

Lichfield District Council



Local Plan Allocations (Focused Changes) Consultation Statement

March 2018

Contents

| | | |
|-----|---|----|
| 1.0 | Introduction | 2 |
| 2.0 | Relationship to the Statement of Community Involvement (SCI) and the Sustainability Appraisal | 4 |
| 3.0 | Community Involvement and Engagement on the Local Plan Part 2 Allocations Document. | 5 |
| 4.0 | Summary of Key Issues and how they were addressed..... | 7 |
| 5.0 | Conclusion..... | 16 |

Appendices

Appendix A: Letter

Appendix B: Letter, Statement of Representations, copies of the newspaper adverts

Appendix C: Summarised list of Specific and General consultees

1.0 Introduction

1.1 This Consultation Statement states how Lichfield District Council has undertaken community participation and stakeholder involvement to produce the Local Plan Part 2 Allocations Document Publication (Focused Changes) Document. This consultation statement has been produced to fulfil the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, (hereafter referred to as the 'Regulations') as defined in Regulations 17 (d) which requires a statement setting out:

- (i) Which bodies and persons were invited to make representations under regulation 18, and regulation 19;
- (ii) How those bodies and persons were invited to make such representations;
- (iii) A summary of the main issues raised by those representations; and
- (iv) How those main issues have been addressed in the document.

1.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 also specify the consultation a local authority must undertake in the preparation of a local plan and before it can publish a pre-submission version of the plan. It states the following:

'Preparation of a local Plan

18.-(1) A local planning authority must;

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which of the local planning authority propose to prepare; and

(b) invite each of them to make representations to the local planning about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are;

(a) such of the specific consultation bodies as the local planning authority may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1)'

1.3 This consultation statement will form one of the 'proposed submission documents' referred to in Regulation 19, as set out below. It states how the authority has met the requirements of its Statement of Community Involvement, which was adopted 10th May, 2016.

'19 Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must;

- (a) Make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35; and*
- (b) Ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).*

1.4 The Council undertook 2 consultations which lasted 6 weeks each for the Publication Stage of the Local Plan Allocations Document and earlier consultation in accordance with Regulation 18 of the Regulations. The two consultations which were undertaken at the Regulation 19 stage were to enable representations to be made upon the document produced following the Regulation 18 exercise. The second consultation (known as the Focused Changes consultation) was to allow comments to be made upon the further changes proposed to the Local Plan Allocations document. These changes had been arrived at in response to the representations received at the initial Regulation 19 consultation and following a review of the housing supply by the District Council.

1.5 Consultation on the second Publications stage consultation (Reg 19) was on a document entitled Lichfield Local Plan Allocations (focused changes) document. This document was consulted upon from 8th January 2018 until 19th February, 2018 a period of 6 weeks. The consultation was undertaken in accordance with Regulation 19 of the Regulations and sought representations on the soundness and legal compliance of the Local Plan Allocations (focused changes) document. More detail on the organisations, including statutory bodies, who were consulted on the Local Plan is included in a summarised list at Appendix C and the letter is included at Appendix A.

1.6 The first consultation for the Publication Stage of the Local Plan Allocations Document was from 20th March 2017 and concluded on 12th May, 2017 a period of over 6 weeks. As with the second consultation this consultation was undertaken in accordance with Regulation 19 of the Regulations and sought representations on the soundness and legal compliance of the Lichfield District Local Plan Allocations Document. Section 3 provides more detail on the organisations who were given the opportunity to feed into the formulation of the Local Plan and a summarised list is included as Appendix C. The letter, posters and copies of the newspaper advert which formed part of the consultation are included at Appendix B. The statement prepared following the consultation was reported in the [consultation statement of January 2018](#).

1.7 Prior to seeking representations on the soundness and legal compliance of the Lichfield District Local Plan Part 2 Allocations Document an ‘open consultation’ was undertaken between 23rd August 2016 to 10th October 2016. This was reported within the consultation statement published in January 2017.

1.8 Prior to this and concurrently the Council operated an early opportunity for individuals and organisations to suggest sites within the District for future uses, and enable sites to be submitted at any time. This is called its ‘Call for Sites’ which encourages any land owner or

developer to download forms and submit details of their sites to be considered for development. The 'Call for Sites' programme is still open.

1.9 In addition at all times the authority operates a self-registration system whereby an individual or organisation can add their details to the consultation portal via the LDC website and register for alerts on new consultations. The consultation portal now holds over 7000 records.

1.10 During the three periods of consultation as well as the ensuring information was made available on the Council's website, information has also been placed in the reception of the District Council's offices at Frog Lane, Lichfield.

2.0 Relationship to the Statement of Community Involvement (SCI) and the Sustainability Appraisal

2.1 The [Statement of Community Involvement](#) (SCI) was adopted in May 2016 and sets the standards which can be expected by our customers for community involvement in the planning process. It identifies what we are required to do by the Regulations¹ and what additional actions the authority will take to enable effective engagement. The Town and Country Planning (Local Development)(England) (amended) Regulations 2008 altered the stages of production of a development plan document, removing the preferred options (Regulation 26) stage and therefore requiring two stages of consultation. A development plan document is therefore required to undertake consultation in the early stages in the preparation of the document (Regulation 18) when issues and further detail to the strategic policy within the adopted plan were able to be submitted and then formal consultation on the Publication /proposed Submission when the Plan has been agreed by the Council for seeking representations on soundness and legal compliance (Regulation 19).

