

ENVIRONMENT & DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE

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Agenda Item: 6

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SUBMISSION BY DEVELOPMENT SERVICES PORTFOLIO HOLDER

LOCAL DEVELOPMENT FRAMEWORK: CORE STRATEGY CONSULTATION RESPONSES

1. Purpose of Report

- 1.1 The main purpose of this report is to consider the responses made to the recent Core Strategy Preferred Options consultation, to seek guidance on responding to the issues raised through the consultation. In addition the report recommends a process of further consultation on the direction of policies that would be required in the Core Strategy to implement the spatial strategy and to manage development.

2. Summary of Policy Development

- 2.1 The LDF report to this Committee in January of this year, reported on the progress of the Preferred Options consultation. This included a preliminary list of the main issues raised by the consultation up to that date and noted that the issues and any others raised would need to be considered at the March Committee in order to feed members views into the preparation of a draft Core Strategy. Since the January report, the consultation period has closed, and in all the consultation has resulted in over 3,750 individuals responding to the consultation in writing, which translates into over 5,000 representations on specific topics. The responses are principally in relation to housing issues and in particular directions of growth for Burntwood. This report considers the issues raised and the options that are available for amending the spatial strategy included within the Preferred Options report, if the Council was minded to make amendments in response to the consultation. A note on the consultation responses is included as **Appendix 'A'** to the report. A summary of the consultation responses is available separately, but Members will note that this extends to around 150 pages. **Appendices 'B' to 'F'** consider particular issues in more detail.
- 2.2 Members are reminded in relation to the preparation of the Core Strategy that the Council's responsibility is to prepare a spatial strategy for the development of the District as a whole to 2026 and in doing so to take account of the identified needs of the District. The Preferred Options document considers individual parts of the District as a matter of convenience, divided into Lichfield, Burntwood, Rural and cross-boundary issues. There is a need however to consider how each part of the District can contribute to a District-wide strategy that meets future needs arising both locally and through the requirements of regional and national policy. The consultation responses from individuals, groups and organisations are naturally concerned mainly with local matters. Whilst these may make many points that have some merit, any amendments that may be considered in relation to the preferred options would need to be in the context of still meeting the overall needs of the District in a coherent strategy and of making the strategy more sustainable.
- 2.3 The January Report noted that there may need to be further consultation on topic based policy development prior to publication of a draft Core Strategy. This is because whilst the Preferred Options report listed policy headings that could be included within the Core Strategy, it did not include any indication of the nature of policies or policy directions

proposed. Government Office has indicated that further consultation on this aspect of the Core Strategy would be advisable.

- 2.4 A consultation document on policy directions for the Core Strategy is currently being prepared and this would include policies for the Core Strategy that would be necessary to implement it. The nature of the policy directions is closely related to the spatial strategy issues under consideration by this Committee, which are also to be considered by Executive on 7th April. The document should therefore be finalised in the light of any steer given by Members through that process, particularly if there is a significant change in spatial strategy. In the light of this it is considered that a potential approach would be for a further Special meeting to consider the policy directions document. It would cover a number of topics that also fall within the remit of People and Partnerships (Overview and Scrutiny) Committee, including housing mix and affordable housing, climate change, open space, leisure and recreation facilities. A joint meeting may therefore be desirable. This would however need to be held early in April in order to avoid a delay in the Core Strategy timetable. There is already a joint meeting to be held to consider policy directions for affordable housing, gypsy and travellers and consideration may need to be given to whether that meeting could consider the consultation document as well as the specific affordable housing policy issues.

Issues arising from Consultation on the Preferred Options:

- 2.5 The following sections deal with the main issues arising from the consultation and suggest possible policy approaches for consideration. The main issues that proved controversial are considered first and these mainly relate to housing matters. These are followed by consideration of employment issues and then other topics included within the Preferred Options document. A number of Appendices contain more detailed discussion on particular topics.

A. Housing Issues

Spatial Strategy and the Distribution of Housing Growth:

- 2.6 In order to progress to a draft Core Strategy, detailed consideration needs to be given to the implications of all of the representations received, although the principal topic of concern raised through the consultation is the strategy for meeting housing requirements. The bulk of the responses received were in effect objections to strategic directions for growth identified as preferred options, particularly for housing.
- 2.7 The overall context to considering the Core Strategy and the consultation responses is that the Council will need to be confident that its Core Strategy is likely to be found sound through the Examination process before it proceeds to its publication, planned for September. The key element of this is likely to be the ability to justify that the proposed housing strategy is the most appropriate when considered against reasonable alternatives. In particular, if the published preferred options are pursued, or any variation to them that requires amending the green belt, the Core Strategy will need to identify the exceptional circumstances that justify amendments to the green belt boundaries.

The need for housing growth at the scale proposed in the Regional Spatial Strategy:

- 2.8 In many responses opposed to directions of growth, residents have argued that the proposed growth of 8,000 dwellings for the District is not needed, that the economic slow-down doesn't justify the release of greenfield sites to meet this level of growth and that the Council should prepare a Core Strategy that provides for less growth, arguing a case with the Government for this approach.

- 2.9 The development industry however, has argued that provision for only 8,000 dwellings does not meet the need within the District and that the Core Strategy should take account of meeting significantly higher levels of housing growth. For example both the Curborough Consortium and Bloor Homes, (who have development interests at Fradley and north of Tamworth respectively), have made representations to the Regional Spatial Strategy Examination in Public that growth in Lichfield District should be increased, to some 12,400 and around 10,000 dwellings respectively. It is argued both that the levels of growth should be increased and in the case of the Curborough Consortium, that the Core Strategy should not be progressed until the outcome of the RSS Examination is known.

Consideration of Responses in Relation to the Overall Level of Housing Growth:

- 2.10 The economic slowdown and its impact upon the house-building industry is undoubtedly a significant factor for the Core Strategy. The rate of house completions and housing starts has already suffered a major decline nationally and this is reflected within Lichfield District. It is uncertain when house-building will start to recover in terms of new build, or what rates of development might be expected in the next few years. The emerging Regional Spatial Strategy for the period up to 2026 is based upon the release of new development to achieve an approximately constant rate of development of 400 dwellings per year within the District. House completion rates have been above this level for 2006 to 2008 but will fall significantly below for 2008/2009 and will be potentially lower for 2009/10.
- 2.11 The economic circumstances do not however mean that housing need has disappeared, even though the ability of the industry to meet the need in the short term is questionable. The planning processes rely on a number of indicators to forecast future housing requirements and these include population projections, which take account of local needs and both internal and international migration. These are taken into account in household projections that also consider forecasts of household structure and size. These factors, because of ageing population structure and more single person households act to increase the level of housing requirements. It is likely therefore that a period of reduced house building is likely to result in an increased degree of unmet housing need.
- 2.12 The Examination in Public of the Regional Spatial Strategy (RSS) commences in April and will consider these issues in assessing whether the Regional Assembly's proposals for 365,000 new dwellings within the region are appropriate. That level is set some 40,000 dwellings below the national forecasts used for the preparation of the revisions to the RSS, although later (2006 based) population forecasts show a higher rate of population increase. The rate at which new housing can be delivered is a matter that will be considered through the Examination in Public in the context of identified need, but the outcome of this debate will not be final until the RSS Partial Review is approved by the Secretary of State, which is programmed to be during 2010.
- 2.13 Local Planning Authorities are urged by Government to continue with their plan-making whilst the Regional planning process is continuing. The LDF process needs to take account of the best information available to inform the Core Strategy and the evidence gathered identifies both a need for general housing and affordable housing within the District. The Core Strategy would not be allowed to proceed to adoption if it did not take into account the emerging regional allocation of 8,000 dwellings since it would not be in general conformity with the Regional Spatial Strategy. Government advice is that Core Strategies should consider how they would accommodate changes to the overall level of housing requirements for their area. In this respect it is important that a spatial strategy is identified that would deliver a phased programme of new housing in locations that would be capable of being implemented within the period and also take account of possible changes to the rate of development and the overall level of housing growths.
- 2.14 The Core Strategy is required to have a monitoring framework and review process that can take account of changing circumstances including the need to either release or hold back phases of development depending upon circumstances. This is the appropriate

mechanism to take account of economic circumstances and their potential effect on house-building rates.

General Issues raised in relation to the spatial strategy:

- 2.15 A significant amount of the objection made by residents that the level of growth is not needed, is born out of opposition to potential growth in one or more strategic housing locations identified in the consultation. Many arguments are put forward in relation to objections to the directions of growth for both Lichfield and Burntwood and these are considered individually below. However, a number of concerns raised may be considered as common issues or general reasons for opposing development. These are generally that the strategy involves the release of green belt, or that the Council has failed to take account of particular issues within the strategy and that proper consideration of these would result in a different strategy being proposed.
- 2.16 These common issues are considered in some detail in **Appendix 'B'**. More generally, it has to be accepted that the issues raised are all relevant considerations for strategic locational planning. Release of green belt land would be a significant change of policy, but the preparation of the Core Strategy is the point at which the need should be considered in relation to planning for sustainable communities for the future. Other issues raised include the limited capacity of infrastructure and poor services or facilities in some locations, particularly Burntwood; potential traffic impact of new development; flood risk; and, impact on wildlife. Despite the views expressed to the contrary in consultation responses, these factors have all been assessed and taken into account in the preparation of the preferred options. What is important to recognise is the need for a balance of judgment in assessing these factors against meeting the needs set by policy requirements, in particular in the context of the Regional Spatial Strategy.

