

# LICHFIELD DISTRICT COUNCIL



## LOCAL PLAN ALLOCATIONS FOCUSED CHANGES MAIN MODIFICATIONS CONSULTATION SUSTAINABILITY APPRAISAL 2018

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# 1 Introduction

## Background

This document is called a Sustainability Appraisal Report. It is the key output of the Sustainability Appraisal and Strategic Environmental Assessment (SEA) processes. It presents information on the social, environmental and economic effects of implementing Lichfield District Local Plan Part 2, Local Plan Allocations (hereafter referred to as the LPA) and the appraisal methodology adopted to identify these effects.

This report has been produced to meet the reporting requirements of both the Strategic Environmental Assessment and the Sustainability Appraisal processes and will be updated should there be any changes to the LPA as it moves towards adoption.

The Draft LPA had been subject to two Regulation 19 consultations. The first took place between 20<sup>th</sup> March 2017 and the 12<sup>th</sup> May 2017. Approximately 5000 representations were received in the response to the consultation. This was followed by consultation on the Draft LPA Focused Changes document (Regulation 19) consultation which took place between the 8<sup>th</sup> January 2018 and the 19<sup>th</sup> February 2018. Just under 300 representations were received in the response to the consultation.

Between the two Regulation 19 consultations there were two significant factors that altered the planning landscape for Lichfield District and the context of the LPA. The first was receipt of three appeals from the Secretary of State, one of these appeal decisions for 750 dwellings at Land at Watery Lane was approved despite not being in conformity with the Local Plan Strategy. The second factor relates to the Government's consultation on the Housing White Paper which inter alia seeks to clarify the national policy position associated with Green Belt. The consultation documents were both subject to sustainability assessment.

The Local Plan Allocations 2008-2029 Focused Changes document included all required accompanying documentation (including a Sustainability Appraisal) and was submitted to the Planning Inspectorate 31<sup>st</sup> May 2018. A schedule of proposed Modifications (March 2018, Examination Core Document Reference CD1-3) was part of the submission. Proposed Modifications M3 and M4 were considered within the accompanying Sustainability Appraisal. The subsequent updates to the submitted Sustainability Appraisal have been clearly listed within the submitted schedule of changes to local plan Allocation supporting documents (March 2018, Examination Core Documents Reference CD1-4).

The LPA was subject to Examination in Public (EIP). Hearing sessions opened on the 4<sup>th</sup> September and took place over a two week period. Following the hearing sessions, the Inspector provided the district council with suggested Main Modifications. The council are now required to consult on these Main Modifications

A total of seven Main Modifications have been developed and they can be found in full on the district council's website. Following assessment of the proposals it is considered that two suggested Main Modifications require inclusion within the Sustainability Appraisal. Proposed amendments to existing policy EMP1 Protection of Employment land (MM7) and the inclusion of a new policy Local Plan Review (MM1) are both considered to require assessment.

Therefore this report considers Main Modifications (MM1 and MM7) in the context of a Sustainability Appraisal. Further it includes such assessments within the submitted Sustainability Appraisal that accompanied the LPA through examination which has resulted in a Main Modification version of the Sustainability Appraisal.

## Delivering Sustainable Development

In producing the Local Plan Lichfield District is committed to the promotion of sustainable development. The Bruntland Report released by the World Commission on the Environment and Development defined sustainable development as:

“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

- The key priorities for delivering sustainable development are set out in the UK Government’s Sustainable Development Strategy (securing the Future) published in March 2005. These are:
  - Sustainable Consumption and Production
  - Sustainable Communities
  - Natural Resource Protection and Environmental Enhancement
  - Climate Change and Energy

The concept of sustainability lies at the heart of the Planning Process. The National Planning Policy Framework states that ‘At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking’. In order to ensure that the LPA is ‘sustainable’ we are required to carry out two distinct, but complementary processes. These processes are called Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). These two processes are considered in more detail below.

## Strategic Environmental Assessment

The European Directive 2001/42/EC enacted in England under the Environmental Assessment of Plans and Programmes Regulations (2004) requires a Strategic Environmental Assessment (SEA) to be completed on all parts of the LDF with the exception of the Local Development Scheme (LDS), and Statement of Community Involvement (SCI).

The purpose of Strategic Environmental Assessment is to “provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development,” (2001/42/EC Article 1). Put simply the SEA process requires that in preparing the Local Plan we consider its likely effects on a broad range of issues such as *biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape* (2001/42/EC annex 1) and determine whether negative effects of implementing the Local Plan can be improved and positive effects enhanced.

By ensuring that Local Planning Authorities consider these issues the SEA Directive seeks to ensure that environmental considerations are fully integrated into the preparation and adoption of plans and programmes which are likely to have a significant effect on the environment.

## Sustainability Appraisal

Whilst SEA focuses upon environmental issues, Sustainability Appraisal (SA) widens the approach to include social and economic issues. The purpose of Sustainability Appraisal is to ensure that the principles of sustainable development are taken fully into account when preparing the Local Development Framework. In preparing all Local Development Documents that will be included within the Local Development Framework Section 19 (5) of the Planning and Compulsory Purchase Act (2004) requires that we:

- Carry out an appraisal of the sustainability of the proposals in each documents
- Prepare a report of the findings of the appraisal

### The Combined Process

In England, the requirements for Sustainability Appraisal and Strategic Environmental Assessment have been integrated into a combined 'Sustainability Appraisal'. This combined process is designed to extend the ambit of rigour of the SEA process to include other pillars of sustainability, namely social and economic assessment.

The combined Sustainability Appraisal process seeks to ensure that all relevant Local Development Framework Documents are subject to appraisal before they are adopted in order that the environmental social and economic effects of each plan can be adequately tested and modified prior to adoption.

### Habitat Regulations Assessment

The Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna- the Habitats Directive provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance and/or restoration of habitats and species of interest to the EU in a favourable condition. This is implemented through a network of protected areas referred to as Natura 2000 sites.

Articles 6 (3) and 6(4) of the Habitats Directive require an Appropriate Assessment for plans and projects likely to have a significant effect on a European site. The requirement for HRA in the UK is set down in the Conservation (Natural Habitats 7c) Regulations, 1994 in England and Wales, amended in 2007 and is consolidated into the Conservation of Habitats and Species Regulations 2010 (SI No. 201/490).

### Purpose of this Report

This report sets out the findings of the Sustainability Appraisal of Lichfield District Council (the LPA). It presents information on the social, environmental and economic effects of implementing the Plan and the appraisal methodology adopted to identify these effects.

### Report Structure

This report has been structured in four sections to directly reflect the four SA questions illustrated over in Table 1.

### Meeting the requirements of the SEA Directive

The following checklist is designed to signpost the requirements of the SEA Directive through references to specific parts of the SA report, or other documents, thus demonstrating how the SA has incorporated SEA.

Table 1 Questions that must be answered (sequentially) within the SA Report

SA Question	SA Sub - Question	Corresponding Requirement
What is the scope of the SA?	What is the Plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents and main objectives of the plan.</li> </ul>
	What is the sustainability context?	<ul style="list-style-type: none"> <li>The relationship of the plan with other relevant plans and programmes</li> <li>The environmental protection objectives, established at international or national level, relevant to the plan.</li> </ul>
	What is the baseline at the current time?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> </ul>
	How would the baseline evolve without the plan?	<ul style="list-style-type: none"> <li>The likely evolution of the current state of the environment without implementation of the plan.</li> </ul>
	What are the key issues that should be a focus of the SA	<ul style="list-style-type: none"> <li>Any existing environment problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance.</li> </ul>
What has the plan-making/Sustainability Appraisal involved up to this point?		<ul style="list-style-type: none"> <li>An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable').</li> <li>The Likely significant effects on the environment associated with alternatives/an outline of the reasons for selecting preferred alternatives/a description of how environmental objectives and considerations are reflected in the Plan.</li> </ul>
What are the appraisal finding's at this current stage?		<ul style="list-style-type: none"> <li>The likely significant effects on the environment associated with the Plan.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Plan</li> </ul>
What happens next (including monitoring)?		<ul style="list-style-type: none"> <li>A description of the measures envisaged concerning monitoring.</li> </ul>

### Difficulties in carrying out the SA

There is a general requirement of the SEA/SA that a section is included which sets out the difficulties encountered in undertaking the assessment. The main difficulties identified in this SA are discussed below:

**Data:** A common problem affecting the SA process is the availability and reliability of data. Although data has been collected to illustrate a number of conditions and trends relevant to the SA of the LPA,



some data sets are more useful than others, and some data sets are known to be old, incomplete. 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.

**Differing level of detail:** This is particularly relevant to the appraisal of sites and housing development options, some of which have secured planning permission and have a greater level of detail available, for example ecology reports. It is therefore possible to predict likely positive or negative impacts at a detailed level. For others sites limited/no detailed information is available and therefore it is not possible completely ascertain if positive or negative effects could result.

**Assumptions:** It is important to note that a number of assumptions have underpinned all of the SA indicators relating to site assessments. These assumptions introduced an element of uncertainty about the likely effect of these options/scenarios if implemented. In particular the impact on climate change and the type of employment opportunities that might be created both affect the nature of impacts that might result, but are somewhat uncertain.

**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 at risk. 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.

The Sustainability Appraisal which accompanied the Local Plan Strategy required revisiting due to the changed planning landscape and updates in baseline information. This has resulted in an amended set of Sustainability Objectives being developed. To ensure continuity a summary of the historic and current objectives has been created (Appendix A:Amendments to SA Framework) and where possible indicators identified to monitor significant effect(s) will be retained to ensure effective monitoring and coordinated response to the process of identifying and addressing adverse effects.

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

## 2 What is the sustainability context and the scope of the Sustainability Appraisal?

### Introduction

This chapter outlines the context and scope of the SA. The requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 were outlined within Chapter 1. Of the identified requirements, this section seeks to answer the questions below.

SA Question Answered	Corresponding Requirements (The report must include)
What is the Plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents and objectives of the plan.</li> </ul>
What is the sustainability context?	<ul style="list-style-type: none"> <li>The relationship of the plan with other relevant plans and programmes.</li> </ul>

SA Question Answered	Corresponding Requirements (The report must include)
	<ul style="list-style-type: none"> <li>The environmental protection objectives, established at international or national level, relevant to the plan.</li> </ul>
What is the sustainability baseline?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> </ul>
How would the baseline evolve without the Plan?	<ul style="list-style-type: none"> <li>The likely evolution of the current state of the environment without implementation of the plan.</li> </ul>
What are the key issues that should be a focus of the SA?	<ul style="list-style-type: none"> <li>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance.</li> </ul>

### Consultation on the scope

In addition to internal consultation and involvement, there is a specific requirement for engagement with statutory consultation bodies and public consultees at certain stages of the combined Sustainability Appraisal and Strategic Environmental Assessment Processes. These requirements are set out in the SEA Regulations.

In determining the ‘scope’ of the Sustainability Appraisal (the level of detail and information to be used to apprise the plan options), the SEA regulations requires that the three statutory environmental consultation bodies should be consulted for a period of five weeks. We consulted the following three organisations on a complete copy of the Scoping Report via e mail for a five week period commencing in August 2016:

- Environment Agency
- Historic England
- Natural England

In addition Government guidance recommends that other community groups and social and economic bodies should be consulted, as the planning authority considers appropriate. As such the authority has alerted a number of additional organisations to the publication of the scoping report through e mail. These were;

- Birmingham City Council
- Walsall Metropolitan Borough Council
- South Derbyshire Borough Council
- Derby City Council
- Derbyshire County Council
- Wolverhampton Metropolitan Borough Council
- Redditch Borough Council
- Bromsgrove Borough Council
- Worcestershire County Council
- Stoke City Council

- South Staffs Borough Council
- Staff Moorlands Council
- Cannock Chase Area of Outstanding Nature Beauty
- Stafford Borough Council
- Newcastle Borough Council
- Stoke and Staffordshire Local Enterprise Partnership
- Greater Birmingham Local Enterprise Partnership
- Solihull Metropolitan Borough Council
- North West Leicestershire District Council
- East Staffordshire District Council
- Tamworth Borough Council
- Wyre Forest District Council
- Dudley Metropolitan Borough Council
- Sandwell Metropolitan Borough Council
- Staffordshire County Council
- Warwickshire County Council
- North Warwickshire Borough Council

Parish Councils were also informed of where and how they could view and comment on the Scoping Report. Whilst a full public consultation was not required at this stage of the Sustainability Appraisal process, we did published the Scoping Report on the Council’s website.

