Force for Our Future and additions to various PPS
Table 3.3	Senior Planning Manager Sport England	Note that 'Sign up for Sport' document to be reviewed 2007/08
Table 3.3	Senior Planning Manager Sport England	Regional Health Strategy should be included in Health section
Table 3.3	Planner English Heritage	Suggest additions to Table 3.3 The main policy themes of the Regional Spatial Strategy should also be included and West Midlands Green Infrastructure Prospectus
Table 3.4	Senior Planning Manager Sport England	All documents regarding open space, playing pitches and indoor sport referred to in table are out of date. Up to date position needs to be reflected.
Table 3.4	Planner English Heritage	Suggest additions to Table 3.4 such as Parish Plans, Town and Village design statements

Table C.5 Chapter 4

	Consultee Details	Summary
4	Planner English Heritage	Welcome in general terms the use of a multi-disciplinary working group to inform the development of the framework.
4.2	Senior Planning Manager Sport England	Concern at lack of leisure interest in Stakeholder Groups
4.6	Planning Liaison Officer Environment Agency	Mainly support Sustainability Objectives but wish to make further comments.
Table 4.3	Senior Planning Manager Sport England	Objective A, Criteria 5 - All development should be to a high standard, not just housing.
Table 4.3	Senior Planning Manager Sport England	Objective D should include criteria about protecting open space and tree cover.
Table 4.3	Senior Planning Manager Sport England	Objective G - Should include opportunities for walking and cycling
Table 4.3	Senior Planning Manager Sport England	Objective I Criteria 43 - should refer to other disadvantaged groups. CPA-KPI could be used.
Table 4.3	Senior Planning Manager Sport England	Objective K - physical activity should be a target/indicator.
Table 4.3	Planner English Heritage	Comments and suggested targets and indicators for Objective A
Table 4.3	Planner English Heritage	Comments and suggested targets and indicators for Objective C

Table C.6 Chapter 5

	Consultee Details	Summary
5	Planner English Heritage	Reiterate the importance of closely involving the conservation and archaeological staff of the District and County Council throughout the assessment process.

Table C.7 Appendix 2

	Consultee Details	Summary
Appendix 2	Conservation Adviser Natural England	Advise that section includes an assessment of how the District compares with the Government-endorsed English Nature standards for accessible natural greenspace.

Interim Core Strategy SA

Table C.8 Chapter 1

	Consultee Details	Summary
1.6	Bromford Living	Look to more green travel solutions & educational provision

Table C.9 Chapter 4

	Consultee Details	Summary
4.3	Mrs Turnbull	We don't need anymore houses around our rural villages.

Table C.10 Chapter 5

	Consultee Details	Summary
5.1	Councillor Derek Love	A mix of all those types of renewable energy production. More research needs to be carried out.
5.1	The Secretary Campaign to Protect Rural England-Staffordshire Branch	As a generality biomass, solar panels (including photo-electric), geo-thermal and hydro-electric are favoured. Wind turbines are not favoured as being uneconomic, sporadic in supply and damaging to the rural environment as identified in 5.6. Conserving energy rather than generating energy is the course to be pursued, in CPRE's view.
5.2	The Secretary Campaign to Protect Rural England-Staffordshire Branch	CPRE favours office development in the centre of Burntwood and at edge-of-centre in Lichfield. We suggest that neighbourhood centres should be favoured for minor office development on public transport routes. These would add life and viability to such centres, and mitigate journey-to-work congestion at major town centre locations.
5.4	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Objective 1. What degree of mitigation of harm? Should the "offset not be estimated? Is not "conservation" of energy more productive than "generation"? Objective 2. Does the District Council agree with the WMRSS? Do they not have reservations about the figures from their own knowledge of the locality? Is there no feedback to Region? Objective 3. Should definition be given of a) what makes a sustainable

Appendix C Summary of Consultation Responses

	Consultee Details	Summary
		locality, and b) what constitutes high quality? Objective 6. Have the needs of local people been identified? Objective 7. Is "working towards" a satisfactory policy? Objective 8. Does this not exclude other forms of coping with the problem, i.e. by car sharing or other private arrangements? Are there not many other illustrations needed, such as increased housing densities, which facilitate sustainability? Objective 9. Whilst improving town centres is an admirable objective, does this objective not exclude the provision of such facilities elsewhere in more sustainable locations?
5.11	Councillor Derek Love	Use what ever means possible to exert pressure on developers to install renewable energy devices.
5.11	The Secretary Campaign to Protect Rural England-Staffordshire Branch	CPRE agrees to Q11, subject to the caveats in 5.1.
5.12	The Secretary Campaign to Protect Rural England-Staffordshire Branch	CPRE supports this aim with a view to making each settlement self-supporting to the maximum possible extent within the limits of its size.
5.13	Councillor Derek Love	Cycle routes are often an afterthought and are made to compete with motor vehicles. Wherever there is a rail link it must be fully utilised.
5.13	The Secretary Campaign to Protect Rural England-Staffordshire Branch	All development of whatever size, existing and proposed, should be progressively adapted to sustainable patterns of transport, new development should incorporate such a pattern from its inception. Such policies should be all-embracing, including measures to reduce transport, including work-at-home; and creating home neighbourhoods which are pedestrian/cycle-friendly and traffic speed-restricted.
5.14	Councillor Derek Love	At Alrewas and Fradley, if made sustainable through new development and a new passenger rail link. Lichfield Trent Valley could even be used for people from outside Lichfield who wish to shop in Lichfield.
5.14	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Park and Ride facilities are of mixed value, often tending to encourage private vehicle use for part of commuters' journeys rather than public transport for the full journey. Each proposal should be carefully analysed as to the journey patterns that it induces.
5.15	Councillor Derek Love	The key villages, especially including Fradley
5.15	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Affordable housing and its achievement should be considered the first priority of housing policy for all settlements with a range of infrastructure facilities supportive of the occupants of such housing. CPRE would point out the sustainability difficulties for such housing out of economic reach of social/welfare/employment etc facilities
5.16	Councillor Derek Love	40% would be ideal, but may not be achievable.
5.16	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Agree
5.17	Councillor Derek Love	Mixed development is better.

	Consultee Details	Summary
5.17	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Urgent need for sites for affordable housing only, restrict size of site but should include a range of housing types and ownerships and good design.
5.18	Councillor Derek Love	Maybe at Streethay and Fradley.
5.18	The Secretary Campaign to Protect Rural England-Staffordshire Branch	This is a major sustainability issue if employment land is to be made available locally in order to limit outward commuting. CPRE favours patterns of site ownership which allows employment land to be released in accordance with demand. Consideration should be given to short-term interim uses pending final employment land use.
5.21	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Development should only be encouraged in locations with these facilities.
5.22	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Train stations should only be located within major population centres. Additional stations can reduce speed, rail capacity and frequency of service in lesser locations.
5.23	The Secretary Campaign to Protect Rural England-Staffordshire Branch	By the skillful understanding and imaginative suggestion of planning conservation staff.
5.24	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Support
5.25	Planning Assistant The Theatres Trust	Encouraging these facilities in town centres will help deliver sustainable development by promoting economic growth, improving accessibility and offering genuine choice for consumers through high density and mixed-use development that recognises the importance of high quality design, but sustainable neighbourhoods should include social facilities to ensure the population have the capacity to reap the health and social benefits which accrue from participation in regular cultural activities.
5.25	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Higher housing densities can help housing sustainability and economic viability of public bus transportation and should make maximum advantage of integrated open space systems to avoid "town cramming".
5.26	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Chasewater is visually a dreary place. Its increased attractiveness is only likely to be achieved through an imaginative and exciting landscape plan. We suggest an open design competition with "increased attractiveness" as its principal criterion.
5.27	The Secretary Campaign to Protect Rural England-Staffordshire Branch	Proposal should give positive benefits in terms of the visual attractions of Drayton Manor Park, especially as regards its setting in the landscape
5.3	The Secretary Campaign to Protect Rural England-Staffordshire Branch	CPRE feels that inadequate attention has been paid in the proposals to the consolidation and enhancement of Lichfield's open countryside attractiveness. Major tree planting in all its varied forms and hedgerow

Appendix C Summary of Consultation Responses

	Consultee Details	Summary
		renewal is desirable in large areas of the District, and will be especially important if large urban encroachments are to be contemplated. The Planning Authority's attitude to this aspect of its heritage is not made clear.
5.32	Carillion-Trine	We note that Option 1 was assessed to provide the best solution in transport terms and for affordable housing provision: two key objectives. We note that in certain cases where SSSI designations apply, this Option scored poorly: this can readily be overcome by directing growth away from areas. We also note that traffic safety was also assessed to be negative; this also can be readily mitigated for.
5.33	Carillion-Trine	We note that Option 2 is considered to also raise issues of traffic generation linked with dispersed development to village settlements and also impact on village conservation areas. This points to a concentration of development on larger settlements, which can both promote sustainable travel and not raise heritage issues. This points to greater development at Burntwood.
5.34	Carillion-Trine	In respect of Option 3, we note that this is assessed negatively due to increased car use but will help to protect Lichfield centre. This again points to more development at Burntwood.
5.35	Carillion-Trine	Option 4 is assessed negatively due to a new settlement's dependence on other centres for services and hence increased need to travel. This again points to development of Burntwood, which importantly we consider is ruled in as a good sustainable opportunity by each of the scenarios considered.

Table C.11 Chapter 6

	Consultee Details	Summary
6.8	Carillion-Trine	The comparative, weighing up of options clearly points to the benefit of concentrated development at Lichfield City (subject to impact on the historic core) and Burntwood. We do not consider that this has been followed through to the Preferred Option Core Strategy which proposes dispersed growth. More substantial development can be directed to Burntwood.
6.16	Carillion-Trine	No account taken of detailed assessments already provided for this site flood risk, ecology and biodiversity enhancement and this is not reflected in the matrix score
6.18	Carillion-Trine	No account taken of detailed assessments already provided for this site flood risk, ecology and biodiversity enhancement and this is not reflected in the matrix score. A review of matrix should be undertaken considering the benefits of development of a new mixed neighbourhood in this area.
6.22	Planning Matters Correspondent Rugeley Landor Society	From the above we firmly believe that in Appendix Table i.1: Objective C should be - ve (probably - - ve), Objective B should be wholly - ve, Objective G should be - ve, Objective K should be - ve.

	Consultee Details	Summary
6.22	Planning Matters Correspondent Rugeley Landor Society	It is important that the Staffordshire Wildlife Trust, as a member of the LSWG, determining sustainability issues (Para. 3.1), should have disclosed an interest in this site and not taken part in its sustainability appraisal.
6.24	Curborough Consortium (RPS)	The transport issues of the Curborough New Settlement option recognise the potential benefits to transport this supports the selection of a Core Strategy built on the inclusion of the Fradley New Settlement
6.25	Chairman Alrewas Conservation Group	Alrewas cannot sustain any more growth
6.26	Chairman Alrewas Conservation Group	More housing in villages such as Alrewas would have a negative impact.

Table C.12 Chapter 7

	Consultee Details	Summary
7.3	Planning Assistant The Theatres Trust	Cultural, leisure and tourism facilities that are likely to attract large numbers of visitors should in the first instance be clustered within your main centre with good accessibility to the public transport network. However, it would be appropriate for the smaller settlements to provide entertainment, leisure and cultural facilities of an appropriate scale and kind to serve their role and catchments through multi functional community centres for example.

Table C.13 Appendix

	Consultee Details	Summary
Table i.1	Mr & Mrs Mears	14 South Burntwood The statement 'Clear and strong negative impact upon locally distinctive settlement character' is false and misleading. The South Burntwood location sits behind the rear boundaries of a ribbon of existing housing that fronts onto Highfields Road and Paviours Road. This development does not have a distinctive character that needs to be preserved. If anything new development constructed to round off this area will be considered against the framework of development control core policies that are designed to minimise the potential for unacceptable harm and will require high standards of design and construction The statement 'Potentially negative impact upon priority habitats' is false and misleading. Proposals which have adequate mitigation or offer opportunities for enhancement should be allowed. Development control core policies should minimise the potential for unacceptable harm and should require adequate mitigation where necessary. The site is located with a Recreation Zone.

Sustainability Appraisal: Shaping our District

Table C.14 General Comments

	Consultee Details	Summary
	Planner English Heritage	No further comments beyond the transparent use of the results of the Historic Environment Character Assessment to inform the assessment process and decision-making.

Table C.15 Chapter 2

	Consultee Details	Summary
2.6	Mrs Kathryn Woodward	Disagree as businesses don't employ local people and more commercial properties won't help the situation.

Table C.16 Chapter 3

	Consultee Details	Summary
3	Mrs Kathryn Woodward	Agree - taxi rank is needed in centre of Lichfield
3	Senior Planning Policy Officer North Warwickshire Borough Council	It is unclear as to how or whether the 'Sustainability Appraisal: Shaping our District' document has assessed the likely impact of development in North Warwickshire and this should be amended to cover this issue before including a reference in the Core strategy Policy and/or reasoned justification.
3	Fradley West Consortium	The Fradley West Consortium proposal should be included as an alternative in the SA.
3.8	Mrs Kathryn Woodward	Agree - no evidence that trips by car will be reduced, and the opposite would be true.
3.14	Mrs Kathryn Woodward	Disagree as very hard to find parking space at peak times.

Sustainability Appraisal: Local Plan Strategy

Table C.17 General Comments

Consultee Details	Summary
Borrowcop & District Residents' Association	Inadequate consultation has taken place regarding the increase in cross boundary travel with regard to the effects of suggested large scale housing development on the A38 and A5 and on the Cross City rail line. The A38 especially is overcrowded, even dangerous at times, and increasing commuting numbers is not a sustainable policy. No evaluation of any other policy than the delivery of a linear target over 15+ years without review or consideration of prevailing or likely future economic conditions. Lack of evidence regarding infrastructure and a lack of flexibility. Fails to show convincingly why alternatives suggested are unsound and why 8,700 houses are needed if hoped for employment does not materialise. The NPPF is concerned with facilitating economic growth whilst limiting greenhouse gases and minimising the need for infrastructure while accommodating growth in sustainable transport. Our West Midland neighbours are seeking to regenerate the town/city centres with transport improvements planned along a line from Coventry to Wolverhampton. Planned levels of transport infrastructure around Lichfield are negligible, yet the Plan assumes that Lichfield's population will grow rapidly, without any certainty at all that employment will be available.
GKN Group Services Limited	The conclusions and recommendations of both the Lichfield District Council Rural Planning Project (LDCRPP) 2011 and Paragraph 6.30 of the Lichfield District Strategic Green Belt Review July 2012, fail the Tests of Soundness as set out in paragraph 182 of the NPPF, in relation to an area of land in the north western corner of Little Aston. The content of the LDCRPP Report September 2011 together with the associated Evolution of Little Aston plan at Appendix 3 referred to therein is not a reasonable and proper representation of the actual physical development that has taken place on the ground. It is proposed that the Green Belt boundary in this particular area of Little Aston would now be more appropriately justified by reference to the physical boundaries that

Consultee Details	Summary
	<p>are clearly identified by the distinct and recognisable permanent features of (a) Little Aston Lake (b) the northern boundary of Little Aston Golf Club and (c) the A454 Aldridge Road that lies further beyond to the north. It is also submitted that various current references to Little Aston in The Local Plan: Strategy document should be reviewed with Little Aston being fully reinstated as a Key Rural Settlement. It is submitted that there is in fact no compelling evidence to exclude Little Aston from continuing as a Key Rural Settlement but even now the proposed Strategy seems unclear whether Little Aston should be identified as a Key Rural Settlement or not.</p>
<p>Beacon Street Area Residents' Association/ South Lichfield</p> <p>Residents Group/ Fradley Against Curborough Town/ Beacon Street Area Residents' Association/ Streethay Against Development/ Borrowcop & District Residents' Association/ Leomansley Area Residents Association</p>	<p>The Lichfield Alliance submits that the Sustainability Appraisal does not meet with the legal requirements of an environmental report. The Lichfield Alliance also submits that sustainability consultations prior to Feb/2011 were undermined by errors and omissions in the evidence base. Prior to this date the District Council itself did not have an adequate understanding the dynamic relationship between housing, employment and cross boundary travel, and was therefore not in a position to propose reasonable alternatives nor to properly evaluate the environmental impact of implementing the plan. The Local Plan's goal has been influenced by the Localism Act, the National Planning Policy Framework (NPPF) and the proposed abolition of the West Midlands Regional Spatial Strategy (RSS). The District Council responded to these events by commissioning additional investigations into demographic changes, and the impact on the need for new homes, employment land, etc. The process of mapping the RSS housing target onto local sites was already well advanced when Local Authorities were given greater freedom to determine planning policy. Lichfield District Council was therefore required to compile evidence retrospectively to justify policies which were already largely settled. The Lichfield Alliance considers that, the District Councils did not objectively consider the Nathaniel Lichfield & Partners and GVA studies but sought to give undue weight to elements of these reports which supported their desire to keep plan amendments to a minimum.</p>
<p>JVH Town Planning Consultants Ltd/ Shipley Estates Limited/ The Aucott Group/ Mr W Leason/ Walton Homes</p> <p>Ltd (JVH)/ Mr Neachell/ Boulton/Mr Bhagi</p>	<p>Object to the plan period, the settlement hierarchy, the prioritisation for the use of previously developed land, the dwelling target and the listed growth locations. Object to the fact that the policy proposes no review of the green belt. Object to the allocation of housing numbers between the strategic housing allocations and the key rural settlements and we object to the way in which the housing numbers appear to have been manipulated to show that 8,700 dwellings are provided. When in fact only 7,700 are to be provided to meet the needs of the Lichfield district population and the remaining 1,000 are to meet the needs of Tamworth and Cannock Chase respectively. The plan should propose that the housing requirement of at least 10,000 new homes be met over the forthcoming 20 year period from , 2012 to 2032 the completions therefore from 2008 to 2012 are irrelevant. We object to the key rural settlements as they fail to include Little Aston and it is considered that the six settlements excluding Fradley should have new housing allocations of at least 2,075 new homes over the next 20 years. It is considered that the Fazeley/ Mile Oak /Bonehill, Little Aston, Armitage Handsacre settlements can provide an additional 1,050 units on sustainably located land and this policy should make provision for that and also include for a review of the greenbelt boundaries around the key settlements to allow for this.</p>
<p>Natural England</p>	<p>No comments</p>
<p>Geoff Purdy</p>	<p>It is so long it discourages public comment No summary It doesn't show how the large number of dwellings are justified it takes advantage of confusion around national Green Belt policy</p>
<p>BDW Trading</p>	<p>Wish to see demonstrable evidence of how the draft Lichfield District Local Plan can provide the appropriate supporting context for this proposal as promoted by Planning for Growth and the Government's National Planning Policy Framework. Planning for Growth and the Government's National Planning Policy Framework post-date the</p>

Consultee Details	Summary
	previous draft Local Plan consultation processes. The proposals area founded in the NPPF's Core Planning principles (Para. 17) and are therefore up to date and are a means of proactively driving and supporting sustainable economic development.
Mr John Adams	The published Local Plan has failed to demonstrate co-operation with neighbouring councils, and has failed to properly assess with the Highways Agency and County Highways department, and with Network Rail the infrastructure needs to support the housing development proposals in the plan. There is no evidence that previous submissions following the publication of the draft plan in 2010 have been considered and no satisfactory explanation for ignoring alternative sites.

Table C.18 Chapter 4

	Consultee Details	Summary
4.2 4.3 4.19	Chasetown Preservation Group	Chasetown Preservation Group and its supporters now endorse the Local Plan, as it has been modified, through the consultation processes, to take account of the many responses from Burntwood residents. Plans for Burntwood also take account of work commissioned by Burntwood Town Council to involve residents in producing an aspirational view of Burntwood into the future.
4.2 4.3 4.19	Burntwood Action Group	Burntwood Action Group and its supporters now endorse the Local Plan as it has been modified, through the consultation processes. Residents have demonstrated their strength of feeling against any further extension of the conurbation into the Green Belt, along with a strong desire to see Burntwood's derelict land used effectively and to have an attractive and viable Town Centre. The identified Strategic Development Allocation for Burntwood is close to the Town Centre, unlike the previously planned Green Belt sites on the outskirts of Burntwood. The proposed redesignation of further employment land into residential land is justified by consultants' analysis of future employment trends in the area
4.2 4.3 4.19	Burntwood and Hammerwich Action Group	The Strategic Development Allocation East of Burntwood Bypass is deliverable and the proposed timescale for housing development on that site is modest and realistic. Plans for Burntwood Town Centre are heavily dependent on the interest of retail developers. If major retailers cannot be enticed into the allocated site the Action Group would be prepared to see some of that land used for leisure activities or housing.
4.2 4.3 4.19	Mr Stan Harper	Hammerwich Parish Council is now endorsing the Local Plan in its revised form. As a result of through the consultation processes Lichfield District Council has now identified areas for required development without the use of Green Belt. The Strategic Development Allocation East of Burntwood Bypass is deliverable and the proposed timescale for housing development on that site is modest and realistic. The re-designation of the Mount Road Industrial Site for residential use is achievable.