The Strategy for Burntwood:

- 2.17 **Appendix 'C'** considers the issues raised in relation to the Burntwood and Hammerwich area in detail. The vast majority of consultation responses from individuals came from residents of Burntwood or Hammerwich and opposed the directions of growth included in the Preferred Options for around 500 dwellings in a south-east direction and 250 dwellings to the south. Both of these locations lie within Hammerwich Parish and around 750 responses were made in relation to this issue. Around 2,000 responses were made objecting to a potential direction of growth east of Farewell Lane submitted by a landowner as part of the consultation. The arguments put forward for opposing growth related to issues concerning the suitability of Burntwood for growth in general and particular arguments about the locations. These matters are dealt with in **Appendices 'B' and 'C'**.
- 2.18 An important aspect in relation to Burntwood has been the submission of a significant new potential housing location made by the landowner (LCP). The arguments put forward by objectors to the proposed directions of growth and the potential for reconsideration arising from the emergence of a possible new housing location, has led to a reassessment of the strategy for Burntwood. Whilst it is still considered the town should play a role in meeting the overall housing requirements for the District, and its own affordable housing need, it may be possible to meet this objective through a combination of urban capacity and the release of land previously allocated or used for employment and open space purposes. Whilst the details of this potential capacity are still being assessed it is considered that this is likely to mean that Burntwood could play a role within an overall strategy without the need to identify urban extensions as strategic directions of growth, or signal the release of green belt land around Burntwood within the Core Strategy.
- 2.19 It is further considered that the additional green belt location east of Farewell Lane put forward through the consultation process when assessed has no merits favouring it above the potential for the release of brownfield sites within the urban area and potentially would

exacerbate the 'rat-running' issue through Hammerwich village to a greater extent than the identified directions of growth. In the absence of any clear benefits, it is considered that this particular proposal should not be contemplated within the Core Strategy.

The Strategy for Lichfield:

- 2.20 **Appendix 'D'** considers the issues raised in relation to the Lichfield area in detail. The vast majority of consultation responses from individuals relevant to Lichfield came from residents of south Lichfield opposing the direction of growth included in the Preferred Options for around 1,650 dwellings as a sustainable urban neighbourhood extending the city to the south. In contrast few responses made related to the proposed easterly direction of growth of around 850 dwellings, which would be in the Streethay area.
- 2.21 The argument that new growth would harm the historic character of the city is the main case for seeking to direct new housing development away Lichfield itself. The argument has however been unsubstantiated by any evidence from those who seek to make it. It is considered that such harm could potentially relate to physical issues arising from the scale of growth, such as in landscape change or harm to significant historic views. However, it is considered that these can be addressed by limiting the extent of development in the directions of growth. It could also potentially relate to activity in and around the city centre, but there is no strong evidence for this arising from past significant growth that has taken place at Boley Park or Darwin Park.
- 2.22 These arguments have to be considered against the fact that the city is the strategic centre for the District with the best range of facilities and accessibility and therefore in principle should accommodate a good proportion of development requirements unless there are stronger arguments for locating this scale of growth elsewhere in the District. In this respect the only location that could potentially accommodate this scale of growth would be a new settlement, but it is considered that such a strategy is not the most appropriate in the context of meeting the District's needs as a whole. The argument that new growth would harm the historic character of the city is unsubstantiated by any evidence from those who make the argument.
- 2.23 It is therefore considered that both the scale of growth and the preferred directions of growth proposed for the city in the preferred options remain appropriate, albeit that in the south it would require taking land out of the green belt. It is considered however that this remains part of the most sustainable strategy in the District context in terms of creating sustainable communities and that this justifies and provides the exceptional circumstances for removing land from the green belt to the south of Lichfield.
- 2.24 It is accepted that infrastructure for the city would need to be improved but it is considered that this can be funded appropriately through the level of development proposed in the directions of growth.
- 2.25 There is deemed to be little scope to significantly shift the balance of proposed growth between the south and east directions of growth serving Lichfield but this issue will be further examined prior to the preparation of the draft Core Strategy for Member consideration.

Housing Growth in key rural settlements:

- 2.26 One of the issues identified through the consultation, is for the strategy to contain more detail on the distribution of rural growth. Members may recall that the preferred options strategy provided for the District's rural settlements to contribute 1,850 dwellings, of which 375 dwellings are already built or have planning permission. This amounts to around 20% of the District's requirements, mostly to occur within identified key settlements. The Preferred Options also identified Fradley village for further significant development from within this total, although no specific figure was indicated.

- 2.27 Whilst there was support for sustaining rural communities within the consultation responses and some support for achieving this through a key rural settlement approach, it was noted that there was a need for improved facilities in many rural communities. These included better public transport and a need for affordable housing. There was some concern that the strategy could be promoting car-based development.
- 2.28 There was no strong lobby opposing the key rural settlement approach although there were several responses promoting growth in some of the smaller villages, principally on behalf of landowners. There was a significant lobby of residents opposing a new settlement at Curborough even though this strategy was not included within the Preferred Options. As a potential alternative strategy, it is considered separately at **Appendix 'E'** but it is concluded that this remains inappropriate.
- 2.29 It is agreed that further clarification of the rural settlement proposals is desirable but apportioning the growth between settlements would require some further work to be undertaken on the individual potential of key rural settlements. Further assessment of the rural settlements has indicated that some of those identified as key rural settlements may have little potential for further growth and these include Little Aston, Alrewas and Whittington. It should be borne in mind that the key villages were identified based upon their range of facilities and accessibility, which gives them a role as rural service centres. This role has to be considered alongside each settlement's potential capacity for acceptable growth.

Possible significant growth at Fradley village:

- 2.30 The Preferred Options included a proposal for Fradley village to become a key rural settlement as part of the District's hierarchy of settlements and in that context to potentially accommodate a significant proportion of the rural growth element of the spatial strategy. This was on the basis in part of a proposed local centre being in place capable of supporting a reasonable level of housing growth.
- 2.31 The consultation has resulted in the submission of further detail on the possible range of housing locations in the Fradley village area. It is considered that Fradley is less constrained than some villages identified as key rural settlements, including nearby Alrewas. An assessment of potential at Fradley suggests that development of a scale of around 1,000 dwellings could be possible, a significant proportion of which could be located on former airfield land currently allocated for employment use. It is considered that further work be carried out to define an appropriate level of growth for Fradley of the order suggested above including its infrastructure requirements, for inclusion in the Core Strategy.

Strategy for smaller villages:

- 2.32 Other than submissions proposing specific housing locations for the smaller villages, there has been little in the consultation response that significantly challenges the preferred options proposal to limit housing growth within these villages to meeting local need and providing affordable housing.
- 2.33 In relation to the role of the Core Strategy for housing in rural areas, its main requirement will be to propose an overall strategy and to show that it can be implemented in broad terms. Consideration of individual sites and the scale of growth of individual villages, particularly where they do not have a key role for the strategy as a whole, should be incorporated within the proposed Allocations of Land Development Plan Document, rather than the Core Strategy.

Cross boundary issues:

- 2.34 The District Council has an obligation to consider potential cross-boundary issues within the Core Strategy. The draft Phase 2 revision of the Regional Spatial Strategy identifies specific issues to be considered jointly by the relevant Local Planning Authorities and these include considering requirements in relation to both Tamworth and Rugeley. In relation to Rugeley the Preferred Options identified the potential for around 1,000 dwellings located around the Power Station, of which around 700 are the subject of an extant planning permission. This issue seems relatively uncontroversial and Cannock Chase District Council has supported the approach.
- 2.35 In relation to Tamworth a joint study is underway that is proposed to report at the end of April. The Preferred Options included an allowance of around 400 dwellings in the Fazeley area as a contribution towards the needs of the Tamworth housing market, within which the settlement falls. The District Council will need to consider the outcome of the ongoing study before a Core Strategy is agreed for publication, in particular to consider whether it would be appropriate to allow for any additional provision within Lichfield District to meet needs arising from within Tamworth.

Overall Conclusions in relation to the Spatial Strategy Responses, including Potential Strategy Amendments for Housing:

- 2.36 It is considered that there are three potential options that the Council should now consider as a way forward for the Core Strategy spatial strategy, and in particular how the housing needs should be met. They are:
- keep to the published Preferred Options strategy and distribution of housing growth;
 - adjust the strategy to take account of concerns raised through the consultation and seek to reduce the level of green belt/greenfield land release at strategic locations, but keep to the same principle of a balanced approach to growth within the District;
 - amend the strategy to one that promotes a new settlement as the principal means of meeting housing requirements, but take into account that the only identified potential proposal for a new settlement is the proposal at Curborough.
- 2.37 It is considered that a new settlement approach is not appropriate for the District for the reasons set out within this report and at **Appendix 'E'**. It is the view however that there are amendments that can be made to the spatial strategy, in particular those identified above in relation to Burntwood, and those relating to the identification of Fradley for rural growth, that would help in strengthening the approach to sustainable development within the strategy. It is therefore considered that these amendments should be 'worked up' by your officers for inclusion within the Core Strategy, which will be reported to the Committee later in the year.