Comments submitted regarding the ‘scope’ of the Sustainability Appraisal and the amendments made to the information set out in the Scoping Report following this stage of consultation are recorded at Appendix B. These amendments were reported to the Council’s Growth Environment & Development Overview and Scrutiny Committee in December 2016.

### Who has carried out the Sustainability Appraisal

Lichfield District Council Spatial Policy and Delivery Team has undertaken the Sustainability Appraisal. We have sought to undertake the appraisal ‘in-house’ in order to ensure that the results are fully integrated with the preparation of the LPA. The appraisal has also been informed through liaison with Staffordshire County Council.

### What is the plan seeking to achieve?

The SA Report must include

- An outline of the contents and objectives of the plan

## The Development Plan Process

The Planning system provides a framework for managing the development and use of land. A key element of this system is the preparation of development plans, which establish where and what type of development might take place, and provides the basis for the consideration of planning applications.

The Local Plan Strategy was adopted by resolution of Full Council on 17<sup>th</sup> February 2015, the LPA complements the Strategy. The 'Strategy' and 'Allocations' should be read in conjunction and are both Development Plan Document produced under the Planning and Compulsory Purchase Act 2004 (as amended) to help shape the way in which the physical, economic, social and environmental characteristics of Lichfield District will change between 2008 and 2029. The LPA together with the Local Plan Strategy (part 1) will, once adopted, replace the existing Lichfield District Local Plan 1998.

## Local Plan Strategy Vision

The vision for Lichfield District is set out in the Local Plan Strategy. As a sister document of the Local Plan Strategy the LPA will also seek to deliver the same vision, this is set out below.

### **Vision for the District**

By 2029, residents of the District will continue to be proud of their community, experiencing a strong sense of local identity, of safety and of belonging. Everyone will take pride in the District's history, its culture, its well cared for built and natural environment, its commitment to addressing issues of climate change, and the range of facilities that it offers. Our residents will have opportunities to keep fit and healthy, and will not be socially isolated. People will be able to access quality homes, local employment, and provision for skills and training which suits their aspirations and personal circumstances. Those who visit the District will experience the range of opportunities and assets in which its residents take pride, will be encouraged to stay for longer and will wish to return and promote the area to others. The need to travel by car will be reduced through improvements to public transport, walkways, cycle routes and the canal network. New sustainably located development, and improvements to existing communities will have a role in meeting the needs of Lichfield District and will have regard to the needs arising within Rugeley and Tamworth. Such development, coupled with associated infrastructure provision will also address improvements to education, skills, training, health and incomes, leading to reduced levels of deprivation. The natural environment within the urban and suburban areas and within the wider countryside and varied landscape areas will be conserved and enhanced, and locally important green spaces and corridors will be secured to meet recreational and health needs. Sustainable development will also help protect the biodiversity, cultural and amenity value of the countryside and will minimise use of scarce natural and historic resources, contributing to mitigating and adapting to the adverse effects of climate change.

## Local Plan Strategy Objectives

The LPA shares the same Strategic Objectives as the Local Plan Strategy. The following Local Plan strategic priorities outline delivery requirements to achieve the Vision and address the key issues that have been identified in the District. The Strategic Priorities give direction to the emerging LPA.

### **Strategic Priority 1: Sustainable Communities**

To consolidate the sustainability of the existing urban settlements of Lichfield and Burntwood as the District's principal service centres, together with key rural settlements and to ensure that the

development of new homes contribute to the creation of balanced and sustainable communities by being located in appropriate settlements and by containing or contributing towards a mix of land uses, facilities and infrastructure appropriate to their location.

#### **Strategic Priority 2: Rural Communities**

To develop and maintain more sustainable rural communities through locally relevant employment and housing development and improvements to public transport facilities and access to an improved range of services, whilst protecting the character of our rural settlements.

#### **Strategic Priority 3: Climate Change**

To create a District where development meets the needs of our communities whilst minimising its impact on the environment and helps the District to mitigate and adapt to the adverse effects of climate change.

#### **Strategic Priority 4: Infrastructure**

To provide the necessary infrastructure to support new and existing communities, including regeneration initiatives in those existing communities where the need for improvements to social, community and environmental infrastructure have been identified, in particular within north Lichfield, Burntwood, Fazeley and Armitage with Handsacre.

#### **Strategic Priority 5: Sustainable Transport**

To reduce the need for people to travel by directing most growth towards existing sustainable urban and rural settlements and by increasing the opportunities for travel using sustainable forms of transport by securing improvements to public transport, walking and cycling infrastructure.

#### **Strategic Priority 6: Meeting Housing Needs**

To provide an appropriate mix of market, specialist and affordable homes that are well designed and meet the needs of the residents of Lichfield District. Lichfield District Local Plan Strategy 2015. To promote economic prosperity by supporting measures that enable the local economy to adapt to changing economic circumstances and to make the most of newly arising economic opportunities.

#### **Strategic Priority 7: Economic Prosperity**

To ensure that employment opportunities within the District are created through the development of new enterprise and the support and diversification of existing businesses, to meet the identified needs of local people.

#### **Strategic Priority 8: Employment Opportunities**

To create a prestigious strategic city centre serving Lichfield City and beyond, an enlarged town centre at Burntwood and a vibrant network of district and local centres that stimulate economic activity, enhance the public realm and provide residents' needs at accessible locations.

#### **Strategic Priority 9: Centres**

To create a prestigious strategic city centre serving Lichfield City and beyond, an enlarged town centre at Burntwood and a vibrant network of district and local centres that stimulate economic activity, enhance the public realm and provide residents' needs at accessible locations.

#### **Strategic Priority 10: Tourism**

To increase the attraction of Lichfield District as a tourist destination through supporting and promoting the growth of existing tourist facilities, the provision of a greater variety of accommodation, the development of new attractions appropriate in scale and character to their locations and the enhancement of existing attractions.

#### **Strategic Priority 11: Healthy & Safe Lifestyles**

To create an environment that promotes and supports healthy choices. To improve outdoor and indoor leisure and cultural facilities available to those that live and work in and visit the District and to ensure a high standard of community safety, promoting healthier living and reducing inequalities in health and well-being.

#### **Strategic Priority 12: Countryside Character**

To protect and enhance the quality and character of the countryside, its landscape and villages by ensuring that development which takes place to meet identified rural development needs contributes positively to countryside character through enhancements to the local environment and preserves the openness of the Green Belt.

#### **Strategic Priority 13: Natural Resources**

To protect and enhance and expand the quality and diversity of the natural environment within and outside urban areas and help realise the positive contributions which can be made to address climate change.

#### **Strategic Priority 14: Built Environment**

To protect and enhance the District's built environment and heritage assets (including Lichfield Cathedral), its historic environment and local distinctiveness, ensuring an appropriate balance between built development and open space, protecting the character of residential areas, protecting existing open spaces and improving the quality of and accessibility of open space and semi-natural greenspaces.

#### **Strategic Priority 15: High Quality Development**

To deliver high quality development which focus residential, community and commercial facilities within the most sustainable locations whilst protecting and enhancing the quality and character of the existing built and natural environment.

### [The Local Plan Allocations](#)

The LPA supplements and provides additional detail concerning how development will be managed in Lichfield District up to 2029

- Land Allocations associated with meeting the growth requirements set out in the Local Plan Strategy (2015) including:
  - Determining remaining housing land requirements to deliver the overall 10,030 homes to 2029 in line with the adopted spatial strategy, including allocations of sites with the Broad Development Location (BDL) to the north of Tamworth , for housing in rural areas and the 'Key Rural' Settlements (including Green Belt release);
  - Consideration of 'infill' boundaries for Green Belt villages (as set out in Core Policy 1);
  - Sites to meet the identified Gypsy and Traveller requirements;

- Land allocations to meet the Employment Land requirements, including the identification of primary and secondary retail areas for Lichfield City Centre;
- A review of any remaining Local Plan (1998) Saved policies;
- Consider Green Belt boundaries including the integration of the developed area of the former St Matthews into Burntwood and development needs beyond the plan period; and
- Consider any issues arising through 'Made' and emerging Neighbourhood Plans where communities have sought the support of Lichfield District Council to progress with matters outside the scope of the Neighbourhood Plan.

### What is the plan not trying to achieve?

The LPA supports the Local Plan Strategy and helps to implement its vision and policies. While it is strategic in nature because it will shape the development of areas in the future, it does not set a vision for the District or assess and determine the development needs of the District. This work has already been carried out and established by the adopted Local Plan Strategy. The key purpose of the LPA is therefore to deliver the residual development identified by the Local Plan Strategy. It seeks to do this by allocating sufficient sites which present the most sustainable opportunities for development within the District.

### Habitats Regulation Assessment

A full HRA screening analysis was undertaken on the Local Plan Strategy (2015) including considering the effects of the spatial strategy.

There is one international and European statutory nature site within the Lichfield District.

- River Mease SAC.

Two other international and European SAC's are within the vicinity of the District and may need to be taken into consideration. These are

- Cannock Chase SAC
- Cannock Extension Canal SAC

The screening assessment of the Local Plan Strategy identified significant adverse effects on these European sites and an appropriate assessment was completed, mitigation packages have been identified and are currently being implemented. The LPA will be developed in conformity with the Local Plan Strategy (2015). It is therefore considered that accepted mitigation measures are sufficient to support the LPA documents. A Habitat Regulation Assessment accompanies the LPA.

### What is the sustainability context?

The SA Report must include

- The relationship of the plan with other relevant plans and programmes.
- The environmental protection objectives established at international or national level relevant to the plan.

A fundamental part of undertaking a sustainability appraisal of the LPA is the identification and assessment of the relationship between the Plan and other relevant plans, and strategies established at international, European Community, National and local levels.

A list of plans, policies and programmes, relevant to the LPA has been compiled and analysed. This list, (originally published in the LPA Scoping Report) has been updated to reflect comments received back during the Scoping Report consultation. In addition Appendix C of this report provides details on the relationship and reflects any additional published plans, policies, strategies and initiatives.