2.2 For both of the consultations at the Draft / Publication Stage of the Lichfield District Local Plan Part 2 Allocations Document the Council has adhered to the procedures set out in the Regulations and the SCI. In the Publication of Draft stage the SCI and the Regulations require views to be sought on whether the document and its accompanying suite of documents are legally compliant and sound; it requires the documents to be available for at least 6 weeks via the website and at the Council's principal offices and to make the documents available in alternative formats upon request; the SCI also requires the Council to issue a press release and to consult with consultation bodies and community involvement using a range of methods described in the SCI Appendix A where appropriate and where resources allow. The authority chose to also send emails via the Local Plan consultation portal and letters to those who had not included an email address, used its corporate social media methods of twitter and Facebook to promote awareness of the consultation, placed smaller exhibitions in Lichfield and Burntwood libraries and provided copies of the main documents for all libraries within the District.

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

2.3 In addition for the first Regulation 19 consultation the authority also undertook exhibitions at a variety of locations across the District which were staffed by members of the planning team.

2.4 For the Draft / Publication Stage of the Part 2 Land Allocations Document the Council complied with the requirements of the Regulations and the Councils SCI.

2.5 During the Regulation 19 consultation the Sustainability Appraisal was available via the Council's website and placed on deposit in the reception of the District Council. Responses made during this period were considered and the District Council response to each is included in Appendix B of the Sustainability Appraisal, the alternative sites proposed were further appraised and have assisted in identifying the most sustainable sites and informed the Plan. The responses were reported to Economic Growth, Environment and Development Overview and Scrutiny Committee on 19th September, 2017 and Cabinet on 5th December 2017 and for the Regulation 19 focused changes consultation the responses to the sustainability appraisal were reported to Cabinet on 1st May 2018.

2.6 The consultation letter and the website referred to the Local Plan Allocations document being supported by a number of documents and listed the following:

- Sustainability Appraisal
- Habitat Regulations Assessment
- Equality Impact Assessment
- Infrastructure Delivery Plan

2.7 The website also listed the evidence that had been prepared and which included the following:

- Duty to Cooperate Statement (both Reg 19 consultations);
- Consultation Statement (both Reg 19 consultation);
- Urban Capacity Assessment (First Reg 19 consultation only);
- Employment Land Capacity Assessment (First Reg 19 consultation only);
- Gypsy and Traveller methodology paper (First Reg 19 consultation only);
- Lichfield Centres Report (First Reg 19 consultation only);
- Open space assessment (First Reg 19 consultation only); and
- National Forest Background Paper (First Reg 19 consultation only).

3.0 [Community Involvement and Engagement on the Local Plan Part 2 Allocations Document](#)

3.1 In accordance with the SCI, Lichfield District Council has undertaken consultations to involve and engage the community to prepare the Part 2 Allocations Document for Lichfield. This chapter sets out the main consultation /community engagement that have taken place prior to the 'Publication stage' consultation.

The SCI requires:

- Views to be sought on whether the Local Plan and its accompanying suite of documents are legally compliant and sound;
- the issuing of a press release; and
- consideration of the use of other techniques listed in the Appendix to the SCI such as web site/twitter, exhibitions etc.

3.2 The consultation period was from 20th March, 2017 to 12th May 2017. In compliance with the Regulations and SCI representations were sought on the Local Plan through the following methods:

- Placing all the documents on its website and stating where and how representations could be made;
- Placing all documents on deposit at the reception at the Council's principal office which is the District Council House, Frog Lane, Lichfield;
- Issuing a press release;
- Placing adverts within 4 locally circulated newspapers, and then re-advertised during the consultation period;
- Holding 9 exhibitions in 8 different locations across the District;
- Providing un-manned small exhibitions in Burntwood Library and Lichfield Library for 6 weeks during the consultation period;
- Sending over 2500 emails via the Local Plan consultation portal to our relevant consultation bodies and those registered to be consulted on the next stage in the preparation of the Local Plan, a summarised list is at Appendix B;
- Sending letters to all those who had not provided email addresses and who wished to be notified of the next stage in the preparation of the Local Plan Appendix A;
- Making the Local Plan Allocations document available via our consultation portal; and
- Sending 'tweets' via the corporate Twitter account.

3.3 During the consultation period and in response to the feedback received (high demand locally) a second exhibition was held in Burntwood which was staffed by officers from the Council.

3.4 The consultation for the Local Plan Allocations (focused changes) document was from 8th January to 19th February 2018. In compliance with the Regulations and SCI representations were sought on the Local Plan through the following methods:

- Placing all the documents on its website and stating where and how representations could be made;
- Placing all documents on deposit at the reception at the Council's principal office which is the District Council House, Frog Lane, Lichfield;
- Issuing a press release;
- Providing small un-manned exhibitions in Burntwood Library and Lichfield Library for 6 weeks during the consultation period;

- Sending over 2500 emails via the Local Plan consultation portal to our relevant consultation bodies, those who had responded to previous consultations and those registered to be consulted on the next stage in the preparation of the Local Plan, a summarised list is at Appendix C;
- Sending letters to all those who had not provided email addresses and who had responded to previous consultations or who wished to be notified of the next stage in the preparation of the Local Plan, the letter is at Appendix A;
- Making the Local Plan Allocations document available via our consultation portal; and
- Sending ‘tweets’ via the corporate Twitter account and Voice It! consultation portal.

3.5 The range of techniques used raised awareness of the consultation and the District Council consider the consultation process fully met the requirement of the SCI and is in accordance with the Town and Country Planning Regulations.

3.6 The authority monitoring report reviews how community engagement has been effective and states that ‘There have been a variety of consultation events throughout the District this year on different projects and documents which have been well attend and received by residents.’ Indicators CE1 reports on the number of users registered on Objective which is the consultation portal and shows that this has increased and now shows 7,660 users registered. Indicator CE2 is the indicator for public engagement and this states there has been a continued good level of public interest in consultation events. Indicator CE3 reports on the number of hits on the website and this shows there has been a large number of hits.