B. Employment Issues:

- 2.38 Issues about the general employment land supply and future requirements for offices are summarised at **Appendix 'F'**. In relation to the consultation employment issues did not attract a significant volume of response, but there were some significant matters raised. In particular, Burntwood Town Council identified the need for more jobs within Burntwood and a need to reduce out-commuting, whilst Lichfield City Council emphasised the need for more jobs that match the 'higher level' skills of the residents particularly through office development and higher 'added value' employment in the city.
- 2.39 Walsall MBC and the Regional Assembly were concerned that the Core Strategy should be clearer in identifying the scale and nature of any office proposals, to ensure that there was no conflict with the Regional Spatial Strategy. Walsall MBC has a concern that there are too many 'open' permissions for B1, B2, B8 employment on general employment sites

within the District that could potentially allow a significant scale of out of town office developments that would harm the Regional Spatial Strategy.

- 2.40 In the light of the responses and the issues and policy options identified in **Appendix 'F'**, it is considered that the draft Core Strategy should be more explicit in terms of the employment strategy that supports the vision and strategic objectives for the District. In particular it should identify the need for more office development, but indicate the limits to the scale and location of such development. In addition, it should recognise that there is capacity within the current general employment land portfolio for a limited re-designation of land to other uses to support other aspects of the spatial strategy and be nearer to the long term size of the employment land requirement that is included within the RSS phase 2 revisions.

C. Other Matters:

The Vision:

- 2.41 The Preferred Options document included a revised vision statement for Lichfield District at 2026. This took account of comments made on a draft vision published with the Issues and Options Consultation in December 2007. There was only a limited response to the revised vision statement from the consultation. This included some support for changes made from the original draft and some further points, particularly in relation to landscape and biodiversity. The vision for the Core Strategy needs to relate closely to the spatial strategy that is finally agreed by the Council, since it should be a locally distinctive vision of how the Council intends the District to be by 2026 and therefore play a key role in directing change. For this reason the proposed vision will not be finalised until a draft Core Strategy is prepared for the Council's approval. The various points made in the consultation responses and the proposed spatial development strategy will both be taken into account in preparing the final version.

Strategic Objectives:

- 2.42 The Preferred Options document also included proposed 'Spatial Objectives', which again were revisions to those consulted on at the Issues and Options stage. There was a significant level of general support for the Objectives included in the consultation document, together with some proposals for wording changes.
- 2.43 The detail of these suggested changes will be given further consideration in preparing the final version of the 'Strategic Objectives' for the Core Strategy. However it is worth noting at this point that officers have reviewed the objectives and agreed that two changes should be made. Firstly, it has been noted that the objectives as published do not include a specific objective that relates to the need for economic regeneration within the District, despite a reference being included within the overall vision. It is therefore recommended that an economic regeneration objective be added. Secondly, it is considered that spatial objective 4, which is, 'To meet the overall development requirements for the District, consistent with the Regional Spatial Strategy', is not necessary. This is because Regional development requirements will in any event need to be met within the strategy in order for it to be in general conformity with the RSS. The Core Strategy cannot be sound if it ignores such requirements, but it is superfluous to also include them as a strategic objective. The spatial strategy will set out a policy approach to meeting other development needs that might arise.

Policy Directions:

- 2.44 As indicated at paragraphs 2.3 and 2.4 of this report it is considered necessary to hold a further consultation on policy directions for the Core Strategy prior to the preparation of a Core Strategy for the consideration of this Committee and Executive. That consultation document would include potential Core Policies that are positively framed towards actions

to deliver the strategy, and Development Management Policies, that would guide decisions on planning applications to make them consistent with the Strategy. It would cover a range of policy themes in addition to the critical issues of housing and employment strategy that are considered above. These would include sustainable development and address climate change issues, sustainable transport, town centres, recreation, leisure, culture and tourism, green infrastructure, natural and built environment, affordable housing and gypsy and traveller provision.

- 2.45 A document is being prepared that incorporates the above topics into a limited number of policy themes that will relate to the spatial strategy. It is suggested that this document is also considered by the People and Partnerships (Overview and Scrutiny) Committee prior to consultation, possibly through a joint meeting as discussed above. Consultation on this document would also allow for views to be received on any amendments agreed to the spatial strategy for housing and employment, since these would be incorporated within it.

3. Community Benefits

- 3.1 The Local Development Framework is required to replace the adopted Local Plan, providing the policy basis for ensuring sustainable growth and the future development of the District in a manner that protects the built and natural environment.

4. Recommendation

- 4.1 That the Committee considers the suggested policy responses to issues raised by the consultation contained in the main body of the report and expresses its views on them. In particular views are sought on the following in order to inform the Executive when it meets to consider a similar report at its meeting in April:
- The proposals to maintain in principle the balanced approach to growth requirements contained in the Preferred Options consultation document of focussing growth on Lichfield, Burntwood and key rural settlements, rather than the provision of a major new settlement or a dispersed approach to growth
 - The proposal to review the approach to the growth of Burntwood in the light of the significant local opposition to strategic extensions and the identified potential to accommodate more growth within the existing limits of the town
 - The proposal to maintain approximately the same distribution of growth for Lichfield, but to explore whether there is any limited potential for additional growth around Streethay
 - To identify Fradley village (Fradley and South Fradley) for significant expansion as the main growth point among the key rural settlements
 - To consider the results of the ongoing appraisal of the cross boundary issues in relation to Tamworth
 - That in relation to employment policy, the draft Core Strategy should be developed on the basis of the recommendations included at **Appendix 'F'**
 - That minor amendments to the Core Strategy vision and strategic objectives be prepared for consideration within the draft Core Strategy document in due course
- 4.2 That a proposed consultation document on policy directions be considered by a further meeting of this Committee prior to consultation, through a further special joint meeting with People and Partnerships (Overview and Scrutiny) Committee.

5. Financial Implications

- 5.1 The preparation of the Core Strategy will have financial implications but these have been considered as part of a previous service and financial planning process and a successful growth item achieved.

6. Strategic Plan Implications

- 6.1 The Local Development Framework will be relevant to all of the Council's ambitions identified in the Strategic Plan where they have a spatial link. In particular it is important to integrate the processes and content of the Core Strategy with the new Strategic Plan and the Sustainable Communities Strategy.

7. Sustainability and Climate Change Issues

- 7.1 The purpose of a Core Strategy is to establish a spatial policy framework for sustainable development and one that addresses as part of policy formulation and subsequent implementation, issues relating to Climate Change. The Core Strategy will recognise climate change as a key and over-arching issue, addressing this through spatial policy and considering the issues for mitigation and adaptation.

8. Human Rights Issues

- 8.1 The extensive consultation procedures provided for by the Planning and Compulsory Purchase Act 2004 cover human rights matters.

9. Crime and Community Safety Issues

- 9.1 None.

10. Risk Management Issues

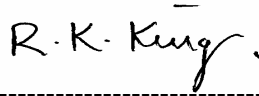
Risk	Likelihood/ Impact	Risk Category	Countermeasure	Responsibility
Core Strategy process needs to ensure it is considered corporately so that the strategy can be demonstrated as being soundly based in addressing the spatial issues arising from the Council's own plans and strategies.	Low/High	Strategic/Financial	Ensure wide consideration of preferred strategy before determining preferred options and draft Core Strategy	Development Services/Leadership Team
Core Strategy process needs to involve external bodies to the extent that the strategy can be demonstrated as being soundly based in addressing the spatial issues arising from all relevant agencies future strategies	Medium/High	Strategic/Financial	Ensure that all appropriate agencies are fully engaged in the development of the Core Strategy preferred options and draft Core Strategy	Planning Policy
Core Strategy proposals are not supported by adequate evidence	Medium/High	Strategic/Financial	Ensure completion of evidence base before agreeing draft Core Strategy	Planning Policy

base			and only include policies or proposals supported by the evidence	
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Background Documents:

1. **Core Strategy Issues and Options Report, December 2007**
2. **Employment Land Review, December 2007**
3. **Open Spaces Assessment, December 2007**
4. **Indoor Sports and Facilities Assessment, December 2007**
5. **Strategic Landscape and Biodiversity Assessment, December 2007**
6. **Strategic Housing Land Availability Assessment Methodology, August 2007**
7. **Draft Strategic Housing Land Availability Assessment, April 2008**
8. **Rural Settlement Sustainability Study, April 2008**

Report checked and approved:



Strategic/Corporate Director

Consultation Response Summaries by Topic

1. All of the consultation responses received in relation to the Preferred Options have been summarised and are accessible to all persons via the Council's Local Development Framework consultation website.
2. A separate schedule of consultation summaries has been prepared for elected members and is available electronically through the following web link www.lichfielddc.gov.uk/corestrategy
3. Hard copies of the schedule, which runs to approximately 150 pages are available in the Members library and on request. They have also been deposited at the District Council's reception, Lichfield library and Chasetown Mining College. The schedule is arranged in such a way as to follow the format of the Preferred Options consultation document including the order of questions about the strategy posed within the document.
4. Some 3,750 individual written responses were made accounting for around 5,000 representations related to specific sections of the Preferred Options document.
5. The covering report considers the main issues raised by the consultation that need to be addressed in finalising the preparation of a Core Strategy. The Council's Statement of Community Involvement states that the Council will respond to representations. This needs to be on the basis of the issues being considered by the appropriate Committee processes. Following this meeting of the Committee and the April Executive, when the issues raised by the consultation have been debated, officers will undertake the task of completing a schedule of responses, based upon the summaries of the representations received.