A summary of the plans and programmes reviewed are listed below:

#### International:

- New York Sustainable Development Summit, 2015
- EC Habitats Directive, 1992
- UN Convention on Biological Diversity, 1992
- EU Air Quality Directive (2008/50/EC)
- EU Water Framework Directive (2000/60/EC)
- EU Nitrates Directive (91/676/EEC)
- Drinking Water Directive (98/83/EC)
- EU Directive on the Conservation of Wild Birds (79/409/EEC)
- EU Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EEC) and subsequent amendments
- EU Directive on Waste (2008/98/EC)
- EU Directive on the Landfill of Waste (99/31/EC)
- EU Packaging and Packaging Waste Directive (2015/720/EC)
- Renewed EU Sustainable Development Strategy, 2006
- UNFCCC (1997) The Kyoto Protocol to the UNFCCC
- World Commission on Environment and Development, Brundtland Report, 1987
- European Structural and Investment Funds Growth Programme 2014-2020 (2015)
- UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage, 1972
- European Strategy for Sustainable Development, 2009
- Our Life Insurance, Our Natural Capital: An EU Biodiversity Strategy to 2020, 2011
- Energy Efficiency Plan, 2011
- Bern Convention on the Conservation of European Wildlife and Natural Habitats, 1979
- EU Seventh Environmental Action Programme of the European Community
- UNESCO World Heritage Convention 1972
- 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:

- Securing the Future – the UK Sustainable Development, 2005
- Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen (2001)
- Government Review of Waste Policy in England 2011
- Wildlife and Countryside Act, 1981
- Countryside Rights of Way Act, 2000
- Natural Environment and Rural Communities Act, 2006
- DEFRA Rural Strategy, 2004
- EA Water Resources Strategy for England and Wales, 2009
- Sustainable Energy Act, 2008



- DEFRA Air Quality Strategy for England, Scotland, Wales & Northern Ireland, 2007
- Planning Act, 2008
- Climate Change Act, 2008
- Planning (Listed Buildings and Conservation Areas) Act 1990
- National Heritage Protection Plan
- Biodiversity , The UK Action Plan
- England Biodiversity Strategy Climate Change Adaption Principles Conserving Biodiversity in a Changing world (2008)
- Government Forestry and Woodlands Statement
- Natural Environment and Rural Communities Act 2006: Biodiversity Duty, Public Authority Duty to have regard to Conserving Biodiversity, 2014
- Conserving Biodiversity, The UK Approach, 2007
- Safeguarding our Soils, A Strategy for England, 2009
- Low Carbon Transition Plan, 2009
- Renewable Energy Strategy, 2009
- Noise Policy Statement for England, 2010
- National Infrastructure Plan, 2010
- White Paper, Water for Life, 2011
- Flood and Water Management Act, 2010
- White Paper, The Natural Choice, Securing the Value of Nature, 2011
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services
- Healthy Lives, Healthy People: Our Strategy for public health in England (Department of Health 2010)
- Enabling the Transition to a Green Economy, 2011
- Conservation of Habitats and Species Regulations, 2010
- Localism Act, 2011
- National Planning Policy Framework
- A Better Quality of Life, Strategy for Sustainable Development, 1999
- Planning Policy for Traveller Sites, 2012
- Circular 06/05: Biodiversity & Geological Conservation
- Infrastructure Act, 2015
- Living Places, Cleaner, Safer, Greener, 2002
- Housing & Planning Act, 2016
- Planning & Compulsory Purchase Act, 2004
- Community Infrastructure Levy (Amendment) Regulations, 2012
- Water Act, 2014
- High Speed Rail (London-West Midlands) Bill 2013-14 to 2015-16
- Sustainable Communities: Building for the Future, 2003
- Planning Our Electric Futures: A white Paper for a Secure, affordable and low carbon electricity
- The Carbon Plan: Delivering Our Low Carbon Future
- Energy Efficiency Strategy
- Energy Security Strategy
- Historic England's Regional Streetscape Manuals
- National Planning Practice Guidance (2014)

### Regional:

- Leading for a connected Staffordshire, Strategic Plan 2013 - 2018, Staffordshire County Council
- Staffordshire Local Transport Plan 2011
- National Forest Strategy 2014-2024, 2014

- Central Rivers Initiative
- Economic Regeneration Strategy, SCC, 2006
- Staffordshire Declaration
- Staffordshire and Stoke-on-Trent Climate Change Risk Register
- Staffordshire and Stoke-on-Trent Minerals Local Plan 1999-2006
- Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010-2026, 2013
- Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy 2010-2026, 2013
- Safer, Fairer, United Communities for Staffordshire 2013-18
- Sustainable Community Strategy (Staffordshire) 2008-2023
- Staffordshire Biodiversity Action Plan
- Staffordshire Local Flood Risk Management Strategy, 2015
- Shaping the Future of Staffordshire 2005-2020: The Sustainable Strategy for the County
- Staffordshire County Council, A Strategy for School Organisation 2012-2017
- Cannock Chase Area of Outstanding Natural Beauty Management Plan 2014-19
- Cannock Chase SAC Strategic Access Management and Maintenance Measures (SAMM)
- Greater Birmingham & Solihull Local Enterprise Partnership Strategic Economic Plan 2014
- Stoke-on-Trent & Staffordshire Local Enterprise Partnership Strategic Economic Plan Part 1 – Strategy 2014-2030 (2014)
- Staffordshire County Council, Lichfield Historic Character Assessment, 2011
- CAMS: Tame, Anker & Mease Abstraction Licensing Strategy, Environment Agency, 2013
- CAMS: Staffordshire Trent Valley Abstraction Licensing Strategy, Environment Agency, 2013
- Health and Wellbeing Strategy for Staffordshire 2013-2018
- Southern Staffordshire Outline Water Cycle Study, 2010
- South Staffordshire Water PLC Water Resource Plan 2015-40
- Severn Trent Water PLC Water Resource Management Plan 2015-40
- Humber River Basin Management Plan 2015
- CAMS: Staffordshire Trent Valley Abstraction Licensing Strategy: Environment Agency 2013
- Tame Valley Wetlands Landscape Partnership Scheme Landscape Conservation Action Plan
- Staffordshire Country Council Supplementary Planning Document: Planning for Landscape Change
- Local Landscape Character Assessments

#### Local:

- Lichfield District Local Plan Strategy 2008-2029, 2015
- Biodiversity & Development Supplementary Planning Document (SPD), 2016
- Developer Contributions SPD, 2016
- Historic Environment SPD, 2015
- Rural Development SPD, 2015
- Sustainable Design SPD, 2015
- Trees, Landscaping & Development SPD, 2016
- Little Aston Neighbourhood Plan, 2016
- Stonnall Neighbourhood Plan, 2016
- Conservation Area Appraisals
- Lichfield District Strategic Partnership's Carbon Reduction Plan 2012/13
- Lichfield District Integrated Transport Strategy 2013-2028
- Strategy for the A5
- Lichfield District Housing Strategy 2013-17
- Lichfield District Council AQMA Updating & Screening Assessment, 2015
- Lichfield District Council Economic Development Strategy 2016-2020, 2016

- Lichfield District Council Community Infrastructure Regulation 123 List, 2016
- Lichfield District Community Safety Delivery Plan 201/18
- Lichfield City Centre Development Strategy & Action Plan 2016-2020
- Lichfield District Council Strategic Plan 2016-2020
- Rural Settlements Sustainability Study, 2016
- River Mease Restoration Plan, 2012
- River Mease Water Quality (Phosphate) Management Plan 2011
- River Mease Diffuse Water Pollution Plan

### What is the sustainability baseline?

The SA Report must include?

- The relevant aspects of the current state of the environment
- The environmental characteristic of areas likely to be significantly affected?

The SEA Directive requires the collection of baseline information on social, economic and environmental characteristics of the area in order to provide the basis for predicting and monitoring effects of the policies within Local Planning Documents. The baseline information will also help to identify sustainability issues and potential ways of dealing with them. A review of current environmental, social and economic conditions affecting Lichfield District is set out in Appendix D.

### How would the baseline evolve without the plan?

The SA Report must include:

- The likely evolution of the current state of the environment without implementation of the plan

In addition to ensuring that the scope of the SA is informed by an understanding of the current baseline conditions, it is also important to ensure that thought is given to how the baseline conditions may evolve in the future without the LPA.

- A significant amount of development could be delivered in an ad hoc manner. This could have particularly significant implications for housing delivery, resulting in both shortages and an inability to plan for predicted future housing need. Certain housing requirements may not be met in particular affordable housing and those with unique housing requirements (elderly requirements for smaller properties).
- The ad hoc principal could also apply to employment sites, with development resulting in a disconnection between housing and employment sites impacting on accessibility. In addition the impact on infrastructure on transport routes would be unknown.
- The natural environment will be affected by climate change. Species and habitats will be put under strain particularly designated sites within the District would be uncertain resulting in an inability to mitigate for impact which could result in harm.
- River level rises and more extreme rainfall patterns will increase flood hazard, particularly in those areas of the District already designated as Flood Zones.
- Commercial property may come under greater pressures to be redeveloped for alternative purposes.
- The District's distinct rural communities will not be develop sustainably, some will be unable to prosper, struggling to retain local services and community facilities whilst others may experience growth that changes their unique character and landscape setting.
- Opportunities to enhance the Districts rich historic environment will be lost.

- An aging population will also mean that additional strain will be put on certain community infrastructure elements.

### What are the key issues that should be a focus of the appraisal?

#### The SA Report must include

- Any existing environmental problems which are relevant to the plan

### Population Trends

The population of Lichfield District has increased by 1.8% between 2011 and 2015 and is expected to increase by a further 8.5% between 2014 and 2039.

The largest population influence is death with a net decrease of 7,800 through natural change which reflects the death rate being markedly higher than the birth rate. This points to the ageing population within the District and as displayed in the age structure breakdown with 22.9% currently aged over 65 which is over 5% more than the national average. The population is projected to see a significant growth in people aged 65 and over and in particular those aged 85 and over.

Life expectancy within the District is similar to the regional and national average with males living to 80 years and females to 84 years. The population is projected to see a significant growth in people aged 65 and over and in particular those aged 85 and over. The rate of increase in the number of older people in Lichfield is faster than both the West Midlands and England and by 2029 equates to a 60% increase in 75-84 year olds and a 115% increase in the amount of residents aged 85. There are however discrepancies within the District with differences in life expectancy between the ward with the lowest life expectancy and the ward with the highest life expectancy which for men means the difference between 76 years and 83 years and for women between 79 and 91.

The 2011 Census found that 18.1% (18,300 people) had a limiting long-term illness in Lichfield. This is higher than the England average of 17.6% and reflects the ageing population within the District.

Between 2014 and 2039 there is a projected fall in household size within Lichfield District from 2.37 to 2.24 persons per household. The projected fall in household size reflects the general ageing of the population evidenced by the projected household growth by age which shows that between 2014 and 2039 there is a large growth in the number of households within the 75+ age category. The age groups for the remaining categories remain largely similar between 2014 and 2039.

The dependency ratio for older people in Lichfield (measures the number of people aged over 65 who depend on people of working age (16-64)) is 38 older people for every 100 people of working age. This is higher than the England average.

### Social and Community Issues

Within Lichfield District 86.5% of the dwelling stock is either owned or privately rented with 41.1% or housing being detached, both significantly higher than the county, regional and national average.

Property prices are relatively high with the average house price in Lichfield District being £250, 675 significantly higher than neighbouring districts in which average house prices range from £164, 916 to £204, 361, and the Staffordshire average of £190, 214 (December 2015). Lichfield District is seen as an attractive commuter area for Birmingham and the larger salaries associated with these jobs.

Housing affordability issues are highlighted by the lowest quartile house price being 7.1 times the lowest quartile income.

The majority of working aged (16-64) population in Lichfield District is in work, with economic inactivity being consistently significantly lower than both the national and regional indicator and benefit claimants for Lichfield also below the national and regional averages.

9.3% of Lichfield District residents aged 16 - 64 have no qualifications which is slightly higher than the national average (8.6%) but significantly lower than Staffordshire and the West Midlands figures. Within Staffordshire those achieving 5 GCSE's Grades A\*-C is consistent with the national average at 64.9% and 64.2% respectively. In Lichfield District 31% of the population is educated to at least NVQ level 4 which also covers degree level qualifications however the proportion of the working age population qualified to 'NVQ Level 4 and above' is below the national average.

### Health Inequalities

In 2012, 23.5% of adults are classified as obese. The rate of smoking related deaths was 229, better than the average for England. This represents 143 deaths per year. Rates of sexually transmitted infections, people killed and seriously injured on roads are better than average. Rates of statutory homelessness, violent crime, long term unemployment, drug misuse, early deaths from cardiovascular diseases and early deaths from cancer are also better than average. The level of early death in men is declining and is below the national average with early death in women declining at a slower rate and reflecting the national average. Levels of infant mortality are also declining and in Lichfield are significantly lower than both the County and National figures.

### Deprivation

Lichfield District is ranked as 206 out of 326 local authorities (i.e. in top 40%) where 1 is the most deprived.