Table C.19 Chapter 9

	Consultee Details	Summary
9.7	Burntwood Action Group	Burntwood Action Group and its supporters now endorse the Local Plan as it has been modified, through the consultation processes. Residents have

	Consultee Details	Summary
9.15 9.33 9.51 9.57		demonstrated their strength of feeling against any further extension of the conurbation into the Green Belt, along with a strong desire to see Burntwood's derelict land used effectively and to have an attractive and viable Town Centre. The identified Strategic Development Allocation for Burntwood is close to the Town Centre, unlike the previously planned Green Belt sites on the outskirts of Burntwood. The proposed redesignation of further employment land into residential land is justified by consultants' analysis of future employment trends in the area
9.7 9.15 9.33 9.51 9.57	Burntwood and Hammerwich Action Group	The Strategic Development Allocation East of Burntwood Bypass is deliverable and the proposed timescale for housing development on that site is modest and realistic. Plans for Burntwood Town Centre are heavily dependent on the interest of retail developers. If major retailers cannot be enticed into the allocated site the Action Group would be prepared to see some of that land used for leisure activities or housing.
9.7 9.15 9.33 9.51 9.57	Mr Stan Harper	Hammerwich Parish Council is now endorsing the Local Plan in its revised form. As a result of through the consultation processes Lichfield District Council has now identified areas for required development without the use of Green Belt. The Strategic Development Allocation East of Burntwood Bypass is deliverable and the proposed timescale for housing development on that site is modest and realistic. The re-designation of the Mount Road Industrial Site for residential use is achievable.
9.7 9.15 9.33 9.51 9.57	Chasetown Preservation Group	Chasetown Preservation Group and its supporters now endorse the Local Plan, as it has been modified, through the consultation processes, to take account of the many responses from Burntwood residents. Plans for Burntwood also take account of work commissioned by Burntwood Town Council to involve residents in producing an aspirational view of Burntwood into the future.

Table C.20 Chapter 14

	Consultee Details	Summary
14	Pegasus Planning Group: Miller Homes Ltd - East Midlands Region/ Wilson Bowden Developments Ltd/ Persimmon Homes Ltd	Agree as there is no credible evidence that would suggest that an alternative, less sustainable approach to accommodating the housing requirements of Lichfield District should be adopted.

Appendix C Summary of Consultation Responses

	Consultee Details	Summary
14	Fradley West Consortium	RPS strongly disagrees with the Council's assessment that the development would have significant impacts on biodiversity, archaeology and heritage assets, and is of the opinion that it could be suitably integrated with the existing settlement and planning growth of the area, particularly Fradley Park providing benefits to biodiversity through managed Green Infrastructure and providing a historic record of use of the airfield in association with planned development. The site makes effective and efficient use of previously developed land in a sustainable location to which considerable positive weight should be attached in determining the sustainability of the proposal. RPS requests that the site is reconsidered by the Council as the most sustainable of the alternative options assessed, to contribute to a higher housing target to meet both Lichfield District's housing needs recognising too that the cross-boundary development requirements have not been fully addressed in the draft Plan.
14.8	Thomas	Agree that the options submitted by JVH Town Planning Consultancy Ltd scored more negatively than any other spatial distribution of housing proposed when, for example, among the rather scattered sites is one "land to the south west of Little Aston (315 dwellings)." The development of this site as outlined would result in a large increase in the population and motor car numbers for a rural settlement, Little Aston, which is acknowledged in various parts of the Local Plan Strategy document to be deficient in services, facilities and public transport. The sustainability and environmental concerns related to all of the above make a distinctly negative contribution to this particular alternative strategy.
14.9	Burntwood Action Group	Burntwood Action Group and its supporters now endorse the Local Plan as it has been modified, through the consultation processes. Residents have demonstrated their strength of feeling against any further extension of the conurbation into the Green Belt, along with a strong desire to see Burntwood's derelict land used effectively and to have an attractive and viable Town Centre. The identified Strategic Development Allocation for Burntwood is close to the Town Centre, unlike the previously planned Green Belt sites on the outskirts of Burntwood. The proposed redesignation of further employment land into residential land is justified by consultants' analysis of future employment trends in the area
14.9	Burntwood and Hammerwich Action Group	The Strategic Development Allocation East of Burntwood Bypass is deliverable and the proposed timescale for housing development on that site is modest and realistic. Plans for Burntwood Town Centre are heavily dependent on the interest of retail developers. If major retailers cannot be enticed into the allocated site the Action Group would be prepared to see some of that land used for leisure activities or housing.
14.9	Chasetown Preservation Group	Chasetown Preservation Group and its supporters now endorse the Local Plan, as it has been modified, through the consultation processes, to take account of the many responses from Burntwood residents. Plans for Burntwood also take account of work commissioned by Burntwood Town Council to involve residents in producing an aspirational view of Burntwood into the future.
14.9	Mr Stan Harper	Hammerwich Parish Council is now endorsing the Local Plan in its revised form. As a result of through the consultation processes Lichfield District Council has now identified areas for required development without the use of Green Belt. The Strategic Development Allocation East of Burntwood Bypass is deliverable and the proposed timescale for housing development on that site is modest and realistic. The re-designation of the Mount Road Industrial Site for residential use is achievable.

Table C.21 Chapter 15

	Consultee Details	Summary
15 Table 15.9	Pegasus Planning Group: Miller Homes Ltd - East Midlands Region/ Wilson Bowden Developments Ltd/ Persimmon Homes Ltd	Dwelling requirement should be increased by 1,000 and phasing of the proposed SDA's is out of kilter with the NPPF.

Table C.22 Chapter 16

	Consultee Details	Summary
16	Framptons Planning: Deans Slade Farm Consortium	Allocating land at Deanslade Farm would assist with all these matters. The South Lichfield Allocation assumes an unrealistic capacity for new housing if proper regard is to be given to the prominence of the rising topography to the south. The Pre-Submission Local Plan is further unrealistic as to the delivery of housing from within the urban area and fails to address how this housing could contribute to the necessary infrastructure given the restrictions places on contributions by the CIL Regs and section 122 in particular.
16	Pegasus Planning Group: Persimmon Homes Ltd	The SA in this regard is supported as sound.
16	Pegasus Planning Group: Miller Homes Ltd - East Midlands Region	The conclusions of the SA in terms of the sustainability advantages of developing to the east of Lichfield around Streethay and to the south of the City are supported as sound. It is considered that development of the Streethay SDA is a sustainable and sound location to accommodate some of the development requirements of the District to 2028.
16.1 16.21	South Lichfield Residents Group	There is no evidence of co-operation with Birmingham or Black Country authorities in whose areas the majority of vacant brownfield land in the West Midlands region is situated. For the reasons listed here and also referred to in Q3a to Q6a below, the Sustainability Report does not provide sustainability appraisals for the individual SDA's or any alternative sites. It ignores the significance of non-designated heritage assets and historic landscapes It overlooks the disbenefit of taking prime agricultural land out of production It is not consistent with the NPPF The Sustainability Appraisal (SA) Table 16.1 is misleading and deficient in respect of the two SDA's proposed for Lichfield because it ignores the sustainability appraisal of individual sites and substitutes in Para 16.20 an appraisal for "Lichfield City as a whole".

Table C.23 Chapter 17

	Consultee Details	Summary
17.15 17.16 17.17 17.18 17.19	Burntwood and Hammerwich Action Group	The Strategic Development Allocation East of Burntwood Bypass is deliverable and the proposed timescale for housing development on that site is modest and realistic. Plans for Burntwood Town Centre are heavily dependent on the interest of retail developers. If major retailers cannot be enticed into the allocated site the Action Group would be prepared to see some of that land used for leisure activities or housing.

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	Consultee Details	Summary
17.15	Burntwood Action Group	Burntwood Action Group and its supporters now endorse the Local Plan as it has been modified, through the consultation processes. Residents have demonstrated their strength of feeling against any further extension of the conurbation into the Green Belt, along with a strong desire to see Burntwood's derelict land used effectively and to have an attractive and viable Town Centre. The identified Strategic Development Allocation for Burntwood is close to the Town Centre, unlike the previously planned Green Belt sites on the outskirts of Burntwood. The proposed redesignation of further employment land into residential land is justified by consultants' analysis of future employment trends in the area
17.16		
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17.15	Chasetown Preservation Group	Chasetown Preservation Group and its supporters now endorse the Local Plan, as it has been modified, through the consultation processes, to take account of the many responses from Burntwood residents. Plans for Burntwood also take account of work commissioned by Burntwood Town Council to involve residents in producing an aspirational view of Burntwood into the future.
17.16		
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17.15	Mr Stan Harper	Hammerwich Parish Council is now endorsing the Local Plan in its revised form. As a result of through the consultation processes Lichfield District Council has now identified areas for required development without the use of Green Belt. The Strategic Development Allocation East of Burntwood Bypass is deliverable and the proposed timescale for housing development on that site is modest and realistic. The re-designation of the Mount Road Industrial Site for residential use is achievable.
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Table C.24 Chapters 19 & 20

	Consultee Details	Summary
19.11	The Landor Society	The MoU (para. 19.9) which states that only 500 of the 1,125 East of Rugeley homes are "to help meet needs arising in Rugeley" is unrealistic. All will be an "urban extension to the existing settlement" (page 119, para. 16.4 of of the Local Plan: Strategy") with "a good degree of of social and physical integration" (page 180, para. G4.4 of the Local Plan: Strategy), and the Rugeley Urban Area is required to provide all local employment, schools, shopping and most other main facilities. Armitage with Handsacre has its own housing allocation of 120 to 220, therefore the 500 figure appears to have been chosen more for convenience, or expedience, than logic. Also the Sustainability Appraisal, para. 19.2 reads "...development here would meet more of the needs arising from Cannock Chase District than from within Lichfield District". The step change needs a convincing explanation as nothing else of significance has altered.

	Consultee Details	Summary
Table 20.1	Mr Roger Sanders	The Alrewas Parish Plan 2002 had details from all households in the village that a large majority of residents were against any building beyond the present village boundary. The village has many constraints : floodplain, narrow roads, views land North of Dark Lane is good agricultural land. Any more development would spoil this ancient village that so many tourists come to see.
Table C.10	Mr Roger Sanders	The Local Plan does not comply with the duty to co operate as any further development in Alrewas is unsustainable. The Local Plan is not justified as it is undemocratic.

Sustainability Appraisal: Local Plan Strategy (Updated)

Table C.25 General Comments

Consultee Details	Summary
Chairman Borrowcop & District Residents' Association	Supports the submission by the Lichfield Alliance of Residents' Associations that the updated Sustainability Appraisal continues to propose the building of some 8,700 houses in Lichfield District without explaining how this figure has been arrived at or why other submissions are not valid alternatives. Sceptical of the number of jobs that the plan hopes will be provided in the area and suggests that the number of houses should be a flexible number dependent on employment creation and not a fixed, linear amount which would increase commuting along the A38 and put additional strain on the infrastructure of the city. Also not clear where adequate funding to improve the infrastructure is coming from. Feel that there has been inadequate consultation with neighbouring authorities in view of the consequences of increased traffic on the A38 and on the Lichfield-Birmingham rail line, and especially the plans to build up to 10,000 homes on the Sutton Coldfield/Lichfield border. Also disappointed that the Council has published a Transport consultation document one week before the end of this SA consulting period: considers that the two must be considered in tandem, not separately.
The Theatres Trust	Suggests that the Glossary contains an explanation of what the document defines as a cultural activity' and makes a distinction between leisure and recreational activities, sporting venues and open spaces, cultural heritage with monuments and woodlands, and cultural facilities such as theatres, as they all have different requirements from a sustainable development point of view.
Planner English Heritage	The Sustainability Appraisal Framework (Table 11.2) is compatible with English Heritage guidance on SA/SEA, and in particular for Objectives A (landscape/townscape) and C (historic environment). Welcome the Council's commitment to preparing a Historic Environment Character Assessment (HECA) as part of the evidence base for the Plan and serving to complement other site specific data on heritage assets (designated and non designated). Also welcome and support the use of the HECA in the appraisal process. In the appraisal of the new proposal for the Brookhay Villages and Twin Rivers Park (Table F1) note and agree with the sensitivity of the area with respect to the historic environment and heritage assets, including its potential archaeological significance.
JVH Town Planning Consultants Ltd: Walton Homes Ltd/ Mr W Leason/ Boulton/Mr Bhagi/ Mr	Objection is based on the following principal matters:- That the new sustainability appraisal of November 2012 makes the same error in assessing the option put forward by JVH Planning as the previous version of the document. The Preferred Strategy is Lichfield centric and the sustainability of sites have been weighted relative to Lichfield centre, our JVH preferred strategy scores badly in this instance where the relationship of sites in the key villages has only been considered relative to Lichfield, rather than their close relationships with larger urban areas, namely Rugeley, Tamworth, Sutton Coldfield and Birmingham and Burntwood. Furthermore that document is not clear in how these matters have been

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Consultee Details	Summary
Neachell/Shipleigh Estates Limited/ The Aucott Group	individually weighted and what particular weights are given to particular items. All of the objections made by JVH Planning to the Deposit Document of August 2012 apply to this document and these are already set out in JVH Planning's original submissions. The new document appears to have been required by a new land use proposal to the east of the A38. However, it is not clear why this should have necessitated a new document prior to submission, this type of situation could reoccur before the examination of the plan and would necessitate a further revision. This is causing an over complication to the process and is not thought to be necessary.
Natural England	Natural England has reviewed the updated sustainability strategy and is satisfied with the selection process of the alternative options. Welcome the three additional recommendations for mitigation of adverse effects from the housing growth scenarios (paragraph 14.75) particularly the requirement that all development should undertake Appropriate Assessment to determine whether the impacts on Cannock Chase SAC will be significant. Support the sustainability appraisal objectives and framework and suggests that there needs to be a minor clarification to point 10a in Table 11.2 (SA Appraisal) as RIGs (Regionally Important Geological Sites) are now known as Local Geological Sites and together with Local Wildlife Sites are often referred to as Local Sites. Suggests that the suggested target or indicators be amended to refer specifically to Local Geological Sites for example "Number and type of Local Geological Sites." Pleased to note that the Sustainability Appraisal considers that the Natural Assets section has been strengthened and made more locally relevant which will help towards achieving sustainable development.
RPS Planning: Fradley West Consortium	Promote the Fradley West development as a logical extension to planned growth at the former Fradley Airfield - as the "Fradley Park and West" Option and not a freestanding proposal. Also consider that the SA and SA Update is poorly presented, inconsistent and does not readily allow comparison of options. Note that some high scoring sustainability objectives are not locational specific and could be provided at any of the proposed housing areas. Notes that the additional information submitted in respect of the new village following the Proposed Submissions and the July SA has raised its total score from -7 to +6; a 13 point improvement. Notes that this improvement is as a consequence of the inclusion of employment provision, an energy from waste plant and health care and community facilities. No other information is provided on the additional material. Note that overall the BV/TRP proposal achieved a total score of +5 compared to a score of -1 to -6 for Fradley West and -2 to +3 for Fradley West in combination with Fradley Park. Whilst it is not entirely appropriate to simply compare overall scores given the subjective nature of the scoring and the different criteria used for BV/TRP do not believe that the BV/TRP scheme would in reality exhibit such a higher level of sustainability compared to Fradley Park and West. RPS considers that Fradley West in combination with Fradley Park is wholly appropriate for a mixed use residential-led development and would provide the most sustainable location for required additional housing and employment land as a logical extension of recently approved development west of Fradley South within the former Fradley Airfield in conformity with policies of the NPPF and supported by the available evidence base. Notes that the SA Update looks at further sites; information for which was received at a later date & considers that the assessment is inconsistent and extremely subjective based on incomplete information. The SA is not required to look at viability or feasibility and has scored proposals based on information submitted at a very late date by the schemes proposers. In some cases it seems the information has been tailored to achieve a high SA score. Fradley Park and West can readily provide higher scoring attributes which match higher scores attributed to the BV/TRP location and has the added significant merit of being previously developed land with a strong structural landscape framework. Considers that SA as currently presented cannot be used to reliably compare schemes given its inconsistency and subjective nature.
LNW Network Rail	Network Rail would like to see "encouragement" maintained and even increased for a park and ride facility at Lichfield Trent Valley railway station, with financial contributions from developers to fund the proposal. Notes that the "Friarsgate" development would have brought transport modes closer together at Lichfield City Railway Station. Offers support

Consultee Details	Summary
	<p>for the continued safeguarding of the Walsall-Lichfield rail corridor for use in the future - particularly significant in connection with the Walsall - Stourbridge line, as it would give a freight bypass' for the West Midlands allowing passenger services to be further improved.</p> <p>We support the objectives that are outlined in the Local Plan, which recognises the importance of continued investment in rail services and stations to improve safety, accessibility and connectivity.</p>
Town Clerk Burntwood Town Council	The Town Council believes there is a pressing need for the Strategy to pay due regard to the recently announced Benefits cuts and the New Homes Bonus, both of which will have a significant impact on the District and thereby the Strategy. Also added that they would like to see an ongoing relationship with the Burntwood Town Strategy acknowledged within the Strategy.
Bromford Living	Bromford Living have reviewed the updated sustainability appraisal and is broadly supportive of the proposal to develop the new village at Brookhay, providing that it is a sustainable development and there is an integrated transport solution
Mr Charles E Holland	Considers that the final observations in respect of the findings of the SA is that the aspirations as contained in the basic document of Sustainability Appraisal would be applied to the previously suggested area for development at Armitage incorporating all the necessary factors required to be applied to perfect estate management and amenity considerations.
South Lichfield Residents Group	The SLRGP has undertaken their own Site Sustainability Appraisal Comparison, which shows that the selection of dwelling locations (included in the Local Plan) is not the most sustainable plan. Considers that the Local Plan needs to be redrawn to take into account both the combination of sites and a reappraisal of dwelling numbers more likely to be required in the District after appropriate discussions and alignment of plans with West Midlands and East Staffordshire Authorities.
BDW Trading	Refers to the attached document which sets out the significant flaws in the Sustainability Appraisal Process for the historic documents, which should be read in conjunction with the Proposed Submission SA Updated November 2012. Notes that the document includes comments on the following documents and should be considered alongside the detailed representations on the Proposed Submission SA Updated November 2012: SA1: Scoping Report 2007 (and Addendum 2009) SA2: Rural Settlement Study 2008 SA3: Rural Settlement Study Update 2011 SA4: Core Strategy Issues and Options 2007 SA5: Interim SA November 2008 SA6: Addendum to Interim SA 2011 SA7: Preferred Options December 2008 SA8: Policy Directions 2009 SA9: Shaping Our District SA 2010 SA10: Proposed Submission SA July 2012.
Pegasus Planning Group: Persimmon Homes Ltd/ Miller Homes Ltd - East Midlands Region/ Wilson Bowden Developments Ltd	Pegasus Group, on behalf of Persimmon Homes, Miller Homes Ltd - East Midlands and Wilson Bowden Developments Ltd., supports the strategy for the District as being sound. Taken as a whole they consider that the plan delivers on the three dimensions of sustainability (economic, social and environmental) advocated in the NPPF. Supports Table 13.2 of the updated SA, relating specifically to the overall spatial strategy of the Plan, with regard to the strong and positive scores for maintaining and enhancing landscape, promoting biodiversity and geo diversity, reducing flood risk and, in terms of social impacts, the positive scores in relation to creating mixed and balanced communities and reducing trips by car. Consider that the evidence very much supports the view that Lichfield can accommodate additional development on its periphery including south of Lichfield and Streethay. Note that section 14 of the updated SA considers alternative options to the spatial strategy. Consider that none of the alternative strategies would be as sustainable as the spatial strategy inherent within the Lichfield Plan.

