

Lichfield District Local Plan 2040 Submission Plan (Regulation 22)

Sustainability Assessment

Non-Technical Summary

Prepared on behalf of Lichfield District Council

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Document Control

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1.0 INTRODUCTION

1.1 BACKGROUND

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

1.2 LICHFIELD DISTRICT LOCAL PLAN 2040 – PURPOSE & OBJECTIVES

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

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

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

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

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

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

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

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

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

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

- 1.2.2 The vision for the District was the subject of an earlier Sustainability Appraisal process and thus is considered 'fit for purpose' for identifying the spatial options to be taken forward in the Lichfield District Local Plan 2040.

1.2.3 To support the above Vision the Local Plan 2040 sets 15 strategic objectives for delivering sustainable economic growth, healthy and safe communities and an integrated infrastructure network within an attractive environment. These are:

Strategic objective & priority 1 - Sustainable Communities:

Strategic objective & priority 2 - Rural Communities

Strategic objective & priority 3- Climate Change

Strategic objective & priority 4 – Infrastructure

Strategic objective & priority 5 – Sustainable Transport

Strategic objective & priority 6 – Meeting Housing Need

Strategic objective & priority 7 – Economic Prosperity

Strategic objective & priority 8 – Employment Opportunities

Strategic objective & priority 9 – Our Centres

Strategic objective & priority 10 – Visitor economy

Strategic objective & priority 11 – Health & Safe Lifestyles

Strategic objective & priority 12 – Countryside Character

Strategic objective & priority 13 – Natural Resources

Strategic objective & priority 14 - Built Environment

Strategic objective & priority 15 - High Quality Development:

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

2.0 METHODOLOGY OF THE SUSTAINABILITY ASSESSMENT

2.1 SA KEY STAGES

2.1.1 SA/SEA is a five-stage process. Figure 1 below sets out each of the stages and the stage currently reached.

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

Table 1 – SA Process Stages

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

2.2 BASELINE, SCOPE AND SUSTAINABILITY OBJECTIVES

- 2.2.1 The Sustainability Objectives upon which this SA is based were developed as part of the SA Stage A and represent a key aspect of the Appraisal process. The scoping stage of a SA involves the collation of evidence relating to the baseline position and policy context for the Lichfield District Local Plan 2040, culminating in a series of key sustainability issues and problems that should be a focus for the SA and to establish a sustainability framework. The Scoping Report (2020) sets out a summary of the findings of the baseline review of relevant policies, plans and programmes.
- 2.2.2 The sustainability issues relevant to the pre-submission Local Plan 2040 are set out in Table 2 below. The sustainability issues are considered to represent the current baseline position in Lichfield District.

Table 2 – Key Sustainability Issues

Scoping Report Topics	Sustainability Issues	Likely Evolution without the Plan
Population, Housing and Communities	<p>Lichfield has a higher elderly population, 5% higher than the national average. Over 65s already outnumber the under 15s.</p> <p>Significant growth in people over 65 and 85 is projected from 2017 – 2027.</p> <p>The working age population has decreased by 3.5% since 2010 which is higher than both the regional and national average.</p> <p>The average house price in Lichfield is considerably more expensive when compared to the regional and national averages. The lowest quartile house price is 7.93 times the lowest quartile income.</p> <p>Crime in the District has increased by 24% when compared to the previous 12 months. There has been an increase of burglary from dwellings, other violence against the person and public order offences.</p> <p>There has been a decrease in the proportion of completions on brownfield land, although the majority of development still occurs on brownfield land.</p>	<p>Services and infrastructure unable to keep up with requirements of an ageing population, leading to communities without access to required infrastructure and service's.</p> <p>A less co-ordinated approach to housing and delivery and risk of undersupply of affordable housing.</p> <p>Population forced to move out of District to have access to affordable housing</p> <p>Risk the ability for communities to interact and remain inclusive. Reduce the ability to create environment where crime and disorder and the fear of crime does not undermine quality of life or community cohesion.</p>