4.0 [Summary of Key Issues and how they were addressed](#)

4.1 This section incorporates a summary of all of the key issues which arose through the consultation undertaken and how they were addressed. It considers them with the most recent event – the Local Plan Allocations (focused changes) document consultation first as this has not previously been included within a consultation statement and then includes the summary of the key issues and how they were addressed from the earlier consultation statements for completeness.

4.2 The key issues raised during the second Regulation 19 consultation on the Local Plan Allocations (focused changes) document along with officer analysis were considered by Cabinet on 1st May 2018.

4.2 In total 272 individual responses were received by the Council in response to the consultation on the focused changes document and carried out as part of the Regulation 19 consultation on the Local Plan Allocations document. The representations were summarised and reported to Cabinet on 1st May 2018 along with the key issues and officer response. In addition the Council received 1 late response which was received after the deadline of 19th February 2018.

4.3 The key issues raised during the consultation are as follows:

| Key Issue | Response |
|--|--|
| <p>The Allocations is not in conformity with the Local Plan Spatial Strategy as there is a significant over provision of dwellings attributed to 'Other Rurals', and under provision in other settlements including Burntwood, Shenstone, Whittington and Fazeley.</p> | <p>The Allocations document meets the overall dwelling requirement set out in the Local Plan Strategy.</p> |
| <p>Development industry challenge the removal of green belt sites within the Local Plan Allocations and question that the document is reactive as opposed to proactive in allocating development sites.</p> | <p>Further analysis of the housing supply was undertaken, taking into account any potential windfalls to re-assess the need for Green Belt release. This is in line with emerging Government policy of exploring all options before releasing designated Green Belt land. The Allocations document meets the overall dwelling requirement set out in the Local Plan Strategy without the need to remove Green Belt land.</p> |
| <p>Policy BE2: Heritage Assets is in conflict with National Policy</p> | <p>Officers have made changes seeking compliance with NPPF.</p> |
| <p>Development industry questioned the deliverability of a number of the allocations, such as Rugeley Power Station and Arkall Farm.</p> | <p>The proposed allocated sites are being promoted through the Local Plan process and are considered deliverable within the plan period. In relation to Rugeley Power Station, the Council has worked closely with the landowner to prepare a Development Brief SPD to guide the future redevelopment of the site. With regards to Arkall Farm, the Council is awaiting the outcome of the planning inquiry. The Local Plan Allocations includes flexibility in terms of housing supply to support any unanticipated under delivery.</p> |
| <p>Development industry challenged the approach to calculating housing supply, such as allocations with permission.</p> | <p>The approach towards calculating supply is considered consistent across the District and as such all sites with permission have been included within the allocations as they are intended to come forward within the plan period and contribute towards meeting the housing provision of 10, 030 dwellings set out in the Local Plan Strategy.</p> |
| <p>Need to deal with neighbouring authority's shortfall in housing provision within the allocations rather than review</p> | <p>The Council is committed to reviewing its Plan in full to address housing shortfall issues within the Greater Birmingham Housing Market Area as set out within both the Local Plan Strategy and reaffirmed in the Local Plan Allocations document. The Local Development Scheme sets out that the Council will consult on its Scope, Issues & Options document in April 2018.</p> |

| Key Issue | Response |
|---|---|
| Comments relating to saved policies being deleted but not replaced, namely Saved Policy C9 and Saved Policy EMP5. | The District Council undertook a review of all saved policies in these circumstances it was not considered appropriate to carry these policies forward. |
| The proposal to protect the Borrowpit at Rugeley Power Station is challenged given its allocation in the Local Plan Strategy. | Rugeley Power Station is allocated to deliver a minimum of 80 dwellings within the plan period. Whilst the Borrowpit is allocated as part of the Local Plan Strategy, the Council consider it is worthy of retention as a landscape / water feature and acknowledge within the document there will be a net gain of 350 units on the former Power Station site. |
| The lack of provision for self-build sites was cited by a number of respondents. | The Allocations document meets the overall dwelling requirement set out in the Local Plan Strategy. The Local Plan Allocations does not include site specific allocations for self-build purposes. The Council maintains a self-build register. |

In addition to the above, notable support was received from local residents for the retention of the Borrowpit as a key landscape/ water feature within the Rugeley Power Station site. Residents indicated support of the removal of green belt sites within the Local Plan Allocations, particularly at Burntwood and Shenstone.

4.4 The Sustainability Appraisal was also commented on during the consultation with 17 representations received. The consultation did however result in two additional sites to be appraised and these have been included in the submission version of the Sustainability Appraisal. No representations were considered to identify any concerns of a crucial and fundamental nature.

4.5 As previously included, the key issues raised during the initial Regulation 19 consultation along with officer analysis were considered by the Economic Growth, Environment and Development (Overview and Scrutiny) Committee on 19th September, 2017 and Cabinet on 5th December, 2017.

4.6 To the first consultation carried out in accordance with Regulation 19 of the Regulations over 5000 responses were received by the Council. The representations were summarised and grouped where similar and reported to the Economic Growth, Environment and Development (Overview and Scrutiny) Committee on 19th September, 2017 and Cabinet on 5th December, 2017 along with the key issues and officer analysis. In addition the Council received 10 responses which were received 'late' after the deadline of 12th May 2017. The Council chose not to formally take these comments into consideration but they were summarised and reported to the Economic Growth and Development (Overview and Scrutiny) Committee on 19th September, 2017 and Cabinet 5th December, 2017 for completeness.