There are however pockets of deprivation within Lichfield District. Two lower super output areas fall within IMD's 20% of most deprived areas nationally. These are found within the wards of Chadsmead and Chasetown.

Four wards in Lichfield have high proportions of households with lone pensioners and of these lone pensioners 59.5% (2, 992) have a long term health problem or disability, similar to the national average of 59.6%. The percentage of lone pensioners with a long term health problem or disability is significantly higher than England in two wards; Burntwood Central (67.9%) and Chasetown (72.1%).

Using 2014 mid-year population figures for Lichfield it has been estimated that around 500 residents aged 65+ are at risk of loneliness. This is exacerbated by lack of transport, with around 18% of people aged over 65 having no private transport which increases to 55% of people aged 85 and over. Free bus passes for the over 65s go some way to ameliorating this issue however the bus service needs to be accessible.

### Crime

Crime within Lichfield District is relatively low with 36 crimes per 1,000 residents which is significantly lower than the Staffordshire average. The number of crimes recorded in the District decreased from 4, 308 crimes in 2010-11 to 3, 677 in 2014-15. Anti-social behaviour has increased by 6.2% over the last year but overall there has been a reduction over the past 5 years from 2, 262 incidents in 2010-11

to 2015 in 2014-15 although there was an increase in hate crimes during 2014/15, the majority motivated by race.

In terms of road traffic casualties, the proportion of casualties killed or seriously injured in 2014 was the lowest rate for 5 years, and lower than the Staffordshire rate. Staffordshire County recorded the 8<sup>th</sup> lowest casualty severity ratio of 153 local authorities across England and it can be inferred that the District's roads are some of the safest in the country.

### Built and Natural Environment

The setting of the District falls within 3 historic landscape character areas, to the west the land rises towards what was an 11<sup>th</sup> century royal hunting forest, the central belt covering the city of Lichfield, and to the east the river valleys. Some of the earliest known sites within the District date back to the Palaeolithic with evidence of human activity throughout the Bronze Age, Roman occupation and Anglo Saxon period, with many sites later recorded in the Domesday Book. The evolution of settlements, ecclesiastical and cultural expansion along with agricultural and industrial development continued throughout the 11<sup>th</sup> to 20<sup>th</sup> centuries.

The rich tapestry of historic development is reflected in the amount of protected historic landscapes and structures within the District. Virtually every settlement contains a conservation area with 21 throughout the District, with a wide variety of scheduled ancient monuments (16 in total), one registered historic park and garden and around 760 listed buildings. These important historic assets make this attractive rural and historic environment locally distinctive and make a substantial contribution to the local economy through tourism.

### Environmental Issues

The number of developments on brownfield land as a percentage of all development has increased from 76% in 2010/ 11 to 88% in 2015/ 16. The percentage profile of homes built on previously developed land will change in future years as greenfield releases will be required to deliver the housing requirements within the Local Plan Strategy 2008-2029.

Lichfield supports a variety of wildlife rich habitats and species which are protected under domestic or European legislation. There are 7 Special Areas of Conservation within a 20km radius of Lichfield District however the Habitats Regulations Assessment of the Local Plan only identified two sites namely the Cannock Chase SAC and the River Mease SAC to which the Local Plan could cause significant harm. As such projects have been put in place to mitigate the effect of the development on these protected sites. There are also 4 Sites of Special Scientific Interest and an Area of Outstanding Natural Beauty along with 78 Sites of Biological Interest. In addition the Staffordshire Biodiversity Action Plan identifies those habitats of importance for the county and includes plans for their conservation and management.

Lichfield 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 the Trent, and remnants of historic landscapes including extensive forest and heathland. The 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 District's landscape is affected by change arising from development, mineral working, agricultural and climate change.

Trees and wooded habitats are important for nature conservation and landscape value within the District. There are 392 Tree Preservation Orders within Lichfield District which along with the Conservation Area legislation protect the trees which bring significant amenity benefit to the local area.

The River Tame and River Trent are the main rivers that flow through the Lichfield District Council area. These rivers carry large volumes of water and have wide floodplains. The EA Flood Zone maps for the River Trent and River Tame indicate fluvial risk occurs predominantly into rural agricultural land where there is currently little proposed development. Pluvial flooding poses a risk to the District due to the lack of drainage capacity during high flows. Blockages of drains and watercourses in urban areas have been attributed to the pluvial flooding incidents and have been identified as highways flooding. Fazeley suffers from recurring fluvial and pluvial flood events. There are a number of properties at risk of flooding from sewer flooding but no known problems with groundwater, reservoir or canal flooding.

There are a number of regional initiatives affecting parts of the District that aim to achieve enhancements to existing landscapes and create valuable new habitats that can play a part in increasing biodiversity value within the District. In particular these include the National Forest, the Forest of Mercia and the Central Rivers Initiative.

### Energy Usage

The average amount of electricity and gas used per capita in Lichfield District has decreased in line with the British average (2005-2014) however it remains at a high rate. Since 2005 the rate of gas usage in Lichfield District per consumer has reduced by 33% with the reduction in electricity usage of around 20%.

### Transport

The District is well served by local routes such the A51, A515 and A5127 and has excellent connections to the national transport network including the M6 Toll, A38 (T), A5148 (T) and A5 (T). However Lichfield has one of the highest levels of car drivers, at 75% with 49.1% of residents commuting out of the District to work.

Lichfield District has four rail stations Lichfield City, Lichfield Trent Valley, Rugeley Trent Valley and Shenstone. 3% of employed residents commute by rail which is the highest level in Staffordshire. Lichfield Trent Valley, Lichfield City, Shenstone, Blake Street and Four Oaks stations are served by the Cross City North line which forms part of the busiest local rail corridors in the West Midlands.

In Lichfield City 71% of households are within 350 metres of a half-hourly or better weekday bus service, achieved through the commercial network. However around 80% of the District's households are within Lichfield and Burntwood and the key rural settlements which therefore intimates that current bus services predominantly serve the main centres and key rural settlements rather than the outlying rural areas.

For the rural north west of the District which have either a less regular or non existent bus service the County Council provide the 'Needwood Forest Connect' bookable bus service where route is plotted on a daily basis from telephone bookings enabling it to only run where there are passengers which require its services. This service is provided between 8am and 6pm Monday to Saturday. There are improvements proposed to the road and rail network for the benefit of the District.



## Economy

Lichfield District has two a City Centre, Lichfield, and a Town Centre, Burntwood. Since January 2009 vacancy rates for Lichfield City Centre have fluctuated between a high of 10.5% in August 2009 to a low of 7.0% in July 2014. In December 2015 vacancy rates stood at 9.15% representing 28 of the available 306 retail premises available in the City Centre. In terms of Burntwood vacancy rates were recorded at 9.85 in July 2014 and fall to 4.55% in December 2015, representing 3 vacancy premises of the total 66 available. Lichfield Direct maintains a large portfolio of sites which are available for employment development, 64.42 ha of land is under construction and/ or has secured planning permission for employment.

## Minerals and Waste

Land to the west of the A38 within Alrewas Parish has been identified as a potential new sand and gravel site. Lichfield District recycles, reuses or composts 54.5% of its waste, which is both above and well in advance of the EU target of 50% of waste being recycled by 2020.

## The Sustainability Assessment Framework

Following on from the review of other plans, policies and programmes, the review of baseline data and the identification of key sustainability issues the Council developed a Sustainability Appraisal Framework against which the LPA site and policies options could be tested. The framework sets out a number of sustainability appraisal objectives, site specific questions that the District council has used to identify and predict the effects of implementing LPA. Since its conception in the Scoping report, the SA framework (consisting of 16 objectives) has been consistently used during the SA process.

Detailed decision-making criteria or sub objectives are also included within the SA Framework. The purpose of these sub-objectives is to provide prompts which allows the council to identify whether detailed objectives are being met. In total 57 detailed decision making criteria are included within the Framework. These detailed questions have evolved since first being published against the SA indicators within the Scoping Report, these amendments and additions are captured within Appendix B.

A number of indicators and targets were also identified and these could be used to monitor the implementation of the plan.

A copy of the SA framework is provided over in Table 2.



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

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
			Extent and use of detailed characterisation studies informing development proposals (HLC)
Cultural Heritage	3 To protect and enhance buildings, features and areas of archaeological, cultural and historic value and their setting	<ol style="list-style-type: none"> <li>1. Will it preserve and enhance buildings and structures and their setting and contribute to the Districts heritage?</li> <li>2. Will it improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings?</li> <li>3. Will it preserve and enhance conservation areas including their setting?</li> <li>4. Will it offer opportunities to bring heritage assets back into active use?</li> </ol>	<p>Number and Proportion of major planning proposals which improved access to heritage features as part of the scheme.</p> <p>Number of listed buildings or structure in Lichfield District</p> <p>Heritage at risk and number of assets removed from Register.</p> <p>Proportion of Conservation Areas with an up to date character appraisal and management plan</p>
Cultural Heritage Population	4 Create places, spaces and buildings that are well designed, integrated effectively with one another, respect significant views and vistas and enhance the distinctiveness of the local character	<ol style="list-style-type: none"> <li>1 Will it achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality?</li> <li>2 Does it value and protect diverse and locally distinctive settlement and townscape character?</li> <li>3 Does it safeguard historic views and valuable skylines of settlements?</li> <li>4 Is the site within a main settlement or a key rural settlement?</li> <li>5 Is the site within close proximity to key services (e.g. schools, food shop, public transport, health centres etc.)?</li> </ol>	<p>Improvements in the quality of the townscapes e.g. delivery of street/public realm audits, improvements works, de-cluttering works both in urban and rural areas.</p> <p>Development meeting design standards within Supplementary Planning Documents.</p>

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Soil Water and Air	5 Maximise the use of previously developed land/buildings and the efficient use of land.	<ol style="list-style-type: none"> <li>1. Will it result in the loss of land that has not previously been developed?</li> <li>2. Is the site capable of supporting higher density development and/or a mix of uses?</li> <li>3. Does the site allow for the re-use of existing buildings?</li> <li>4. Will it reduce the amount of derelict degraded and underused land within the District?</li> </ol>	<p>Proportion of new development on Brownfield Land.</p> <p>No of redundant buildings bought back into use.</p> <p>Proportion of long term vacant dwellings in the District.</p> <p>Housing Mix of sites with planning permission.</p> <p>Housing Density of sites with planning Permission.</p>
Climatic Factors	6 Reduce the need to travel to jobs and services through sustainable integrated patterns of development, efficient use of existing sustainable modes of transport and increased opportunities for non-car travel	<ol style="list-style-type: none"> <li>1. Does the site location encourage the use of existing sustainable modes of travel?</li> <li>2. Will it reduce the overall impact on traffic sensitive areas?</li> <li>3. Will it help develop walking, cycling rail and bus networks to enable residents access to employment, services and facilities?</li> </ol>	<p>Traffic Levels (million vehicle kilometres) in the local road network.</p> <p>Access to bus services.</p> <p>Increase opportunities for walking and cycling.</p>
Climatic Factors	7 To reduce, manage and adapt to the impacts of climate change	<ol style="list-style-type: none"> <li>1. Will it reduce the causes of climate change?</li> <li>2. Will it encourage prudent use of energy?</li> <li>3. Will it provide opportunities for additional renewable energy generation capacity within the District?</li> </ol>	<p>Carbon Dioxide emissions within the Authority Areas.</p> <p>Renewable Energy Capacity within the District.</p>
Soil Water and Air	8 To minimise waste and increase the reuse and recycling of waste materials.	<ol style="list-style-type: none"> <li>1 Will it reduce household and commercial waste?</li> <li>2 Will it increase waste recovery and recycling?</li> <li>3 Will it reduce the proportion of waste sent to landfill?</li> </ol>	<p>Residual Household water per household.</p> <p>Percentage of household waste sent for reuse, recycling or composting.</p> <p>Municipal waste landfilled.</p>

