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

Local Plan Allocations Sustainability Appraisal Scoping Report: Consultation Sheet

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

Table 1:

Comment	Response
Statutory Organisation: Historic England	
Historic England has published guidance on the SA/SEA process and the historic environment which may be of interest – this can be found at https://content.historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-envirnment/SA SEA final.pdf. This includes a list of international, national and local plans and programmed that could usefully supplement the list on pages 14-16.	Duly noted, **Recommendation** The following documents will be included in the review of Relevant Plans, Programmes and Policies. • UNESCO World Heritage Convention 1979 • European Landscape Convention (Florence Convention) • The Convention for the protection of the Architectural Heritage of Europe (Granada Convention). • The European Convention on the Protection of Archaeological Heritage (Valetta Convention) • National Policy Statement for Waste Water March 2012 • National Policy Statement for Energy July 2011 • Streets for all: Guidance for Practitioners- English Heritage's regional manuals on the design and management of streets and public open spaces
We welcome the section on the built and natural environment baseline data on page 20. In our view, this should be expanded to include data on Heritage at Risk within the district (https://historicengland.org.uk/advice/heritage-at-risk/) as well	Duly Noted Information requested is contained within the following sections of Appendix B **Main Heading**

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

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

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

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

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

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

6. Number of species relevant to the district which have achieved BAP Veteran trees, ancient woodland. It isn't clear from the SA scoping report how these types of indicators would help us understand the SA/SEA performance of the proposed sites.	See amended Site Specific Questions and indicators listed against Staffordshire County Council : Ecology rep box three
Sustainability objective – 'To protect and enhance the rich diversity of natural archaeological/geological assets, and landscape character of the district'. Site Specific questions: 1. Will it promote and maintain an attractive and diverse landscape 2. Will it protect areas of highest landscape quality 3. Will it improve areas of lower landscape quality 4. Will the development create a new landscape character. We refer the Council to the Statements of Environmental Opportunity (SEO) for the relevant NCA profile and the 'special qualities' of the Cannock Chase AONB (see AONB Management Plan 2014-19). Where proposals are for over 100 homes and/or 3Ha in extent Natural England consider this may represent a strategic site. Landscape & Visual Impact Assessment should be carried our accordingly. The following NPPF material is relevant: Para 17. Within the overarching roles that the planning system ought to play, a set of core land use planning principles should underpin plan-making …..planning should… take account of the different roles and character of different areas, … recognising the intrinsic character and beauty of the countryside.	Duly Noted. **Recommendation.** The following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2 1. Proximity to an internationally or nationally designated landscape 2. In terms of Landscape Character Types what is the sites sensitivity rating? 3. Proximity to an internationally or nationally designated geodiversity sites 4. Is it on previously undeveloped land? 5. Does it offer the opportunity to promote landscape connectivity? 6. Does it offer the opportunity to improve or create the landscape character of the District? The following questions will remain. Will it improve existing green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiatives. Will it prevent the sterilisation of mineral resources. In addition the Assumption Appendix will provide further clarity in regard to assessment.

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

led approach. The Site Allocations part of the local plan process provides a platform for the implementation of the strategic approach in the LPS. Clear linkage between the allocated sites' performance in terms of offering opportunities e.g. improvements in Landscape character and creating and linking GI would be desirable and positive.	
Sustainability Objective – "Maximise the use of previously developed land/buildings and the efficient use of Land" Site specific questions –formatting typo to correct. Detailed indicator – "% of permissions granted on previously developed land as a % of previously developed land available within the District". We refer you to our comments above on landscape character and multifunctional GI. Regarding the wording of the detailed indicator – would numbers of units be valuable too? i.e. to give a sense of the scale as well as the percentage balance being achieved.	Duly Noted **Recommendation** Table 1 Sustainability Objective 5, Site Specific Questions, amend bullet point 3 to read: 1. Would the development of the site involve the loss of greenfield? Bullet point 4 to be removed 2. Would the development of the site involve the loss of gardens? Table 1 Sustainability Objective 5, Detailed Indicator, amend to read: % of permissions granted on previously developed land. Table 1 Sustainability Objective 5 Detailed Indicator add. Number of homes granted permission on previously developed land.
Sustainability Objective – "Reduce the need to travel to jobs and services through sustainable integrated patterns of	Duly Noted **Recommendation**