4.7 The key issues raised during the consultation are as follows:

- Line of Lichfield and Hatherton Canal contains an inaccuracy;
- Lack of information pertaining the status of Land at Watery Lane, Curborough;
- Development within the Green Belt objected to due to policy protection associated with the sites;
- Need to look at brownfield sites first before releasing any Green Belt for development
- Site boundaries require amendment, for example the boundary associated with land at Dark Lane, Alrewas was cited as an allocation which required review;
- Policy BE2 (Heritage Assets) is in conflict with National Policy
- Policy IP2 (Lichfield Canal), drafting of line is incorrect wording of policy requires minor alteration;
- Additional key development considerations requested by statutory bodies for a number of the allocations;
- Development industry questioned the deliverability of a number of the allocations, such as Rugeley Power Station;
- The need for a vision/plan within Burntwood was identified;
- Local Plan Allocations document undermines the Neighbourhood Plan process, particularly in relation to the Shenstone Neighbourhood Plan;
- The proposal to protect the Borrow Pit at Rugeley Power Station was challenged given its allocation in the Local Plan Strategy
- Development industry challenged the approach to calculating housing supply, such as allocations with permission;
- Development industry argue the Local Plan Allocations document makes no allowance for 'safeguarded land' to be taken out of the Green Belt
- Local concerns over the impact development will have on local infrastructure, services and facilities;
- Need to deal with neighbouring authority's shortfall in housing provision within the allocations rather than review was cited by numerous respondents;
- The need for additional information associated with the following was cited (notably these matters were not considered showstoppers): Flood Risk, Highways England Network, Historic Heritage, HSE; and
- Duty to co-operate was cited as an issue by numerous parties including Parishes, a neighbouring Local Planning Authority, local residents and the development industry.

4.8 The sustainability appraisal was also commented on during the consultation with 29 representations received. The majority of these focused on requesting changes to the sustainability objective scores allocated against individual sites, some of which were supported by site specific studies. A number of representations then went on to compare and contrast sites with a view to supporting the development of the sites selected or recommending alternative development options. A number of the representations argued that the Sustainability Appraisal failed to assess all of the reasonable alternatives available

for development. Representations focused on sites in and around Shenstone and raised the relationship between the Sustainability Appraisal that accompanied the recently made Neighbourhood Plan and the Local Plan Allocations Sustainability Appraisal. Representations received focused on Burntwood sites offered alternative sustainability objectives scores and commentary taking the opportunity to add a local dimension to the scoring.

4.9 The District Council has considered all the representations and the following is how those main issues have been addressed:

| Key Issue | Response |
|--|--|
| Line of Lichfield and Hatherton canal contains an inaccuracy | Noted. Proposals map to be amended to accurately plot the Lichfield and Hatherton canal line |
| Lack of information pertaining the status of Land at Watery Lane, Curborough | Land at Watery Lane, Curborough was not considered to be in line with the spatial strategy by the Council. However the Secretary of State, while agreeing that the proposal is not in line with the adopted Local Plan Strategy, determined to approve the Call in due to wider material considerations. The Council challenged this in the High Court, this challenge was unsuccessful. |
| Development within Green Belt objected to due to policy protection associated with the sites. | The proposed Green Belt allocations were identified due to the need to identify land outside of settlement boundaries in order to meet the numbers associated with the Local Plan Strategy. A further analysis of the housing supply has been undertaken, taking into account any potential windfalls to re-assess the need for Green Belt release. |
| Need to look at brownfield sites first before releasing any Green Belt for development | The Local Plan Allocations is supported by its evidence base, including the SHLAA and Urban Capacity Assessment which outlines sites, including brownfield sites that are available and deliverable within the plan period. Further, the Council has prepared a Brownfield Register which identifies brownfield land that is suitable for residential development. |
| Site boundaries require amendment, for example the boundary associated with land at Dark Lane, Alrewas was cited as an allocation which required review. | Site boundaries have been reviewed and where appropriate such as at Dark Lane, Alrewas they have been amended. |

| Key Issue | Response |
|---|---|
| Policy BE2 (Heritage Assets) is in conflict with National Policy | Officers have worked with stakeholders to agree appropriate changes seeking compliance with the NPPF |
| Policy IP2 (Lichfield Canal), drafting of line is incorrect wording of policy requires minor alteration | Noted. Amend line of canal, and amend policy wording as appropriate. |
| Additional key development considerations requested by statutory bodies for a number of the allocations | Following further discussions with statutory bodies, where appropriate additional key development considerations have been added into the document. |
| Development industry questioned the deliverability of a number of the allocations, such as Rugeley Power Station. | The proposed allocated sites are being promoted through the Local Plan process and are considered deliverable within the plan period. In relation to Rugeley Power Station, the Council has worked closely with the landowner to prepare a Development Brief SPD to guide the future redevelopment of the site. |
| The need for a vision/ plan within Burntwood was identified | Noted, this is a matter that should be addressed through the Local Plan Review. |
| Local Plan Allocations document undermines the Neighbourhood Plan process, particularly in relation to the Shenstone Neighbourhood Plan | The Neighbourhood Plan for Shenstone seeks to contribute toward addressing the housing needs for the development area by providing a minimum of 50-150 new dwellings within the plan period. The Neighbourhood Plan allocates Land at Lynne Lane for 50 units (Policy HA1). This site is allocated within the Local Plan Allocations (Site Reference S1) which makes specific reference towards Policy HA1 in the Key Development Considerations, alongside two additional sites to take the quantum of development in Shenstone up to 150 dwellings. The proposed Green Belt allocations were identified due to the need to identify land outside of settlement boundaries in order to meet the numbers associated with the Local Plan Strategy. A further analysis of the housing supply has been undertaken, taking into account any potential windfalls to re-assess the need for Green Belt release. |
| The proposal to protect the Borrowpit at Rugeley Power Station | Rugeley Power Station is allocated to deliver a minimum of 800 dwellings within the plan period. |