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The Principal Inspector Health and Safety Executive	We have concluded that we have no specific representation to make at this stage of your plan-making process, due to insufficient information in the consultation document on the location and use class of sites that could be developed. The HSE is therefore unable to give specific advice on the compatibility of future developments within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) located in the area of the plan
Mrs Patricia Toplis	Notes that during November and December 2012 the field at Streethay, offered for housing needs in the Local Plan, has been flooded. Development here would make the situation worse and would flood the residents of Streethay.
Mr Peter Boulton	250 houses earmarked for the site behind St. Stephens School and Old Hall Lane are going to be built on a natural flood plain. The fields have recently been flooded, extending more than a mile in all directions. The roads were virtually impassable and residents in Edwards Farm Road suffered blocked drains and sewers as a result. This is a historic problem and is likely to occur again. The Council should force developers to build higher quality housing in every category to include a garage or off road parking for two cars as well as designated parking areas for visitors. The individual plots should be large enough for a reasonable sized garden with access roads being straight and wide so as to allow for emergency and delivery vehicles sufficient room to pass. Query where sufficient employment will come from in order to sustain a development of this size. Very few employment opportunities exist at Fradley Park, or indeed anywhere else in this largely rural location. Developers can not let the existing commercial units, which is why they want to build houses on Fradley Park. The Council should insist that road access to the A38 is improved at the developers expense, both at Hilliards Cross and Fradley Village, unless safety improvements are undertaken. The Council should insist on all of the 1000 hours, as well as the proposed school, being built at Fradley Park, where they will cause the least environmental and aesthetic damage to the area as a whole.
Fradley Park Developments Ltd	<p>Fradley Park Developments Ltd contend that from their engagement with Fradley Parish Council and the village it is apparent that the community is strongly opposed to the proposal to develop the fields north of Hay End Lane for housing. Contend that feedback received from their recent public consultation event in Fradley Village on the Local Plan proposals indicate that over 97% of people were in favour of using the additional brownfield land at Fradley instead of the proposed greenfield land north of Hay End Lane.</p> <p>Supported draft Policy Fradley in representations on the Submission Draft Local Plan. Also promotes the availability of the additional existing employment land located to the south of the Coventry Canal and east of Gorse Lane within the proposed Strategic Development Allocation (identified as Potential Employment Land by Map E.2 in Appendix E) to deliver benefits if developed for housing. Capacity assessment indicated it is capable of accommodating in the region of 250 dwellings and would require minimal new infrastructure. The development would integrate with the masterplan and benefit from the infrastructure and improved connectivity of the approved scheme for up to 750 dwellings with community facilities. States that this additional available brownfield land presents itself as an obvious alternative location for the proposed additional 250 dwellings in Fradley, which the draft Local Plan currently proposes on greenfield land to the north of Hay End Lane, adjacent to Fradley Village.</p>
Station Manager Rugeley Power Ltd	Savills on behalf of Rugeley Power Limited (RPL) agrees with the SA of the policy for the development to the East of Rugeley (paragraphs 19.1-19.12 (inc) and Table 19.1) which identifies the proposal as having a positive sustainable effect and to be an important element of the overall development strategy for the District.

Consultee Details	Summary
Walsall Metropolitan Borough Council	1. Consider that the overall conclusion (para.14.13), that the preferred spatial strategy derived for the plan so far (rather than the alternatives put forward by others) does appear to provide the most sustainable way forward for the district. 2 Welcomes the addition of references (in Section 8) that place the sustainable development of Lichfield in a wider context. However, consider it important to appraise the environmental and social implications of economic development including for town centres and transport. In addition, consider that Policies UR1A - UR1D of the Regional Strategy should be explicitly acknowledged and that it should be clearly established that it is vital that the Black Country should be able to secure substantial amounts of investment given that its regeneration is "critical" to the region (RS para. 4.6A). 3. In the context of the Duty to Cooperate, account should be taken of plans for adjoining areas, including the metropolitan area and the Black Country which has adopted its Core Strategy. Considers that the SA should address the likely impacts on the plans for such areas, and that the Lichfield Local Plan Strategy should include a specific commitment to support the regeneration of the nearby major urban areas.
Mrs Veronica Bailey	Notes that Local Plan policy H2 refers to building housing on sites adjacent to village boundaries. Wishes to promote SHLAA site ID 25 at Harlaston, adjacent to the village boundary. Considers that the provision of affordable homes for the younger generations and the elderly are the way forward for a brighter future for the rural villages.
Lichfield Civic Society	Consider that the evaluation of options for housing has not properly addressed the range of realistic long term development options and hence the role that development north of Lichfield could play in providing a sustainable development solution. Consider that these deficiencies are not addressed in the updated Sustainability Appraisal, where potentially sustainable options put forward during public consultation have not been assessed in the same depth as the preferred options. The RSS Panel recommendation for a comprehensive study into the development of a new settlement to the north-east of Lichfield has not been undertaken, nor reasons for its omission from analysis put forward. Consider that there is also a need to resolve that the Duty to Co-operate duties have feed back into the Local Plan and Sustainability Appraisal.
Beacon Street Area Residents' Association/ Leomansley Area Residents Association/ Fradley Against Curborough Town/ South Lichfield Residents Group/ Streethay Against Development/ Borrowcop & District Residents' Association	The Lichfield Alliance suggest that Local Plan representations should have been taken into account when assessing the environmental impact of implementing the Local Plan. Consider that this is because the environmental report's preferred option is based on an erroneous understanding of the optimal balance between housing growth and employment growth required to minimise cross boundary travel to work and, by association, minimise investment in infrastructure.
Deans Slade Farm Consortium	Contend that the soundness of the SA is flawed in the failure to properly & rationally justify the appraisal of the Local Plan Strategy, particularly in the context of : the scale of housing growth allocated for Lichfield and the omission of the allocation of land at Deanslade Park as part of the South of Lichfield Sustainable Urban Extension. (See attached statement for full representation).
National Memorial Arboretum	Note that there is very little reference within this updated SA to the potential risk to the NMA arising from the proposed creation of the Brookhay Villages and Twin Rivers Park (BVTR) scheme, which proposes a large number of houses and employment development within close proximity to the NMA's site boundary. Suggests that this is possibly due to the relatively

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Consultee Details	Summary
	<p>early stage in the preparation of the BVTR proposals and the absence of an Environmental Impact Assessment (EIA). Suggests that the scope of potential risks could relate to impacts upon: the visual setting and landscape character of the NMA; noise and air quality impacts (both direct and indirect through increased traffic); flooding concerns; ecological impacts (most likely indirect); and traffic increases. Comment that such impacts may either not materialise or may be satisfactorily mitigated, but this is difficult to assess at this stage. Note that the promoters of the BVTR scheme highlight the potential to deliver benefits to the NMA, predominantly through improved public transport access; the principle of which would be welcomed by the NMA, but again, due to lack of detail, consider it difficult to quantify the merits of these public transport improvements, and question whether they are deliverable or viable, and whether they can be secured at an early phase of development. State that the NMA would need to be convinced that any new link between the NMA and the new station was operationally cost effective and likely to attract sufficient patronage, before any such link could be acknowledged as a benefit of the proposals. Overall conclude that it is not possible at this stage to quantify the direct or indirect implications for the NMA of the BVTR proposal. Point of Clarification State that awareness should be raised that the NMA is not part of the BVTR development team and is in no way responsible for the promoting of the scheme, either formally or informally. Note that the BVTR developers held an early consultation event at the NMA, but this was arranged as a commercial booking of the facilities and should not be seen as an endorsement by the NMA of the proposals. Comment that the NMA, through these representations and hopefully its future involvement with the Council and other interested parties, is seeking to protect the interests of the Arboretum and its nationally important role as a focus for remembrance. The NMA's involvement in this current consultation is designed to achieve these objectives.</p>
Lichfield & Hatherton Canals Restoration Trust	Safeguarding of the whole route of the Lichfield Canal between Huddlesford and Ogley and protection by planning Policy would enable the Lichfield & Hatherton Canals Restoration Trust Ltd (The Trust) to proceed without barriers to obtaining the necessary funding and support to complete the restoration within the timescales (i.e. by 2023).
G & J Greaves	The SA states that two scales of new village option have been put forward (Option A - 2,000 units and, Option B - 4,000 units). This position reflects the version of the Drivers Jonas Deloitte Strategy Report of May 2012. However, the version of the Strategy Report dated September 2012 removed reference to any exact scales of the new village option. Rather it identified the broad extent of the land which could potentially be made available and confirmed that the "... precise scale, form and content of the village will be refined and developed over time as part of discussions with the Council and others". See separate letter dated 17th January 2013 and enclosed Drivers Jonas Deloitte New Village Option Strategy Report dated September 2012 for further information
Fradley & Streethay Parish Council	Believe that the proposed reduction in car trips is over estimated in this Local Plan and that traffic volumes and the associated junction impacts are also under represented. The evidence base uses the 2001 Census which are out of date. Section 14.53 does not mention any road network improvements to support the housing proposals in Streethay, such as at Trent Valley Island junction, which is currently over capacity in both peak periods. Not providing any infrastructure improvements to the local road network is likely to result in grid lock. The 2011 Pell Frischmann report prepared for the Highways Agency in March 2011 - A38 Corridor Sustainable Transport Solution Study - highlighted that the level of housing and the location of that housing close to the strategic road network, as proposed in the Local Plan, will considerably reduce the operation of the strategic road network deterring investment in the area and lead to an increase in accidents. The issues raised in this report do not appear to have been addressed in this SA. Also question the viability of the plan's proposals if a high CIL Tarrif is set to fund infrastructure improvements.
Satplan	Does not wish to add any further comments to those submitted in September, which remain valid. Understands that the Council does not wish for representations that would repeat what has already been documented & that all previous representations submitted on behalf

Consultee Details	Summary
Limited: Lylavale Express Ltd	of the client in September are forwarded to the Inspectorate as appropriate as the process moves towards EiP

Table C.26 Chapter 1

	Consultee Details	Summary
1	BDW Trading	Notes that the non-technical summary to the SA has been updated to try and address some of the deficiencies in the July 2012 version. However, consider that whilst the Non-Technical Summary is more complete the following issues have not been included within the paragraphs indicated: 1.1-1.6 No mention of the SA/SEA regulations or guidance that provide the requirement for Sustainability Appraisal, the purpose of the SA process or the methodology used. 1.6 Notes that the document states that the other Sustainability Appraisals and any Addendum produced should be read in conjunction with this document to give the full SA for the plan process. Representations on the previous SA documents have been submitted on a separate form but should be considered alongside our representations on the SA Update November 2012. 1.6 The list of previous SA documents fails to include the Scoping Report 2007 and SA of the Proposed Submission Local Plan Strategy July 2012. 1.19 The sustainability objectives listed do not include the additional objectives that are found in some of the matrices (see BDW TRADING LTD. rep on historic docs. SA9, page 6). 1.21-24 With regard to the likely significant effects of the plan it is not made clear what the positive and negative effects of the plan are or the likely characteristics of those effects. The effects appear to be for the Local Plan as a whole, it is not clear how the different elements of the plan perform. Reference to the previous stages of the SA is not made. 1.25 The adverse effects of the plan have not been set out it is therefore uncertain whether the mitigation measures given are appropriate. 1.33 The results of the Interim Core Strategy SA are not given. 1.34 The reason for assessing options should be that a reasonable alternative' is presented, not simply that an option has been proposed. 1.35 No summary of the findings for alternatives to the Spatial Strategy is given or conclusions made. 1.38 No summary of the findings for the appraisal of the Scenarios for Housing Growth is given or conclusions made. 1.40 No summary of the findings for the appraisal of the Scenarios for Economic Growth is given or conclusions made. 1.41 There is no explanation of the selection or rejection of options. It is not clear what the preferred option is or why it was selected. There are no conclusions or recommendations for the Local Plan. It is not clear how the SA has informed the development of the plan. The NTS does not show an SA that has been an integrated part of the development of the plan. 1.42 A reference to where the indicators can be found is not provided. Some of the indicators set out in the SA framework are not measurable. (see BDW TRADING LTD. rep on historic docs. SA1, page 1) The Non-Technical Summary also fails to set out: The methodology used. The consultation process and how the findings of the consultations have informed the plan. The characteristics of the likely effects as set out in Annex II of the SEA Directive.
1.2	Mr Edmund Davey	Comments made refer to the largest area of development planned for Fradley, though they equally apply to building on land which is currently under cultivation anywhere. No planned development can entirely safeguard the welfare of naturally occurring fauna and flora. Building projects exacerbate landscape fragmentation, ecosystems suffer and with species loss clearly linked to habitat destruction. British wildlife continues to decline because of the pressures we increasingly exert and new houses and accompanying infrastructure are probably the most important part of that. Both Fradley Pool Nature Reserve and Croxall Lakes are close enough to the proposed Fradley development site to be exposed to disturbance to wildlife corridors and damage/loss of habitats. The UK as a whole will need to grow more of its food and therefore unwise to allow further

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	Consultee Details	Summary
		<p>building on the good ground which will be vital for feeding the increasing population. These factors are in direct conflict, but the need for food security trumps other considerations. The high unpredictability of future weather compounds the food problems, with climate change causing more frequent severe weather events. The global picture thus emerging is of a very uncertain future for food supplies. The UK is especially vulnerable because of its high population density, existing high and projected very high numbers, and relative geographical isolation from mainland Europe. Recent severe flooding in Fradley will be exacerbated by runoff from any new development in the area, further impeding the growth of crops on what might remain for agriculture on adjacent flood plains, whilst the land built over would be permanently removed from production. Attempts to incorporate flood defence systems might mitigate the effects locally, though such plans ignore the effects of water channelled downstream. This strategy would add considerably to the costs and bring conflict with affected local communities such as Walton and Burton on Trent. Suggest that local authorities encourage, or oblige, owners of housing stock which has stood empty for a significant period to free this up for sale or rent. According to the charity Empty Homes there is currently more than enough property within the Staffordshire and West Midlands Regions to house current and immediately foreseeable need.</p>
1.2	Mr Charles E Holland	Sustainability should especially provide the foundations from which the future unborn generations will benefit but at the same time taking care of the present.
1.3		
1.7		Lichfield is fortunate in being within the Birmingham Catchment Area and should be demanding and making provision for attracting its fair share of the current Governments effects to encourage increased investment in production in this area. Considers that Lichfield can offer quality areas for new housing within its surrounding villages and therefore a new town venture within the area would likely to be considered a wasteful enterprise.
1.8		
1.12		
1.13		In guiding investment for sustainable communities that Investment needs to consider the livelihood of the future generation, their dependants and how it is to be satisfactorily achieved and develop long term special investment with interest in all aspects of personal comfort.
1.14		Broad Policy Framework ... Spatial Development Strategy presumably in the sensible development of management of land and the development of all necessary services.
		A Broad Approach and Sensible Approach and Interpretation in managing, particularly in Managing the District in a sensible response to all other documents.
	Flood risk is a fundamental aspect to be firmly taken into consideration in the allocation of any land for any form of development. Transport with respect to Armitage appears to be soundly based and housing in any plan is an important ingredient in land use terms to be considered. Due to the impact of Birmingham Lichfield will assume that much greater importance within the Region, providing itself a most attractive location in respect of present operatives and those requiring peace and consideration in the declining years. Housing requires different attention to other uses, such as amenity features, along with a safe suitable road layout with suitable grass verges and supervised walkways to preferred centres and public open space for amenity, sport and recreation, also the necessary landscaped areas for interest. The design of new accommodation needs to utilise elevated features to allow for supervision of pedestrian walkways and public open space especially routes to school and via public parks and there is a specific need in such planned residential areas for the Medical Surgeries/Clinics that provide a suitable service to the local population to be included.	

	Consultee Details	Summary
		<p>A satisfactory visual and working environment is essential and most vital to all development, it serves to promote interest within wellbeing and encourages incentives and neighbourhood responsibility.</p> <p>Basic requirement to provide suitable residential accommodation, to meet design standards of the highest order, for all members of the community, as Lichfield will be more than likely to attract immigrants from Birmingham. Development within the Armitage location would mitigate many of the adverse effects seen and to be noted within Modern Housing Development. Intensive Density is not necessarily the answer for quality housing needed to attract those with future investment interests.</p>
1.11	Alrewas Conservation Group	There is no mention of the fact that the proposed Brookhay villages cover the same area as the proposed extension to the Alrewas Quarry.
Table 1.1 1.16	Mr Cyril Preece	<p>Query why no mention has been made of Hopwas Woods, which is an area of ancient woodland in excess of 365 acres as mentioned in the Doomsday records. The A51 is becoming increasingly busy, with residents being unable to venture safely off their driveways due to ignorance and impatience of other road users. With regards to the HS2, feel that there will be no benefit to Lichfield.</p> <p>Query why no mention is made of Hopwas Woods.</p>
Table 1.1 1.2	Mr Derek Love	<p>Feels that comments regarding renewable energy are very negative and discouraging. Considers that it gives developers an excuse to disregard any thought of incorporating renewable energy projects into their schemes and that although there may be a case made for not installing renewable energy, such as solar panels, in individual houses on small housing schemes, a case could be made for a communal heating scheme, which could be more cost effective.</p> <p>Support the submission in particular, the wish to protect existing SSSI's. Stowe Pool was granted this status mainly because of the presence of the native white clawed crayfish. However, have recently been informed by the Council that American crayfish had been found in the Beacon Park pond area and could very well wipe out the native species, once the eggs found their way into Stowe Pool. It would be tragic if Stowe Pool lost its native crayfish and therefore probably its SSSI status. Support the submission in particular, the wish to protect existing SSSI's. Stowe Pool was granted this status mainly because of the presence of the native white clawed crayfish. However, have recently been informed by the Council that American crayfish had been found in the Beacon Park pond area and could very well wipe out the native species, once the eggs found their way into Stowe Pool. It would be tragic if Stowe Pool lost its native crayfish and therefore probably its SSSI status.</p> <p>Native Crayfish in Stowe Pool must be protected against the imminent invasion by American Crayfish and the SSSI status must be preserved. Prompt action should be taken now by locating and removing the American Crayfish.</p>
Table 1.1	Mr David Litchfield	Reliability of public transport needs to be improved to make it more popular. Fazeley residents look to Lichfield for Council & other services, but there is no direct bus service. High Speed rail is desirable in principle, but the present plans are not good for the Fazeley area. Fazeley suffers from fluvial flood risk. With regards to housing, the problem in this area is finance and not land, as there are many half-built developments.

	Consultee Details	Summary
1.15	Professor Allan Lloyd	Significant development around Rugeley should be contained to the east of the town. To the north and north east there are open countryside and unsustainable small rural communities. Development here would conflict with both the strategy for sustainability and that intended to protect biodiversity. Old wet meadowlands are a feature of this area, together with a variety of mature native tree species. The rural communities should not therefore form part of the main thrust of development plans.
1.16	Planning advisor Cannock Chase AONB Joint Committee	In the Sustainability Appraisal, reference could be made to the protection afforded to the AONB in the section concerning the NPPF (paras. 8.23 & 8.24) & reference the existence of the AONB Management Plan as a material planning consideration and linked to this, the operation of the agreed Planning Protocol which covers the AONB. Raises concerns over the cumulative impact of large scale developments across the District (i.e. Brookhay Villages proposal), over and above forecast housing needs, in terms of increased recreational pressure on the AONB (and the SAC). Re-iterate concerns that the Publication Draft of the Local plan and the SA, although strong on many aspects of environmental and landscape protection, lacked a specific acknowledgement of the special protection afforded to the AONB through the NPPF. Requests that such an amendment is accepted prior to the Local Plan Inquiry alongside action on the suggestion made during the earlier consultation period, on behalf of the AONB Joint Committee, for a specific policy treatment of the AONB.
1.26	Councillor Mark Taylor	It is vital that reduction of car usage and increased use of public transport is prioritised, especially further investment in rail to reopen the Lichfield- Walsall line and the Lichfield-Derby line. The long term economic returns would more than justify the initial financial outlay, as well as supporting the proposed new communities north of Lichfield.