General Issues raised in relation to the spatial strategy:

- 1 **Release of land that is currently green belt:** this argument is that development in the green belt would be contrary to the Council's own policies. One community group also recognises that the partial review of the Regional Spatial Strategy allows for small local adjustment of green belt boundaries where it allows for the most sustainable form of development, but considers that the proposed directions of growth identified east of Burntwood exceed 'small local adjustments'. As a general point, whilst it is true that the District's current planning policy is to maintain the green belt, the preparation of the Core Strategy is the point at which the Council needs to consider whether any amendments to its boundaries are necessary in the interests of the sustainable development of the area, taking account of future requirements. Whether or not the changes that would be necessary to implement the Core Strategy preferred options should be regarded as 'small local adjustments' is a matter of judgement, however it should be noted that the phrase is used in the proposed revisions to the RSS in the context of the extent of the green belt in the West Midlands Regional as a whole. If a spatial strategy is pursued that requires amendments to the green belt boundaries, for example in relation to strategic directions of growth for Lichfield or Burntwood, the key test would be to demonstrate exceptional circumstances for the changes as required by national policy. This would need to be based on the need to meet the housing requirements of the RSS through the most sustainable form of development taking account of all of the relevant factors.

- 2 **The limited capacity of infrastructure and poor services or facilities;** many arguments have been put forward on the basis that housing growth in a particular location would be inappropriate because of the lack of infrastructure and services. This argument is used in particular in relation to Burntwood, but also in relation to other locations. It is true that infrastructure and services are important considerations in relation to planning future growth. It is also accepted that there are deficiencies in facilities and services in many communities within the District. Burntwood is a specific community where one of the main thrusts of planning policy has been to seek improvements to the town's 'infrastructure', including shopping and community facilities within a town centre. Nevertheless, judgements on developing a spatial strategy to meet an identified housing growth requirement of 8,000 dwellings need to be made in the context of the District as a whole and take into account where facilities and services are best located. For example in relation to Burntwood, while it is acknowledged that there are significant deficiencies in the town, nevertheless it does have a range of shopping, education, recreation facilities etc. that place it as the second most sustainable location within the District context. It can be argued that one way of achieving improved facilities is through the investment that can be drawn to a location through housing growth, for example in improving the potential for retail investment. Whilst there is no doubt a line to be drawn, the role of the Core Strategy is to balance the issues of the current level of infrastructure with the need to develop a growth strategy in the context of the range of settlements within the District.

- 3 **Potential traffic impact of new development;** many have argued in relation to particular directions for growth that its associated traffic generation would have an unacceptable impact upon local road networks and junctions. One of the factors that was recognised in the preparation of the Preferred Options document was that the evidence base on transport is as yet incomplete and consultants are still preparing assessments that examine the potential effects of new growth for Lichfield and Burntwood. These studies will also consider what strategies or improvements would be necessary to accompany development so that investment for infrastructure improvements involving both public transport and highways improvements can be planned and funded. The Highways Agency is currently assessing the potential requirements for the trunk road network, in particular the A38 arising from the Preferred Options. The Preferred Options and directions for growth that were consulted on took account of the relative accessibility of existing communities within the District in terms of public transport and this is an important factor. Before a spatial strategy is finalised it will

be necessary to have the outcomes from the second stage of the transportation assessment and the views of the Highways Agency.

- 4 Flood risk;** this was identified as an argument in particular against a direction of growth to the south-east of Burntwood within Hammerwich Parish, where there is a brook course which is a potential flood risk. As a general point the Council has carried out a strategic flood risk assessment and in the main avoided potential areas of flood risk in the preferred directions of growth. In relation to the Hammerwich area, a potential developer has carried out a more detailed flood risk assessment and this is being audited by the Environment Agency. It is understood that for the scale of growth identified in the preferred options report of around 500 dwellings, no flood risk areas need be affected.
- 5 Impact on wildlife;** many residents have argued that the proposed directions of growth are Greenfield sites and mainly farmland and their development would have a harmful effect on wildlife. Again it needs to be acknowledged that protection of habitats and species is an important aspect of the forward planning process. It has to be noted however that all of the proposed directions of growth included within the preferred options avoided any nationally designated biodiversity or landscape designations and identified local Sites of Biological Importance. Whilst there may be priority habitats that should be protected within the directions of growth, it is not considered that these would prevent development and although they may have some effect upon the capacity of locations the Core Strategy is not site specific and so any effect could be taken account of at the subsequent Allocations of Land stage. It needs to be noted also that the potential for biodiversity interest is not restricted to greenfield locations and that brownfield and derelict sites, which are given priority for development through national policy, can often too be of biodiversity interest, particularly if left undeveloped for a long period of time.

Directions of Growth for Burntwood:

1. Representations relating to Burntwood:

These fall into 3 groups:

a. Resident's responses objecting to identified strategic directions of growth:

By far the largest number of responses to the consultation came from residents of Hammerwich and Burntwood who objected to extensions to the Burntwood urban area, shown in the consultation document as being to the south-east and south of Burntwood within Hammerwich Parish. Nearly all of the representations gave the same reasons for opposing housing growth. These related to both the principle of the area accepting any growth and to the harm arising from the particular directions of growth shown as preferred. The main reasons can be summarised as follows:

- Inadequate infrastructure to support growth, including employment, transport, highways, schools, health, shopping and social facilities
- The potential for coalescence of Burntwood with Hammerwich village and with the conurbation
- Loss of statutory Green Belt
- Loss of habitats and wildlife
- Use of greenfield land rather than brownfield/derelict land
- Pressure on local roads and junctions, including Pipe Hill and increased 'rat-running' through Hammerwich village
- Flooding issues

In addition approximately 2,000 representations were made opposing an easterly direction of growth for Burntwood. Whilst the Preferred Options **do not** propose this direction of growth, the representations have been made in response to a landowner submission made as part of the consultation exercise. This submission proposes some 377 dwellings on land east of Farewell Lane. The consultation has resulted in the formation of two new residents groups in the area formed to oppose the preferred options, these being the Burntwood and Hammerwich Action Group and the Burntwood Action Group.

b. Burntwood Town Council representing local elected members.

The Town Council response strongly objects to the proposed spatial strategy and considers that the approach should be based upon accommodating growth by way of a new settlement and a dispersed strategy excluding any significant development at Burntwood. This was the strategy most preferred at the previous public consultation stage. The Town Council considers that the necessary road infrastructure required for a new settlement could be funded by the developer and there should be no further major development in Burntwood or urban extensions, until services have 'caught up', including more leisure provision and retail space.

It is considered that the town is not a sustainable community at present and therefore it is inappropriate for it to accept additional housing growth. It notes that previous plans have accepted that there should be no further significant housing development in Burntwood until community facilities, shopping and employment opportunities are at a level appropriate for the existing population. The town needs a wider range of employment opportunities and outward commuting should be reduced.

It notes that new development for Burntwood should be limited to infill sites and brownfield sites within its boundaries. It also considers that there should be a long-term vision that the Mount Road industrial estate and Chase Terrace abattoir should be relocated and the land re-zoned for housing, although no indication is given as to where the industrial site should be re-located to.

The response notes the proposal at Farewell Lane made during the course of the consultation and for similar reasons given in relation to the preferred directions of growth considers that this should also be rejected.

c. Development industry responses, notably proposing development in locations other than those proposed in the Preferred Options.

Several landowner/developer responses have been submitted relating to future housing growth for Burntwood. These include those supporting the identification of the two directions of growth in the Preferred Options. However in respect of these it needs to be noted that both developers are seeking development at a larger scale than proposed in the Preferred Options. For the south Burntwood direction (ie. south of Highfield Road) the developer proposes 500 dwellings rather than the 250 dwellings proposed, whilst for south-east Burntwood the developer has indicated that the growth should be larger than the 500 dwellings proposed and that it should include a wider mix of uses as part of a neighbourhood 'hub', including employment uses and potentially a retirement village.

Other submissions on behalf of landowners/developers continue to promote growth to the north and east of Burntwood. Nearly all of these are not new and were taken into account in the analysis that identified preferred directions of growth. One new significant potential Greenfield housing location has been put forward, which is referred to earlier as the 377 dwellings to the east of Farewell Lane.

Finally a proposal has been put forward by LCP, the owners of substantial land interests at Burntwood, for a strategic housing location south of the Burntwood town centre bypass. This would utilise part of its land that is a former colliery site with an employment allocation in the local plan, together with land to the south which extends to Church Street, Chasetown. The land suggested south of the employment allocation is owned by Lichfield District Council. It is currently used as public open space and although it is not within the green belt, part of the area is a Site of Biological Importance. The submission identifies the possible capacity of this combined area as around 350 dwellings, and this is considered further below.

2. The Issues:

Issues in relation to Burntwood that need to be considered before finalising or refining the spatial strategy can be summarised as follows:

Should Burntwood contribute in principle to meeting the District housing requirement, other than through limited infill development?

Does the need for infrastructure improvements make development inappropriate at all, or rather have implications for the phasing of development within the overall strategy?

If the principle of accommodating growth is accepted given all other considerations, are the Preferred Directions of growth the most appropriate locations for housing development when considered against potential alternatives, including those arising from the consultation?