<p>Health and Inequalities</p>	<p>Higher than national average number of working age people having no qualifications. The District has a lower proportion of working age adults qualified to NVQ Level 3 than the national average.</p> <p>Although Lichfield has a higher life expectancy and healthier life expectancy than the national average, residents can still expect to spend a large number of years in ill health. There is also some disparity between wards.</p> <p>A high rate of obesity can be seen in the District, from an early age through to adulthood.</p>	<p>The population will be less likely to contribute to and enable the reinforcement of a strong competitive economy.</p> <p>The district will be unable to proactively meet development needs of business and support a fit economy.</p> <p>A Local Plan can ensure the built environment contributes to delivering health benefits and supports the wellbeing of a population. Without a Plan developments are less likely to provide accessible open space or other infrastructure requirements that will have a positive impact on health and wellbeing.</p>
<p>Economy and Employment</p>	<p>High level of out commuting by residents of the District.</p> <p>Disparity between the gross weekly pay of residents in the District and those whose workplace is within the District.</p> <p>Both Lichfield City Centre and Burntwood Town Centre have the lowest vacancy rates in a number of years, with 18 out of 306 shops in Lichfield City Centre and 4 out of 66 in Burntwood being vacant.</p>	<p>Fewer residents being employed within the District leading to a lack of a skilled workforce and a strong competitive economy.</p> <p>Less co-ordinated approach to new employment and commercial infrastructure leading to the impediment of sustainable growth.</p> <p>Places at risk the continued vitality of our town centres to remain competitive providing customer choice access to services and facilities.</p>
<p>Townscape and Historic Environment</p>	<p>There are 22 conservation areas within the District, a total of 16 scheduled ancient monuments, a registered historic park and garden and 762 listed buildings of which 12 are Grade I, 63 are Grade II* and 687 Grade II. 17 listed buildings are on the 'Buildings at risk survey' with 4 of those being Grade I and II*.</p> <p>Within Lichfield there are many rural villages that are set within a varied and attractive rural area.</p>	<p>Loss of heritage assets due to a less co-ordinated approach to housing and delivery.</p> <p>Uncontrolled or unsympathetic development could harm local landscape and townscape character.</p>

<p>Landscape and Ecology</p>	<p>Lichfield supports a variety of wildlife rich habitats and species, with 2 SACs, 4 SSSIs, an AONB, and 78 Sites of Biological Interest.</p> <p>Areas within the District are at risk of pluvial and fluvial flooding.</p> <p>Within the District there is a large amount of high quality agricultural land, in particular Grades 2 and 3.</p>	<p>Lack of local protection could lead to a degradation and loss of valued landscapes.</p> <p>Lack of strategic oversight leading to inappropriate development, damaging Districts valuable habitats and species.</p> <p>Potential risks from inappropriately located development.</p>
<p>Transport and Movement</p>	<p>Public transport provision across the District is variable.</p> <p>3% of employed residents commute by rail, which is the highest in Staffordshire.</p> <p>49.1% of residents commute out of the District to work. Lichfield District also has one of the highest rates of car drivers at 75%.</p> <p>In Lichfield City 83% of households are within 350 metres of a half hourly or better weekday bus service. Some settlements are limited to just 1-2 bus services a week with some rural villages having no bus service at all.</p>	<p>A less strategic overview of development and infrastructure delivery may occur.</p> <p>Necessary highway infrastructure may not be strategically implemented.</p> <p>Ensure that new development is in accessible locations that reduce the need to travel.</p> <p>Ensuring that new growth is integrated with new transport infrastructure.</p>
<p>Climate, Energy and Waste</p>	<p>Traffic continues to compromise air quality in the AQMA.</p> <p>48.9% of all household waste was recycled in 2017/18 which is above the EU target of 50% of waste being recycled by 2020.</p> <p>Over a ten year period average domestic consumption has decreased by 22.8% in Lichfield which is larger than both the regional (-22.6%) and national (-23.6%) figures.</p> <p>Bring up water to a 'good quality' rating in line with Environment Agency objectives.</p>	<p>Without a strategic approach to development and infrastructure, existing issues of air quality may be exacerbated.</p> <p>Positive trends could be reversed reducing the ability of the District to contribute a low carbon future.</p> <p>A Local Plan can provide further support in the long-term approach to climate change mitigation and adaption. Therefore, without a Local Plan development may be less ambitious in its energy performance.</p>