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Soil Water and Air	9 Seek and improve air, soil and water quality	<ol style="list-style-type: none"> <li>1.Which Source Protection Zone does the development fall within?</li> <li>2.Does the site fall within the River Mease SAC?</li> <li>3.Is the site within or directly connected to road to an AQMA?</li> <li>4.Will it result in the loss of quality agricultural land?</li> </ol>	<p>Population living within Air Quality Management Areas.</p> <p>Number of planning applications granted contrary to Environment Agency advice on water quality.</p> <p>Proportion of homes built on Greenfield land</p>
Soil Water and Air	10 To reduce and manage flood risk	<ol style="list-style-type: none"> <li>1.Is the site located outside an area of risk from flooding?</li> <li>2.Will there be an opportunity for flood risk reduction?</li> </ol>	<p>Number of Planning Permissions granted contrary to Environment Agency advice on fluvial flooding.</p> <p>Number of Planning Permissions granted contrary to Lead Local Flood Authority advice on surface water flooding.</p> <p>Number of existing properties within the Environment Agency's flood risk areas.</p> <p>Proportion of new development/dwellings incorporating Sustainable urban drainage techniques.</p>
Population and Human Health	11 To provide affordable homes that meet local need	<ol style="list-style-type: none"> <li>1.Will it provide sufficient housing to meet existing and future housing need?</li> <li>2.Will it increase the range and affordability of housing for all social groups?</li> <li>3.Will it reduce the number of households waiting for accommodation or accepted as homeless?</li> <li>4.Will it meet the needs of the travelling community and show people?</li> </ol>	<p>Number of households on the household register.</p> <p>Number of people accepted as homeless (annually).</p> <p>Net Additional Dwellings.</p> <p>Net affordable housing completions.</p> <p>Housing mix.</p> <p>Net additional Pitches.</p>

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
Human Health	12 Improve services and access to services to produce good health and wellbeing and reduce health inequalities.	<p>1 Will it improve accessibility to health care for existing residents (including older residents) and provide additional facilities for new residents?</p> <p>2 Will it support a healthy life style including opportunities for recreational/physical activity?</p> <p>3 Will it provide new accessible green space?</p>	<p>Life expectancy at birth (male and female).</p> <p>Number of new or improved healthcare facilities delivered annually through development.</p> <p>Number of new sports pitches or other leisure facilities delivered annually through development.</p>
Population and Human Health	13 To promote safe communities, reduce crime and fear of crime	<p>1. Will it reduce crime through design measures?</p> <p>2. Will it contribute to a safe built environment?</p>	<p>Reduction in overall British Crime Survey comparator recorded crime – Lichfield District.</p> <p>% of residents who say that they feel very or fairly safe when outside in Staffordshire during the day and after dark.</p>
Material Assets	14 Improve opportunities for prosperity and economic growth	<p>1. Will it encourage higher skilled economic sectors in the District?</p> <p>2. Will it encourage new employment that is consistent with local needs?</p> <p>3. Will it encourage growth of existing businesses?</p> <p>4. Will it encourage small businesses to grow?</p>	<p>Employment Rate.</p> <p>Number of VAT registrations per 1000.</p> <p>Business Births.</p> <p>Unemployment by ward.</p> <p>Proportion of the District Employed in key sectors.</p>
Material Assets	15 To enhance the vitality and viability of existing city, town and village centres within the District	<p>1. Will it improve existing facilities within Lichfield City and Burntwood Town Centre?</p> <p>2. Will it protect and enhance the ability of our key rural settlements to meet the day to day needs arising with these settlements and from the wider rural areas they serve?</p>	<p>Total amount of retail floor space (by type) in Lichfield City Centre and Burntwood Town Centre.</p> <p>New retail spaced developed within villages.</p> <p>Loss of shops and other retail businesses to other uses.</p>

Table 2 Sustainability Framework			
Sustainability Topic	Sustainability Objective	Site Specific Questions	Monitoring Indicator
		3. Will it support and protect existing neighbourhood centres serving the local needs of our urban communities	Vacancy rates in Lichfield City Centre and Burntwood Town Centre. Loss of local community, leisure and shopping facilities to other uses.
Population and Human Health	16 Increase participation and improve access to education, skills based training knowledge and information and lifelong learning	1 Will it increase educational attainment amongst young people? 2 Will it reduce the number of working age residents who have no, or lower level qualifications?	Proportion of working age population with no, or lower level qualifications. Success rate for Work Based Learning. % of Working Age Population with NVQ level 4 and above. Success rate for further education. % of 18-59 year olds attending Higher Education Institutions.

### 3 What has the plan/making/SA involved up to this point?

The SA Report must include

- An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are reasonable);
- The likely significant effects of the environmental associated with alternatives/an outline of the reasons for selecting preferred alternatives/a description of how environmental objectives and considerations are reflected in the Plan.

#### Introduction

The statutory requirements require the SA Report to present (and explain) the alternatives, present their appraisal and tell the story of how this appraisal has informed the development of the plan.

This section seeks to identify where alternatives have been considered and why those selected were reasonable. It also provides signposts to the assessments associated with the reasonable alternatives and tells the story of how alternatives to the sites and polices within the plan were considered.

#### General Methodology Housing Sites

- **Policy Context**, Lichfield District Council adopted its Local Plan Strategy in February 2015. Within that Strategy, Core Policy 1 'The Spatial Strategy' and Core Policy 6 'Housing Delivery' provides the policy context for the selection of alternatives and preferred options. These policies are supported through the following localised policies; Policy Lichfield 4: 'Lichfield Housing', Policy Burntwood 4: 'Burntwood Housing', Policy: 'North of Tamworth', Policy: 'East of Rugeley', Policy Frad4: 'Fradley Housing', Policy ALr4: 'Alrewas Housing', Policy Arm4: 'Armitage with Handsacre Housing', Policy Faz4: 'Fazeley, Mile Oak & Bonehill Housing', Policy Shen4: 'Shenstone Housing', Policy Whit4: 'Whittington Housing', Policy Rural 2: 'Other Rural Settlements'.
- **Regulation 18**, Lichfield District Council undertook consultation on the proposed scope and nature of the Local Plan Allocations (Regulation 18) from August 2016 to October 2016. Assessment of the responses received did not identify any issues which could be considered as 'showstoppers'. The scope of this consultation was directly informed by the Local Plan Strategy which had already been subject to SA.
- **Stage 1**: All sites within the Strategic Housing Land Availability Assessment (SHLAA) 2016 which were located within or adjacent to settlements identified within the settlement hierarchy were identified and subject to the SA process along with any additional sites which were submitted/ promoted through the Regulation 18 consultation. Such an approach was taken so that sites which could be considered to be potentially aligned to the adopted spatial strategy were considered. Any sites which were noted as being complete or under-construction (having had the benefit of planning permission), or sites assessed as capable of delivering less than 5 dwellings were removed from the schedule of sites prior to being assessed. This was because it was considered that these were already moving through the planning process and for sites of 5 or less dwellings were not taken through the SA process because the LPA was not allocating sites below this threshold.
- Concurrently and in isolation an Urban Capacity Assessment was produced which assessed the deliverability of all sites identified within the SHLAA located within the existing built up areas of settlements. Where this assessment determined that an urban capacity site was deliverable, consideration was given to other evidence, including their assessment within the SA (SA outputs), to conclude on whether the site should be proposed for allocation.

- **Stage 2:** The Urban Capacity Assessment assesses each settlement within the settlement hierarchy in terms of its delivery against the requirements of the Local Plan Strategy. Where the assessment indicated that insufficient sites had been found including those found through stage 1, consideration to sites beyond the settlement boundary was given. This consideration was based on a range of evidence e.g. green belt review, including the SA outputs.
- An SA assessment was completed for each of the identified reasonable alternatives and full results are contained and a summary of allocated sites produced.
- **Stage 3: Changes to Site Selection post Regulation 19 consultation.**
- Since preparing the Regulation 19 consultation (undertaken March – May 2017) there were two significant factors that altered the planning landscape for Lichfield District. The first was receipt of three appeals from the Secretary of State, one of these appeal decisions for 750 dwellings at Land at Watery Lane was approved despite not being in conformity with the Plan. The second factor relates to the Government’s consultation on the Housing White Paper which inter alia seeks to clarify the national policy position associated with Green Belt. In light of these factors, along with significant public objection to the release of Green Belt land, a review of the housing supply was undertaken. The Housing Supply Update 2017 concluded that there was a supply of 11,259 dwellings, which is 1229 dwellings above the 10,030 dwellings. This enables the release of Green Belt sites to be excluded from the LPA whilst still meeting the overall housing requirements.
- In addition, a number sites with small yields have secured planning permission within the period between the completion of the original SA and the publication of this version. These additional sites have been included with the preferred options.
- Consultation response received during Regulation 19 consultation identified additional information which further informed site assessments. Where appropriate, amendments were made to site assessments.
- A number of new reasonable alternatives were identified within the period between the completion of the original SA and the publication of this version. These additional alternatives have been included within the SA.
- A completed assessment for all reasonable alternatives and full results are contained within Appendix E a summary of the effects of the preferred options are contained within Appendix F.
- Table 3 below identifies the preferred options for the housing sites. Those sites which have been identified and included post Regulation 19 consultation are denoted by a \*.
- It should be noted that those sites deemed under construction pre the Regulation 19 are not identified within Table 3 or Appendix F. However those sites deemed under construction in the period between Regulation 19 and this publication of the SA are included.

Table 3 Preferred Options Housing Sites

Settlement	Allocations	SA reference
Alrewas	A2	28
	A3	751
	A4	974
	A5	36
Armitage	AH1	91
Burntwood	B1	1005
	B2	156
	B3	7
	B4	119



Settlement	Allocations	SA reference	
	B5	4	
	B7	496	
	B8	429	
	B10	ELAA 47	
	B13	478	
	B16	1037	
	B17	1054	
	B20*	167	
	B21*	146	
East of Rugeley	R1	1031	
Fazeley	FZ2	115	
	FZ3	140	
Fradley	F1	138	
Lichfield	L1	418	
	L2	1032	
	L3	ELAA 58	
	L4	1057	
	L5	1065	
	L5	89-90	
	L5	19	
	L6	44	
	L7	428	
	L8	648	
	L9	East of Streethay	
	L10	103	
	L12	31	
	L13	1040	
	L14	39	
	L16	61	
	L17	63	
	L18	836	
	L19	60	
	L20	813	
	L21	425	
	L22	54	
	L23	164	
	L24	415	
	L25	64	
	L26	144	
	L27	856	
		L28	1070
		L29	52
		L31*	ADD1
	North of Tamworth	NT1	104
NT2		43	
Other Rural	HR1	255	
	HR1	135	
	OR1	51	
	OR3	935	

Settlement	Allocations	SA reference
	OR4	1046
	OR5	1022
	OR7*	837
	OR8*	1109
	H1*	85
	HR2*	ADD2
Shenstone	S1	30
Whittington	W2	8
	W3	754

### General Methodology Employment Sites

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

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

Table 4 Preferred Options Employment Sites

Settlement	Allocations	SA ref
Employment	F2	ELAA 97
	F2	ELAA 105
	F2	ELAA 113
	OR6	ELAA 96
	A6	ELAA 77
	L30	ELAA 52

## General Methodology Gypsy and Traveller Sites

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

Note there has been no further amendments or additions Gypsy and Traveller methodology following Regulation 19 consultation.

Table 5 Preferred Options Gypsy and Traveller Sites

Settlement	Allocations	SA ref
Gypsy & Traveller	GT21	GT

## General Methodology Saved Policies

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

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

- Proposed Policy (the policy the LPA is proposing)
- Policy absent – (the impact without the policy in place)
- Alternative if suggested – (alternative policy options suggested by others)
- Saved Policy – (existing policies within the Local Plan)

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

Regulation 19 consultation responses have led to a number of wording amendments to a number of Proposed Policy options. Those amendments were appropriate and have been accommodated within the policy wording. An assessment of amended policies has been completed. These new policy options are referred to as Amended Proposed Policy.