3. Policy Directions – Responding to the Consultation:

Should Burntwood contribute in principle to meeting the District housing requirement, other than through limited infill development?

The Council has always acknowledged that Burntwood should have a much greater range and scale of services and facilities and this has been part of its planning strategy for many years. However, when considered in relation to the settlements within the District that could potentially accept some growth it needs to be acknowledged that Burntwood does have a range of shopping, at Sankeys Corner and other local centres, and other facilities, and jobs, albeit that improvements are necessary.

Without any further housing growth Burntwood would be faced with population decline as the average household size reduces over the plan period. This would not assist in supporting additional services and facilities, particularly commercial facilities such as shopping.

The level of growth proposed for Burntwood in the Preferred Option is lower than that included for either Option 1 (town based development), Option 2 (town and key village), or Option 3 (dispersed development) which were published as the initial options and consulted on in December 2007/January 2008, that is, overall, the proportion of growth that Burntwood would contribute towards the District requirement is reduced from earlier consideration and is a relatively low proportion of the growth for the District's second largest settlement.

Does the need for infrastructure improvements make development inappropriate at all, or have implications for the phasing of development within the overall strategy?

In considering this question it is important to bear in mind the consultations that have taken place to inform the Core Strategy work to date. This includes engaging with key stakeholders to determine the relationship between any planned housing (and other forms of growth) and infrastructure requirements.

Education – the County Education Authority has informed us that it could suitably meet the need to accommodate additional pupil numbers arising from the preferred options. This would not be a constraint on achieving either the number of dwellings identified in the Preferred Options, or on the timing of development

Town centre – The relatively poor shopping facilities have long been recognised. Permission has been granted for a comparison shopping development of around 10,000 sq. metres, adjacent to the Morrison's store alongside the town centre bypass, which would substantially increase the range of shopping available within the town. This development is seen as being part of a wider proposal for the town centre that would utilise other land such as the former Olaf Johnson site next to Sankeys Corner. A range of other town centre uses would be possible within the area including creation of community and leisure uses. Whilst the situation is that current market conditions make it difficult to secure commitment to new development in this area and so the permitted development may not proceed in the short term, there is nevertheless available unmet shopping capacity that could be taken up as part of a town centre. The potential for town centre growth and the likely timing of this is considered to be a significant issue that should be taken into account in the phasing of any significant growth for Burntwood.

Transport capacity – the County Council as Highway Authority considers that there are no real highways capacity issues at Burntwood, although there are a few peak hour junction issues. Local improvements that might be necessary are currently the subject of a Phase 2 Transport Assessment being carried out by the County Council's consultants. It is likely that this study will identify a range of transport improvements required to accommodate development including public transport and highways improvements that would be funded by the developer.

Habitats: the major protected habitats in Burntwood lie to the west and the north of the town. While there may be locally important priority habitats within the directions of growth the impact of these is unlikely to be such as to prevent development taking place.

Are the Preferred Directions of growth the most appropriate locations for housing development when considered against potential alternatives, including those arising from the consultation?

The preferred directions of growth included in the Preferred Options were identified as a balance of judgement based upon the range of potential deliverable locations put forward through the Housing Land Availability Assessment. It was acknowledged within this process that all potential directions of growth around Burntwood raise some issues. Because of this, the scale of the directions of growth was limited to some 750 dwellings.

The consultation has given rise to potential new opportunities to accommodate housing growth in Burntwood, both within the town and as urban extensions.

Coalescence is a significant planning issue and is relevant to green belt boundaries but also to seeking to maintain the separate identity of communities. In the case of the Burntwood preferred directions of growth within Hammerwich Parish coalescence has two specific aspects. The first of these is the potential for the south-east direction of growth to meet Hammerwich village and lose the physical separation of the village from the Burntwood built-up area. The second is that the southerly direction of growth has the potential to extend virtually to the M6 Toll and the northerly extent of Brownhills is also close to the M6 Toll on its southern side. There would in both cases be the potential for significant closure of these gaps and for this reason the preferred options limited the scale of potential housing growth to 750 dwellings in total, which could be accommodated by part closure of the current physical separation in both cases. It is accepted that the closure of this separation should be avoided if possible and the preferred options had disadvantages in this respect. When prepared however there were no identified alternative strategic scale locations that might be preferable and were known to be deliverable.

In relation to the proposal put forward as an eastern direction of growth, this could be considered as a strategic scale alternative. It is considered however that whilst this direction would have less impact in terms of potential coalescence with Hammerwich village, it does not have any other obvious benefits over the preferred directions of growth. One of the major concerns of residents expressed through the consultation has been traffic 'rat-running' through Hammerwich village. This possibility is more likely with this option than the preferred growth directions, particularly that of proposed growth to the south.

The two other potential options for the re-use of employment land (in combination with open space at Chasetown), would have the potential benefit of avoiding the use of greenfield and green belt land and for this reason alone the options need to be subject to a full appraisal:

- The LCP/LDC land option at Chasetown would entail the use of allocated employment land and it has been the District Council's position to retain such land to seek to secure more local jobs. In support of this potential loss LCP has indicated the potential for redevelopment within its industrial estates of around 4.5 hectares of employment land as part of a programme of renewal it has already started and a further 4.8 hectares that could contain a mixture of general employment and town centre uses. The location would be close to the town centre and so would be likely to perform well from a sustainability point of view for housing use and it would also be located well within the town's road network. There are however biodiversity issues in relation to the site because of part of the LDC land is a Site of Biological Importance, and there would be an issue of whether the Council is prepared to release all or part of the land from its current open space use, which needs to take account of the quantity and quality of open space in this area. Taking these factors into account it is considered that this location may well have potential to accommodate a significant level of housing, but that further investigation is needed to see whether the constraints can be overcome and if so, to establish the capacity of the location.
- Mount Road industrial site has been identified in a number of consultation responses, including by the Town Council, as having potential for redevelopment for housing. A small part of the site has previously been put forward for consideration within the Housing Land Availability Assessment, but there is no current developer interest in the main part of the site. Marketing and employment consultants have considered this site for the Council and identified the area has having issues in relation to its future employment potential and that in the long term consideration of redevelopment for housing might well be an option for the Council. The capacity of this area will vary dependent upon how much land is likely to be released.

Conclusions:

Issues around the range of facilities and infrastructure available to serve Burntwood are recognised, together with the need to improve local employment opportunities. Nevertheless, it is considered in the light of the range of factors relating to potential for housing growth within Lichfield District as a whole, that Burntwood should make a contribution to meeting the District requirement and to meeting local affordable housing needs. It is recognised that there are significant issues relating to the preferred directions of growth. In the light of the potential to consider other locations of a strategic scale that have emerged through the consultation, the options for the redevelopment of employment and other land within the urban area, as identified above, should be investigated in more detail to consider their capacity and deliverability. This would be with a view to seeking to avoid the necessity to identify any locations for strategic expansion of Burntwood into the green belt. In addition, further consideration should be given to how the provision of additional housing within Burntwood can be linked to the provision of additional facilities and infrastructure,

Directions of Growth for Lichfield

1. Representations Relating to Lichfield:

These fall into 3 groups:

Resident's responses, in particular objecting to identified strategic directions of growth

Whilst there were responses from residents that accepted that Lichfield should play a significant part in meeting housing, employment, retail and office provision, most considered that these roles should be limited because of inadequacies in existing infrastructure, potential congestion and impact on the character of the city.

The largest number of responses from individual residents were objections to the proposed direction of growth to the south of the city, which includes the area of development restraint south of the Shortbutts Lane/Wordsworth Close area and green belt area around Cricket Lane and London Road. Several reasons have been given for objection to this direction of growth. These can be summarised as: impact on the character of the historic city, its landscape and skyline; taking green belt land; increased traffic congestion; poor infrastructure capacity including schools and health provision; it would threaten the identity of Lichfield as a historic market town; it would result in coalescence, with Shenstone, Wall and Birmingham. The consultation has resulted in the formation of a new residents group in the area formed to oppose the southern direction of growth, the South Lichfield Residents Association.

Few responses were received in relation to the proposed eastern direction of growth around Streethay.

Some responses were concerned at the lack of references in the consultation document as to how sustainable communities and new infrastructure would be provided if the new neighbourhoods were created as urban extensions to the city.

Lichfield City Council on behalf of the town as a whole, and other groups

The City Council's response is strongly in favour of growth being accommodated in the form of a new settlement at Fradley as the preferred spatial strategy. It is clear from the response that the new settlement reference relates to the Curborough Consortium proposal. The City Council considers that Lichfield is not a sustainable settlement in view of the high level of out-commuting and that the creation of a new settlement would preserve the historic character of the city and avoid the need for major incursions into the green belt. It considers that having a linked new settlement, ie. one relying on the city for higher level services, but physically separate, would allow provision of services and facilities within the settlement to meet its day-to-day needs whilst the close linkage would help to support facilities within the city such as the Friarsgate redevelopment and the Garrick theatre. It argues that it is the only realistic option of securing funding for A38 improvements and that any visual encroachment by a new settlement on the historic settling of Lichfield would be less than the proposed alternative of development at Streethay or south Lichfield as urban extensions. The response considers that the preferred options ignore the preferences expressed in the previous consultation on Issues and Options, although it incorrectly quotes these responses as having a 40% preference for a new settlement, when in fact this was 30%, (of around 140 responses).