| Key Issue | Response |
|---|---|
| was challenged given its allocation in the Local Plan Strategy. | Whilst the Borrow Pit is allocated as part of the Local Plan Strategy, the Council consider it is worthy of retention as landscape/ water feature and acknowledge within the document there will be a net gain of 350 units on the former Power Station site. |
| Development industry challenged the approach to calculating housing supply, such as allocations with permission. | The approach towards calculating supply is considered consistent across the District and as such all sites with permission have been included within the allocations as they are intended to come forward within the plan period and contribute towards meeting the housing provision of 10,030 dwellings set out in the Local Plan Strategy. |
| Development industry argue the Local Plan Allocations document makes no allowance for 'safeguarded land' to be taken out of the Green Belt | The Council is committed to reviewing its Plan in full to address the Greater Birmingham Housing Market Area issues. As part of this review a full Green Belt review will be undertaken to inform the evidence base and therefore at this stage it is not considered necessary for 'safeguarded land' to be taken out of the Green Belt for future plan periods. |
| Local concerns over the impact development will have on local infrastructure, services and facilities. | The Local Plan Allocations document is supported by its evidence base including the Infrastructure Delivery Plan (IDP). The IDP ensures the allocations are robust and deliverable by identifying key strategic infrastructure requirements. Further, the Local Plan Allocations document has been informed by statutory bodies including Staffordshire County Council. |
| Need to deal with neighbouring authority's shortfall in housing provision within the allocations rather than review was cited by numerous respondents | The Council is committed to reviewing its Plan in full to address housing shortfall issues within the Greater Birmingham Housing Market Area. The outcome of the GL Hearn and Amec Foster will feed into a future full Local Plan Review. |
| <p>The need for additional information associated with the following was cited (notably these matters were not considered showstoppers):</p> <ul style="list-style-type: none"> • Flood Risk • Highways England Network | These matters have been addressed where appropriate within the Key Development Considerations associated with each of the site allocations. |

| Key Issue | Response |
|---|---|
| <ul style="list-style-type: none"> • Historic Heritage • HSE | |
| <p>Duty to Cooperate was cited as an issue by numerous parties including Parishes, a neighbouring Local Planning Authority, local residents and the development industry.</p> | <p>The Council considers it has fulfilled its Duty to Cooperate as part of the Local Plan Allocations process. The Duty to Cooperate Statement prepared as part of the Council's evidence base discusses this further. The Council is committed to ongoing Duty to Cooperate discussions.</p> |

4.10 Previous consultation carried out in accordance with Regulation 18 of the Regulations which consulted on the proposed scope and nature of the Local Plan Allocations document resulted in 98 responses being received by the Council in response to the open consultation. In summary the key issues raised during that consultation were:

- A number of comments indicated that it would be preferable to deal with the Birmingham housing numbers and review Lichfield District's own housing numbers now. In addition the level of employment land requirements were also recommended to be updated.
- Core Policies 1 and 6 were challenged in particular. This was primarily associated with the perceived need to review the Local Plan Strategy (2015) to deal with Birmingham's housing needs. However other responses indicated that strategic changes to Core Policy 1 could create investment uncertainty, particularly in the retail sector.
- In relation to settlement policies such as Whit 4 (Whittington) it was suggested these should be amended to take account of unmet housing needs arising from Birmingham.
- Policy NR3 was challenged in terms of its perceived conflict with the NPPF.
- Policy CP4 was cited as being an issue because of the lack of infrastructure that has come forward aligned to what was set out in the Infrastructure Delivery Plan associated to the Local Plan Strategy (2015).
- Saved Policy NA.1 relating to the AONB was put forward for retention by the Cannock Chase AONB.
- Policy SC1 was highlighted as being in conflict with National guidelines due to the withdrawal of the Code of Sustainable Homes.
- In relation to Burntwood Town Centre, a general point of allowing a level of flexibility of uses on specific land identified in the town centre was made.
- The Council's housing trajectory identified within the Local Plan Strategy (2015) was challenged.
- A total of 76 representations proposed sites for development, however the bulk of these sites have already been received by the Council through the

Strategic Housing Land Availability Assessment (SHLAA). Any new information was considered by officers.

- A request was received from Tamworth Borough Council to accommodate a proportion of housing growth, employment growth and provision for gypsies which they consider cannot be accommodated within the Tamworth Borough boundary.

4.11 The District Council considered all the representations and the responses to the main issues raised are summarised below. The revisions were incorporated into the Local Plan Allocations DPD which was consulted on from March to May 2017.

| | |
|---|--|
| | |
| Requests for increasing the housing numbers to accommodate the requirements of Birmingham and Tamworth. | The District Council consider this to be part of the wider GBHMA un met housing demand and is deemed beyond the scope of this Plan, changes to the overall housing numbers should be considered holistically and strategically as part of a future review of the Lichfield District Local Plan. |
| Policy NR3 | The District Council consider the policy is positively worded and has been subject to Examination. |
| Policy CP4 | Infrastructure is an issue for all areas and the Local Plan contains policies on infrastructure needs. The Infrastructure Delivery Plan will continue to be reviewed and updated, this will be done in line with guidance from our professional infrastructure providers. |
| Saved Policy NA1 | The policy is proposed for redrafting. |
| Policy SC1 | The comments are noted. |
| Burntwood Town Centre | The comments are noted and there is recognition that there is a need to be flexible with development in this locations. |
| Housing trajectory and sites proposed for housing development | The sites submitted have been considered for inclusion within the Allocations DPD and have helped inform the Plan and the development of alternatives. The trajectory will be redrafted as part of the Allocations DPD. |
| Tamworth's requests for more employment land and gypsy provision | A review of the District's current stock of employment land has been undertaken which has demonstrated that there is sufficient land within the existing employment land portfolio to meet the requirements of the adopted Lichfield District Local Plan Strategy with some flexibility. The flexibility enables the |

| | |
|--|--|
| | <p>Allocations document to address the 6.4 hectare requirement arising from Tamworth. A review of Tamworth Borough Council's evidence base has identifies a lack of a full and proper assessment of the gypsy and traveller pitches in its administrative area and that this should be undertaken before Lichfield District should agree to look at this issue under the duty to co-operate.</p> |
|--|--|

5.0 Conclusion

5.1 Lichfield District Council considers that the consultation process used throughout the preparation of the Local Plan Allocations document has fully met the requirements within the Lichfield District Council adopted Statement of Community Involvement, and is in accordance with the relevant Regulations.