2.2.3 The Sustainability Objectives used in the SA are set out in Table 3 which also shows the topics set out in the SEA Regulations are linked to the SA Objectives.

Table 3 – Sustainability Objectives (SO)

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

14	To increase opportunities for non-car travel and reduce the need for travel	(b) population (c) human health
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2.2.4 In order to assess the preferred options against each of the SA objectives in a consistent manner, a number of appraisal questions and associated indicators have been developed.

3.0 SUSTAINABILITY ASSESSMENT – REASONABLE ALTERNATIVES

3.1 INTRODUCTION

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

(a) Implementing the plan or programme; and

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

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

3.2 PROPOSED SPATIAL STRATEGY AND ECONOMIC GROWTH STRATEGY

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

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

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

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

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

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

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

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

3.2.5 The proposed Economic Growth Strategy and the Spatial Strategy set out in Policies SP1 and E1 have been assessed against the Sustainability Objectives.

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

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

3.3 PREFERRED ALLOCATIONS – HOUSING AND EMPLOYMENT

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

3.3.2 A Site Selection process was developed by the District Council taking account of relevant national planning policy and guidance together with the findings of the SA and other evidence-based studies to assess the sites within the District and determine the most appropriate sites for allocation within the Lichfield District Local Plan 2040.

3.3.3 The SHLAA contains a total of 376 potential housing sites. Following the completion of the initial stages of the site methodology 116 housing sites were excluded from consideration in this SA. The remaining 260 sites were assessed against each of the sustainability objectives. The appraisal results are set out in the SA for each of the sites considered as 'reasonable alternatives' for the purposes of this SA.

- 3.3.4 The SA findings are not the only factors taken into account when determining options or housing allocations to be taken forward in a plan. Indeed, there will often be an equal number of positive and negative effects identified for each option such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as consultation responses, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.
- 3.3.5 The findings of the Sustainability Appraisal and a more detailed assessment of key sites has been undertaken to identify preferred sites. Strategic Policy SP12: Housing Provision identifies the following strategic allocations:
- Land to the North-east of Lichfield (3,300 dwellings);
 - Land west of Fazeley (800 dwellings);
 - Land off Hay End Lane, Fradley (500 dwellings); and
 - Land off Huddlesford Lane, Whittington (75 dwellings).
- 3.3.6 These options meet the requirements of the SEA Regulations and Task B2 of the SA Stages. A
- 3.3.7 A similar three stage site selection process was undertaken to identify the 'reasonable alternatives' for employment sites and associated allocations. The ELAA contains a total of 78 potential employment sites. Following the completion of Stages 1, 2 and 3 63 sites are considered as 'reasonable alternative' employment sites for the purposes of this SA and were each assessed against each of the sustainability objectives. The appraisal results are set out in the SA for each of the alternative employment sites.

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

4.1 INTRODUCTION

4.1.1 This section of the report summarises the findings of the Sustainability Assessment of the Lichfield Local Plan 2040: Submission Plan in respect of any significant effects associated with the SA objectives and also considers ways of mitigating adverse effects and any cumulative effects arising from the Local Plan 2040 as a whole. This accords with Tasks B3 and B4 of the five stage SA process.

4.2 ASSUMPTIONS, UNCERTAINTIES AND DIFFICULTIES

4.2.1 An appraisal of environmental effects inevitably relies on assumptions and an element of subjective judgement. As the Local Plan 2040 contains strategic options there are no short, medium or long term effects associated with this stage of the Local Plan.