It also needs to be recognised that a number of local organisations, such as Lichfield Civic Society and Leomansley Area Residents Association support the type of arguments put by the City Council and identify Fradley as a preferred location for development.

Development industry responses

There was a significant degree of support from the development industry that Lichfield should play a key role in the context of meeting development needs. This applied both to developers supporting the preferred options and developers promoting other locations for growth. The Curborough Consortium response takes the view that its proposed new settlement at Curborough would play a role in supporting the higher-level facilities available in Lichfield whilst at the same time avoiding the need for peripheral growth through urban extensions.

No new potential locations for strategic growth were brought forward for Lichfield through the consultation.

2. The Issues

Issues in relation to Lichfield that need to be considered before finalising or refining the spatial strategy can be summarised as follows:

Should Lichfield contribute in principle to meeting the District housing requirement, other than through infill development resulting from urban capacity?

Would the strategy proposed for Lichfield of accommodating approximately 50% of the growth requirement, including through urban extensions, harm the historic character of the city?

Does the level of infrastructure provision in Lichfield make development inappropriate, or have implications for the phasing of development within the overall strategy?

If the principle of accommodating growth is accepted given all other considerations, are the Preferred Directions of growth the most appropriate locations for housing development when considered against potential alternatives?

3. Response to the Representations: Policy Directions

Should Lichfield contribute in principle to meeting the District housing requirement, other than through infill development resulting from urban capacity?

In the context of the settlements within Lichfield District, the city acts as a strategic and service centre for the District and because of this, has the best range of facilities and services to serve its own population and a wider area, particularly within the city centre and a range of employment opportunities. It also has the best range of public transport facilities with both local services operating within the city and a hub for inter-urban services. The city's two train stations give good local and national rail accessibility to residents. In the context of the District therefore, it is considered that Lichfield is the most sustainable settlement and has the fundamental characteristics necessary to allow sustainable growth. The role of Lichfield within the Region is recognised in the Regional Spatial Strategy, which identifies the city as one of the 25 strategic centres within the region. The city offers the potential for using, and improving where necessary, its range of existing infrastructure, as opposed to the need to create substantial levels of new infrastructure. For these reasons it is considered that in principle Lichfield offers the greatest potential of the District's existing settlements to meet a significant proportion of the growth requirements arising from the Regional Spatial Strategy. Growth can, in addition positively contribute to sustaining facilities and services, particularly those operated within the city centre, where some growth would help to sustain a viable and vital local economy.

Within this general context and addressing the issues raised through consultation, the question needs to be asked as to whether there are substantial reasons why the city should not play a major role in meeting the District's requirements.

Would the strategy proposed for Lichfield of accommodating approximately 50% of the growth requirement, including through urban extensions, harm the historic character of the city?

One of the main arguments that has been used to support a policy of restraining the growth of Lichfield by diverting it elsewhere, in particular to a new settlement, is that expanding the city by urban extensions would be harmful to its historic character. This is the argument that found favour through the examination of the former Structure Plan policies for Lichfield that proposed a new settlement of 3,000 dwellings based on brownfield land at Fradley. This approach was supported by the District Council at that time (1998).

There has been little discussion however as to exactly what that harm would be and none of the representations made have sought to explain in any detail how the adverse impacts would be created, other than that there would be a general harm to Lichfield as an historic market town through an increase in size and harm to views of the city centre by creating modern development in the foreground of views on the approaches to the city or from specific viewpoints.

The argument that new growth would harm the historic character of the city is therefore vague in relation to how this would demonstrate itself in practice. It is at present unsubstantiated by any evidence from those who make the argument.

It is considered that harm to the historic character could potentially relate to physical issues arising from the scale of growth, such as in landscape change or harm to significant historic views. Officers are of the view that in relation to both the scale of growth proposed overall and the directions of growth, these issues can be addressed, particularly by defining the limits of development to the south of the city more precisely. It is considered that there are few places in the directions of growth where new development would obstruct views of the city's historic core. Significant parts of the directions of growth are not on rising ground. Although it is agreed that some approaches to the city would change, particularly in the Cricket Lane area, the quality of these changed approaches could be addressed through good design.

The second potential aspect of harm to the character of the historic city relates more to the city centre and through increased activity. This could relate to traffic congestion or the level of use of city centre facilities, services and streets. There is however, little evidence for this argument arising from past significant of the city by urban extensions such as Boley Park or Darwin Park.

A second stage of Transport Assessment work is currently being carried out to assess the likely effects of the preferred Lichfield options, including the directions of growth. This will consider an appropriate strategy for assimilating the proposed scale and locations of development into the city in transport terms, to identify the nature and cost of public transport and highway improvements that may be necessary. The work will allow the Core Strategy to incorporate a sustainable transport strategy to deliver the necessary improvements.

Whilst this transport work remains to be completed, when a final view can be taken of this issue, it is considered that the case for harm to the historic city from the scale of development proposed in the preferred options is unproven. In terms of the main alternative put forward, it should also be noted that the County Council and the Highways Agency have as yet been unable to agree an assessment of the traffic impact arising from the proposed new settlement.

Does the level of infrastructure provision in Lichfield make development inappropriate, or have implications for the phasing of development within the overall strategy?

It is accepted that infrastructure for the city would need to be improved but it is considered that this can be funded appropriately through the level of development proposed in the directions of growth. It is considered that the preferred directions of growth remain appropriate albeit in the south it requires taking land out of the green belt, but it is considered this is the most sustainable strategy.

If the principle of accommodating growth is accepted given all other considerations, are the Preferred Directions of growth the most appropriate locations for housing development when considered against potential alternatives?

There is little scope to significantly shift the balance of proposed growth between the south and east directions of growth. This is because of the need to contain any development in the Streethay area below rising land and because of limitations imposed by the A38 and railway. This limits the possibilities to seeking additional redevelopment sites and consideration of densities. The issue will however be further examined prior to the preparation of the draft Core Strategy.

It is considered that the argument made in relation to potential coalescence with Shenstone, Wall or Birmingham is unfounded in relation to the scale of growth proposed. The suggested scale of 2,450 dwellings can be contained so that it does not significantly impact on the rising ground south of Shortbutts Lane or along Birmingham Road and would not cross the ridgelines here. At Cricket Lane the land is not on rising ground although clearly development in this location would result in a significant change to the approach to the city as viewed from the A38 Swinfen junction.

The Core Strategy will define the limits to growth for strategic locations more clearly than the Preferred Options, both through its written content and in a key diagram or other illustrative material.

Conclusions:

The argument that new growth would harm the historic character of the city is the main argument for seeking to direct new housing development away from Lichfield itself. This view has however been unsubstantiated by submission of any evidence from those who seek to make it. It is considered that such harm could potentially relate to physical issues arising from the scale of growth, such as in landscape change or change to significant historic views, but these can be appropriately addressed in the directions of growth. It could also potentially relate to activity in and around the city centre, but there is no strong evidence of this arising from past significant growth such as from Boley Park or Darwin Park.

These arguments have to be considered against the fact that the city is the strategic centre for the District with the best range of facilities and accessibility and therefore in principle should accommodate a good proportion of development requirements unless there are strong arguments for locating this scale of growth elsewhere in the District. A new settlement could potentially accommodate this scale of growth, but it is considered that such a strategy is not the most appropriate in the context of meeting the District's needs as a whole.

It is accepted that infrastructure for the city would need to be improved but it is considered that this could be funded appropriately through the level of development proposed in the directions of growth. It is therefore considered that the scale of growth proposed for the city in the preferred options remains appropriate and that the preferred directions of growth remain appropriate, albeit that in the south it would mean taking land out of the green belt. On this latter point, the view is that incursion into the green belt is necessary to maintain a truly sustainable form of development.

There is likely to be little scope to significantly shift the balance of proposed growth between the south and east directions of growth but this issue will be examined further.

The New Settlement Option:

1. The Preferred Options Report identified a balanced form of growth favouring concentrating growth within and as extensions to, existing urban areas and key rural settlements, rather than proposing a new settlement. A number of the consultation responses, however, consider that the new settlement option should be preferred as a means of relieving existing settlements from urban extension, particularly Lichfield and Burntwood. Significant among the responses favouring a new settlement are Lichfield City Council, Burntwood Town Council, and Lichfield Civic Society. The responses from the Town and City Council's are directed towards avoiding any peripheral growth of Burntwood or Lichfield into the strategic directions of growth identified in the Preferred Options. Homezone supports a new settlement at Curborough on the basis that it would increase the supply of affordable housing, however it also broadly agrees with the level of growth suggested for Lichfield and Burntwood.
2. The main arguments put forward for a new settlement are to protect the historic character of the city of Lichfield, to protect the green belt around both Lichfield and Burntwood, to secure a higher proportion of affordable housing, and that Burntwood in particular lacks the infrastructure to accommodate growth.
3. There is only one new settlement proposal that is being promoted through the LDF process, which is the Curborough Consortium proposal for 5,000 dwellings at Curborough. The Curborough Consortium proposal is a specific one, with clear parameters in terms of location, design and infrastructure provision and the assessment needs to be made against these proposals, since they have been judged by the Consortium to represent what is deliverable.
4. A planning application has been made for the Curborough Consortium proposal, which represents the only significant major change of spatial strategy that could be considered as an alternative to the published preferred options or some variation on them. It is therefore necessary to consider the arguments put forward by the proponents of a new settlement in some detail, to decide whether the preferred options (with/without minor amendment) are the most appropriate strategy in the circumstances, or whether that approach should be discarded in favour of a new settlement.
5. The Consortium has made representations against the spatial strategy taken by the Preferred Options and argued that a new settlement is a more sustainable strategy. It has identified the main advantages that it considers lie with a new settlement and has included a critique of the Council's arguments against a new settlement, which were included within the Preferred Options Consultation document (at para. 12.14).
6. It is necessary to consider all of these points in deciding whether to accept or reject the case for a new settlement and they are set out below. Firstly, however, Members need to be aware that part of the context for the new settlement is that the Consortium has also made representations to the partial review of the Regional Spatial Strategy that seek to increase the overall level of housing provision to be made in Lichfield District from 8,000 dwellings to 12,400 dwellings and for the RSS to specifically name Curborough as a location for a new settlement. The Consortium's representations on the Preferred Options however also argue that a new settlement at Curborough is the most sustainable approach to meeting the 8,000 requirement.