As outlined within the introductory section of this report, Main Modifications proposals have resulted in two further policies assessments being completed.

The introduction of new policy MM1: Local Plan Review has resulted in the creation of a separate assessment. MM6 Protection of Employment Land has been included within the existing matrix and summary table for EMP1. These policy options are referred to as Main Modification within the Appendix E

Appendix G contained the scoring for each of the proposed policies and Supporting Commentary and Recommendations if appropriate.

#### Reasons for selecting preferred alternatives.

To provide a link between Appendix E: Full SA Scoring Matrix and Appendix F: Allocated Sites Summary Impact, Table 6 Reasons for Preferred Alternatives in relation to housing and employment selection has been included within this updated version of the SA. A separate table, Table 7 Reasons for Preferred Alternatives Gypsy and Traveller sites has also been included. The tables will ensure the narrative behind preferred alternatives is easily and succinctly available. Table 6 and Table 7 can be found within Appendix G.

## 4 What were the appraisal findings at Publication stage?

### The SA Report must include

- The likely significant effects on the environment associated with the Publication Plan.
- The measure envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Plan.

This section of the SA report relates to the Publication Plan stage of the SA process. The first part provides a brief overview of the methodology used to undertake the appraisal. A review of the findings and the envisaged cumulative, synergistic and indirect effects of the LPA is provided. Conclusions for each stage of the assessment are also presented.

### Methodology

The purpose of the SA is to identify likely significant effects on the baseline /likely future baseline of the Plan. This has been achieved by assessing the plan against 16 Sustainable Indicators supported through a number of Site Specific Questions identified through the scoping process and which are collectively referred to as the SA Framework.

Due to the many uncertainties, there is a need to exercise caution when identifying effects. The appraisal findings contained within Appendix E (sites) and Appendix H (policies) have therefore been notably cautious. All likely significant effects are identified within the headings for each of the sites and polices, and commentary is provided in respect of all of the individual site assessments and remaining significant effects. The commentary should be read in conjunction with Appendix I (assumptions) which provides greater detail of assumptions made and includes context for significant effects.

The SA scoring is not a quantitative process but a qualitative one, it is also based on the professional judgement of officers. A single negative score against an objective could be so significant that even if other scores are positive an option may be rejected, or policy amended. Alternatively a negative score could be justifiable and not require any changes to be made.

In many instances, it has not been possible to predict whether significant effects are likely to occur, as opposed to only possibly occurring. This is most notable in respect to SA 7 (To reduce, manage and adapt to climate change). In these cases, the appraisal has undertaken a precautionary approach, recording any information which may result within the assumptions and commentary and recording a neutral or uncertain effect where it was not possible to conclude the nature of the effect. Despite these uncertainties, the appraisal has sought to focus on the merits or implications of the LPA.

It should be noted that in predicting the likely significant effects of the LPA, regard has been given to the criteria presented within the Environmental Assessment of Plan and Programmes Regulations 2004, Schedule 1. Where possible, the duration, frequency and reversibility of effects have been taken into account. Cumulative, synergistic and indirect effects have also been considered.

Table 8 below provides a key for the scoring mechanism.

Table 8 Scoring Mechanism

Scoring	Explanation
++	Significant positive effect on sustainability objective
+	Minor positive effect on sustainability objective
N	Neutral effect on sustainability objective
-	Minor negative effect on sustainability objective
--	Significant negative effect on sustainability objective
?	Uncertain effect on sustainability objective

The full results of the SA are provided in tables as the one below in Table 9

Table 9 Example Scoring Table

SA Objective	Site Specific Question	Score	Comment
To promote biodiversity protection enhancement and management of species and habitats	Will it conserve protected/priority species	<b>Double -</b>	There are protected species present on site and on land adjacent to the site 2016 survey data

### Summary of Findings

SA assessment was completed for each of the identified reasonable alternatives and full results are contained within Appendix E. Allocated sites summary impact are contained within Appendix F Sites and Appendix H policies.

### Assessment of Secondary, Cumulative and Synergistic Effects

In addition to the appraisal of individual policies and sites which may arise direct from policy and site implementation, the SEA Regulation (Annex 1f) requires consideration of the overall effect of the plan including secondary, cumulative and synergistic effects of the plan policies.

The SA Guidance (ODPM 2005) defines secondary, cumulative and synergistic effects as:

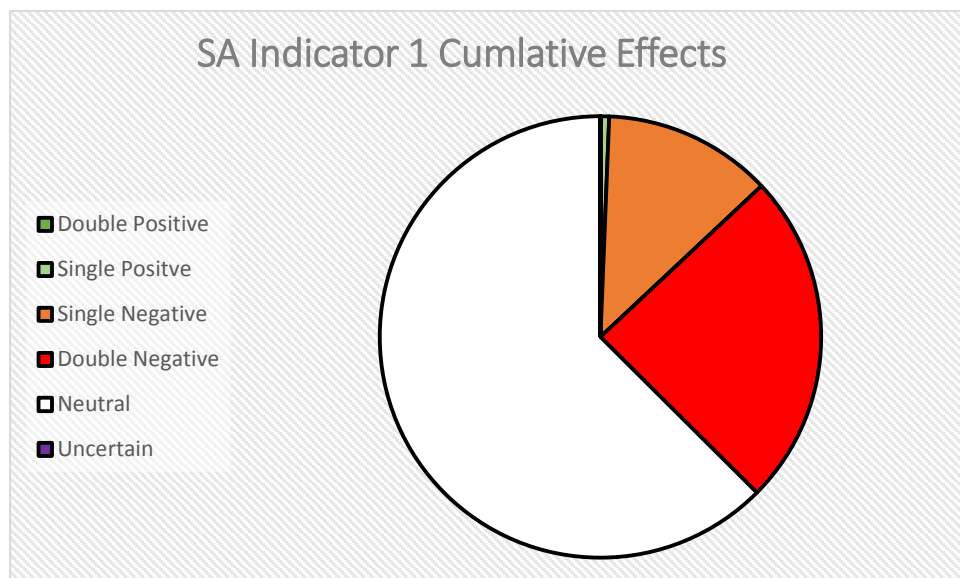
- Secondary (Indirect) effects are those that are not a direct result of the Development Plan, but occur away from the original effect or as a result of a complex pathway. These effects can be both positive and negative. Examples of secondary effects are a development that changes a water table and which, as a result, may affect the ecology of a wetland; or construction of one project that facilitates or attracts other development.
- Cumulative effects may arise where several developments each have insignificant effects but together have a significant effect, or where several individual effects of the plan have a combined effect result in noise disturbance or visual impact.
- Synergistic effects interact to produce a total effect greater than the sum of the individual effects. These can often occur as habitats, resources or communities get close to capacity. For example a wildlife habitat can become progressively fragmented to such an extent that there is insufficient space to support the species which have used the space in the past. On the other hand, beneficial synergistic effects may occur when a series of major transport, housing and employment developments in a sub-region, each with their own effects, collectively reach a critical threshold so that the developments as a whole and the community benefiting from them become more sustainable.

These terms are not mutually exclusive and in undertaking this assessment the term cumulative effects is taken to include secondary and synergistic effects

### Summary of Cumulative Effects

The detailed site specific questions included within the SA scoring matrix has enabled the identification of trends which identified a broad range of Cumulative effects. The significant positive and negative effects, uncertain effects have been summarised below using charts and commentary. In addition charts summarising of all the SA Objectives can be viewed in Appendix J.

Chart 1: To promote biodiversity protection, enhancements and management of species and habitats.

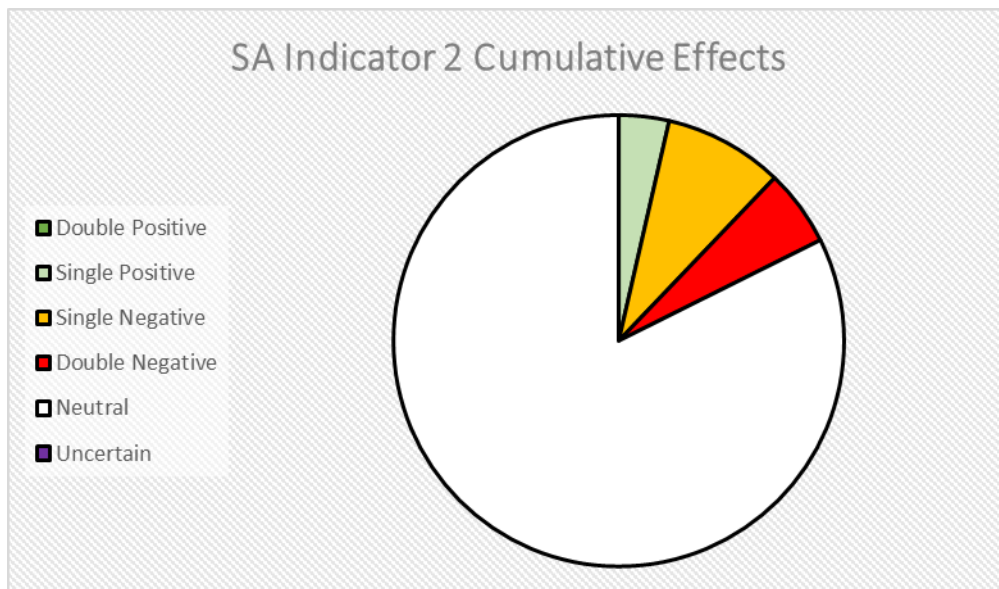


- The significant proportion of Double Negative effects can be accounted for by the identification of sites within the 0-15km zone of influence attached to the Cannock Chase SAC.

The level of development proposed through the LPA is in line with the adopted Local Plan Strategy. This level of residential growth is mitigated through the approved Strategic Access Management and Monitoring Measures approved by the Cannock Chase partnership. The District Councils adopted Community Infrastructure Levy Regulation 123 ensure obligations are secured to enable the implementation of identified mitigation measures. It is necessary for development to mitigate their impact on the Cannock Chase SAC.

- Further negative scores have been recorded against the loss of ecological connectivity, what is difficult to record at this point within the process is if at detailed design stage through the interpretation of adopted policy and support included within the adopted Supplementary Planning Documents mitigation could be identified.
- It is clear that the plan will have a negative impact on biodiversity and habitats and it should be noted that detailed survey work to confirm site detail at time of delivery and measures identified within Appendix I (assumptions) would to a large extent mitigate these effects.

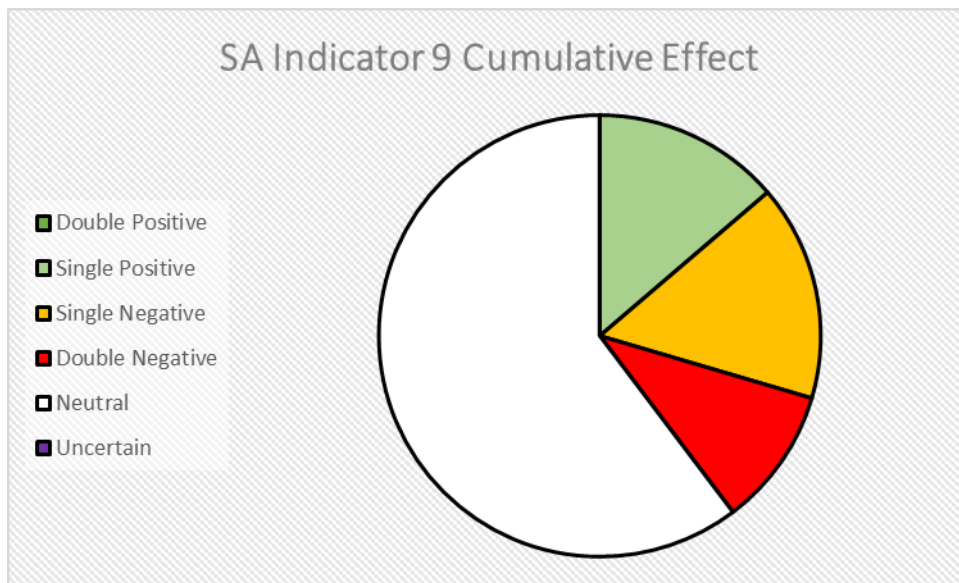
Chart 2: To promote and enhance the rich diversity of the natural archaeological/geological assets and landscape character of the district.