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

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

4.3 VISION AND OBJECTIVES

4.3.1 The overall vision for Lichfield District sets out the aspiration for development in the District to be delivered in a sustainable way, to ensure that the District is a place where residents and communities feel safe/belong and are proud of the district's history, culture and the natural and built environment. The Strategic Objectives then provide more detail about how the Vision will be achieved. Therefore, where effects on the SA objectives have been identified these are broadly very positive. Where the Local Plan strategic objectives directly address a particular SA objective, significant positive effects have been identified although in most cases the positive effects are minor due to the general nature of the objectives and the fact that they will be delivered through more detailed policies in the Lichfield District Local Plan 2040.

4.3.3 No conflicts between SA objectives or the Local Plan Vision and Objectives were identified.

4.4 STRATEGY FOR SUSTAINABLE DEVELOPMENT

- 4.4.1 The amount of housing and employment development to be provided through the Strategic 'Spatial Strategy' Policy SP1 will have generally significant positive effects on SA Objective 1: Housing Needs as it will meet the objectively assessed housing need for Lichfield and a fair contribution to the greater Birmingham and Black Country housing market area shortfall. The strategy will also have a positive effect on SA Objective 6: Stable and Sustainable Economy by seeking to meet the identified needs for employment land in the District by delivering a portfolio of potential sites. Balancing the amount of housing and employment land will ensure that local needs are appropriately met.
- 4.4.2 Providing everyone with an opportunity to live in a decent and affordable home is a key social target. A steady supply of housing is necessary to generate vitality, facilitate continued economic prosperity, help support local shops and services required by local residents and help achieve the aim of creating mixed and balanced communities.
- 4.4.3 A full range of household sizes for all income levels and ages, will help reduce the levels of outward commuting, will help attract business and improve the supply of employees. The proposed strategy has the opportunity to deliver a range of housing types, including affordable housing and scores well against the social objectives.
- 4.4.4 The proposed strategy will contribute positively to maximising previously developed land and buildings but the proposed housing allocations which will focus new development outside of existing settlements boundaries, will have an adverse effect on the loss of land that has not been previously developed (Sustainability Objective 4) as new developments outside of the existing settlement boundaries are being proposed.
- 4.4.5 The proposed strategy will have a positive score on promoting safe communities and reducing the fear of crime (Sustainability Objective 2) by providing enhanced access to health and recreational services.
- 4.4.6 Specific measures relating to the reduction and management of water, flood risk and surface water run-off (Sustainability Objective 9), minimisation of waste and recycling (Sustainability Objective 8), air pollution levels (Sustainability Objective 7) and managing climate change (Sustainability Objective 10) are addressed by a suite of policies in the Submission Plan which, once the Local Plan 2040 is adopted, will come into force and replace the existing policies in the Lichfield Local Plan Strategy. Based on the above, the Strategy represent a generally neutral effect on these sustainability objectives

albeit new development does provide an opportunity to bring forward a strategic approach to managing areas of flood risk (Sustainability Objective 9).

- 4.4.7 The Strategy will have the potential to have a negative impact on the District’s biodiversity assets (Sustainability Objective 11) in both the urban and countryside areas but also offer the opportunity for significant ecological enhancement and habitat creation. Local Policies on, Countryside Management, Habitats and Biodiversity, trees/hedgerows, SAC’s and Green Infrastructure/Connectivity will ensure that any biodiversity loss is reduced to an acceptable minimum. Based on the above, the Strategy represent a neutral effect on this sustainability objective.
- 4.4.8 The Strategy will have the potential to result in negative impacts on the historic environment, heritage assets including archaeological remains, and their settings (Sustainability Objective 12). The Strategic Policy on built and historic environment will ensure that any heritage impacts are minimised. Based on the above, the Local Plan Strategy represents a neutral effect on this sustainability objective.
- 4.4.9 The Strategy has the potential to impact negatively on the District’s landscape and townscape (Sustainability Objective 13). The Strategic Policy on natural and historic landscapes will ensure that any landscape impact is reduced to an acceptable minimum. Based on the above, the proposed strategy represents a neutral effect on this sustainability objective.
- 4.4.10 The proposed Strategy focusses new growth, principally, on the strategic center and larger service villages which offer the best opportunities to increase non-car travel and reducing the need for travel (Sustainability Objective 14), improve health/promoting well-being (Sustainability Objective 3) and potentially improving educational attainment (Sustainability Objective 5) due to the focusing of new development in existing settlements were public transport, including opportunities for enhanced services, is available. Based on the above, the proposed strategy represents a positive effect on these sustainability objectives.