5.2 The effectiveness of the consultation methods are reviewed through the Authority Monitoring report and considered as comfortably achieving, and meeting outline targets.

Your ref
Our ref DP1/
Ask for Spatial Policy and Delivery
Email Developmentplans@lichfielddc.gov.uk



District Council House, Frog Lane
Lichfield, Staffordshire WS13 6YX

Direct Line 01543 308192
Customer Services 01543 308000

8th January, 2018

Dear Sir/Madam

**Town and Country Planning (Local Planning)(England) Regulations 2012 – Regulation 19 Consultation.
Draft Lichfield Local Plan Allocations (Focused Changes) Document**

Lichfield District Council is seeking your views on the aforementioned Local Plan Allocations (Focused Changes) Document. The document is the Part 2 to the Lichfield Local Plan and will add detail to the first part of the Local Plan which is the Lichfield Local Plan Strategy. This version of the Plan is the final draft (subject to Council approval) prior to submission to the Secretary of State. The Council has considered and addressed the representations received during the consultations held during August- October 2016, and March - May 2017 from the public, statutory bodies and other organisations. These consultations have helped shape the Local Plan Allocations (Focused Changes) Document.

This Lichfield Local Plan guides development any will help shape the way the physical, economic, social and environmental characteristics of Lichfield District will change up to and beyond 2029. The first part of the Local Plan was the Local Plan Strategy and this set the level of growth for housing and employment for the district and policies to guide planning decisions on a wide range of topic areas. This Local Plan Allocations (Focused Changes) Document seeks to:

- Identify the remaining land allocations to deliver the level of housing and employment growth already agreed in the Local Plan Strategy;
- Review the City and Town Centre retail and office requirements;
- Review the remaining saved polices from the 1998 Local Plan;
- Proposes new policies to guide development and help deliver objectives such as the Lichfield bypass, National Forest and Lichfield Canal;
- Identifies a site for gypsy and travellers and considers the settlement boundaries and Green Belt boundaries as stated in the Local Plan Strategy and through 'made' neighbourhood plans.

The Local Plan Allocations Document is supported by a number of technical reports:

- Sustainability Appraisal
- Habitat Regulations Assessment
- Equality Impact Assessment
- Infrastructure Delivery Plan

All the documents are available on line at www.lichfielddc.gov.uk/Allocations and through our consultation portal <http://lichfielddc-consult.limehouse.co.uk/portal> they are also available to view in the reception of the District Council House Frog Lane, Lichfield Staffordshire, WS13 6YZ Monday to Friday 9.00am-5.00pm (except Bank holidays) where officers will be available to assist you.

We are seeking views on whether the Local Plan Allocations (Focused Changes) document and its accompanying suite of documents are legally compliant and sound. All of the above documents are available for comment during the period 8th January to 5pm on the 19th February 2018 and a representation form is available to assist in the submission of comments. The use of the standard representation form is strongly recommended as this will ensure that comments are related to matters relevant to the subsequent examination by a Planning Inspector.

In addition to online there is a small display in Lichfield and Burntwood libraries showing the key elements of the Local Plan Allocations (Focused Changes) document during the consultation period.

Representation forms are available from the District Council House reception, can be downloaded from the Council's website www.lichfielddc.gov.uk/Allocations or a paper copy can be provided by phoning 01543 308192 or emailing developmentplans@lichfielddc.gov.uk.

Completed representation forms and comments can be submitted via the following:

- Online through our 'Consultation Portal' - <http://lichfielddc-consult.limehouse.co.uk/portal> - using this method will enable you to register for email alerts for upcoming planning policy consultations;
- Via Email – all responses must be emailed to developmentplans@lichfielddc.gov.uk; and
- Via Post to - Spatial Policy & Delivery Team, District Council House, Frog Lane, Lichfield, WS13 6YZ.

All responses received by 5pm on the 19th February, 2018 will be considered. Late responses will not be accepted under any circumstances. Individual acknowledgement of receipts will not be possible.

Please note that copies of all comments received will be made available for the public to view, including your address and therefore cannot be treated as confidential. For more information on how your data will be processed please see the enclosed Data Protection information.

Representations may be accompanied by a request to be notified at a specified email address or postal address of the following:

- The submission of the Plan for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.
- The publication of the recommendation of the person appointed to carry out the independent examination
- The adoption of the Plan.

Yours faithfully

Ashley Baldwin
Spatial Policy and Delivery Manager
Economic Growth

Your ref
Our ref DP1/
Ask for Spatial Policy and Delivery
Email Developmentplans@lichfielddc.gov.uk



District Council House, Frog Lane
Lichfield, Staffordshire WS13 6YX

Direct Line 01543 308192
Customer Services 01543 308000

17th March, 2017

Dear Sir/Madam

**Town and Country Planning (Local Planning)(England) Regulations 2012 – Regulation 19 Consultation.
Draft Lichfield Local Plan Allocations Document**

Lichfield District Council is seeking your views on the aforementioned Local Plan Allocations Document. The document is the Part 2 to the Lichfield Local Plan and will add detail to the first part of the Local Plan which is the Lichfield Local Plan Strategy. This version of the Plan is the final draft (subject to Council approval) prior to submission to the Secretary of State. It has considered the representations received during the consultation in October 2016 from the public, statutory bodies and other organisations and this is the main participation opportunity for anyone to comment on an aspect of the plan's soundness and to propose a change to the plan.