- The negative cumulative effects against this indicator result in large from the impact on landscape character. What was unclear at assessment is the opportunities that sites offer to improve and promote landscape character and connectivity providing mitigation for such impacts.
- In addition it is also unclear as the positive overall impact that the proposed amendments to the saved policies could have on delivering mitigation in term of cumulative effect in this regard most notably National Forest and AONB Policy.
- Comments received as part of the Regulation 19 consultation attached to the Focused Changes LPA lead to a small number (four) of preferred option sites receiving amended scores relating to Site Specific Question 7. These accounts for the small increase in single negative effects relating this indicator. Of those effects identified all can be mitigated through existing policies within the adopted Local Plan Strategy.

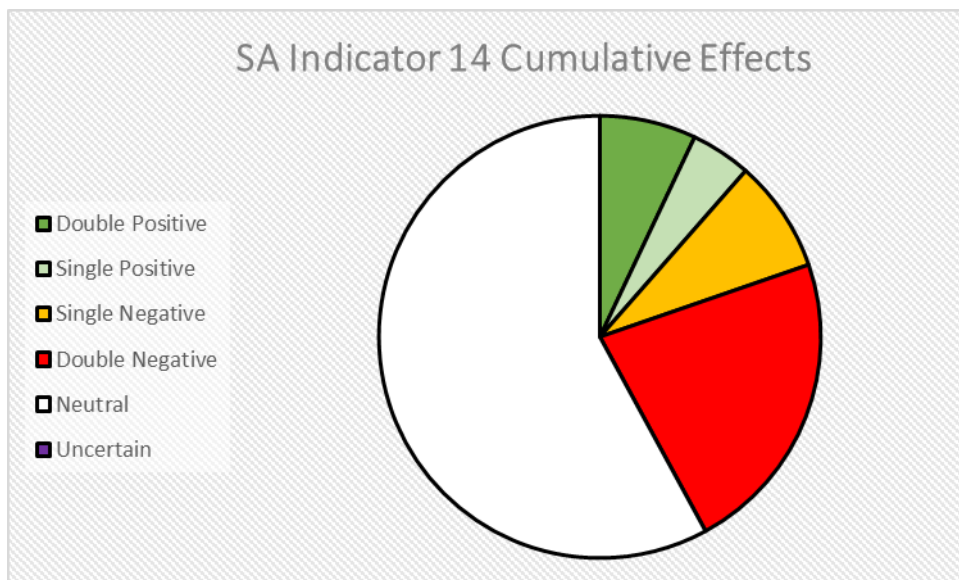


Chart 3: Seek and improve air soil and water quality



- The negative effects against this indicator result in large part from the impact of soils in terms of the loss of agricultural land. Whilst the LPA focused on delivering development on previously developed land there still remains an impact. What is uncertain is if any cumulative negative impact will result from the loss of individual areas. This uncertainty will need to be monitored to enable the mitigation measures if required.

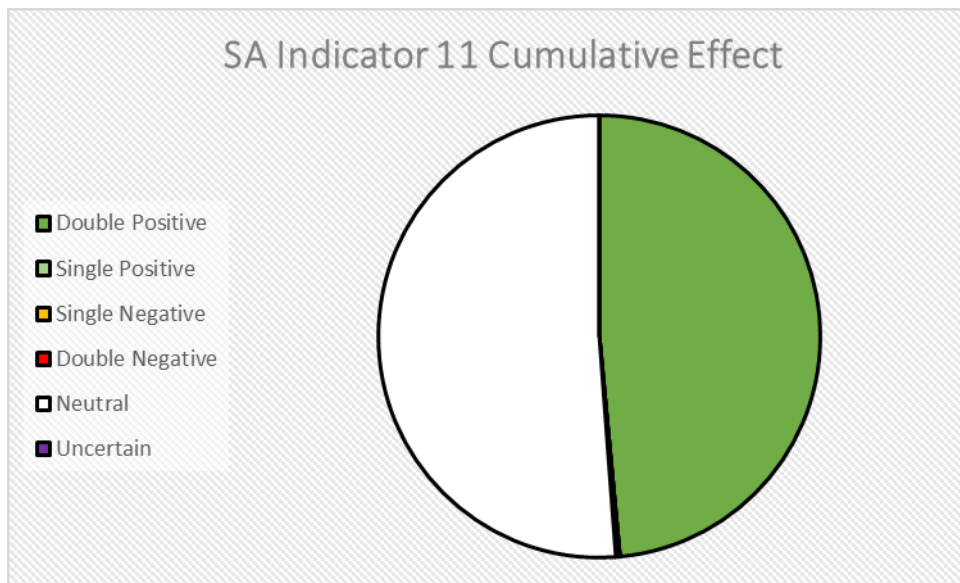
Chart 4: Improve opportunities for prosperity and economic growth



- The significant negative effect against this indicator results in the loss of employment land for housing development. This could result in the cumulative effect of the District being unable to provide adequate employment provision and opportunities for economic growth. However placed within a broad policy context, the District Council Employment Land Review 2012 concludes that the District has an excess of employment land particularly B8, therefore this effect may not require mitigation, only appropriate monitoring.



Chart 5: To provide affordable homes that meet local need.



- In relation to its cumulative effects the LPA is largely positive and this should not be overlooked. In particular the LPA by its nature provides homes for the District SA Objective 11 and to a greater extent identifies a positive impact in terms of using existing resource well, SA Objective 5. As illustrated in Chart 4 and 5 respectively.

Chart 6: To maximise the use of previously developed land/buildings and the efficient use of land.

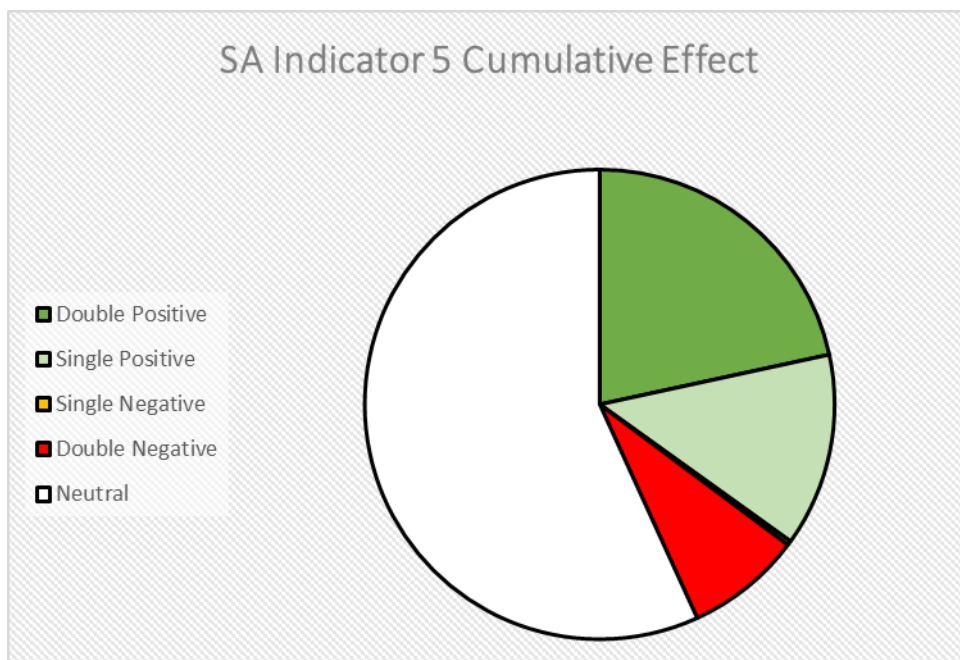
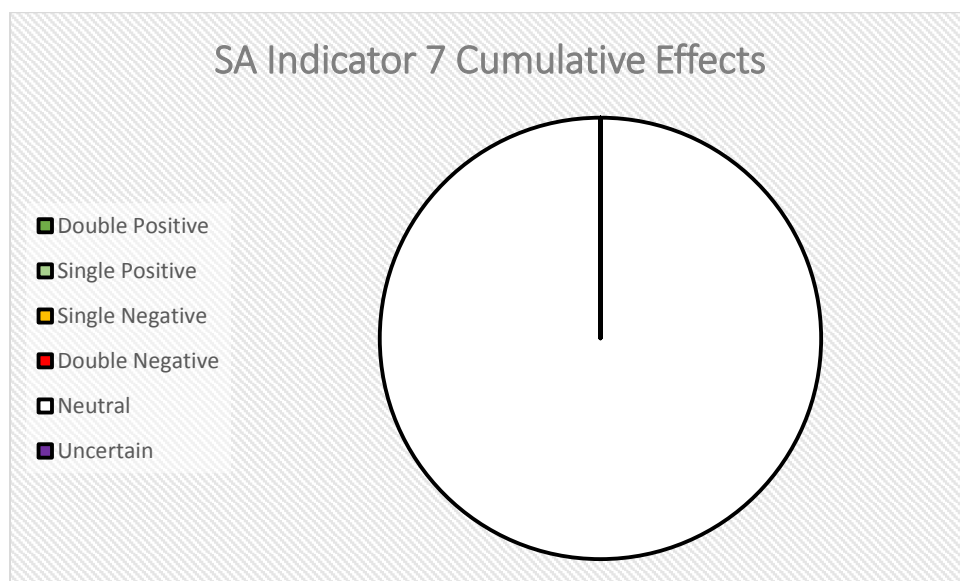


Chart 7: To reduce, manage and adapt to the impacts of climate change.



- The site specific question should result in the identification of effects. However due to the nature of the LPA being predominately a site based document it was unclear as to the extent each site would have on the questions posed therefore a precautionary approach was taken and all sites scored neutral.
- An increase in the District contribution to greenhouse gas production (or exported production) is an almost inevitable consequence of the quantum of proposed development and includes factors such as increasing mobility, embedded energy in construction material and increased energy use from new housing and employment development. It is clear that the delivery of the LPA will have an impact on climate change. While the negative effect that may result are likely to be generational, none the less spatial planning has some influence over the manner in which places evolve and operate. Every effort should be made through the implementation of policy, supported by Supplementary Planning Documents and in combination with other external plans to mitigate these effects and to ensure adaption measures are put in place in a timely manner. The monitoring of this cumulative effect and mitigation will be reported through the Authorities Monitoring Report.

### Summary of Cumulative Effects

#### Negative

- Pressures on biodiversity and Landscape in both urban and undeveloped areas
- A reduction in landscape quality
- Loss of agricultural grade land
- Loss of existing employment land

#### Positive

- Provision of affordable homes
- Use of brownfield land.

#### Uncertain

- There remains uncertainty in terms of cumulative impact of the plan in relation to SA objective 7 To reduce, manage, adapt to climate change.

### Interaction with other relevant plans and programmes

The analysis of cumulative effects should also consider the significant effects of the plan in combination with the effects of additional plans, policies and programmes. Appendix C of the SA report assesses the way in which these plans and programmes affect the LPA and identify the way in which the LPA can be strengthened or supported by such documents. It is recognised that some mitigation measures are more appropriately dealt with through partner documents at lower tiers of plan making, such as in Supplementary Planning Documents.

### Inter relationships

A compatibility assessment has been developed to enable an understanding of the inter relationship between each SA objective. Table 10 below illustrates a range of effects from no links, probably compatible to potential incompatibility. SA Indicator 11, 14 and 15 and their interrelationship with other Indicators are where incompatibility occurs.