Table C.27 Chapter 2

	Consultee Details	Summary
2	Campaign to Protect Rural England- Staffordshire Branch	CPRE, although concurring with the definition in 2.4 of the objective of Environmental Assessment, regards the definition of sustainable development in the United Nations resolution as not giving sufficient guidance. CPRE (Staffordshire) would prefer to see a more fundamental definition used in planning documents, and promote:- "Sustainability is a course of action capable of being maintained indefinitely without environmental detriment, acknowledging the inter-dependence of all life forms on earth". Regard local policies based upon growth as unsustainable, unless such growth is critically examined and offset by such measures as re-use of previously- developed land and CPRE press the case for conservation of land above all else. The increase of UK population by 25%-30% by 2050 will require significant land take & lead to a situation of non-sustainability, and notes that the current sustainability appraisal document remains almost entirely silent on this issue. Regard the UK's heritage as threatened to the point of extinction by the trajectory of development posed by the document in conjunction with other Local Plans and national infrastructure proposals including wind turbines and transportation schemes such as High Speed Rail, wholly at variance with countryside values. CPRE criticise the SA as being subjective rather than objective & believe that if the aspects of sustainability highlighted by CPRE were factored in to this process, then the conclusions reached would contradict the report's conclusion.
2	Mr Charles E Holland	Draws parallels with the current Environmental procedure and the Professional Survey Information required in support of the submission of the County Development Plans and Town Maps by County Councils and City Councils, under the 1947 Planning Act and its relevant Circulars. Comments that the European Legislation, whilst required,

	Consultee Details	Summary
		does not necessarily need to be acted upon especially with respect to a precise location if use is to be accordingly restricted that can benefit from the approach of professional common sense if such a use is beneficial to society and the community in general and so generates desirable investment.
2.5	Agent J & J Design: Trustee	Welcome the SA and recognise its key role in providing a sound evidence base for the plan.
2.6	Grosvenor	Welcome the recognition of the three key dimensions to sustainable development as identified by the NPPF, including the social role and welcome the intention to include the assessment of the social and economic impacts, as well as the environmental impacts. We support the UN General Assembly definition of sustainable development and the recognition of the UK Sustainable Development Strategy 'guiding principles'.
2.7	Gospel Hall Trust	
2.5	BDW Trading	Notes that paragraph 2.5 sets out the purpose of a Sustainability Appraisal but contends that the SA fails to deliver the purpose as set out in this paragraph. Considers that the report does not fully appraise the environmental, social and economic effects of the plan and policies; that the SA has not been integral to the plan making process or informed the decision making process. Also contends that the SA fails to demonstrate that the plan is the most appropriate given the reasonable alternatives. (See also BDW Trading Limited Rep on Historic Documents)

Table C.28 Chapter 3

	Consultee Details	Summary
3	Mr Charles E Holland	Strategy does not accommodate the changes arising following the banking crisis, policies need to be reviewed to allow the local economy of Lichfield and surrounding rural area to be revitalised and ensure the necessary services are in place to meet the needs of the development proposed. The allocation of the land at Armitage as a complete neighbourhood unit would generate such interest and could so be established as the example for others to follow.
3	BDW Trading	This report fails to document how the Lichfield District Local Plan: Strategy has been informed by the SA or the significant effects arising from its implementation. The framework for monitoring is inadequate (see BDW Trading Limited rep on historic docs. SA1, page 1) 3.9 The matrix of scores from the appraisals found in Appendix B is impossible to understand and does not show how the SA has informed the plan. No commentary, explanations of the scoring system or conclusions are provided within the matrix. An amended SA framework has been used with additional Sustainability Objectives but no explanation is provided (see BDW Trading Limited rep on historic docs. SA10, pages 8-9)

Table C.29 Chapter 4

	Consultee Details	Summary
4	Mr Charles E Holland	Suggests proposals for the development of land around Armitage which would include potential residential and service requirements, especially environmental, amenity,

Appendix C Summary of Consultation Responses

	Consultee Details	Summary
		sporting and leisure aspects. Notes that the SA assesses the protection of the use of available resources and safeguarding the environment and contends that all of this is recognised in the submission of the site at Armitage
4	BDW Trading	Para. 4.15-18 - consider that the findings of the SA of the Issues and Options Core Strategy within the Interim Core Strategy SA show a deeply flawed SA. The assessment of the new settlement did not assess the potential for a new settlement in general but assessed the specific Curborough proposals as set out in para. 4.28. Para. 4.28 - consider that the Interim Core Strategy SA 2008, which accompanied the 'Preferred Options' assessed the Issues and Options of the Core Strategy 2007(as stated in para. 4.15) and is therefore an attempt to retrofit the SA to the plan making process as the SA was issued one year after the publication of the Issues and Options document. Contend that an SA of the Preferred Options has not been published or subject to public consultation. (see BDW TRADING LIMITED rep on historic docs. SA4, page 2, SA5, page 2, SA7, page 5). Para. 4.30 - contend that the SA of the Policy Directions 2009 was also not published or subject to public consultation (see BDW TRADING LIMITED rep on historic docs. SA8, page 5). Para. 4.37 - Consider that the findings of the Shaping Our District SA provide only a summary of the appraisal. No matrices showing the assessment are included and there is no explanation of how the preferred spatial strategy was selected, the alternatives considered or the reasons for selection and rejection of options - all contrary to regulations and guidance. (see BDW TRADING LIMITED rep on historic docs. SA9, page 6) Para. 4.38 - Consider that the consultation process has not been transparent as the Shaping Our District SA did not include any details of the consultation process for the SA, either how to comment or the results of the consultation process to date. Also consider that the Proposed Submission SA July 2012 failed to provide any clarification on how feedback from the consultation exercises has informed the process. (see BDW TRADING LIMITED rep on historic docs. SA9, page 6, SA10, page 8).
4.3	Agent J & J Design: Trustee Grosvenor Gospel Hall Trust	Support the strategic priorities, with particular emphasis on priorities 1, 2, 4 & 11.
4.7	Mr Cyril Preece	12,000 trees are presently being felled in Hopwas Woods by Tarmac and Ministry of Defence. Concerned that Hopwas as an area seems to be disregarded by Lichfield District Council.

Table C.30 Chapter 5

	Consultee Details	Summary
5	Mr Charles E Holland	Considers that it needs to be recognised that certain aspects of sustainability research means different precepts and concepts to different groups and items change almost daily. Therefore it is necessary to adopt as broad approach as possible in obtaining reliable information, such an approach should be considered in the early stages and any bias avoided. Finance is an important part of any undertaking in the development process and should likewise be most carefully considered, especially with regard to the stability of the system providing finance for the future and its stability and integrity of the supply.

	Consultee Details	Summary
5	BDW Trading	<p>Para 5.1 - consider that the SA does not comply with the purpose of the SA as set out in this paragraph. Para. 5.5 - considers that this section reads like a confession that the SA has not succeeded in recommending the most sustainable approach for the local plan. Para. 5.6 - the failings in the SA Framework and approach to scoring are identified. The difficulty of carrying out the SA with the framework should have highlighted the need to review the objectives and approach. The emphasis of the guidance is not on a tick box exercise. The results should be backed up by facts and an appropriate commentary on the findings (Practical Guide to the SEA Directive ODPM 2005, Appendix 7, page 75 and BDW Trading Limited rep on historic docs. SA5, page 3, SA10, page 8). Para. 5.8 - the need to update the data with the information from the 2011 census is stated. The census data became available. Population and household estimates for England and Wales were issued in July 2012. Consider that the November 2012 SA update should therefore contain the updated census information and the decisions made should have been reviewed in the light of the latest figures. (Practical Guide to the SEA Directive ODPM 2005, para 5.B.8 and BDW Trading Limited rep on historic docs. SA1, page 1).</p>

Table C.31 Chapter 6

	Consultee Details	Summary
6	Mr Charles E Holland	<p>Appears that there is no reference to the observations of the District Valuer, and considers such advice vital, especially with respect to the finance available. Presumes that the CPRE and such similar institutions have been consulted and that further useful consultations are likely to be the Country Land Owners Association and the National Farmers Union. Queries whether any consultation has been undertaken with the Mining Authority, regarding possible subsidence or future gas extraction or the use of heat resource pumps in the provision of heat for housing and also whether any consultation with the Social Services Department of the Staffordshire County Council has been undertaken.</p>
6	BDW Trading	<p>Para. 6.5 - Note that the ICSSA appraised the Issues and Options document of 200, but contend that an SA of the Preferred Options has not been published contrary to guidance and regulations. Appendix C lists the consultation responses made but fails to explain their significance and the difference the consultation has made to the plan development. (see BDW TRADING LIMITED rep on historic docs. SA4, SA5, page 3, SA7, page 5). Para. 6.6-7</p> <p>Consider that no SA of the Policy Directions has been published and that the summary findings set out in the Shaping Our District report cannot be verified. (see BDW TRADING LIMITED rep on historic docs. SA8, page 5). 6.9 Contend that the Sustainability report currently on the Council's website is an updated version (Dec 2012) of the report issued for consultation (Nov 2012). There is no indication of this on the website or in the report. The extent of the changes is unclear but has resulted in some sections being moved within the report and different page/paragraph numbering. This paragraph is one of the additions. The findings of the Consultation on the July 2012 Submission are not included within Appendix C. There is no explanation of the legal challenge, who made it or whether the SA report has been amended as a consequence again contrary to guidance and regulations (see BDW TRADING LIMITED rep on historic docs. SA10, page 8).</p>

Table C.32 Chapter 7

	Consultee Details	Summary
7	Mr Charles E Holland	From that which is stated in the document and the relevant table it would appear that the necessary requirements of the SEA Directive have been fully complied with.
7	BDW Trading	<p>Para. 7.1 Contend that the SA is not compliant with the Directive on several counts in particular the following sections as detailed in BV&TRP representation on the historic documents: SA4: Core Strategy Issues and Options 2007 (page 3) - SA of the Issues and Options document was not issued for consultation with the draft plan. EU Directive 2001/42/EC - Article 4, Article 5, Article 6 (1and 2), Article 8 SA5: Interim SA November 2008 (pages 3-4) - The reasons for the selection and rejection of alternative options is not explained. A Sustainability Appraisal of the Direction of Growth was not carried out as part of the development of the plan or issued for consultation. EU Directive 2001/42/EC - Article 4, Article 5, Article 6 (1and 2), Article 8 SA6: Addendum to Interim SA 2011 (page 4) - The assessed the development proposed at Highfields Farm using an amended list of Sustainability Objectives. All sites should have been reassessed using the same method and evidence. A comparison of the results cannot be made. EU Directive 2001/42/EC - Annex I SA7: Preferred Options December 2008 (page 5) - An SA of the Preferred Options has not been published or subject to public consultation EU Directive 2001/42/EC - Preamble para. 15 , EU Directive 2001/42/EC - Article 2 (b) SA8: Policy Direction 2009 (page 5) - SA not published. EU Directive 2001/42/EC - Preamble para. 15 , EU Directive 2001/42/EC - Article 2 (b) SA9: Shaping Our District 2010 (page 8) - There are no results of the consultation process. No detailed results of the Spatial Strategy are included. Reference is made to the SA of the Policy Directions document, which was not published for public consultation. EU Directive 2001/42/EC - Preamble para. 4 , EU Directive 2001/42/EC - Article 5, Article 8, Article 12, Annex I SA10: Proposed Submission SA July 2012 (pages 7-9 provide detailed comments) - EU Directive 2001/42/EC - Article 5 (para 1 and 2), Annex I In addition, contend that the Proposed Submission SA-Update November 2012 does not identify the likely significant impacts on the environment or the characteristics of those effects, the reasons for the selection and rejection of alternatives, the results of the consultation process or how the results have influenced the plan. No conclusions or recommendations are provided from the SA with regards to the Local Plan.</p> <p>Notes that throughout this chapter there is considerable repetition of previous planning policies and government and institutional advice. Considers that whilst the present NPPF Policy came about in 2012, little consideration was given to the present recession and its influence in respect of investment into land use. Suggests that the proposed planning framework for Lichfield should be prepared to take advantage of Birmingham's proximity & influence. Considers that any plan should have regards to an advanced economic role with supporting investment potential, satisfactory residential accommodation to fit with all manner of social undertakings including transport amidst an ideal environment with the attraction of a sound and basic constructive finance policy. Considers that the visual environment has tended to be neglected with the intensive density of present accommodation, but that it is essential to good health in support of a working population on which so much depends. Wildlife and the protection of habitats follows in a similar pattern including woodland and the surface areas of plants and grass. With regard to the Green Belt policy originally established following other ideals in 1955 (almost sixty years ago), comments that the policy did not have any real regard for the difficulties that the planning process was going to experience in the future, particularly with regard to immigration, and modern industry and all the particular needs with regard to Health and Social needs, Europe and particularly the ageing population. Refers to agricultural holding maps of the various ownerships and quality of the land, including mineral plans, and to plans relating to visual quality that identified woodland and topography, all of which support the development practice in the selection of sites for future development and the constraints implied. Also refers to plans of authorised washland areas, flood plains, hedgerows & trees. Considers energy generation to be important with respect to our climate and keeping warm, and particularly consideration of how long this nation can afford to import fuel. Refers to alternative transport fuels, fracking as an important process to obtain gas, the erection of wind turbines and the use of heat resource pumps to assist with tackling climate change and contribute to a low carbon</p>

Consultee Details	Summary
	<p>economy. Comments that concerning waste management, much waste can be recycled for future beneficial use whilst certain waste is burnt and used as a source local heating and electricity generation whilst deposited waste is used in the production of methane gas, similarly to that collected at Sewage Disposal Works. Considers that it is essential to critically examine the strategic location of brownfield sites for specific strategic development in the future, or possibly to be left as amenity space to perfect surrounding regenerated residential development. Comments that all water courses are normally to be considered in respect of Washlands and floodplains and in particular drainage ditches.</p> <p>With regard to the preservation and improvement of landscapes considers that a balance needs to be struck between the increase in world population and the consequent need for housing with the need for food. Considers public open space to be essential in supporting healthy activity but also essential with respect to sporting activity and children's recreation, forming an important part of any residential allocation within a neighbourhood unit, including that associated with schools. Considers that Conservation Areas are important, especially the Lichfield City CA and the important role that it plays in South Staffordshire. Comments on the canal system as being important in the past as a convenient method of transport for goods and now important in supporting leisure activities, in some cases providing living accommodation, and possible be used as a transport link when other constraints arise in the future. Considers that with regard to pollution and water quality considerable care needs to be exercised with the discharge from sewage works and the treatment of run off from fertilised agricultural land. Considers future economic development important to all locations and that this is in the hands of the Local Authority and the planning system to ensure provision of the very best of sites in attractive locations both from the economic and amenity aspects and with the most suitable access arrangement. Considers that special sites always need to be kept within a certain portfolio (e.g. helicopter pad) & that that that precise purpose that may not be aligned to recognised planning policy but nevertheless purposeful for the District and with possible financial investment within the District. Considers that town centre uses are basically dependent on servicing arrangements and car parking and particularly the road structure and also dependent on how the District Valuer handles the Financial Appraisal at the time with respect to the Basic Valuation of the retail outlet. Considers that the transport system is in part dictated by the uses that promote transport, hence the requirement in the first instance to identify the preferred location for industry/commercial development and then identify the most suitable routes for walking and cycling to be then generally followed by the vehicle routes from the supporting residential area thus leading to sustainable development. This process leads to the consideration of certain types of quality commercial/ service development in rural areas. Notes the previous work of the Rural Development Commission and English Industrial Estates. Again comments that Lichfield should ensure that it doesn't miss out with regard to its proximity to Birmingham & the future High Speed Rail Link, in attracting investment to the Lichfield area.</p>

Table C.33 Chapter 8

	Consultee Details	Summary
8	Mr Charles E Holland	Considers that sporting facilities and amenity in support of leisure to include education directly related with the specialist engineering skill and similar supporting subject matter, should likewise have that priority in assisting the growth of the local economy and the prosperity of the area of South Staffordshire, as considers Lichfield to have a most important role now and in the future. Considers that whilst Local Enterprise Partnerships are in assisting factor, the responsibility for assistance with economic growth lies with the Local Authority Considers that there is a special requirement to ensure the need for the careful establishment of a neighbourly and community spirit and that development should be be planned accordingly to foster such a spirit. Also considers that appropriate services should be available to meet all requirements, especially those health related. Considers

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	Consultee Details	Summary
		that all housing, including affordable housing, should be of an admirable quality, feature designed to address climate change. Considers the health of the population to be a most important factor, especially in support of the economy, and that health services should be conveniently and readily available, and that land should be incorporated in various forms to meet exercise requirements and peace and tranquillity of the neighbourhood and its occupants. Believes that it is education towards better health that needs to be advanced, and that the aim of planning is to find the space and induce the facilities to be formed and constructed including the environment and the necessary facilities and disciplines that support the culture. Considers that the implementation of the suggestions within this response reflect the requirements of the basic planning process and essentially should be incorporated within any sensible development policy.
8	BDW Trading	Para. 8.8 contend that it is not clear how the Duty to Co-operate has been discharged or how the duty has shaped the plan. Para. 8.12 with regard to bullet points one and two, it is not clear how the unmet requirements from neighbouring authorities have been met or that reasonable alternatives have been considered (see BV&TRP rep on historic docs. SA10, page 7). 8.24 It is not clear why the role of the now defunct PPGs and PPSs should be acknowledged. Full weight should now be given to the NPPF. 8.48-74 Proper consideration of the Adopted Regional Strategy 2008 is not evident in the SAs. 8.94 Fradley is not included within the twelve survey areas. The proposed plan includes settlements and broad and strategic development allocations at Fradley. It is not clear why Fradley was not included. 8.133 It is unclear how the SA process has informed the sustainable transport strategy of the draft Local Plan (also paras. 8.174 and 8.178). 8.184 It is not clear how the NPPF approach to housing has influenced the SA process and draft Local Plan. 8.237-241 it is unclear how the SA has addressed the need for an updated evidence base for those parts of the 2008 SHMA that were not updated in 2012.
8.23	Planning advisor Cannock Chase AONB Joint Committee	Specific reference should be made to the provisions of para.115 of the NPPF in relation to AONBs & considers that such an amendment is accepted prior to the Local Plan Inquiry alongside action previously suggested for a specific policy treatment of the AONB.

Table C.34 Chapter 9

	Consultee Details	Summary
9	Mr Charles E Holland	Comments that issues drawn attention to in Section 9 have been referred to in observations concerning this document elsewhere but note the reference to wages/salaries comparison & considers that this should prove to be advantageous if carefully utilised in the attraction of Investment for the future. Notes that the document supports constructive development incorporating renewable energy to meet present day requirements and so allow for development in suitable settings to encourage investment.

Table C.35 Chapter 10

	Consultee Details	Summary
10	Mr Charles E Holland	Any present indicators are not likely to prove helpful, as need to adopt certain precautionary elements with respect to financial costs, as investors are wary of the present national economic situation. Considerable care needs to be applied in the use of the Community Infrastructure Levy being favourably to critically examine requirements and the real costs of the exercise.

Table C.36 Chapter 11

	Consultee Details	Summary
11	Mr Charles E Holland	The contents of the Section are to be supported but in many instances need a fuller explanation to the average citizen. The contents of the Section are to be supported but in many instances need a fuller explanation to the average citizen and objections should be answered by constructive dialogue and example, particularly with regard to ultimate financial savings following individuals investment and allowance for Insurance and Maintenance with the ultimate valuations explained, again by involving the District Valuer. This is an important part of any planning process especially if the classical Visual Environment is to form part of the Valuation in the future but should be carefully discounted by exposure and its own problems. The List attached should at all points be supported being a logical part of the advocated Planning Process but within the Section there appears no support for Agriculture and the Agricultural process especially when allied to landscape preservation and renewal etc. An important part of any planning process especially if the classical Visual Environment is to form part of the Valuation in the future but should be carefully discounted by exposure and its own problems. The List attached should at all points be supported being a logical part of the advocated Planning Process but within the Section there appears no support for Agriculture and the Agricultural process especially when allied to landscape preservation and renewal etc.,.
11	BDW Trading	Table 11.2 - regard the Sustainability Objectives in the SA framework as inadequate, which is highlighted by the detailed criteria associated with the objectives. (see BDW Trading Limited rep on historic docs. SA1, page 1) Para. 11.7 Note that the scoring system was amended in the Addendum to the Scoping Report 2009. The SA framework set out in the Scoping Report of 2007 is no longer appropriate as it has not been updated to reflect the NPPF. Contend that para. 11.8 highlights that the SA framework is demonstrably inadequate as the introduction of coloured asterisks has been necessary in order to prevent issues being hidden in the analysis. The failure of the SA framework should have been recognised when assessing the plan and an update provided. The issues that could be hidden in this way are not identified.