The Curborough Consortium Representations:

7. The Curborough Consortium representations make many points in relation to its proposal for a new settlement, seeking to justify why it is the most appropriate strategy to meet the

housing requirements for the District. The section below considers the points made within the Consortium response.

8. The following points are made **by the Consortium** as its case for following a new settlement strategy:

- Concerns that pursuing a Core Strategy in advance of established strategic policy (the RSS review) and an insufficient evidence base, is likely to result in an unsound strategy. It is premature to base a preferred spatial strategy on the strategic requirements in the RSS Preferred Option.
- Without specific inclusion of Curborough as a strategic allocation in the CS, concerns are expressed over the document's robustness, flexibility and ability to deal with changing circumstances.
- The Council has not selected the most appropriate strategy when considered against reasonable alternatives (a crucial soundness test), because it excludes the Curborough new settlement.
- The Council has sought to play down the support for Curborough new settlement expressed at the issues and options stage.
- **Lichfield City:** a principal issue is the need to protect Lichfield's historic character from large-scale development pressure. Although it is the principal urban location in the District, with relative locational and transport sustainability, its inability to accommodate significant additional development has been recognised through the adopted Structure Plan. The Council should recognise the significant and 'prohibiting' constraints around the city, of green belt, high quality agricultural land, the need to protect the historic core and setting of the city, and the effect of additional development on traffic flows and congestion. The Area of Development Restraint should be re-designated as green belt because growth should be focussed in more sustainable locations, which have been properly tested at a public examination, such as the Curborough/Fradley new settlement. It is clear that Curborough can perform the same function as an urban extension to Lichfield in a more sustainable manner outside the green belt whilst protecting the city's historic setting. There are infrastructure difficulties associated with urban capacity growth.
- **Burntwood:** the principal issue in relation to the town is considered to be the need to concentrate on infrastructure improvements, particularly town centre facilities, and employment growth. Burntwood is considered to have a much lower tier of services and facilities in comparison to Lichfield and therefore it is a wholly inappropriate location for strategic housing development. The strategy for Burntwood should be to ensure economic growth and not to provide for greenfield or green belt release and as such it is likely to have only a limited role, through urban capacity, in providing for future housing needs. The Inspectors report on the Core Strategy, which identifies a need to distinguish between the strategies for Lichfield and Burntwood, is cited in support of the case.
- **Key rural settlement expansion:** key rural settlement expansion is considered to be less sustainable because there are only limited public transport connections available and the strategy would require greenfield and green belt release for most villages. The scale proposed in the preferred options of 1,400 dwellings is considered to be disproportionate to the scale and limited level of services and facilities in these villages. It is suggested that only around 450 dwellings in total would be appropriate for these villages, primarily in the form of 100% affordable dwelling exception sites. Dispersal of growth amongst these settlements is also considered to be contrary to a strategy that addresses climate change issues.
- **Dispersed rural village development:** Whilst such a strategy is not proposed in the Preferred Options, the Consortium response makes the point that the Inspector's report into the first and subsequently withdrawn Lichfield District Core Strategy, noted that the allocation of limited housing growth to villages would be unlikely to have any significant effect in the retention of village services, such as village shops. It notes that the rural sustainability study does not point to the identification of Fradley as a key rural settlement and that in the Consortium's view merely 'adding' a few properties at

Fradley Park would exacerbate the problems and mistakes of Fradley South. The Consortium considers that the Preferred Options approach is 'sadly lacking' a forward-looking vision.

- **Development on the edge of Tamworth and Rugeley:** In the Consortium's view there is no justification for any additional growth near to Rugeley or Tamworth over and above existing commitments, particularly should this be providing for any element of Lichfield District's own needs. It has made representations to the Regional Spatial Strategy Phase 2 review that any growth in relation to cross-boundary matters should be expressed as additional to the 8,000 RSS figure for Lichfield District. It considers that locating growth adjacent to the two towns would be catering for these authorities needs and would not address the affordable housing needs arising within Lichfield District as none of the affordable housing built in these locations would meet the affordable housing needs of Lichfield District residents.
- **The Curborough New Settlement:** In relation to the new settlement, the response considers that the preferred options report underplays the level of housing that could be achieved within the plan period. The Preferred Options document assesses this as 3,800 – 4,000 dwellings, but the submission considers that this is inconsistent with the submitted planning application and that the delivery could be greater – or the development could be phased to provide housing into the period beyond 2026.
- The submission identifies the key advantages of a new settlement at Curborough over the preferred or other strategies, as:
 - It is unaffected by environmental designations
 - It is not in the green belt
 - It offers a genuine opportunity to create a sustainable new settlement with a significant amount of affordable housing and excellent public transport
 - It sits alongside the major employment location in south east Staffordshire
 - It provides the best opportunity to address climate change issues
- The Consortium submission also provides a critique of the list of difficulties identified within the Preferred Options document that would be associated with a new settlement. It notes that a 'linked' new settlement, where a smaller settlement relies on a larger neighbour for higher-level services and facilities is recognised as the optimum solution for developing a new settlement proposal. By providing a range of new services and facilities locally it is considered that the proposal will fundamentally relieve the city of pressure and that this would not be achieved by urban extensions as proposed in the Preferred Options. The response considers that it has addressed the concern at capacity issues on the A38 raised by the Highways Agency; that a new settlement will optimise the delivery of affordable housing; that it would not draw investment away from other settlements; that the new settlement can expand the range of jobs available at Fradley through a local centre and school provision; that any adverse impacts on biodiversity would be mitigated; that visual encroachment on Lichfield can be avoided through long term management of the settlement edge and the creation of a 'District Park'; the delivery of the proposed improved transport measures should be seen as a benefit, rather than a disbenefit.
- The response concludes by proposing an alternative spatial strategy, based upon a new settlement, that would distribute growth as follows: 3,900 dwellings in a new settlement at Curborough (as part of 5,000 dwellings), 750 dwellings at Lichfield, 225 dwellings in Burntwood, 450 dwellings in Key villages, 700 dwellings east of Rugeley, 275 dwellings at Fazeley, with the remaining 1,700 dwellings being existing commitments.

Response to the Representations:

1. It is clear that because of its scale relative to the overall housing requirements of the District, the inclusion of a new settlement proposal within the Core Strategy would represent following a completely different spatial strategy to that included within the published Preferred Options. To identify a single location to take the vast majority of the District

housing requirement for the period up to 2026 would result in a significantly changed District. In addition to the major growth in one location associated with a new settlement it would also mean a significantly different future for the existing settlements within the District.

2. A new settlement would not only limit the potential of Burtonwood, Lichfield and the villages to meet their own local housing requirements, including their potential for affordable housing, but a severe restraint on housing growth of existing settlements would impact upon the potential for investment within them. Whilst there is capacity identified within urban areas, this is limited, particularly within Burtonwood. It is likely that a new settlement strategy would have the effects of a population standstill, or fall in some settlements and a consequent concern at how such settlements would be able to attract new investment or seek to address issues of infrastructure or deficiencies in facilities.
3. Some local communities have pointed to a new settlement as a solution to their individual issues, particularly as a means of avoiding urban extensions to their town and perceived difficulties that would arise from them. Although it has to be acknowledged that such issues exist, the role of the District Council in preparing a Core Strategy is to consider how to accommodate growth requirements in the best interests of the District as a whole. It is considered that a new settlement approach that would see nearly all of the housing growth requirement met in one location, supported by the need to develop need facilities and infrastructure, is not an approach that is in the best interests of the District as a whole, taking account of the varying needs of its existing settlements.
4. There are a number of key points that counter the specific arguments put forward by the Curborough Consortium and other representations made in favour of a new settlement. Whilst at the Issues and Options stage the District Council considered a new settlement as an option, without specifying any location, the only new settlement proposal with a prospect of being delivered within the District is the proposal at Curborough.
5. The representations made by the Consortium make much of the long history of the proposals for a new settlement at Fradley, of the previous support for a new settlement within the Staffordshire Structure Plan and past support by Lichfield District Council and Staffordshire County Council. In relation to the history of the consideration given to a new settlement in the District, this was always on the basis of a scale of around 3,000 dwellings, both in the Staffordshire Structure Plan and the consideration of the matter at the Examination of the withdrawn Core Strategy – this is explicit in the Inspector’s Report.
6. It is erroneous to conclude that the long history of promoting a new settlement proposal equates to previous Council support for a proposal of the scale or in the specific location being promoted by the Curborough Consortium. An increase in scale by 2,000 dwellings therefore generates the need to re-consider the potential impact of a new settlement in relation to its location. The Staffordshire Structure Plan made no reference to Curborough, only to Fradley.
7. Major issues directly related to the scale of development are its physical impact in the location proposed and its transportation impact. In relation to physical impact, because a new settlement is no longer able to be developed within the core of the former airfield, the location proposed is to the west and south of it, and about 87% of it would be on greenfield land. The physical proximity to the northern edge of Lichfield creates an impact on views into and out of the city.
8. In relation to transportation it should be noted that neither the Highways Agency or the County council as Highways Authority, has agreed the transportation assessment associated with the new settlement proposal. They have yet to agree on either the amount of road traffic that would be generated or on the distribution of the traffic. This means that it is not possible for these Agencies to properly assess the impact that the new settlement would have either on the A38, or on the increase in traffic on roads within Lichfield itself.