4.5 LOCAL PLAN 2040: SUBMISSION PLAN - POLICIES

Transport

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

Infrastructure

- 4.5.2 Meeting housing needs and the promotion of economic prosperity are strategic objective of the Lichfield District Local Plan 2040 which are equally dependent on the delivering of timely and supporting infrastructure. The Strategic and Local Policies have the potential to indirectly improve economic and housing growth in the District by providing important infrastructure. The policies represent a minor positive effect on Sustainability Objective 2: promoting safe communities, Sustainability Objective 3: improving access to health and recreational facilities, Sustainability Objective 5: educational attainment; Sustainability Objective 3: improving access to health facilities, Sustainability Objective 14: increasing opportunities for no-car travel, by seeking to retain and enhance social and community infrastructure but is likely to have a neutral effect or no link on the remaining SA objectives.
- 4.5.3 Strategic policies SP8 (Blue Infrastructure, watercourses and flood risk) and SP9 (water quality) will have a positive effects (either minor or significant) in relation to reducing and managing flood risk and surface water run-off (Sustainability Objective 9), managing climate change (Sustainability Objective 10) and protecting and managing impact on biodiversity species and habitats (Sustainability Objective 11). The policies are likely to have a neutral effect or no link to the majority of SA objectives.

Sustainable development

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

Housing

- 4.5.5 Providing everyone with an opportunity to live in decent and affordable home is a key social target. Housing is a key driver to revitalisation and it is an essential community need to provide a variety of housing types. A steady supply of housing is necessary to generate vitality, facilitate continued economic prosperity, help support local shops and services required by local residents and help achieve the aim of creating mixed and balanced communities. There is a shortage of affordable housing in Lichfield District. The Local Plan's growth strategy will further increase the pressure for affordable housing which the Affordable Housing Local Policy H2 seeks to address by encouraging the provision of affordable housing in development proposals. The provision of allocated housing areas will contribute positively to these objectives.

- 4.5.6 All the housing policies and allocations score positively (either minor or significant) against the social objectives. It is the Council's intention to bring forward a range and mix of housing tenures during the plan period to support the planning of high levels of economic growth. This is likely to contribute to meeting housing needs (Sustainability Objective 1) providing safe communities (Sustainability Objective 2), improving health facilities (Sustainability Objective 3), thereby delivering an equitable sharing of the benefits of prosperity.
- 4.5.7 The Housing policies are expected to have no effects on a relatively high proportion of the SA objectives as there is no direct linkage between the Policy and the SA Objectives. There is only one likely significant negative effect identified in relation to the loss of land that has not been previously developed (Sustainability Objective 4). This is due to new housing developments outside of the existing settlement boundaries being proposed, to meet local need, which cannot be mitigated.
- 4.5.8 The housing policies and allocated housing sites will result in a neutral effect on economic factors (Sustainability Objective 6) and retention of employment/trained personnel (Sustainability Objective 5) in the District.