Table C.37 Chapter 12

	Consultee Details	Summary
12	Mr Charles E Holland	Whilst Climate Change is an important time consuming objective, careful consideration needs to be given so that such a policy does not lead to reduce investment within the Area and a sound balance needs to be taken with regard to the application of over burdensome conditions that remove the desire for investment within the local area. Ultimate common sense needs to prevail for the benefit of all locally concerned.
12	BDW Trading	Para. 12.3 The Addendum to the Interim SA 2011 stated that the SA did not consider factors such as the Green Belt (see BDW Trading Limited rep on historic docs. SA6, page 4) . Paragraph 12.3 now states that the character of the countryside has been strengthened positively by including a requirement to preserve the openness of the Green Belt'. Consider that it is not clear how the appraisal of Issues and Options could be done effectively without considering the issue of the Green Belt. Consider that Table 12.1 is indecipherable. Consider that the SA Framework Objectives have now been altered although there is no reference to the change or the reasons for the additional objectives or the issues that they represent. The table has no key or commentary. Many of the boxes are blank but no explanation is provided (see BDW Trading Limited rep on historic docs. SA9, page 6).

Table C.38 Chapter 13

	Consultee Details	Summary
13	Mr Charles E Holland	Notes the contents of Table 13.1. Proposed Settlement Hierarchy, including the reference to development within the location of Armitage and Handsacre. Consider that the area for development including servicing should be strategically increased, especially in order to support sustainability.
13	BDW Trading	Paras. 13.1- 13.6 Consider that it is not clear how the Spatial Strategy was selected and whether it is the most appropriate strategy for the District. (see BDW Trading Limited rep on historic docs. SA1-10, pages 1-9). Table 13.2 Consider that the results show that the SA Assessment is deeply flawed (see BDW Trading Limited rep on historic docs. SA10, pages 7-9 and the other representations made in relation to this document). Page 112 The reference to additional houses to meet the need in Tamworth and Rugeley is noted, but consider that there has been no SA of the need to meet the requirement elsewhere in the district.

Table C.39 Chapter 14

	Consultee Details	Summary
14	Campaign to Protect Rural England- Staffordshire Branch	In view of the present uncertain social, economic & environmental scene CPRE suggests that the Local Plan focusses on an initial 5 years period, rather than 20, and then projects forward in subsequent 5 year stages to allow the testing of assumptions and their viability. This would also allow for the incorporation of a continuous process of involvement by the public, via localism, and would better act in the interests of sustainability. CPRE considers that Variant i of Scenarios A, B, D, E, H and J represent the most sustainable and achievable options, and leave open opportunities of targets being expanded if changed circumstances developing by a 5 year review date indicate this as a prudent possibility. The possibility then exists of further housing expansion, if circumstances dictate, of such partially self-contained proposals as Curborough New Village, BV and TRP. However CPRE note that the expressed preference for Options set out above come with heavy provisos, namely that: development for housing of greenfield sites is fundamentally at variance with principles for sustainability; secondly strongly support policies which secure priority preparation and release of brownfield sites in advance of greenfield; thirdly advocate achieving the highest acceptable housing densities to both minimise land-take and to make more economic provision of sustainable public transport; and fourthly the "most acceptable" housing scenarios include sites which CPRE would normally strongly oppose, notably on sustainability grounds (ie loss of agricultural land) and other environmental issues. These include South Lichfield and North of Tamworth. CPRE consider that the fact that such sites are still being advanced is a measure of the extent to which the whole Local Plan strategy becomes insupportable in sustainability terms, and is conditioned by socio-economic and demographic factors beyond the control of the LPA and resting with central government.
14	Mr Charles E Holland	The alternative options do not appear to give or make any reference to the present Government's recent interest in Birmingham and surrounds and the potential for future investment, that would no doubt increase a certain potential migration into the District, with its acknowledged Heritage quality to be appreciated by those making such a move and should be supported by Government to maintain that special integrity of The District. The ethics of future development, the sensitive nature and safeguards should be specifically considered as per the early suggested special portfolio to avoid any form of future confrontation.

	Consultee Details	Summary
14	BDW Trading	<p>The assessment fails to assess the inclusion of BDW TRADING LIMITED either accurately or in sufficient detail to provide a transparent assessment (see also BDW TRADING LIMITED rep on Appendix F for further details). 14.2 The selection and rejection of alternatives have not been clearly documented as required by the regulations and guidance. 14.3 The selection of alternatives is flawed - it should be those that are considered reasonable rather than simply options put forward to the Council. Options put forward appear to have been assessed as sites in isolation rather than part of a spatial strategy. 14.8 The summary of the results for Brookhay Villages and Twin Rivers Park (BV&RTP) fails to assess the inclusion of BV&RTP either accurately or in sufficient detail to provide a transparent assessment. 14.13 The overall findings set out in this section appear to be taken from a previous report and have not been updated to reflect the new options that are being considered. Table 14.1 The figures given in Tables 14.1-14.10, which set out the scenarios for development, do not make sense. The overall figures for each scenario are considerably higher than the figures given for each variant. The difference in the figures is not explained. 14.61-65 The record of the difficulties encountered during the SA raises significant doubts regarding the adequacy of the SA including: data sets that are known to be old, incomplete and unreliable; differing levels of detail for sites which means that the SA is not comparing like with like; uncertainty regarding the assumptions made and lack of certainty regarding the significance of the impacts. 14.73 Selection of Preferred Option - BDW TRADING LIMITED scores highly in Scenario A and J (variant iii) but the positive results for BDW TRADING LIMITED are not mentioned in the selection of the Preferred Option. The different variants assessed are also not considered in the preferred option. 14.22-135 In general the section on the options is extremely difficult to follow. There is a lack of cross referencing and a lack of conclusions based on the results. The reasons for the selection or rejection of alternatives must be clearly documented. It is also not clear how the assessment of the different options have informed the Spatial Strategy.</p> <p>This chapter sets out the Appraisal of the Alternative Options considered by LDC, however the elements considered are named Scenarios and Variants within the Scenarios - lack of consistency. 14.2 In this chapter, the SA-U considers Scenarios A through J, with three Variants of each also considered. 14.3 In paragraph 14.72 to 14.74 inclusive, the SA-U purports to select the Preferred Option, but despite Scenario J scoring 15 against Scenario A scoring 10, the Council has chosen to determine that Scenario A is preferred. 14.4 Although three variants of where housing would be located relative to each Scenario, there does not appear to have been any selection of the Preferred Variant. Variant (iii) is the highest scoring for both Scenarios A and J. 14.5 Paragraph 14.93 refers to "Policy-On Scenario 2" as being the best performing scenario. This is difficult to understand, as there is no such thing as Scenario 2 in Chapter 14. The highest scoring two Options are Scenario J / Variant (iii) with a score of 15/9, followed by Scenario A / Variant (iii) with a score of 10/9. 14.6 More details are given in the attached Technical Note file IPD-11-220 LDC SA-U Summary of Factual Errors 14-01-2013.pdf.</p>
14	G & J Greaves	Disagree with certain details included within these paragraphs (14.16 - 14.19) which have informed the Council's assessment of the new village option. See separate letter dated 17th January 2013 and enclosed Drivers Jonas Deloitte New Village Option Strategy Report dated September 2012 for further information.
14.8 14.13	Alrewas Civic Society	Alrewas Civic Society consider that the Brookhay/Twin Rivers proposal would increase vehicles adjacent to the A38, increasing congestion, and adding to the pollution and noise which is currently a major issue to residents of rural villages along the A38. Consider that the A38 cannot safely carry significantly higher levels of traffic without additional lanes, which would be inappropriate for a residential area. The Alrewas area suffers

	Consultee Details	Summary
		<p>significant flooding frequently every year and believe that protecting the Bookhay/Twin Rivers development from flooding would increase flooding at Alrewas, Burton on Trent and The National Memorial Arboretum.</p> <p>Overall Alrewas Civic Society considers the original plan set out by Lichfield District Council takes a more balanced view of meeting the housing requirements across the whole District, in a more sensitive way after much consultation with local residents.</p>
14.8	Alrewas	<p>Concerned that development proposals in the locality will increase traffic movements along the A38, along a section (Lichfield to Burton) with already inadequate junctions for the volume and type of vehicles (e.g. large numbers of HGV's). Needs to be a mechanism for looking at the aggregate effect of all proposals not just assessing each proposal on a stand alone basis. Also raises concerns over air quality and safety. The timing of the improvements is essential - infrastructure must be in place as a priority and must not be left until the middle/end of the housing building works. Recent flooding along the A38 has also highlighted the chaos caused if the A38 is closed - alternative routes need to be considered and up graded. Provision for the housing numbers required in the Lichfield District has been identified elsewhere in the district and this additional major proposal (Brookhay Villages & Twin Rivers Park) is not necessary and furthermore would lead to the loss of good agricultural land.</p> <p>Infrastructure must be in place as a priority and must not be left until the middle/end of the housing building works. Need to consider the likelihood of increased flooding from the several planning opportunities identified in the locality. Needs to be a mechanism for looking at the aggregate effect of all proposals not just assessing each proposal on a stand alone basis. Proposals must be properly mapped against the inflows to the Trent, Tame, Dove etc. from a much wider catchment area than the environs of Alrewas. Recent flooding has led to overflows of sewage indicating once again that the pumping stations cannot cope with current usage levels.</p>
14.11	Parish Council	

Table C.40 Chapter 15

	Consultee Details	Summary
15	Mr Charles E Holland	<p>Understands that the Appraisal of policies is legally required, but considers that the fundamental pursuit and priority of the exercise should at all times be endeavouring to attract development for the benefit of a sustainable community. Comments that it should be recognised that the development process also needs to have regard to agriculture, that is removed as progress to provide for other facilities and services are developed in support of a community and its infrastructure. Considers that the delivery of sustainable development in all its aspects is essential to the welfare of all concerned, both in respect of the present built environment and future development, recognising that all parties in some way or other just have to be compensated either financially or by the quality amenity and quality environment providing peace and tranquillity for all to enjoy. Comments that sustainable construction is to be specifically found in Building Regulations that will be increased as research along specific lines takes place, it is now a fundamental part of the development/Construction System thus setting standards for development and of which renewable energy forms a part. Consider as that necessary infrastructure for any future proposals should be planned for as a first stage in the development process with a competent potential supply for the service, especially drainage and treatment for that is fundamental to any development process and provision of land required for specialist services including education, health and community etc. Considers that sustainable transport</p>

	Consultee Details	Summary
		<p>is most desirable and whilst provided in support of new development, comes at an extreme cost that needs to be recognised and possibly suitably blended with new proposals. Comments that homeworking is now a fundamental part of the business process and has to be recognised within any form of estate development and suitably planned for and should be so recognised in Homes for the Future particularly having regard to the opportunity afforded at Armitage and Handsacre. Considers that a suitable and sustainable housing mix is required within any suitable planned neighbourhood community especially if meeting specific requirements of a special nature of quality development that needs the services of other locals especially cleaners and gardeners etc., Comments that Gypsies Travellers and Show People require their own specific sites suitably supervised with adequate appropriate facilities and intensively landscaped, easily accessible and in a suitable location that can be accepted not to give rise to any offence to local residents.</p> <p>With regard to Economic Development and Enterprise - considers that the opportunity should be taken to locate such development adjacent to major transport routes or having easy access to such routes, if at all possible. But development should be suitably landscaped and the buildings themselves should be designed and constructed in appropriate materials to fit as near as possible with the visual environment. Comments that purposely designed new office development in keeping with the buildings already existing can have its place within a village setting, understanding that it is part of the rural community and so may be incorporated within a park like setting. Comments that tourism is important within both the urban and rural context regarding the historical content of buildings, the quality of the countryside and its special features that also require a respectful attitude to be adopted, special catering and satisfactory accommodation being available again within the appropriate setting. With regard to Healthy and Safe Communities - considers that such Communities are important to the planning process having the necessary services available within reasonable proximity and designed to afford easy supervision. Consultations with the police should be undertaken with respect to any estate designs and layouts, as would be expected in the opportunities being offered with respect to the proposal in respect of Armitage and Handsacre. With regard to Natural Assets - considers that these should at all times be respected and cared for, but there needs to be a proper balance in respect of the attraction of Sustainable Investment that should by diverse means be assisted to cope with that which needs to be conserved. Trees and Hedges can be suitably incorporated within development proposals, and are therefore a different matter. Considers that disease is an important aspect to take into consideration with respect to tree growth. Again considers that wildlife is somewhat different, but suitable habitats may be created and then suitably inspected and protected. Again considers that natural resources including mineral deposits are somewhat different and special consideration with regard to policy needs to be understood and so preserved. Considers that the Built and Historic Environment should always be protected, although considers that there are cases likely to arise when it would be appropriate to carefully move any such building to a more suitable location in order to allow for quality development that would be substantially contributing to necessary sustainability to take place.</p>
15	BDW Trading	<p>15.1-2 Sustainability appraisals of the Preferred Options December 2008 and Policy Directions 2009 have not been issued for public consultation. 15.3 The references made to the SA of the Policy Directions are impossible to verify within the Shaping Our District document as the report was not published. 15.4 Chapter 6 (Consultation) within the SA fails to explain how the findings from the consultations have informed the SA and development of the plan. 15.5-84 Assessment of the policies is extremely difficult to follow as details of the cross referencing to other documents are not provided. In order to understand the results a paper chase of other documents is required, contrary to the guidance. The assessment of development management policies is inconsistent. Some have a detailed commentary, some no commentary. The results are not transparent. 15.85 The cumulative effects have been addressed collectively through CP1. The cumulative</p>

	Consultee Details	Summary
		effects of the individual policies have not been assessed. The cumulative effects have not been properly assessed.
15.5 15.19 15.66	Agent J & J Design: Trustee Grosvenor Gospel Hall Trust	Notes that the SA fails to provide any justification for the omission of the third paragraph of the model policy issued by PINS, and hence the failure to fully comply with national policy. The SA also fails to evaluate the potential effects of this omission. Welcome the positive social effects from Policy CP4 with regard to recognition of the need to promote local community facilities in support of mixed and balanced communities, promotion of safe communities and to enable improved community participation. However, comments that the SA assessment appears to lack depth of understanding of the range of community facilities needed despite the special needs of the ageing population. Notes that the SA explanatory text omits reference to places of worship, which are explicitly recognised in the NPPF (paras. 28 & 70). This omission appears to have not been reviewed following the publication of the NPPF in March 2012. This is likely to result in a weaker and less effective policy in the Local Plan.

Table C.41 Chapter 16

	Consultee Details	Summary
16.1	Mrs Fiona Lever	The document does not appear to take into account any of the comments raised in the July 2012 consultation. The Pell Frishmann study on the A38 appears to have been overlooked along with the fact that the Highway Agency has yet to approve development in Streethay and may not allow it due to the impact it could have on the strategic road network. The assumption that a development in Streethay could reduce car trips also remains despite the publication of the 2011 Census data which indicates that car ownership is increasing and that Lichfield has above the national average car ownership levels. A survey of Streethay residents indicates that 89-100% of residents drive from their homes to Lichfield town centre, that 59-88% of the working population in Streethay work outside Lichfield district and 73-97% of Streethay residents drive to work. Given the LDC has not received any LSTF funding, query who is going to finance the sustainable travel options. All previous comments submitted in July 2012, still stand.
Table 16.1	Mr Derek Love	Agree with the protection of sensitive sites and particularly the SSSI status of Stowe Pool. The present invasion of American Crayfish must be halted and the native crayfish must be protected.

Table C.42 Chapter 18

	Consultee Details	Summary
18	Wigginton & Hopwas Parish Council	The residents of Wigginton and the Parish Council do not favour any development to the North of Brown's Lane which would result in building nearer to Wigginton and therefore object to any development which led to any further coalescence between the settlements of Tamworth and Wigginton.

Table C.43 Chapter 19

	Consultee Details	Summary
19	Mr Charles E Holland	Recognises that Armitage and Handsacre is to the East of Rugeley & also within reasonable distance of the South East of Stafford, which is a location where the Staffordshire County Council are intent on developing an Industrial Park alongside the A.34, that will provide additional interest to Local Residents of the Lichfield District no doubt including Armitage and Handsacre. Considers that whilst brownfield sites are desirable locations for regeneration specifically required to be undertaken by the system, they are not always available in the time scale, due to the problems of contamination and the need for treatment. Therefore considers that a reserve of other sites should always be available to meet needs for the benefit of the area. Acknowledges that planning standards are to be maintained with regard to the use of land, but takes the view that a certain amount of business acumen also needs to be considered in order to obtain the ultimate best possible deal for the community.
19.7 Table 19.1	The Landor Society	Questions how realistic the delivery of an "additional 450 dwellings" at Rugeley Power Station is, as it is dependent on a the borrow pit being filled in with surplus ash from Rugeley power station, as the owners of the power station have plans to use biomass fuel, which will significantly reduce the level of ash production (only around 24% of the present coal fired station) over the next 8 years. Disagrees with the SA findings in Table 19.1 that there will be a "positive impact upon reducing trips by car" from the East of Rugeley SDA as there is no nearby employment land and very few employment opportunities in Rugeley.

Table C.44 Chapter 20

	Consultee Details	Summary
20	Mr Charles E Holland	Comments that opportunities within rural locations are not always acceptable to local residents and the Authority and certain difficulties regularly have to be overcome in general terms for the benefit of the wider community. Acknowledges that the costs of community services in rural locations are expensive and thus notes that care and attention needs to be considered at all levels as to how the ultimate success of such an investment can be achieved. Considers that the first priority should be the basic provision of the necessary services, & if that is easily available then special regard needs to be taken with respect to the visual environment. Comments that this can often be overcome and also improved by design and featured landscaping. Then regards it necessary to consider the importance of the precise location and the practical benefits to be achieved from a particular pattern of use. Considers that acceptable and fitting design acceptable to the existing is a very important aspect of any development within rural locations. Notes the requirement to provide an opportunity for those that have resided, served and supported the local community to relocate within the community within suitable residential premises within a village and that particularly applies to the agricultural community. Considers that the rural village with its desirable visual environment will usually prove to be attractive to many in which to reside and possibly start a home based business. Notes that if in time such businesses are successful & need to expand this should be generally supported, & that many examples are to be found in Staffordshire, particularly in controversial areas. Considers that an open mind needs to be kept about such matters. Considers that perhaps encouragement should be given to the farming units to link together & form a particular enterprise with respect to the supply of food and goods, supporting the re-establishment of the village shop or a suitable blacksmiths with the advantage to pursue numerous skills and service. Considers that all such themes are a major supporting consideration for Sustainability.

	Consultee Details	Summary
20 20.12	Fradley Park Devs Ltd	<p>Contend that the SA has not assessed the sustainability of options for the Strategic Development Allocation at Fradley. Consider that the use of the additional available brownfield land at the former airfield to accommodate the additional 250 dwellings is the most sustainable solution for Fradley.</p> <p>Understand that the Fradley community does not generally agree with all of the findings of the Rural Masterplanning project, contrary to para. 20.12 of the Sustainability Appraisal. From engagement with Fradley Parish Council and the village contend that it is apparent that the community is strongly opposed to the proposal to develop the fields north of Hay End Lane for housing. Feedback from the community on the Local Plan proposals to Fradley Park Developments Ltd indicate that 97% of people were in favour of using the additional brownfield land at Fradley instead of the proposed greenfield land north of Hay End Lane.</p>
20	BDW Trading	20.1 This chapter sets out the Appraisal of the development options in and adjacent to rural villages in the text and Table 20.1 SA of the Rural Settlements. 20.2 This Representation relates to errors of fact; errors of numerical scoring results; inconsistency in approach and areas of no evidence given from which an attributed score can be considered.

Table C.45 Chapter 21

	Consultee Details	Summary
21	Mr Charles E Holland	Considers that a serious factor to be considered within any monitoring experience is the age of the residents over the various periods in specific locations and their necessary requirements. Suggests that a certain proportion of such balanced information may be obtainable from the local Doctors surgery. Considers that there is also the need to check employment and possibly the likely basic financial income of families within any specific location or given area, in order to determine just what factors need to be seriously considered and just what is likely to be ultimately affordable particularly in respect of retail. Considers that careful analysis needs to be undertaken with respect to the income from the Community Charge and also the property market with respect to all types of housing and the rents payable including retail. Again considers that a particular note needs to be taken of the rateable values of properties within any given areas adjacent to possible future development locations.