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

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

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

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

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

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

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

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

	3. What affect will there be on statutory designated sites? 4. What affect will there be on veteran trees? 5. What affect will there be on green corridors and water courses? 6. Will it reduce ecological connectivity? 7. What affect will there be on the RIGS site **Detailed Indicator** 1. Performance SBAP Action Plan Targets 2. Amount of priority habitat created, restored or maintained as part of the site allocation. 3. Amount of green and blue infrastructure restored or maintained as part of the site allocation 4. Increased links between woodland, hedgerows, copes, individual trees – including veteran and aged trees. 5. Number of and area of RIGS within the District.
We also note that the proposed indicators fail to answer most of the questions and recommend a rethink.	Duly Noted **Recommendation** See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above.
There is no mention of water quality or ecological status despite Water Framework Directive requirements for Local Plans to contribute to objectives.	Duly Noted **Recommendation** See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above
In Table 1 there appears to be a typo in the biodiversity Detailed Indicator column for item 1 which should read Lowland Heathland (i.e. without the slash). There appears to be a typo in the biodiversity Detailed Indicator column for item 3 which should read either wildflower grassland or species-rich grassland.	Duly Noted **Recommendation** See amended Table 1 Sustainability Objective 1 Detailed Decision Making Criteria and Detailed Indicator above.

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

Staffordshire Ecological Record which is the data holder for the data that will be essential for monitoring	Appendix B Page 99 Nature Conservation Sites amend typo Sites of Biological Interest to Sites of Biological Importance Remove reference to Cannock Chase AONB and reposition in the additional Landscape Section. See response to SCC Landscape representation for further information. Add the following text: There are 78 SBI's within Lichfield District; however the total number of sites changes periodically. Up to date information on these sites and their boundaries is provided by Staffordshire Ecological Record. Add the following text: Lichfield District contains a wide variety of species which are defined by and received protection under domestic or European Legislation. Particular protected species that have been encountered within Lichfield District include: • Bats • Birds • Great crested newts • White clawed crayfish • Water voles • Otters • Badgers • Invertebrates • Reptiles • Plant species
Staffordshire County Council: Landscape	
Section 3 European Landscape convention (Florence 2002)	Duly Noted **Recommendation**

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

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

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

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

relation to the above statement. Walsall Council is working with the Cannock Chase SAC Partnership to agree what evidence is relevant to the consideration of housing numbers. This matter is of fundamental importance to additional work that might be commissioned to support Lichfield's emerging Local Plan Allocations.	

Local Plan Allocations Sustainability Appraisal Scoping Report: Consultation Sheet

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

Table 2:

Comment	Original response	Amended Response
Statutory Consultee: Natural England In terms of wider themes we note that the district's high level of car use and 'out commuting'. The Council should consider related air quality impacts on 'ecological receptors' (semi natural habitats and their wildlife) in order to understand potential effects arising from site allocations.	Duly Noted Recommendation The following site specific question will be added to Table 1 against Sustainability Objective Seek to improve air, soil and water quality.	Duly noted Recommendation the following site specific questions will appear against Sustainability Objective 9 1. Which Source Protection Zone does the development fall within? 2. Does the site fall within the River Mease SAC? 3. Is the site within or directly connected by road to an AQMA? 4. Will it result in the loss of quality agricultural land?
Statutory Consultee: Natural England Sustainability objective – 'To protect and enhance the rich diversity of natural	Duly Noted Recommendation	Duly Noted Recommendation The Following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2

archaeological/geological assets, and landscape character of the district'. Site Specific questions: 1. Will it promote and maintain an attractive and diverse landscape. 2. Will it protect areas of highest landscape quality 3. Will it improve areas of lower landscape quality 4. Will the development create a new landscape character? We refer the Council to the Statements of Environmental Opportunity (SEO) for the relevant NCA profile and the 'special qualities of the Cannock Chase AONB (see AONB Management Plan 2014-19). Where proposals are for over 100 homes and /or 3 Ha in extent Natural England consider this may represent a strategic site Landscape & Visual Impact Assessment should be carried out accordingly. The Following NPPF material is relevant: Para 17. Within the overarching roles that the planning system ought to play, a set of core land use planning principles should underpin plan making … planning should .. take account of the different roles and character of different areas… recognising the intrinsic character and beauty of the countryside.	The Following indicator will be added to the Site Specific Questions Table 1 related to the Sustainability Objective 2 1. Proximity to an internationally or nationally designated landscape 2. In terms of Landscape Character Types what is the sites sensitive rating? 3. Proximity to an internationally or nationally designated geodiversity sites. 4. Is it on previously undeveloped land? 5. Does it offer the opportunity to promote landscape connectivity? 6. Does it offer the opportunity to improve or create the landscape character of the District? The following questions will remain Will it improve existing green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiatives? Will it prevent the sterilisation of mineral resources In addition the Assumption Appendix will provide further clarity in regard to assessment.	1. Does it respect and protect existing landscape character? 2. Will it protect sites of geological importance? 3. Does it offer the opportunity to improve and promote landscape connectivity sympathetic to the existing District landscape character? 4. Will it lead to the sterilisation of mineral resources? 5. Will it improve existing green infrastructure including National Forest, Forest of Mercia and the Central Rivers Initiative? 6. Will it result in the loss of historic landscape features? 7. Will it safeguard sites of archaeological importance and their settings? Note: Question 4, Is it on previously undeveloped land. Has been removed due to duplication. The following questions appears against Sustainability Objective 5. Will it result in the loss of land that has not previously been developed?