Employment

- 4.5.9 Overall, there are likely to be mainly positive effects from the Employment policies. Two significant positive effects are expected for Sustainability Objective 6: Achieving Stable and Sustainable economic growth, i.e. to support sustainable economic growth and improve employment opportunities in the District, including tourism and development of Drayton Manor Park together with Sustainability objective 5: improving education attainment.
- 4.5.10 Policy SP13 confirms that a total of 85 hectares of new employment land is required in the District during the plan period.
- 4.5.11 The employment policies set out the framework for the delivery of this future employment land, including the expansion of existing employment areas and future local plan allocations and thus score positively in the SA.
- 4.5.12 Employment activity can also have an indirect positive effect on human health in the longer term. Supporting economic growth will result in an in-direct positive effect on SA Objectives 3: promoting wellbeing.
- 4.5.13 The Employment policies are expected to have a neutral effect on a relatively high proportion of the SA objectives as there is protection built into these policies could therefore prevent adverse impacts on the environment.

Natural Resources

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

Built and historic environment

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

Area specific policies

- 4.5.21 Each of the areas specific policies focus on improvements to the environment, economy of the level of facilities and service in the identified areas. The economy polices, therefore, score positively against

SA Objective 6: Achieving Stable and Sustainable economic growth, i.e. to support sustainable economic growth and improve employment opportunities in the service centre and service villages together with an indirect impact on SA objective 5: improving education attainment.

- 4.5.22 The environment policies score positively positive effects on SA Objective 11: promoting, protecting and enhancing species and habitats, SA Objective 12: promoting and enhancing the historic environment and preserving or enhancing the District's landscape and townscape (Sustainability Objective 13).
- 4.5.23 The policies focused on the protecting and enhancing the range and access to services and facilities in the centres and villages scored positively SA Objective 3: Health and wellbeing, SA Objective 7: reducing air pollution and SA Objective 14: reducing the need to travel.
- 4.5.24 No significant negative effects have been identified and a neutral or no link score was recorded for the remaining SA objectives.

Lichfield District Local Plan 2040 – Housing Allocations

- 4.5.25 The SA findings confirmed that, with such a large number of potential sites being assessed an equal number of positive and negative effects were identified for each site. Whilst it is not possible to 'rank' the sites based on sustainability performance alone the SA findings indicate that sites falling within or on the edge of existing service centres and service villages scored positively in respect of the efficient use of land (Sustainability Objective 4), SA Objective 3: improving access to health facilities, SA Objective 7: reducing air pollution and SA Objective 14: reducing the need to travel.
- 4.5.26 The initial findings of the Sustainability Appraisal were utilised by the District Council as part of a more detailed assessment of key sites which informed the strategic residential sites in the Lichfield District Local Plan 2040: Submission Plan. Strategic Policy SP12: Housing Provision identifies the following strategic allocations:
- Land to the North-east of Lichfield (3,300 dwellings);
 - Land west of Fazeley (800 dwellings);
 - Land off Huddlesford Lane, Whittington (75 dwellings); and
 - Land off Hay End Lane, Fradley (500 dwellings).
- 4.5.27 All the strategic allocations have a significant positive effect on providing housing to meet the needs of existing and future residents (SA Objective 1), a neutral or slight positive effect on enhancing the character and quality of the landscape/townscape (SA Objective 13) and minimising the need to travel (SA Objective 14).

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

4.6 CUMULATIVE EFFECTS

- 4.6.1 The SA has also considered the cumulative effects of the Local Plan 2040. The Local Plan 2040 will result in significant positive effects on SA Objective 1: Housing Needs as it will meet the objectively assessed housing need for Lichfield and a fair contribution to the greater Birmingham and Black Country housing market area shortfall and have a positive effect on SA Objective 6: Stable and Sustainable Economy.
- 4.6.2 The adoption of policies to protect and enhance the natural and built environment including the important landscape and heritage assets of the District will ensure that the Local Plan 2040 will result in a neutral or slight positive effect on all the key SA Objectives.
- 4.6.3 The only negative score relates to the efficient use of land (SA Objective 4) due to the allocation of new housing sites on open land where mitigation is not possible.

5.0 MITIGATION AND ENHANCEMENT

5.1 INTRODUCTION

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

6.0 MONITORING

6.1 MONITORING

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

6.2 NEXT STEPS

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