Table C.46 Appendices

	Consultee Details	Summary
Appendix A	BDW Trading	Appendices A and B are impossible to understand. The matrices do not include a commentary or any explanation of the scoring system. An amended SA framework has been used but no explanation is given.
Table A.1	G & J Greaves	Disagree with a number of the scores awarded in respect of the new village option at Table A.1 and believe that the sustainability performance of the new village option is higher than suggested. Concerned that a number of the scores awarded by the Council in assessing its own Local plan spatial strategy in this table are too positive.

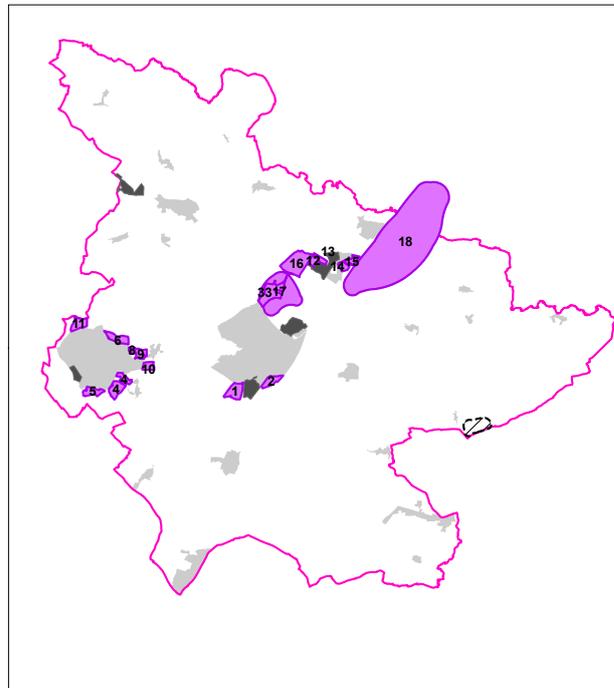
	Consultee Details	Summary
Appendix B	BDW Trading	Appendices A and B are impossible to understand. The matrices do not include a commentary or any explanation of the scoring system. An amended SA framework has been used but no explanation is given.
Appendix C	BDW Trading	Appendix C has not been updated with the representations from July 2012, including the Lichfield Alliance challenge to legal compliance. There is no summary regarding the consultation and the changes that have been made to the plan as a consequence and no conclusions.
Appendix D	BDW Trading	Appendix D - Alternative options map has not been updated to show new options.
Appendix E	BDW Trading	Appendix E - the information set out on BV&TRP is not reflected in the assessment in Appendix F, although some of the information is factually incorrect e.g. biodiversity.
Appendix E	G & J Greaves	Concern that certain details included within these paragraphs (E.104 - E.112) are not directly relevant to the new village option land and/or are inaccurate and that this information will have likely have been relied upon by the Council in its assessment of the new village option. See separate letter dated 17th January 2013 and enclosed Drivers Jonas Deloitte New Village Option Strategy Report dated September 2012 for further information.
E.117 E119	Alrewas Parish Council	Infrastructure must be in place as a priority and must not be left until the middle/end of the housing building works. Need to consider the likelihood of increased flooding from the several planning opportunities identified in the locality. Needs to be a mechanism for looking at the aggregate effect of all proposals not just assessing each proposal on a stand alone basis. Proposals must be properly mapped against the inflows to the Trent, Tame, Dove etc. from a much wider catchment area than the environs of Alrewas. Recent flooding has led to overflows of sewage indicating once again that the pumping stations cannot cope with current usage levels.
E.120	Alrewas Parish Council	Concerned that development proposals in the locality will increase traffic movements along the A38, along a section (Lichfield to Burton) with already inadequate junctions for the volume and type of vehicles (e.g. large numbers of HGV's). Needs to be a mechanism for looking at the aggregate effect of all proposals not just assessing each proposal on a stand alone basis. Also raises concerns over air quality and safety. The timing of the improvements is essential - infrastructure must be in place as a priority and must not be left until the middle/end of the housing building works. Recent flooding along the A38 has also highlighted the chaos caused if the A38 is closed - alternative routes need to be considered and up graded. Provision for the housing numbers required in the Lichfield District has been identified elsewhere in the district and this additional major proposal (Brookhay Villages & Twin Rivers Park) is not necessary and furthermore would lead to the loss of good agricultural land.
Appendix F	BDW Trading	F.1 This appendix sets out the Appraisal of the Brookhay Villages and Twin Rivers Park Option in Table F.1. F.2 The sections in Chapter 20 and Appendix F contain: Errors of fact regarding the three Options commented upon. Errors of numerical addition of scores. Inconsistencies in like-for-like and differential comparisons between Options. Apparent areas where no evidence is given for scores awarded. F.3 This Representation MUST be read in conjunction with the attached documents

Appendix C Summary of Consultation Responses

	Consultee Details	Summary
		IPD-11-220 LDC SA-U Summary of Factual Errors 14-01-2013.pdf, plus SA Update Critique Table 14-01-2013.pdf that details the matters upon which the Representation is based.
Table F.1	BDW Trading	Appendix F.1 - the answers are totally inadequate to enable the reader to understand: a) the proposals. b) the options being assessed. c) the reasons for the scoring or what the scoring means. d) the evidence used to come to the decisions made. e) the significance of the impacts. f) the mitigation measures proposed. g) the regional context. h) the viability/deliverability. i) the short/medium/long term impacts. j) the temporary/permanent/direct and indirect effects. k) the conclusions/recommendations - the results of the options have been grouped into an overall assessment and cannot be understood.
Table F.2	BDW Trading	Appendix F - Table F.2 considers the Variants (i) through (vi), which relates to the spatial distribution of dwellings within each development Scenario (A through J). Although the Variants (iii) and (vi) that both contain the BV&TRP development proposal have scored the highest, there does not appear to be any conclusion or recommendation drawn from this result. The lack of any evidence that the results shown in Table F.2 have been used to inform the Plan Making process renders the Table inadequate to enable the reader to understand: a) the options being assessed. b) the reasons for the scoring or what the scoring means. c) the evidence used to come to the decisions made. d) the conclusions/recommendations - how the results of the assessment cannot be understood.

Appendix D Maps

Map D.1 Sites Assessed



Key

	Lichfield District Boundary
	Settlements
	Submitted Local Plan Spatial Strategy Sites/Locations
	Sites Assessed

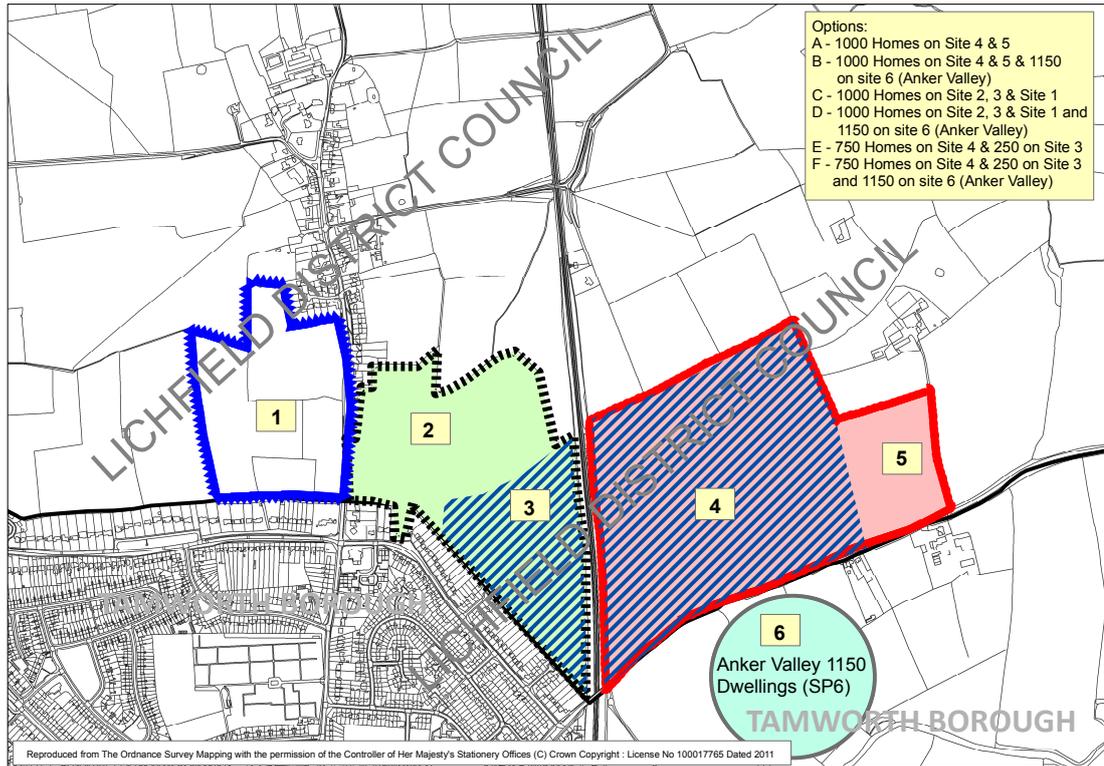
Lichfield
district Council
www.lichfield.gov.uk

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1. Lichfield Deans Slade Farm (450 homes)
2. Lichfield Cricket Lane (450 homes with approx 12ha employment use)
3. NE Lichfield Watery Lane (750 homes)
4. Burtwood South East (500 homes)
5. Burntwood South (250 homes)
6. Burntwood Rake Hill & Meg Lane (567 homes)
7. Burntwood Meg Lane (445 homes)
8. Burntwood East of Rugeley Road (149 homes)
9. Burntwood North of Church Road (440 homes)
10. East Burntwood Farewell Lane (367 homes)
11. Burntwood Bleak House Farm (694 homes)
12. Fradley Gorse Lane - re-allocation of part of the Fradley SDA from employment to residential (250 homes)
13. Fradley Hay End Lane Pig Farm (425 homes)
14. Fradley South of Fradley Lane (258 homes)
15. Fradley North of Fradley Lane (272 homes)
16. Fradley West (850 homes)

- 17. The New Village Option NE Lichfield (2,000 homes)
- 18. Brookhay Village and Twin Rivers Park (BV & TRP) (7,500 homes but 3,600 homes to 2028)

Map D.2 North of Tamworth Options



Appendix E Characteristics of Areas Likely to be Significantly Affected

Lichfield City

Population and Housing

E.1 Lichfield City is the main settlement in the District with a population of around 30,000. It is an attractive town and as such it has become a popular destination for migrants from Birmingham and other parts of the West Midlands conurbation, with the result that house prices are very high compared to the regional average. There is a very high proportion of large detached dwellings, and an under-supply of smaller, more affordable properties. The City 'out-performs' the regional average in housing sales.

E.2 Delivery of low cost housing is key in order to tackle affordability problems associated with affluence in the area, which has some of the highest house prices in the West Midlands.

E.3 More than half of housing delivery in the District in the past ten years has been located in the City of Lichfield itself, which reflects its administrative function in the district, but appears high relative to the size of its population.

Employment

E.4 Lichfield City has lower levels of unemployment than other areas however there is a high level of outward commuting as residents travel outside the District to access jobs which are appropriate to their skills and qualifications.

E.5 Lichfield City is the main location for new 'prime' stock of employment floorspace. There is a concentration of employment within and adjacent to the centre. There are a number of light industrial areas predominantly in the east of the city, not dominated by any one particular industry. The majority of existing employment sites are of good quality, with only pockets of units proving difficult to let.

E.6 The office market within the District is focused on Lichfield South (Wall Island). To date this market has been very successful and there is demand for additional premises in this location, which has the potential to expand.

E.7 The key retail / leisure development in Lichfield will be Friarsgate which proposes a mixed use development, featuring retail, leisure and residential uses as well as the provision of public spaces and infrastructure improvements.

E.8 There is a growing evening economy based primarily around the restaurant trade and cultural activity such as the Garrick Theatre and various other events particularly in relation to the Cathedral.

Transport

E.9 The city is compact, with development radiating outwards from the centre, so that most of the residential and employment areas can access the city centre within reasonable walking or cycling time, for example through the linear park. Conversely, other areas need improvement and safer, more attractive and cohesive links.

E.10 Lichfield City benefits from excellent links both in terms of road, rail and bus networks. There are strong linkages to the M6 (toll) further south, and will be enhanced further through the completion of the southern bypass and improvements to the A38 and A5.

E.11 The key network for Lichfield City has been defined in the Lichfield Integrated transport Strategy and the Transport Appraisal of the Spatial Strategy for Lichfield City (2012). The Trunk Roads (A5, A5148 and A38) to the south and east of Lichfield have been included in the network.

E.12 The analysis uses a Ratio to Flow Capacity (RFC): an RFC of 0.85 generally shows that a link is operating at, or close to capacity. Currently all links in the key network operate with RFCs of less than 0.85 except for St. John Street, north of the signalised junction with Birmingham Road which exhibits RFCs of 0.87 AM peak and 0.97 in the PM peak. The appraisal states that the Friarsgate redevelopment incorporates a scheme which aims to remove inappropriate traffic from the historic core of Lichfield, which will solve any potential link capacity problem. There are therefore currently no acute link congestion issues.

E.13 The city has two rail stations both of which are served by the Cross City North line which is the busiest local rail corridor in the West Midlands, and the West Coast Mainline (Lichfield Trent Valley) linking Crewe and London via Stoke, Stafford, Lichfield, Rugby and Northampton. Phase 1 of the Government's proposed High Speed Rail network passes around Lichfield to the east and north.

E.14 Bus services connect the City of Lichfield to Stafford, Cannock, Burntwood, Walsall, Tamworth, Burton and Birmingham, as well as the surrounding rural villages.

E.15 Analysis of accessibility highlights Lichfield City as accessible in terms of access to key services (employment, education, healthcare, supermarkets) using existing transport infrastructure.

Sport and Recreation

E.16 Lichfield City has leisure facilities linked to the Friary and King Edwards schools which provide swimming and indoor sports facilities. There is a shortfall in provision serving Lichfield City and its hinterland (Facilities Planning Modelling 2010 and the Swimming and Sports Hall feasibility study 2013).

E.17 An Open Space, Sport and Recreation Assessment was undertaken (2012) which identified specific areas of open space within Lichfield City as being poorer in quality, with some identified areas of shortfall in quantity, quality and accessibility including high demand for allotments. The Playing Pitch, Tennis and Bowls Strategy 2012 showed adequate playing pitch provision but a potential shortfall in bowling provision to the south of Lichfield (but serve a wider hinterland).

Crime

E.18 Recorded crime in Lichfield District has shown some considerable reductions over recent years. The majority of offences are clustered around Lichfield City Centre.

Deprivation

E.19 There are pockets of deprivation in Lichfield, specifically to the north-west of Lichfield City.

Landscape

E.20 The City has a significant urban landscape, and the quality of the built historic environment is notable. The City sits in a dip in the landscape and there are key views into the City towards the spires of the cathedral and churches.

E.21 There is a strong call to conserve and enhance existing elements of the built environment, as well as to target environmental improvements to areas which may be identified as in need of enhancement to the urban landscape.

E.22 The City is circled on three sides by green belt land, to the south east, south west and north west. The area to the north-west is identified as part of the Forest of Mercia.

E.23 There are significant green infrastructure links through the City, such as the linear park which connects Beacon Park, Minster and Stowe Pools and beyond to Eastern Avenue, and the Lichfield Canal to the south of the City.

Biodiversity

E.24 Stowe Pool and Walk Mill Clay Pit SSSI is within Lichfield City Centre. There is a Local Nature Reserve on the northern limit of the urban area.

Heritage Assets

E.25 Lichfield City has an outstanding and nationally significant historic built environment, including the cathedral, Dr Johnson's birthplace and Erasmus Darwin House, in addition to a wealth of listed buildings, Conservation Areas, medieval street patterns and other key assets including Beacon Park and the Heritage Centre. There are civic spaces and places to hold events celebrating the city's heritage and culture.

E.26 A significant part of the City is designated as a Conservation Area.

Air Quality

E.27 There are no major air quality issues within Lichfield City.

Water Supply

E.28 The Water Cycle Study has highlighted that there is limited water availability from surface and groundwater management units, especially from the Bourne/Black Brook and the Lichfield and Shenstone Groundwater Management Unit. Minor infrastructure upgrades will be required for south Lichfield.

Wastewater Collection and Treatment

E.29 A number of restrictions regarding wastewater treatment works (WwTW) capacity and infrastructure extent/capacity have been identified, including the areas served by Lichfield WwTW. In the short term, development should not take place within Lichfield WwTW catchment until the wastewater treatment capacity issues are resolved.

Water Quality

E.30 The Black Brook, Fotherley Brook, River Tame and River Trent have been identified as having 'poor' ecological status in the RBMP and the Burntwood Brook, Ford Brook, Moreton Brook, River Blithe and River Mease as having 'moderate' ecological status. Potential developments within the catchments of these watercourses may be impacted by abstraction and wastewater treatment limitations. WwTWs identified as requiring additional capacity and being located on, or upstream, of a watercourse identified as having poor water quality at present or being vulnerable to the impact of new development may struggle to obtain the required increases in consent from the Environment Agency. Additional consultation will be required for sites in those catchments, including sites around the City of Lichfield. It is unlikely this will prevent development, but a delay may be experienced whilst new consents are negotiated or STWL upgrades/improves its WwTWs.

Flood Risk

E.31 Although the City of Lichfield is not located on any main rivers, it is affected by, and contributes to, a number of their tributaries. As such flood risk should be a key consideration for development within the City.

E.32 Surface water flooding is a significant consideration for the City of Lichfield, which suffered badly during the June/July 2007 flood event.

Burntwood**Population and Housing**

E.33 Burntwood is the second main settlement in Lichfield District with a population of around 30,000. It grew rapidly between the 1960s and 1990s through the amalgamation of a series of smaller mining communities which have coalesced.

E.34 Burntwood now has over 30% of the District's population and households but has experienced a far lower rate of housing development in recent years, or around 85dpa, less than 20% of the District's total. In part, this is due to a low level of housing land which is suitable and deliverable.

E.35 The rapid expansion of Burntwood, comprising a number of former mining communities which have amalgamated, has led to it lacking a coherent sense of place. It lacks a town centre large or viable enough to cater for the needs of its population, including town centre functions, social and community facilities. This currently results in residents having to travel to meet many of their employment, shopping and leisure needs.

Employment

E.36 There is a need to diversify employment opportunities in Burntwood, particularly office jobs. There are high levels of out-commuting.

E.37 Quality of employment sites in Burntwood varies from good quality in Zone 1 of the Business Park, to more difficult in terms of access and market attractiveness in sites such as those located at Mount Road / New Road.

E.38 The focus of economic activity is within and adjacent to the centre of Burntwood. It offers mainly secondary / third market accommodation.

E.39 The town centre is currently providing only a small proportion of the retail floorspace required to meet the local population's needs. There is significant leakage of expenditure to other centres. Burntwood is an area in need of improvement, and has recently experienced an increase in vacancy rates and vacant floor space.

E.40 The GBSLEP has identified the A5 and the M6 Toll as growth corridors, and the E3i Belt, a 20-40 km area straddling southern Staffordshire and north Worcestershire featuring 'economic', 'entrepreneurial', 'environmental' and 'innovation' factors which create the conditions for business growth and potential for sustainable, knowledge-based economic growth.

Transport

E.41 Burntwood benefits from excellent links to the strategic highway network. A 'high level' analysis of the performance of Burntwood transportation network has been undertaken using standard transport planning techniques. This indicated that there are currently no peak hour highway capacity issues.

E.42 Burntwood is not served by a railway, but daytime bus services link the town to the wider District.

E.43 Analysis of accessibility highlights Burntwood as having good levels of accessibility to key services (employment, education, healthcare, supermarkets) using existing transport infrastructure.

Sport and Recreation

E.44 Burntwood has 2 sports hall sites and a swimming pool at Burntwood Leisure Centre.

E.45 The 2012 Open Space Assessment identifies a shortfall in play and open space provision. Specific parks were identified within Burntwood as being poorer in quality. The Assessment also highlighted areas with shortfalls in quantity and accessibility. The Playing Pitch Tennis and Bowls strategy (2012) shows there is a need for improved cricket, tennis and rugby facilities.

Crime

E.46 Recorded crime in Lichfield District has shown some considerable reductions over recent years. In relation to Burntwood, there are also hotspots within residential areas including Chasetown.