Para 109 The Planning system should contribute to and enhance the natural and local environment by … protecting and enhancing valued landscapes…. Para 170 Where appropriate, Landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of Landscape sensitivity.		
Sustainability Objective - " Maximise the use of previously developed land/buildings and the efficient use of Land" We refer you to our comments above on landscape character and multifunctional GI. Regarding the wording of the detailed indicator – would number of units be valuable too? I.e. to give a sense of scale as well as the percentage balance being achieved.	Duly Noted Recommendation Table 1 Sustainability Objective 5, Site Specific Questions, amend bullet point to read: 1. Would the development of the site involve the loess of greenfield? Bullet point 4 to be removed 2. Would the development of the site involve the loss of gardens? Table 1 Sustainability Objective 5, Detailed Indicator, amend to read: % of permissions granted on previously developed land. Table 1 Sustainability Objective 5 Detailed indicator add.	3. Will it result in the loss of land that has not previously been developed? 4. Is the site capable of supporting higher density development and/or a mix of uses? 5. Does the site allow for the re-use of existing buildings? 6. Will it reduce the amount of derelict, degraded and underused land within the District?

	Number of homes granted permission on previously developed land.	
Sustainability Objectives – "Reduce the need to travel to jobs and services through sustainable integrated patterns of development, efficient use of existing sustainability modes of travel and increased opportunities for non- car travel". Our comments about 'site specific questions' apply equally here. The performance of individual sites in terms of SA/SEA will reflect their strategic location and relationship with existing infrastructure. Detailed indicators should refer to sustainable transport links (bus routes, Cycleway and paths) created or enhanced through the provision of multi – functional GI.	Duly Noted Recommendation Add the following against Table 1 Sustainability Objective 6 Detailed Indicator • Access to bus services • Access to cycle ways • Increase in the provision of multi-functional space; Cycle and walking networks that include green Infrastructure gain. Remove the following indicators 1. Traffic Counts on selected strategic roads in the District 2. Journey to work by mode 3. Access to bus services In addition see recommended amendments made against SCC highway comments. In addition the assumptions will further link sites to existing sustainable transport infrastructure.	Duly Noted Recommendation The following site Specific Questions against Table 1 Sustainability Objective 6 will be used. 1. Does the site location encourage the use of existing sustainable modes of travel? 2. Will it reduce the overall impact on traffic sensitive areas? 3. Will it help develop walking, cycling and bus networks to enable residents access to employment, services and facilities? 4. Will it help develop rail transport networks to access employment, services and facilities?
Staffordshire County Council : Ecology In Table 1 Indicators for designated sites should refer to site condition rather than number of sites as the number of sites or their size is not within Local Plan influence. Sites outside the District but affected by the Plan need to be included – e.g.	Duly Noted Recommendation The following text will replace the Detailed Decision Making Criteria and Detailed Indicator Information that relates to Sustainability Objective Table 1.	Duly Noted Recommendation The following site Specific Questions against Table 1 Sustainability Objective 1 will be used. 1. Will it conserve protected/priority species?

Cannock Chase SAC and the River Mease SAC outside of the District. WE recommend the indicator be percentage of international/national sites in favourable condition. This reflects Natural England's Condition assessment phraseology. An indicator for Local Wildlife Sites (sites of Biological Importance) should be included.	Detailed Decision making Criteria Why Site Specific Questions: 1. What affect will there be on protected /priority species 2. What affect will there be on priority habitats and local nature conservation sites? 3. What affect will there be on statutory designated sites? 4. What affect will there be on veteran trees? 5. Will it reduce ecological connectivity? 6. What affect will there be on the RIGS sites	2. Will it conserve protect priority habitats and local nature conservation sites? 3. Will it protect statutory designated sites? 4. Will it encourage ecological connectivity (including green corridors and water courses)? Note Impact on RIGS Sites is measured through Sustainability Objective 2 Site Specific Question 2.