The Lichfield Local Plan guides development and will help shape the way the physical, economic, social and environmental characteristics of Lichfield District will change up to and beyond 2029. The first part of the Local Plan was the Local Plan Strategy and this set the level of growth for housing and employment for the district and policies to guide planning decisions on a wide range of topic areas. This Local Plan Allocations Document seeks to identify the remaining land allocations to deliver the level of housing and employment growth already agreed in the Local Plan Strategy, reviewed the City and Town Centre retail and office requirements, review the remaining saved policies from the 1998 Local Plan and proposes new policies to guide development and help deliver objectives such as the Lichfield bypass, National Forest and Lichfield Canal, identifies a site for gypsy and travellers and considers the settlement boundaries and Green Belt boundaries as stated in the Local Plan Strategy and through 'made' neighbourhood plans.

The Local Plan Allocations Document is supported by a number of technical reports:

- Sustainability Appraisal
- Habitat Regulations Assessment
- Equality Impact Assessment
- Infrastructure Delivery Plan

All the documents are available on line at www.lichfielddc.gov.uk/Allocations and through our consultation portal <http://lichfielddc-consult.limehouse.co.uk/portal> they are also available to view in the reception of the District Council House Frog Lane, Lichfield Staffordshire, WS13 6YZ Monday to Friday 8.45am-5.15pm (except Bank holidays).

We are seeking views on whether the Local Plan Allocations document and its accompanying suite of documents are legally compliant and sound. All of the above documents are available for comment during the period 20th

March to 5pm on the 12th May 2017 and a representation form is available to assist in the submission of comments. The use of the standard representation form is strongly recommended as this will ensure that comments are related to matters relevant to the subsequent examination by a Planning Inspector.

In addition to online there is a small display in Lichfield and Burntwood libraries and an exhibition showing the key elements of the Local Plan Allocations document will be in the following locations where planning staff from Lichfield District Council will be available to talk to you:

| | |
|---------------------------------|---|
| Tuesday 21 st March | Alrewas Village Hall – Tarmac Annex, Wellfield Road, Alrewas. DE13 7H. |
| Thursday 23 rd March | Mile Oak Community Centre-youth annex, Price Avenue, Mile Oak. B78 3NL. |
| Monday 27 th March | Lichfield District Council - Council Chamber, Frog Lane, Lichfield WS13 6YZ |
| Friday 31 st March | Whittington Village Hall, Langton Crescent, Whittington WS14 9LR. |
| Monday 3 rd April | The Old Mining College Centre, Queen Street, Chasetown WS7 4QH. |
| Tuesday 4 th April | Fradley Village Hall, Church Lane, Fradley. WS13 8NL. |
| Wednesday 5 th April | St John the Baptist Church Hall, St John’s Hill, Shenstone, WS14 0JB. |
| Friday 7 th April | Armitage & District Royal British Legion Club, New Road, Armitage WS15 4BN. |

Representation forms are available from the District Council House reception, can be downloaded from the Council’s website www.lichfielddc.gov.uk/Allocations or a paper copy can be provided by phoning 01543 308192 or emailing developmentplans@lichfielddc.gov.uk

Completed representation forms and comments can be submitted via the following:

- Online through our ‘Consultation Portal’ - <http://lichfielddc-consult.limehouse.co.uk/portal> - using this method will enable you to register for email alerts for upcoming planning policy consultations;
- Via Email – all responses must be emailed to developmentplans@lichfielddc.gov.uk ; and
- Via Post to - Spatial Policy & Delivery Team, District Council House, Frog Lane, Lichfield, WS13 6YZ.

All responses received by 5pm on the 12th May, 2017 will be considered, late responses will not be accepted under any circumstances. Individual acknowledgement of receipts will not be possible.

Please note that copies of all comments received will be made available for the public to view, including your address and therefore cannot be treated as confidential. Lichfield District Council will process your personal data in accordance with the Data Protection Act 1998. Our Privacy Notice can be viewed at www.lichfielddc.gov.uk/Council/Privacy-notice.aspx or contact us and for a copy to be sent to you.

Representations may be accompanied by a request to be notified at a specified email address or postal address of the following:

- The submission of the Plan for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.
- The publication of the recommendation of the person appointed to carry out the independent examination
- The adoption of the Plan.

Yours faithfully

Ashley Baldwin
Spatial Policy and Delivery Manager
 Economic Growth

**Town and Country Planning (local Planning) (England) Regulations 2012:
Notice of Consultation
Regulation 19: Publication of a Local Plan**

**Statement of Representations Procedure:
Lichfield District Local Plan Allocations**

The subject matter of, and area covered by, the Local Plan Allocations is:

The Allocations document is the Part 2 to the Lichfield Local Plan and will add detail to the first part of the Local Plan which is the Lichfield Local Plan Strategy. It identifies the remaining land allocations to deliver the level of housing and employment growth already agreed in the Local Plan Strategy, reviews the City and Town Centre retail and office requirements, reviews the remaining saved polices from the 1998 Local Plan and proposes new policies to guide development and help deliver objectives. It covers the whole District upto 2029. It will be used to guide development in the District and determine planning applications in the plan period. Notice is hereby given that the documents will be published as set out below.

Period of Representations in relation to the Local Plan Allocations:

9.00am on Monday 20th March 2017 until 5.00pm on Friday 12th May, 2017.

Statement of Fact that the Proposed Submission Local Plan Allocations, the Sustainability Appraisal and supporting documents area available for inspection at the following locations:

Reception of Lichfield District Council House, Frog Lane, Lichfield, Staffordshire. WS13 6YZ Monday to Friday 8.45am-5.15pm (except Bank holidays)

The District Council website: www.lichfielddc.gov.uk/Allocations

Physical copies of the document are available on request at developmentplans@lichfielddc.gov.uk or 01543 308192

Representations

The use of the standard representation form is strongly recommended as this will ensure that comments are related to matters relevant to the subsequent examination by a Planning Inspector.