Landscape

E.47 Cannock Chase Area of Outstanding Natural Beauty (AONB) lies immediately to the north of Burntwood, which provides a natural recreational resource, tourist attraction and important landscape. There are limited opportunities to expand the town significantly to the west without encroaching into Cannock Chase. In addition, Burntwood lies within the Forest of Mercia, a landscape-orientated initiative that seeks to redress the loss of woodland in the West Midlands, and Chasewater Country Park lies to the west.

E.48 Burntwood is completely surrounded by Green Belt land.

Biodiversity

E.49 Burntwood is closely surrounded by two SSSIs. Chasewater and the Southern Staffordshire Coalfield Heaths SSSI lies to the south and west of the town, while Gentleshaw Common SSSI lies to the north. The area also lies within 8km of the Cannock Chase SAC.

E.50 Chasewater County Park is situated between Burntwood, Brownhills and Norton Canes and acts as a focus for biodiversity enhancement, as well as providing recreation, leisure and educational opportunities. A Biodiversity Enhancement Area was identified in regional policy, which extends from Cannock Chase in the north to Sutton Park south of Burntwood, aimed at promoting lowland heath management.

E.51 The District has one site designated as a Local Geological Site south of Burntwood.

Heritage

E.52 Burntwood contains a small number of listed buildings and no Conservation Areas.

Air Quality

E.53 There are no major air quality issues within Burntwood.

Water Supply

E.54 The Water Cycle Study has highlighted that there is limited water availability from the surface and groundwater management units, especially from the Bourne/Black Brook and the Lichfield and Shenstone Groundwater Management Unit. Major investment will be required in the water supply network for all new development sites in Burntwood.

Wastewater Collection and Treatment

E.55 Overall, no major 'show stoppers' have been identified by Severn Trent Water Ltd with regard to wastewater collection and treatment within Lichfield District. However, a number of restrictions regarding wastewater treatment works (WwTW) capacity and infrastructure extent/capacity have been identified, including for the Burntwood WwTW.

Water Quality

E.56 The Black Brook, Fotherley Brook, River Tame and River Trent have been identified as having 'poor' ecological status in the RBMP and the Burntwood Brook, Ford Brook, Moreton Brook, River Blithe and River Mease as having 'moderate' ecological status. Potential developments within the catchments of these watercourses may be impacted by abstraction and wastewater treatment limitations, including at Burntwood.

Flood Risk

E.57 Although Burntwood is not located on any of the main rivers, it is affected by, and contributes to, a number of their tributaries. Fluvial flood risk is a constraint to development within and around Burntwood.

E.58 Surface water flooding is a significant consideration for Lichfield District, and Burntwood has been identified within the Surface Water Management Plan as being at high risk of surface water flooding.

Fradley

Population and Housing

E.59 Fradley is a settlement comprising two parts, a residential area known as Fradley Village and a more recent housing development known as Fradley South sited on the former airfield. Although a rural settlement lying to the north of Lichfield, Fradley has been a focus for employment growth in recent years, mainly on and around the former airfield, accommodating the majority of the District's employers.

E.60 Fradley's status as a key rural settlement means that it functions as a service centre for the wider rural area. However, there is a lack of varied housing stock throughout Fradley, with a significant majority of the stock being large detached houses and a lack of smaller properties so that opportunities for first time buyers and lower income families are limited, as are opportunities for older residents to move to smaller dwellings. This also means that there is a significant imbalance between housing and employment in the local area and Fradley experiences a high level of both out-commuting and in-commuting.

Landscape

E.61 The village maintains a strong physical and visual connection to the countryside. Fradley lies just outside the boundary of the National Forest to the north. This is a landscape orientated initiative that seeks to redress the loss of woodland in the areas. The Coventry Canal enhances the character of the village and contributes to the separation of the two parts of the village.

Biodiversity

E.62 As well as the Coventry Canal, Fradley is close to the River Tame. Both of these features have important functions as wildlife corridors and connect to nearby areas of importance for bird life and priority habitats. There are several patches of ancient woodland around the outskirts of the village.

Heritage Assets

E.63 Part of Fradley is designated as a Conservation Area. There are a number of listed buildings in and around Fradley, and three Scheduled Monuments within a few kilometers.

Air Quality

E.64 Road traffic is the main emission source of pollutants in Lichfield. Monitoring data indicate that the annual mean NO₂ objective continues to be exceeded at roadside locations within the District, including alongside the A38 at Fradley.

Water Supply

E.65 The Water Cycle Study has highlighted that there is limited water availability from the surface and groundwater management units, especially from the Bourne/Black Brook and the Lichfield and Shenstone Groundwater Management Unit. Minor infrastructure upgrade will be required for Fradley Airfield.

Wastewater Collection and Treatment

E.66 Overall, no major 'show stoppers' have been identified by Severn Trent Water Ltd with regard to wastewater collection and treatment within Lichfield District. However, a number of restrictions regarding wastewater treatment works (WwTW) capacity and infrastructure extent/capacity have been identified, including the area served by Alrewas and Lichfield Curborough WwTW which covers Fradley. STWL may need to seek additional funding sources and further consultation with the Environment Agency with regards to the discharge consents.

E.67 Alrewas was identified as having very limited water quality headroom at present. In the short term, development should not take place within Lichfield and Alrewas WwTW catchments until the wastewater treatment capacity issues are resolved.

Water Quality

E.68 The Black Brook, Fotherley Brook, River Tame and River Trent have been identified as having 'poor' ecological status in the RBMP and the Burntwood Brook, Ford Brook, Moreton Brook, River Blithe and River Mease as having 'moderate' ecological status. Potential developments within the catchments of these watercourses may be impacted by abstraction and wastewater treatment limitations. WwTWs identified as requiring additional capacity and being located on, or upstream, of a watercourse identified as having poor water quality at present or being vulnerable to the impact of new development may struggle to obtain the

required increases in consent from the Environment Agency. Additional consultation will be required for sites in those catchments, including Lichfield Curborough and Alrewas WWTWs. These affect Fradley.

Flood Risk

E.69 Lichfield District is located within the catchment of the River Trent. Other main watercourses within the District include the River Blithe, the River Tame, the Mare Brook, the Curborough Brook and the Bourne Brook. All of these are mature rivers and are fairly substantial watercourses associated with wide flood zones, affecting settlements such as Alrewas. Fluvial flood risk is a constraint to development in Alrewas and Fradley.

E.70 Surface water flooding is a significant consideration for Lichfield District. Fradley has been classed as 'amber' for flood risk in the Water Cycle Study, meaning minor infrastructure development may be required.

Transport

E.71 Lichfield District has good connections to the national transport network including the A38(T) which runs near to Fradley. The Highways Agency has concerns regarding heavy traffic levels at junctions on the A38(T) to the east of Lichfield and the road has a poor safety record.

E.72 A railway line passes close to the eastern side of the village but no station exists in Fradley. The nearest passenger station is now Lichfield Trent Valley. Phase 1 of the Government's proposed High Speed Rail network passes close to Fradley.

E.73 Fradley is served by bus services to Lichfield and Burton upon Trent. However, infrastructure improvements are required at Fradley, which is difficult to access without the use of private transport. The lack of a frequent bus service prohibits regular bus use for journeys to work.

E.74 The Coventry Canal runs through the village and merges with the Trent and Mersey Canal at nearby Fradley Junction. Several bridges cross the Coventry Canal in Fradley, including Bell Bridge which carries the A38.

E.75 The Lichfield District Integrated Transport Strategy highlights the management of traffic and lorry movements at Fradley as one of the key strategic issues to be addressed, and notes that any development at Fradley will need to address the existing traffic management, heavy lorries and road safety issues in the village.

Employment

E.76 In 1998 major redevelopment started on the former airfield, with the construction of factories, warehouses and 750 new houses. Today Fradley Park, a 300-acre warehousing and distribution development, covers most of the former airfield. Fradley is the largest rural employment site, and is of regional significance given its scale. There are still undeveloped areas on the site, which form the majority of the land available to meet general employment needs in the District.

E.77 There is potential in the District for the development of a cluster of low carbon technologies, particularly electric cars/car charging points associated particularly with the location of Zytek at Fradley.

Sport and Recreation

E.78 An Open Space, Sport and Recreation Assessment (2012) shows inadequate provision of equipped play towards the east of the village. The Playing Pitch, Tennis and Bowls strategy shows a deficiency of sports pitches (cricket and football). Residents currently have to travel to facilities in adjacent settlements, some of which are being used to capacity. There is a need for community facilities including health provision.

Rugeley

E.79 The town of Rugeley, which lies within Cannock Chase District, sits on the north-western boundary of Lichfield District. This geographic location, coupled with good road and rail communications has led to high levels of out-commuting for jobs and services, particularly by car. Rugeley had around 24,060 residents in 2010, and has accommodated 29% of Cannock Chase District's housing growth over the last ten years.

E.80 The parish of Armitage with Handsacre lies to the east of Rugeley and falls within Lichfield District. This contains a brownfield site with sustainable access to a range of existing services and facilities in the new Hawksyard development, Armitage with Handsacre village, Rugeley and Brereton.

E.81 Rugeley is the second largest town within Cannock Chase District and the principal town in its northern part. It is located on the north-eastern edge of Cannock Chase Area of Outstanding Natural Beauty and has a centre of significant Conservation interest because of Rugeley's origins as an historic market town. There has been a prosperous industrial community at Rugeley since the early 13th century, with tanning, iron, glass and mining as past trades. Because of this it is an area of some historic importance with archaeological potential. The geography of the area and the presence of Cannock Chase means that for certain services Rugeley has looked more to Stafford and to Lichfield than to Cannock.

E.82 In terms of its more recent past however, there was significant late 20th century mining at Lea Hall colliery and the adjacent power station, which remains operational. As a result principally of mine closure there has been the loss of a significant mining community and unemployment issues. There is a significant need therefore to establish a more balanced economy for the area and to address regeneration issues, particularly within the town centre, which has had limited investment since the 1980's. Today Rugeley has a population of around 23,000 people or around 26% of the District total.

E.83 Rugeley town centre is a significant centre for the northern part of Cannock Chase district, but also for a rural hinterland that includes the large village of Armitage with Handsacre within Lichfield District, the Lichfield District parishes of Longdon and Colton, and a rural hinterland within Stafford Borough.

E.84 In relation to Rugeley the particular needs identified through the evidence base overall is for the regeneration of the town and in particular the town centre. This includes providing for new key elements of sustainable transport infrastructure that link the residential areas of

the town better to the town centre and to facilitate movement within the centre, particularly between different functional areas and transport interchanges. There is also a need to improve education and health provision. Analysis of the accessibility calculations highlights Armitage as one of the most accessible in terms of access to key services using existing transport infrastructure, particularly for employment and healthcare facilities. However, an Open Space, Sport and Recreation Survey identified facilities in Armitage with Handsacre as being poor in quality.

E.85 The recent completion of the Rugeley Eastern Bypass has improved access for businesses in the north. The Rugeley-Hednesford-Cannock-Walsall-Birmingham 'Chase Line' rail service continues to grow in its popularity and has benefited from recent service enhancements, including more frequent and faster trains. The WCML has also brought significant benefits to Rugeley. However, some of the local services have declined and now offer a core rather than comprehensive network.

E.86 There are pockets of deprivation and crime hotspots in Rugeley, with issues over housing viability in north parts of the district. Handsacre is a hotspot for recorded crime. Despite recent improvements, access to high quality employment opportunities remains an issue. Transport links are less extensive than in Cannock further south, although Rugeley adjoins the A51 and benefits from a rail station within the Lichfield District on the 'Chase Line'. There is an identified need to rebalance the housing market to provide more aspirational, larger, homes in Rugeley.

E.87 There is a substantial area of defined Green Belt to the south and west, whilst the area also contains part of the Cannock Chase AONB and SAC as well as a number of SSSIs, ancient woodland and flood plain issues. Rugeley town itself also contains a number of Conservation Areas. As such, there are very few large sites available for further housing and limited room for infill development in the urban area.

E.88 Lichfield District is located within the catchment of the River Trent. Other main watercourses within the District include the River Blithe, the River Tame, the Mare Brook, the Curborough Brook and the Bourne Brook. All of these are mature rivers, and are fairly substantial watercourses associated with wide flood zones, affecting settlements such as East Rugeley, as recorded in the historical records from flood events such as August 1987, December 1992, Autumn 2000 and June/July 2007.

E.89 Surface water flooding is a significant consideration for Lichfield District. Armitage and the Longdons have been identified within the Surface Water Management Plan as being at high risk of surface water flooding,

Tamworth

E.90 Tamworth is located in the south-east corner of Staffordshire and has a boundary on the edge of the town to the south and east with north Warwickshire. It is an historic town, once the Saxon Mercian Capital (the site of Offa's summer palace) and a Norman Castle remains a significant feature within the town centre.

E.91 As well as being a market town for a rural hinterland, Tamworth developed as a manufacturing centre during the 20th century principally as the location for Reliant motor manufacturing.

E.92 Rapid growth of the town occurred from the 1960s firstly through implementing overspill agreements with the city that resulted in several planned estates, but latterly through large-scale private sector housing developments, so that today's population is around 76,000 people. Its recent development history and employment needs mean that Tamworth has strong social and economic links with Birmingham, but rapid growth increase has resulted in a town population that is currently skewed towards younger age groups, although an ageing of the population is projected for the period up to 2026. There is therefore a need for social and community infrastructure to develop and adapt to both existing and future needs, but also a need for regeneration in both older areas of the town and in some of the early planned estates.

E.93 In parts the Tamworth urban area is adjoined to settlements within Lichfield District, these being Fazeley and Mile Oak. The geography of the local authority boundaries constrain the future development options available within the Borough.

E.94 Tamworth has some fairly high levels of deprivation with particular pockets in the Glascote Heath area of Tamworth. Deprivation is less of a problem in the surrounding rural areas and small villages.

E.95 The Employment Land Review outlined the employment context for the town. It noted in particular the significance of commuting patterns, since there are significantly more employed residents in the town than there are jobs located within Tamworth itself. There are strong journey to work flows, and although there are strong linkages with employment locations in North Warwickshire and Lichfield District, the strongest relationship is with employment centres in Birmingham. As a result 20% of employed residents within Tamworth have journeys to work of more than 20 kilometres.

E.96 Tamworth town centre is one of the key strategic centres on the north-east side of the West Midlands. It is a principal shopping centre for the area and serves extensive rural areas within Lichfield District and North Warwickshire as well as the town itself.

E.97 The main demographic driver of housing need in Tamworth is natural population change, with a significant surplus of births over deaths. Domestic in-migration was found to be less influential than elsewhere in south east Staffordshire, whilst there was minimal need arising from international migration.

E.98 The Southern Staffordshire Housing Needs Study and SHMA update (2012) notes the small physical area of the Borough itself and the physical constraints, which include flood risk, conservation and biodiversity interest, together with Green Belt in the south of the town. Major upgrades to water supply infrastructure will be required for developments in the Anker Valley. In addition, the Tamworth Wastewater Treatment Works may exceed its capacity if all the proposed development was progressed. The River Tame poses the largest flood risk threat to Tamworth. The closest Household Waste Recycling Centre to Tamworth is currently in Lichfield.

E.99 The Integrated Transport Strategy notes that a range of traffic management and public transport improvements have already been completed within Tamworth, including bus service improvements and an additional parking for Tamworth Station. However it identifies several key strategic transport issues to be addressed. These are identified as: accommodating development at Anker Valley; managing congestion, particularly at Ventura Park; supporting investment in the town centre that complements Ventura Park; improving public transport provision to the West Midlands; supporting A5(T) junction capacity and safety improvements; and, encouraging sustainable travel. Congestion is also an issue on the approach to the town centre in Aldergate/Upper Gungate.

Curborough

E.100 The site is located to the north east of Lichfield and south of Wood End Lane. Streethay is to the south and Fradley Park and the A38 located to the east of the site. It includes previously developed land which formed part of the RAF Fradley airfield. There is potential for diversification of agricultural land and buildings for employment purposes outside the main rural villages, in order to provide more opportunities for Lichfield residents to work within the District. Alrewas has a limited existing economic base in the village itself. There are some quasi employment uses on Main Street.

E.101 There are several listed buildings and a Scheduled Monument around the village of Curborough as well as a Conservation Area. In addition, there are several blocks of ancient woodland in the area, and the Coventry Canal lies close by, with links to priority habitats and areas of importance for bird life.

E.102 The Water Cycle Study has highlighted that there is limited water availability from surface and groundwater management units, especially from the Bourne/Black Brook and the Lichfield and Shenstone Groundwater Management Unit. Major upgrades will be required for the Curborough new settlement. Minor infrastructure upgrade will be required for Fradley Airfield and North Streethay. A number of restrictions regarding wastewater treatment works (WwTW) capacity and infrastructure extent/capacity have been identified, especially with regard to the areas served by Lichfield and Alrewas WwTWs. The Water Cycle Study has classed Curborough as 'red' for both water supply and wastewater treatment, meaning that major infrastructure upgrades are required.

E.103 The Black Brook, Fotherley Brook, River Tame and River Trent have been identified as having 'poor' ecological status in the RBMP and the Burntwood Brook, Ford Brook, Moreton Brook, River Blithe and River Mease as having 'moderate' ecological status. WwTWs identified as requiring additional capacity and being located on, or upstream, of a watercourse identified as having poor water quality at present or being vulnerable to the impact of new development may struggle to obtain the required increases in consent from the Environment Agency. Additional consultation will be required for sites in those catchments, most notably Lichfield Curborough and Alrewas.

E.104 Lichfield District is located within the catchment of the River Trent. Other main watercourses within the District include the River Blithe, the River Tame, the Mare Brook, the Curborough Brook and the Bourne Brook. All of these are mature rivers, and are fairly substantial watercourses associated with wide flood zones, affecting settlements such as Alrewas, as recorded in the historical records from flood events such as August 1987,

December 1992, Autumn 2000 and June/July 2007. There are several stretches of river that run through the Curborough area which fall within the flood zone. Fluvial flood risk is a constraint to development in many areas of the District, including within and around the towns of Alrewas and Fradley. The Water Cycle Study has classed Curborough as 'red' for flood risk, meaning that major upgrades to infrastructure are required.

E.105 There are areas of higher quality agricultural land generally concentrated in a band immediately to the north of the West Coast Main Line (at Brownfield Farm) and also on land west of Streethay.

E.106 The Highways Agency has concerns regarding heavy traffic levels at junctions on the A38(T). Should HS2 be progressed, its route adjoins the north and eastern extremities of the site close to the major Tesco warehouse on Fradley Park.

E.107 Curborough is just outside the National Forest, a landscape-orientated initiative that seeks to redress the loss of woodland in the West Midlands.

E.108 Alrewas has a doctors surgery but Fradley has no current provision relying on services in Alreas or Lichfield.

Brookhay Villages and Twin Rivers Park

E.109 The site of the Brookhay Villages and Twin Rivers Park (BV & TRP) proposed development is currently primarily open land. Part is agricultural with a small number of existing buildings, and part has been or will be worked for minerals. Whilst a small area of the land falls into the classification of 'best and most versatile' agricultural land, the majority is poorer agricultural quality. The agricultural landscape derives from intensive agricultural use with large single fields and limited hedgerows/trees.

E.110 There are numerous sites of biodiversity value within and near the proposed development site, including the River Mease SAC and SSSI, priority habitats, ancient woodland, wet gravel pits important for birds and wildfowl, veteran trees and protected species such as otter.

E.111 The River Tame and the Coventry Canal act as biodiversity corridors which connect with some important habitats. The Central Rivers Initiative is an area identified for habitat creation. BV&TRP is also within the National Forest, a landscape initiative which seeks to redress the loss of woodland in the area.

E.112 The area contains several Scheduled Monuments, a listed building and other historic assets. In addition, there are Conservation Areas nearby at Fradley and Alrewas.

E.113 The Water Cycle Study has highlighted that there is limited water availability from the surface and groundwater management units, especially from the Lichfield and Shenstone Groundwater Management Unit. Minor infrastructure upgrade will be required for Fradley Airfield and North Streethay, and any development at Alrewas.

E.114 The River Tame and River Trent have been identified as having 'poor' ecological status in the RBMP and the River Blithe and River Mease as having 'moderate' ecological status. WwTWs identified as requiring additional capacity and being located on, or upstream,

of a watercourse identified as having poor water quality at present or being vulnerable to the impact of new development may struggle to obtain the required increases in consent from the Environment Agency. Additional consultation will be required for sites in those catchments including Alrewas. Alrewas WwTW has been identified as having very limited water quality headroom at present. In the short term, development should not take place within its catchment until the wastewater treatment capacity issues are resolved. WwTWs discharging into the River Mease require phosphate stripping.