9. The increase in scale could have the potential for a development to be more self-contained and therefore to be considered as a sustainable proposal in this sense. For example it could justify new secondary school provision and a greater level of services such as shopping. However the same increase in scale could potentially result in greater impact, such as in levels of traffic, visual impact within the landscape, or the reliance of a greater number of people on the higher levels of services and facilities available within Lichfield. The County Council has not indicated whether there would be any impact upon the city's existing secondary schools
10. Because the Curborough Consortium proposal is the only new settlement available to consider, if there are potential harmful impacts arising from the specific proposal put forward, the Council could not assume that these could be addressed, for example through adjusting the location, and still result in a new settlement proposal that could be shown to be deliverable.
11. The representations emphasise the role the new settlement would have in protecting the historic character of the city by taking development away from it. There is a need for a new settlement proposal to demonstrate that it would indeed relieve impact of development upon the historic character of the city. The argument has however been unsubstantiated by any evidence from those who seek to make it, as discussed in **Appendix 'D'** above in relation to Lichfield.
12. In relation to the argument that a new settlement could deliver more affordable housing, the more balanced distribution proposed in the Preferred Options, which includes strategic growth directions, would deliver affordable housing. National policy sets a site size threshold of 15 dwellings for affordable housing provision and so the argument on the amount of affordable housing is not accepted. The principal point in relation to affordable housing is that the needs identified through the Housing Market Needs Assessment point strongly away from a strategy of concentrating new affordable housing in one location such as a new settlement, but on the contrary point towards making a wider distribution and to significant provision in Lichfield, Burntwood and key rural settlements.
13. It is not accepted that the District's 8,000 requirement should be located centrally to meet the needs of the District. The Consortium's view of the term 'need' relates closely to 'demand' for housing in the District. Much of the 8,000 dwellings requirement would be accommodating household migration, mainly from the West Midlands conurbation, but also from Tamworth. In this context it is less clear that any particular element of the requirement should be met in any particular location within the District.
14. Growth proposed for Burntwood is criticised as unsustainable because the settlement requires infrastructure provision, including a proper town centre. Whilst it is recognised that Burntwood has infrastructure deficiencies, restricting growth to such an extent that the town's population would start to fall would not assist in remedying them.

Conclusion:

15. For the reasons discussed above, to include a proposal for a new settlement within the Core Strategy would represent a change to a completely different spatial strategy that would have significant implications for the rest of the District. It is considered that there would be a detrimental impact upon the ability of other settlements to meet their own requirements, such as for affordable housing or investment. It is also considered that the specific proposal available for consideration has impacts that would be detrimental to the area and for these reasons a new settlement should be included within the Core Strategy.

Employment Issues

Employment Land Requirements including Offices provision.

The Issues:

1. In Lichfield District there is significantly more general employment land available than required to meet the Regional Spatial Strategy allocation of 99 hectares up to 2026. There is therefore a need to consider whether this can be justified by particular requirements or opportunities within the District.
2. In the context of the overall needs there is a need to consider whether potentially surplus employment land represents an opportunity to release land to meet other requirements, such as housing.
3. The Regional Spatial Strategy identifies Lichfield city as a strategic centre, which should seek to accommodate 30,000 sq.m. of office floorspace within or on the edge of the city centre. A study has shown that there may only be capacity to meet around half of this in Lichfield city centre. There is an issue of whether additional office floorspace provision should be provided for in the Core Strategy over and above what can be found within the city centre and if so where should this be located.
4. There is an overall issue of whether the Core Strategy should seek to achieve a specific direction in terms of economic strategy, in other words should there be priorities for seeking particular types of new employment? Examples of different approaches to this might be seeking a continued emphasis on logistics based employment, or alternatively seeking more emphasis on employment in identified growth sectors, or to build on emerging trends and strengths of the District and Staffordshire. The latter approach could suggest seeking job opportunities in business sectors including jobs related to education, research, or medical sectors and resulting in less land requirement, in different locations to a logistics based approach.

Evidence:

5. Employment Land availability at 2006 showed a total general employment land supply of 132 hectares, including 8 hectares of redevelopment land on existing employment sites. Of the total land available, approximately 129 hectares was at Fradley airfield, 15 hectares in Lichfield and 19 hectares in Burntwood.
6. The average build rate for employment land from 1996 – 2006 was 6.6 hectares per year and from 2001 – 2006 it was 7.5 hectares per year, so based simply on these previous rates the existing supply would last for between 17 - 20 years.
7. The Employment Land Review assessed future employment needs, using various methods. This included looking at past rates of growth, considering needs assessed by looking at projections of employment growth in the economy (ie. including growth sectors and declining industries), and considering needs arising to meet the forecast changes in the labour force. One of the issues this highlighted was the continuing trend of decline in manufacturing employment, but also it identified growth in financial, business, health and education sectors.
8. In terms of future land requirements, simply based on past development rates the amount of existing general employment land would be able to meet these needs, however an approach using projections of employment growth would suggest a need for only around 30 hectares, since most new employment would be in office based jobs. An assessment of employment land need based upon the labour force forecasts arising from population growth (housing growth levels in the RSS), suggests no need for new employment land at all.
9. Evidence shows that the average income of people living in Lichfield District is significantly higher than the average income of people working in Lichfield District. This suggests that a better-balanced employment structure containing more jobs in the higher earnings sectors, would provide more local job opportunities to meet the skills available within the local population.

10. A consultants report on the market for offices and office development potential commissioned by the District Council, suggests significant difficulties in achieving RSS levels of provision within or on the edge of Lichfield city centre and limitations on the size and types of site likely to be available. It estimates potential sites for only about 17,000 sq. m. (net) in or on the edge of the city centre. This view is supported by the Historic Environment Character Appraisal of the city centre, since the character and grain of the centre is fundamental to its historic importance. Possible other locations suitable for some smaller scale office development would be as part of Burntwood town centre, close to Trent Valley station, or south Lichfield.

Policy Directions:

11. Taken as a whole the evidence on future employment structural changes and the amount of general employment land available suggests that the direction of the economic strategy for the District should be related to seeking jobs in higher earning office sectors and exploiting the potential of the District, where the high environmental qualities are an attraction to employers. This suggests a need for an employment land portfolio that has less emphasis on general employment land, and more on higher quality business and office space. The latter has to be directed primarily towards town centres to be consistent with national and regional policy, and to follow a sequential approach to identifying other locations if other requirements need to be met.
12. On the basis of seeking a portfolio to meet needs and opportunities the Core Strategy could allow for office provision within and on the edge of Lichfield city centre, to a limited extent as part of Burntwood town centre, at Trent Valley through redevelopment of existing employment land and to a limited extent on the edge of the city where there is the potential to provide larger floorplate offices. Overall the provision could amount to 30,000 – 35,000 sq. m. of B1(a) offices. Other office provision within the District could be limited to those offices ancillary to other employment uses.
13. The evidence and strategy approach suggested creates an opportunity to consider the re-allocation of existing general employment land to other uses, and to align the overall total supply of this type closer to the levels identified within the Regional Spatial Strategy.

Recommendations:

1. That the draft Core Strategy includes an employment strategy that is aimed at seeking greater opportunities for high value employment within the District, including higher wage opportunities in growth sectors related to business, education and research and consequently a balanced portfolio of employment land able to accommodate such opportunities to serve both Lichfield and Burntwood.
2. That in the light of the above and the limited capacity of Lichfield city centre to meet the RSS levels for office floorspace and to provide for larger floorplate office locations, the draft Core Strategy allows for limited office development, up to around a further 15,000 sq. m., elsewhere in Lichfield city, in addition to city centre office growth. This could include redevelopment of existing employment around Trent Valley station and a limited peripheral site associated with the southern direction of growth. In addition the Core Strategy should provide for limited redevelopment for office purposes, up to 5,000 sq. m., within an expanded Burntwood town centre.
3. That where possible the grant of new permissions for employment development within existing allocated sites should limit office development to offices ancillary to B2 or B8 uses.
4. That in the light of the evidence on future need for general employment land and the potential for redevelopment for existing employment purposes, the draft Core Strategy provides for the release of existing employment land and existing employment development within Burntwood to help meet housing needs, and for the release of existing employment land at Fradley airfield to help meet housing needs.