Representation forms are available from the District Council House reception, can be downloaded from the Council's website www.lichfielddc.gov.uk/Allocations or a paper copy can be provided by phoning 01543 308192 or emailing developmentplans@lichfielddc.gov.uk

The address to which representations must be made is:

Spatial Policy and Delivery Manager
Economic Growth
Lichfield District Council
District Council House,
Frog Lane,
Lichfield.
Staffordshire.
WS13 6YZ.

Representations may be made in writing to the above address or electronically by:

Email to developmentplans@lichfielddc.gov.uk

Planning Policy Consultation centre at: <http://lichfielddc-consult.limehouse.co.uk/portal>

Where requested, all named representatives will be notified of future stages. Please note that copies of all comments received will be made available for the public to view, and therefore cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 1988. Our Privacy Notice can be viewed at www.lichfielddc.gov.uk/Council/Privacy-notice.aspx or contact us and for a copy to be sent to you.

All comments received will be submitted to the Secretary of State and considered as part of a public examination by an Independent Planning Inspector. Representations at this stage should only be made in regards to the legal and procedural compliance of the Local Plan, soundness of the Local Plan and whether the Local Plan is in conformity with the Duty to Cooperate.

Notification Request

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- The submission of the Plan for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.
- The publication of the recommendation of the person appointed to carry out the independent examination
- The adoption of the Plan.

For further information, please contact the Spatial Policy and Delivery Team on 01543 308192 or developmentplans@lichfielddc.gov.uk

Local Plan Allocations

Time to give your views

Everyone is invited to give their views on Lichfield District Council's proposed Local Plan Allocations.

This is the second part of Lichfield District's Local Plan and covers issues, from housing and employment land allocations through to reviewing planning policies used to determine planning applications.

The consultation will run from **20 March to 12 May**, and as part of this we're running a series of events to answer questions and talk through the proposals.

Local consultation events will run from 3.30pm to 6.30pm on:

- **21 March at Alrewas Village Hall - Tarmac Annex, Alrewas**
- **23 March at Mile Oak Community Centre - Youth Annex, Mile Oak**
- **27 March at Lichfield District Council - Council Chamber, Lichfield**
- **31 March at Whittington Village Hall, Whittington**
- **3 April at The Old Mining College Centre, Chasetown**
- **4 April at Fradley Village Hall, Church Lane, Fradley**
- **5 April at St John the Baptist Church Hall, St John's Hill, Shenstone**
- **7 April at Armitage & District Royal British Legion Club, Armitage**

The Local Plan Allocations is available in Lichfield District Council's Frog Lane reception. You can also read it online and have your say at:

www.lichfielddc.gov.uk/localplan

The deadline to comment is by 5pm, 12 May 2017

Local Plan Allocations

Time to give your views

Everyone is invited to give their views on Lichfield District Council's proposed Local Plan Allocations.

This is the second part of Lichfield District's Local Plan and covers issues, from housing and employment land allocations through to reviewing planning policies used to determine planning applications.

The consultation is running until 5pm on **Friday 12 May**, and as part of it we've put up small exhibitions in Lichfield and Burntwood libraries and are hosting a series of events across the district.

Local consultation events will run from 3.30pm to 6.30pm on:

- **31 March at Whittington Village Hall, Whittington**
 - **3 April at The Old Mining College Centre, Chasetown**
 - **4 April at Fradley Village Hall, Church Lane, Fradley**
 - **5 April at St John the Baptist Church Hall, St John's Hill, Shenstone**
 - **7 April at Armitage & District Royal British Legion Club, Armitage**
- * New event added, running from 10am to 1pm**
- **10 April at The Old Mining College Centre, Chasetown**

The Local Plan Allocations is available in Lichfield District Council's Frog Lane reception. You can also read it online and have your say at:

www.lichfielddc.gov.uk/allocations

The deadline to comment is by 5pm, 12 May 2017

Please send any written comments to:
developmentplans@lichfielddc.gov.uk or to
Spatial Policy & Delivery, District Council House,
Frog Lane, Lichfield WS13 6YZ

Lichfield
district council
www.lichfielddc.gov.uk

List of Specific and General Consultees

| Specific Consultees | General Consultees |
|--|---|
| County Councils | Residents |
| All adjoining Local Authorities | Local Economic Partnerships covering the District, namely the Greater Birmingham and Solihull Local Economic Partnership and the Stoke-on-Trent and Staffordshire Economic Partnership |
| All Parish Councils within Lichfield District and those adjoining our boundaries | Voluntary bodies |
| Environment Agency | Bodies representing the interests of: -businesses within Lichfield District - various racial, ethnic or national groups -people with disabilities -young or older people -religious groups |
| Natural England | |
| Historic England | |
| Highways England | |
| Health and Safety Executive | |
| Homes and Communities Agency | |
| The Coal Authority | Developers, Agents and Landowners |
| Network Rail | Various schools |
| British Pipelines Agency | Transport providers |
| British Telecom/ EE/T-mobile/Three/Vodafone& O2 | Charities |
| Civil Aviation Authority | Community groups including residents associations |
| Clinical Commissioning Group, NHS England | Housing bodies |
| Office of Rail Regulation | Sports bodies and groups |
| South Staffordshire Water Plc | Environmental bodies and groups |
| Staffordshire Police | Other specialist interest groups |
| Staffordshire Fire and Rescue Service | Design advice groups |
| Western Power Distribution | National Forest Company |
| Severn Trent Water Plc | Cannock Chase AONB Partnership |
| National Grid | Government Office for the West Midlands |
| Marine Management Organisation | Aggregate operators |
| | The Theatres Trust |