- SA Indicator 11: To provide affordable homes to meet local need.
- SA indicator 14: Improve opportunities for prosperity and economic growth.
- SA indicator 15: To enhance the vitality and viability of existing city, town and villages centres within the District.

These indicators identify positively against Material Assets and it is therefore not surprising that at this strategic level of review it is difficult for them to illustrate compatibility with those indicators dedicated to measuring SA Objectives focused on Biodiversity, Geodiversity, Flora and Fauna and Soil, Water and Air. That noted these inter relationships have been assessed without the detailed design information from each site and the individual intricacies each one of those will have. Further no measure of potential mitigation has been reflected within the assessment matrix. Mitigation would enable the extent of such conflicts to be addressed.

Table 10 Compatibility matrix of sustainability appraisal objectives

		-	No links	
				Potential incompatible
		+	Probably compatible	

1																
2	+															
3	-	+														
4	+	+	+													
5	+	+	+	+												
6	-	-	-	+	+											
7	+	-	+	+	+	+										
8	-	-	+	+	+	+	+									
9	+	-	+	+	+	+	+	+								
10	+	-	-	+	+	-	+	-	+							
11			+	+		+										
12	-	-	-	+	+	+	-	-	+	-	+					
13	-	-	-	+	+	+	-	-	-	-	+	+				
14			+			+				+	+	+	+			
15		-	+	+	+	+				+	+	+	+	+		
16	-	-	-	-	+	+	-	-	-	-	+	+	+	+	+	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

In summary the vast majority of the objectives either sit comfortably alongside each other or have no effects. However a number have been identified as being potentially incompatible.

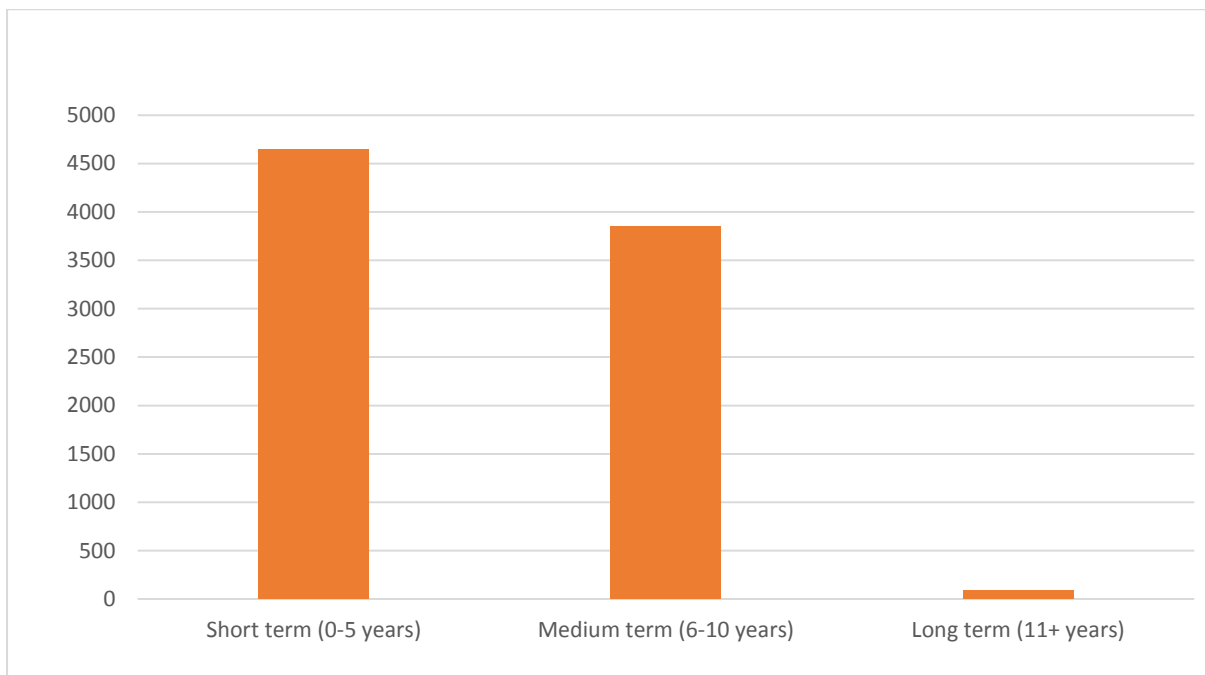
### Duration

As part of the Scoping Report that preceded this assessment timescales for durational effects were identified as follows:

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

Table 11 below plots the preferred sites in regarding to rate of development over the plan period.

Table 11 Durational Effects



It is clear that in combination the plans effect in regard to housing will peak during the Short term, drop in volume but remain high in the Medium term, with effects falling dramatically at the point at the Long term is reached. However, within each 'term' there is very likely to be sites that have greater positive or negative effects than their counterparts. These individual peaks and troughs are best illustrated in Appendix F.

In regard to policy effects the majority will be consistent across the plan period with the peaks and trough identified above against housing and employment delivery. Effects positive or negative associated with Policy IP2: Lichfield Canal will have a far greater link to the timescales attached to the completion of the Lichfield Canal. Further Policy NR11 National Forest and Policy NR10 have defined restricted geographical areas and as such will only have effect when development in those areas is brought forward.

In regard to impact generated from Main Modifications on durational impacts, MM1: Local Plan Review states the following;

*“Lichfield District Council shall carry out an early review of the Local Plan for Lichfield that will be submitted to the Secretary of State for Examination in accordance with the latest Local Development Scheme or no later than the end of December 2021.”*

Whilst the policy will not impact on the likely significant impacts associated with the delivery of sites, impacts associated with certain policies will, to some extent, be curtailed after 2021. The significant impacts generated from the following policies will cease following the implementation of MM1, which will see policies reviewed and replaced.

Impacts from these policies occur directly at the point of implementation, there will not be any ongoing impacts and therefore all impacts being experienced within the Short Term period of the plan.

- Policy ST3: Road Line Safeguarding
- Policy E2: Services Access to our Centres
- Policy E3: Shop fronts and advertisements

These impacts (summarised in Appendix H) are overwhelmingly positive. There are however benefits associated with the duration restriction, most notably relating to significant negative impacts on Sustainability Objective 2 relating to Policy ST3.

The following policies will also fall within the requirements of MM1 (their impacts are identified in Appendix H). Implementation of these policies in the Short term period will result in impacts being experienced into the future. As such resulting in impacts continuing through to the Medium term period of the plan.

- Policy IP2: Lichfield Canal
- Policy EMP1: Employment Areas & Allocations
- Policy NR10: Cannock Chase Area of Outstanding Natural Beauty
- Policy NR11: National Forest
- Policy BE2: Heritage Assets
- Policy Lichfield 3: Lichfield Economy

Due to the transport nature of the following policies it is considered that the impacts will continue through to the Long term period of the plan.

- Policy ST4: Road and Junction Improvements - Lichfield City
- Policy ST5: Road and Junction Improvements – Fradley

## Mitigation

The LPA follows the adoption of the Local Plan Strategy and a wide range of Supplementary Planning Documents. Local Plan Strategy was adopted in 2015. As well as providing a spatial strategy for the district it also contains a number of relevant Core Policies and Development Management Policies which will facilitate mitigation in response to significant negative effects identified as part of the LPA. Main Modification MM1 will after 2021 lead to the delivery of a set of replacement policies both Strategic and Non-Strategic in nature in line with the requirements of the National Planning Policy Framework 2018.

In addition the district has adopted a number of Supplementary Planning Documents covering the following areas:

- Biodiversity and Development
- Developer Contributions

- Trees, Landscaping and Development
- Historic Environment
- Rural Development
- Sustainable Design

They build upon and provide more detailed advice and guidance on the policies within the Local Plan Strategy.

Within the LPA each allocation has a number of Key Development Considerations whilst not all encompassing they identify potential mitigation measures that may arise during the planning application process that applicants will need to address.

Lichfield District Council adopted its Community Infrastructure Levy (CIL) charging Schedule in April 2016. The District Councils Regulation 123 list sets out infrastructure requirements within may in whole or in part be funded through CIL. It is likely to mitigating actions will be supported by CIL.

It is also considered that additional measures contained within other plans, policies and programmes will also support mitigation e.g. Cannock Chase SAMM.

All five routes of mitigation have been designed to complement and reinforce one another and will enable a raft of mitigation responses to bring the plans impacts down to an acceptable level.

### Overall Conclusions

Overall, the level of development proposed by the publication version of the LPA accords with the identified needs of the District. The range of sites allocated by the LPA strike a balance between the need to protect the Districts valuable environmental assets, promote economic growth and deliver the spatial strategy for the District. Most importantly the LPA sits within the policy context of the Local Plan Strategy which has identified and outlined within policy the mitigation measures which are required to make development acceptable. Whilst the additional of MM1 will have an impact on the detail of these policies it is considered that the overarching requirements contained within the NPPF 2018 through Strategic and Non –Strategic policy will ensure the Development Plan for the District will continue to provide the ability to make development acceptable. It is therefore considered that these measures are sufficient to guard against adverse environmental effects. The SA is legally compliant, and provides robust basis in which to base decision making in terms of site and policy selection.

## 5 What are the next steps (including monitoring)?

The SA Report must include:

- A description of measures envisaged concerning monitoring

### Developing a Monitoring Framework

The SEA Directive requires the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects and to be able to take appropriate action where necessary.

The monitoring undertaken on the LPA will help to:

- Monitor the significant effects of the Plan
- Track whether the plan has had any unforeseen effects
- Ensure that action can be taken to reduce/offset the significant effects of the plan
- Provide baseline data for future sustainability appraisals, and
- Provide evidence of how the environment / sustainability criteria of the area is evolving.

The requirements of the SEA Directive focus on monitoring the effects of the Plan. This equates to both the plan's significant effects and also unforeseen effects. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to the implementation of the Plan when they occur as often other plans, projects or programmes could all effect the quality of environment, economic performances or the social aspects of the Plan.

It is good practice for the monitoring of significant sustainability effects to be integrated with other monitoring of the Local Plan Strategy and LPA. For this reason, the Council will report significant effects as part of its existing monitoring regime. Proposed significant sustainability effects indicators are included in the Sustainability Appraisal Framework. These have been drawn from the baseline information and key sustainability issues identified within the Sustainability Appraisal Scoping report and are identified to monitor potential significant adverse effects highlighted in the main report.

A complete monitoring framework will be established prior to the Adoption of the Site Allocations Plan and the Authority Monitoring report updated to reflect the proposed framework.

### What happens next

Following the Examination of the LPA in September 2018 seven main modifications have been put forward. This documents has taken such modifications into consideration. Approval will be sort from the appropriate Council groups to undertake a seven week public consultation. Comments will be processed and consideration by the the inspector for consideration.

## Local Plan Allocations Sustainability Appraisal Appendices Contents

Please use the links below to view each appendix.

Appendix A – Amendments to SA Framework (LPS – LPA)

Appendix B – SA Scoping Report consultation responses

Appendix C – Review of published Plans, Policies, Strategies and Initiatives

Appendix D – Baseline, current state of the environment

Appendix E – Full SA Scoring Matrix

- Appendix E – Alrewas
- Appendix E – Armitage with Handsacre
- Appendix E – Burntwood
- Appendix E – East of Rugeley
- Appendix E – Employment
- Appendix E – Fazeley, Mile Oak & Bonehill
- Appendix E – Fradley
- Appendix E – North of Tamworth
- Appendix E – Other Rural
- Appendix E – Gypsy & Traveller
- Appendix E – Lichfield
- Appendix E – Shenstone
- Appendix E - Whittington
- Appendix E – Post Regulation 19

Appendix F – Allocated sites summary impacts

Appendix G – Table 6 Reasons for Preferred Alternatives Housing and Employment and Table 7 Reasons for Preferred Alternatives Gypsy and Travellers. \_

Appendix H – Saved policy summary

Appendix I - Assumptions

Appendix J – Cumulative effects summary