E.115 Fluvial flood risk is a constraint to development in many areas of the District, including within and around the towns of Alrewas and Fradley. The BV&TRP proposed site contains flood risk areas.

E.116 The Highways Agency has concerns regarding heavy traffic levels at junctions on the A38(T). Air quality on A38 at Fradley exceeds standards currently and additional traffic from the development may reduce air quality here further. However, the proposal indicates that road improvement measures will be undertaken which will help to reduce any adverse effects on air quality. The likelihood and significance of effects are unclear.

E.117 There is potential for diversification of agricultural land and buildings for employment purposes outside the main rural villages, in order to provide more opportunities for Lichfield residents to work within the District. Alrewas has a limited existing economic base in the village itself. There are some quasi employment uses on Main Street.

E.118 An Open Space, Sport and Recreation Assessment (2012) identifies some shortfalls in play and amenity space in Alrewas and Fradley and the Playing Pitch, Tennis and Bowls strategy shows some shortfalls in playing pitch provision (such as cricket) for these two villages.

E.119 Alrewas has a doctors surgery but Fradley has no current provision relying on services in Alreas or Lichfield.

E.120 BV&TRP is severed from access to services and facilities in Alrewas and Fradley by the A38.

Glossary

Term	Abbreviation	Meaning
Affordable Housing		Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should: <ul style="list-style-type: none"> • Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices • Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.
Amenity Greenspace		Areas such as parks or recreational fields which can be used by all people either through visual amenity and/or for informal sport and leisure.
Annual Monitoring Report	AMR	A report submitted to Government by local planning authorities or regional planning bodies assessing Local Development Framework progress and policy effectiveness.
Area of Outstanding Natural Beauty	AONB	A statutory National Landscape designation to provide special protection to defined areas of natural beauty. These are designated by Natural England.
Biodiversity Action Plan	BAP	A plan concerned with conserving, protecting and enhancing biological diversity,
Broad Development Location	BDL	A broad development location is a broad area of search, within which, allocations for development will be considered through the Local Plan Allocations document.
Biodiversity		The whole variety of life encompassing all genetics, species and ecosystem variations. This includes diversity within species, between species and of ecosystems.
Biodiversity Enhancement Area	BEA	An area that comprises important concentrations of biodiversity which are to be improved.
Biomass		The biodegradable fraction of products, wastes and residues from agriculture (including plant and animal substances), forestry and related industries.
Brownfield Development or Sites (Previously Developed Land)		Site available for re-use which has been previously developed, and is either abandoned or underused. The definition covers the curtilage of the development.
Central Rivers Initiative		A partnership approach to managing the River Trent and River Tame in the region between Tamworth and Burton upon Trent.
Climate Change		Long term change in weather patterns and increased global temperature, which is likely to be caused by an increase in Carbon emissions.
Clinical Commissioning Groups	CCG	Clinical commissioning groups are NHS organisations set up by the Health and Social Care Act 2012 to organise the delivery of NHS services in England. They replace primary care trusts
Code for Sustainable Homes		Criteria set out by the government to help enforce sustainable residential development. The Code begins at Level 1 being the least sustainable through to Level 6, the most sustainable

Combined Heat and Power	CHP	The use of waste heat from power generation to provide heating for a building or a neighbourhood.
Community Infrastructure Levy	CIL	A new provision which empowers, but not requires, Local Authorities to obtain financial contribution on most types of new development based on size and type of the development. The proceeds of the levy are to be spent on local and sub-regional infrastructure to support the community.
Conservation Area		Areas of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance.
Core Strategy		A Development Plan Document setting out the spatial vision and objectives and strategy of the planning framework for an area, having regard to the Community Strategy (see also DPDs).
Civic Spaces		An extension of the community or public institutions which form the spaces between buildings, such as market squares.
Decentralised Energy		Energy from on-site or renewable sources limiting the need to draw energy from the national supply.
Developer Contributions		Monetary contributions which may be made by a developer as part of a legal agreement (S106 or CIL) when a planning permission is granted. Monies are used to provide local facilities and all types of infrastructure.
Development		Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land."
Development Management		The management or 'control' planning system which requires planning permission to be obtained, and in line with policy, before development can take place.
Development Plan		A document setting out the Local Planning Authority's policies and proposals for the development and use of land and buildings in the authority's area. It includes Unitary, Structure, and Local Plans prepared under transitional arrangements and Development Plan Documents prepared under the Planning & Compulsory Purchase Act of 2004.
Development Plan Document	DPD	DPDs are Local Development Documents that have development plan status. Once adopted, development control decisions must be made in accordance with them unless material considerations indicate otherwise. The DPDs which local planning authorities must prepare, include the core strategy, site-specific allocations of land and, where needed, area action plans. There will also be a proposals map, which illustrates the spatial extent of policies that must be prepared and maintained to accompany all DPDs. All DPDs must be subject to rigorous procedures of community involvement, consultation and independent examination, and adopted after receipt of an inspector's binding report.
District Park		A significant area of publicly accessible natural or semi-natural open space offering opportunities for recreation and play.
Diversification of Rural Employment		The establishment of new enterprises in rural locations often re-using rural buildings and land that is no longer used for agriculture.
Evidence Base		The information and data gathered by local authorities to justify the "soundness" of the policy approach set out in Local Plan and supporting documents, including physical, economic, and social characteristics of an area. This includes consultation responses.
Examination in Public	EIP	The consideration of public views on a development plan document, or proposed changes to it, held before an independent Inspector.

Flood plain		Generally flat-lying areas adjacent to a watercourse, tidal lengths of a river or the sea where water flows in times of flood or would flow but for the presence of flood defences.
Green Belt (not to be confused with the term 'greenfield')		A statutory designation of land around certain cities and large built-up areas, which aims to keep the defined area permanently open or largely undeveloped. Areas of Green Belt within Lichfield District form part of the West Midlands Green Belt. The purposes of Green Belt are to: <ul style="list-style-type: none"> • check the unrestricted sprawl of large built up areas; • prevent neighbouring towns from merging; • safeguard the countryside from encroachment; • preserve the setting and special character of historic towns; and • assist urban regeneration by encouraging the recycling of derelict and other urban land.
Green Infrastructure		The physical environment within and between our cities, towns and villages. It is a network of multi-functional open spaces, including formal parks, gardens, woodlands, green corridors, waterways, street trees and open countryside.
Green Networks or Corridors		Linking rights of way, cycle routes, canals, rivers, parks and woodland to create greater accessibility to the countryside and provide potential for improved biodiversity.
Greenfield Land or Site		Land (or a defined site) which has not been built on before or where the remains of any structure or activity have blended into the landscape over time.
Greenway		Part of green infrastructure, a corridor of undeveloped land, as along a river or between urban centres, that is reserved for recreational use or environmental preservation.
Gypsies & Travellers		Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently.
Habitat Regulation Assessment	HRA	An assessment of the potential effects of a proposed plan or development, in combination with other plans and projects, on one or more European sites of nature conservation/biological importance.
Historic Environment Character Area	HECA	An area of defined character in the landscape, such as medieval field patterns.
Historic Environment Record	HER	A system for recording information, such as known archaeological sites & finds, designated sites, historic landscapes, historic buildings and other features in the landscape.
Historic Landscape Character		The identification of the historic development of today's landscape, and the resultant pattern of physical features due to geography, history and tradition.
Homeworking		Relates to the growing practice of working from home, especially when related to the use of Information Communication Technology.
Housing Market Area		A geographical area which is relatively self-contained in terms of housing demand
Housing mix		The provision of a mix of house types, sizes and tenures in an area.

Implementation		The practical delivery of a measures that form part of a plan.
Indices of Multiple Deprivation	IMD	The index combines a number of indicators which focus on a range of social, economic and housing issues, and are then used to provide an overall deprivation rank for these areas. Published by the Office of the Deputy Prime Minister.
Infrastructure		The basic structures and facilities needed to support a society or organisation.
Infrastructure Delivery Plan	IDP	A plan to implement the necessary social, physical and green infrastructure, required to create sustainable communities in line with a Local Plan.
Issues, Issues and Options, Preferred Options, Policy Directions and Shaping our District		The “pre-submission” consultation DPDs, with the objective of gaining public consensus over proposals ahead of submission to Government for independent examination.
Interim Core Strategy Sustainability Appraisal	ICSSA	An interim sustainability appraisal of the Issues, Issues and Options and Directions of Growth for the Core Strategy
Key Rural Settlements		Defined settlements outside major towns/urban areas providing services and facilities.
Lichfield District Council	LDC	The local authority responsible for matters including planning, environmental health, waste collection, housing, parks and open space.
Lichfield Transport and Development Strategy	LTaDS	A package of measures to deliver road and public transport improvements for Lichfield City.
Lichfield Sustainability Working Group	LSWG	The group established to undertake the sustainability appraisal of the Plan.
Local Centre		Small shops and perhaps limited services, serving a small catchment. Sometimes also referred to as a neighbourhood centre or key rural centre.
Local Development Document	LDD	These include Development Plan Documents, which will form part of the statutory development plan, and Supplementary Planning Documents, which do not form part of the statutory development plan. LDDs collectively deliver the spatial planning strategy for the local planning authority's area, and may be prepared jointly between local planning authorities.
Local Geological Sites		Non-statutorily protected sites of regional and local importance for geodiversity (geology and geomorphology) in the United Kingdom. Local Geological Sites together with Local Wildlife Sites are often referred to as Local Sites
Local Plan		The plan for future development within Lichfield District upto 2029, drawn up by the local planning authority in consultation with communities and other bodies. The Local Plan when adopted forms the statutory plan for the District. The Lichfield District Local Plan will be divided into two documents; the Local Plan Strategy and the Local Plan: Allocations.
Local Plan Strategy		This document. The Local Plan Strategy contains the broad policy directions and long term strategy to manage development, infrastructure and services across the District. The strategy consists of strategic policies which set out how the strategy will be implemented and monitored.
Local Plan: Allocations		Second part of the Lichfield District Local Plan which will contain policy based allocations to manage development within the District until 2029.
Local Planning Authority	LPA	The Local Authority or Council that is empowered by law to exercise planning functions. Often the local Borough or District Council.

Local Transport Plan	LTP	A five-year integrated transport strategy, prepared by local authorities in partnership with the community. The plan sets out the resources for delivery of the targets identified in the strategy.
Mitigation		Measures to avoid, reduce or offset the significant adverse effects of an external factor e.g. Lessening the effects of climate change.
Mixed use (or mixed use development)		Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.
National Forest		A national project for woodland creation, tourism and economic revival.
National Planning Policy Framework	NPPF	Document containing all national planning policy published in March 2012. The National Planning Policy Framework replaced all previously issued Planning Policy Statements (PPS) and Planning Policy Guidance Notes (PPG)
Natural assets		Stocks of natural raw materials, including forests, fisheries, soil, and minerals; and the capacity of the environment media such as air and water to absorb and decompose the wastes from production and consumption.
Natural & Semi-natural Greenspace		Includes woodlands, wetlands, urban forestry, local geological sites, scrub and grassland.
Nature Reserves		A protected area of wildlife or other geological interest. Can also be used to provide opportunity for special areas of research.
Neighbourhood Centre		An group of essential local services which may comprise a shop, post office, take away, health centre and a pharmacy. See also, local centre.
Neighbourhood Plan		An area based plan prepared by it's community as defined in the Neighbourhood Planning (General) Regulations 2012. Once 'made' a neighbourhood plan becomes part of the development plan for the area.
Objective		On-line consultation centre.
Offices		Defined by Class A2 of the Use Class Order, including financial and professional services, rather than businesses which are covered by Class B1 of the Use Class Order.
Open Space		All space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation. They can also act as a visual amenity and a haven for wildlife.
Other Rural Settlements		Smaller villages that do not have a good range of public services.
Pitch (Gypsy and Traveller Sites)		A designated place for a family of Gypsies or Travellers to live.
Phasing		Distinct stages of development implemented in a sequential manner appropriate to demand.
Primary Care Trust	PCT	An NHS primary care trust is a type of NHS trust, which is part of the National Health Service in England. The PCT formerly provided some primary and community services or commissions them from other providers, and are involved in commissioning secondary care.
Regeneration		The economic, social and environmental renewal and improvement of rural and urban areas.
Regional Spatial Strategy	RSS	The RSS was a strategy for how a region should look in 15 to 20 years time and possibly longer. It identified the scale and distribution of new housing in region, indicates areas for regeneration, expansion or sub-regional planning and

		specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal. Regional Spatial Strategies were revoked by the Secretary of State on 6th July 2010 and therefore the Regional Spatial Strategy for the West Midlands no longer forms part of the development plan.
Registered Provider	RP	Also known as Registered Social Landlords. Is the generic name for all social landlords who provide low-cost social housing for people in housing need on a non-profit making basis.
Renewable Energy		Energy produced from a sustainable source that avoids the depletion of the earth's finite natural resources, such as oil or gas. Sources in use or in development include energy from the sun, wind, hydro-power, ocean energy and biomass.
Retail Floorspace		Total floor area of the property that is associated with all retail uses. Usually measured in square metres.
Rural Regeneration		Careful development in rural areas to ensure local housing needs are met and that there are suitable opportunities for employment to ensure economic sustainability.
Safeguarding		to ensure that no harm is caused to a particular feature.
Section 106 Agreement		A legal agreement under Section 106 of the 1990 Town & Country Planning Act. It is a way of addressing matters that are necessary to making a development acceptable in planning terms such as providing highways, recreational facilities, education, health and affordable housing.
SIC Code	SIC	Standard Industrial Classification. A standard used to classify business establishments by economic activity.
Site of Biological Importance	SBI	A non-statutory designation used to protect locally valued sites of biodiversity.
Site of Special Scientific Interest	SSSI	A site identified under the Wildlife and Countryside Act 1981 (as incorporated in the Countryside and Rights of Way Act 2000) as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (basically, plants, animals, and natural features relating to the Earth's structure).
Social Rented Housing		Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of a grant.
Spatial Planning		Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. This includes policies which can impact on land use, for example by influencing the demands on, or needs for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.
Spatial Strategy		The overview and overall approach to the provision of jobs, homes, and all infrastructure over the plan period.
Special Area of Conservation	SAC	Strictly protected sites for rare and threatened species and habitats on land or sea as designated under the EC Habitats Directive.
Staffordshire County Council	SCC	The local authority responsible for matters including education, transport, highways, minerals and waste.

Staffordshire Strategic Partnership	SSP	A framework for all agencies, sectors and partners to work collectively to promote the economic, social and environmental well being of the County.
Strategic Centre		A local or town centre which provides a wide range of services and facilities such as shops, supermarkets, post office, banks, health centres etc.
Strategic Development Allocation	SDA	An area which has been identified and allocated for new development, which is significant to the spatial strategy as a whole. These allocations are usually complex, have long lead in times and can assist in the delivery of strategic infrastructure.
Strategic Development Location	SDL	An area which has been identified as suitable for new development, which will be significant to the spatial strategy as a whole. In the submitted Local Plan Strategy these Strategic Development Locations became the Strategic Development Allocations.
Strategic Framework Objective	SFO	The overarching objectives established through the preparation of the Scoping Report which are used to assess the environmental, economic and social impacts of the Plan
Strategic Flood Risk Assessment	SFRA	An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.
Strategic Housing Land Availability Assessment	SHLAA	An assessment of the potential housing sites to inform the Core Strategy and subsequent allocations of land. The Strategic Housing Land Availability Assessment (SHLAA) which has been prepared in line with good practice guidance with the involvement of the development industry, local property agents and the local community, identifies the committed sites, additional urban capacity and a range of other sites that have been submitted for consideration. The SHLAA is not a policy document, but identifies the range of sites that are being given further consideration through the formulation of the Core Strategy.
Strategic Housing Market Assessment	SHMA	An assessment of the estimated demand for market housing and need for affordable housing in a defined geographical area, in terms of distribution, house types and sizes and the specific requirements of particular groups and which considers future demographic trends.
Supplementary Planning Document	SPD	An SPD is a Local Development Document that may cover a range of issues, thematic or site specific, and provides further detail of policies and proposals in a 'parent' DPD.
Supported Housing		A housing service aimed at helping people live more stable lives, including those who may have suffered from homelessness, addiction or other serious challenges to life.
Surface Water Management Plan	SWMP	The reports follow the requirements of Defra's draft Surface Water Management Plan (SWMP) guidance and have been produced for the Local Authority areas of Stafford Borough, Lichfield District, Tamworth Borough, South Staffordshire District and Cannock Chase District. The purpose of the report is to identify areas at the greatest risk of surface water flooding and to provide evidence for the Local Plan.
Sustainability Appraisal	SA	An assessment to establish if the plan is promoting sustainable development. An assessment to comply with Section 39(2) of the Planning and Compulsory Purchase Act 2004 and further guidance, and the requirements for Strategic Environmental Assessment from European Directive 2001/42/EC

Sustainable Communities		Central Government refers to sustainable communities as 'places where people want to live and work, now and in the future'. Creating communities that are more sustainable will generally mean seeking to provide a range of homes, jobs and facilities that enables people to meet more of their needs locally without the need to make long journeys by private transport.
Sustainable Community Strategy	SCS	A strategy prepared by a community to help deliver local aspirations, under the Local Government Act 2000.
Sustainable Development		A widely used definition drawn up by the World Commission on Environment and Development in 1987: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The Government has set out four aims for sustainable development in its strategy "A Better Quality of Life, a Strategy for Sustainable Development in the UK". The four aims, to be achieved at the same time, are: social progress which recognises the needs of everyone; effective protection of the environment; the prudent use of natural resources; and maintenance of high and stable levels of economic growth and employment.
Sustainable travel / Sustainable Transport		Often meaning walking, cycling and public transport (and in some circumstances "car sharing"), which is considered to be less damaging to the environment and which contributes less to traffic congestion than one-person car journeys.
Sustainable Drainage Systems	SuDS	A replicate natural system which aims to reduce the potential impact of new and existing developments on surface water drainage discharges such as permeable paving or on site retention basins.
Sustainable Urban Extension / Sustainable Urban Neighbourhood	SUE / SUN	The name given to the Anker Valley allocation within Tamworth Borough Local Plan June 2012 which was withdrawn.
Third Sector		The third sector is a term frequently used to describe voluntary, community and not-for-profit organisations. The term is taken in reference to the private and public sectors.
Traffic Impact Assessment	TIA	An assessment of the effects upon the surrounding area by traffic as a result of a development, such as increased traffic flows that may require highway improvements.
Travelling Showpeople		Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently.
Touch Down Units		Locations available to business's which offer a range of services and facilities such as internet access, hot desk provision, meeting/conference rooms and photocopying. These spaces offer access to facilities which some business's otherwise would not be able to access.
Unregulated energy		The expected energy use in a building which is not 'regulated' (see 'Regulated energy' above). Unregulated energy does not fall under Building Regulations, and most typically includes appliances and small electrical items.
Urban Cooling		The effect which can be achieved by increasing vegetation cover and reducing hard surface cover in built up areas to reduce very high temperatures.
Urban open space		Parks, play areas, sports fields, commons, allotments, green corridors alongside rivers/canals/railways and other open areas vital to the cultural, aesthetic and historic heritage of urban life.

Veteran Trees		Trees that are of interest biologically, culturally or aesthetically because of age, size or condition. Normally this means the tree is over 250 years old with a girth at breast height of over 3 metres. However, other factors must be considered such as the location and past management of the tree.
Viability		In terms of retailing, a centre that is capable of success or continuing effectiveness. More generally the economic circumstances which would justify development taking place.
Vibrancy		An area or street which is alive with activity.
Vitality		In terms of retailing, the capacity of a centre to grow or develop.
Waste Hierarchy		The waste hierarchy is the cornerstone of most waste minimisation strategies and refers to the 3Rs of reduce, reuse and recycle. The Staffordshire & Stoke-on-Trent Joint Core Strategy refers to 5 stages: eliminate, reduce, re-use, recycle, energy recovery & dispose. The aim of the waste hierarchy is to generate the minimum amount of waste and to extract the maximum practical benefits from products.
Water Framework Directive	WFD	A European Union Directive committing member states to achieve good qualitative and quantitative status of all water bodies by 2015.
Windfall Development or Site		A site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan. Most "windfalls" are referred to in a housing context.