

Local Plan Review Response

1. If the Lichfield District Council (LDC) Local Plan Reviews were planned to cover a period over 15 years ahead instead of 5 years, it could prevent close and confusing repetition of one Local Plan Review always concluding and the next immediately commencing.
2. The evidence base needs to clearly distinguish between the needs of the LDC population and the contribution to be given to the needs of the Birmingham or Greater Birmingham populations. Without this separation, any confidence in needs analysis is undermined.
3. No. The Birmingham Strategic Locations Study (BSLS) has over 20 alternative supply sites identified and evaluated and none of those is cross-compared to the LDC proposed growth options. The collaboration approach needs to extend to the assessment and prioritisation of the alternative sites in other local authority areas. Otherwise, what are we comparing the LDC options against? They are presented inside an LDC bubble only, which reduces the credibility of the LDC proposals.
4. Yes. The policies in 1.2 should be revised to indicate where LDC housing growth would be acceptable and would prevent LDC having to react to external pressures every five years. Instead, LDC would be proactive.
5. Yes. Those policies applying to Neighbourhood Plans (NP). LDC growth proposals affecting an adopted NP need a separate impact analysis as part of the overall impact assessment. Otherwise, NP's are devalued from inception.
6. No comment on these particular policies.
7. Yes. As stated in Q2 and Q4 we need to see LDC needs as distinct from other authority needs and in advance of the five year, re reviews where the housing growth potential, however limited, is to be found in LDC and if available and justified, for external needs.
8. No, you have not identified the exact need for new homes to satisfy LDC needs. The Review has not cross-compared the LDC options to others using the Greater Birmingham Housing Market Area Study. See above for what needs to be done.
9. Agree with LDC vision as it underwrites a specific vision for key settlements. None of the key settlement visions includes excessive growth.
10. Yes, support the LDC Strategic Objectives as not one of the 15 LDC Objectives supports the options for growth set out for an Urban Fringe Extension near Little Aston or a New Settlement at Shenstone.
11. Yes. Well-designed and managed higher densities in existing urban areas are used successfully elsewhere and reduce the need to put pressure on low-density housing supply in the Green Belt.
12. LDC should be much more transparent about contributions made to GBHMA each year to date, as a proportion of overall LDC supply and as identified above should be much more transparent about the current proposals. Without this key metric, ambiguity, uncertainty and low confidence in any new proposals will continue.
13. Yes, small self-build sites should be identified by LDC for affordable ownership options however nationally they make a very marginal contribution to overall supply.
14. Yes, an LDC promotion of small pre purchased sites and grants.
15. Yes. The lack of a confident and clear traveller site allocation by LDC has led to random applications for traveller sites in the Shenstone Parish Council area. However, sensitive and complex the LDC Review must designate sites so they can deal with random landowner applications more effectively.

16. Only if liaison with Travellers justifies a cross boundary approach. A cross boundary approach on its own is not enough if it does not deliver appropriate solutions.
17. Yes as they support existing town centre growth.
18. No comments on this question.
19. No comments on this question.
20. The electrification of the infrastructure rail link between Alrewas and Lichfield is an important consideration in the consideration of New Settlements and should be part of the Review considerations. There are other drivers for this consideration, access to the (i) National Arboretum (ii) National Football Training Centre.
21. Yes focussing growth around existing LDC urban areas has the advantage of the using the services and amenities that exist in those areas, with the exception of the northern fringe of Birmingham/Sutton Coldfield. The reason for this exclusion is that all other urban areas proposals have the existing infrastructure /amenities/services to merit consideration. The Little Aston area has no infrastructure /amenities/services to justify inclusion as an urban area appropriate for growth.
22. Apart from the above comments, there are no further comments on this option.
23. No. Agree with growth focussed on town centres only. This approach has been successfully taken to the supply of housing in the current LDC Review. There is no evidence that what are named as key rural settlements have any capacity to sustain any meaningful growth. The proposal for the Sutton Coldfield/Birmingham Other Option on the southern border is neither a Town Centre or Key Rural Settlement it is an urban fringe extension into the Green Belt. It should not be inside the Option 2 as a result. See Q's 21 and 28 for a response to the urban fringe extension option.
24. No. No evidence of capacity to sustain any meaningful growth in these locations. More appropriate alternatives exist. Shenstone is identified as a Key Rural Settlement has an approved Neighbourhood Plan (NP) recently adopted by Lichfield Council. The NP runs to 2029. The current LDC LP and the NP clearly state that Shenstone should "accommodate a proportionate level of growth which addresses local need whilst maintaining a self-contained community with clear physical boundaries". Lichfield Council's own land catalogue of potential sites for house building named the SHLAA and dated 2012 shows the whole of the Shenstone Business Park as "developable" and this potential could and should have been further explored in the LDC LPA document. The Shenstone Neighbourhood Plan researched the whole Business Park vacancy rates and unit short term letting of the industrial units showing the potential for a change of use to housing and deployment of affected units to adjacent vacant units. There is no evidence that this has been refreshed for the recently adopted LPA consultation document. Stonnall and Little Aston also have adopted NP's with similar commitments to accommodate a proportionate level of growth which addresses local need whilst maintaining a self-contained community with clear physical boundaries.
25. Yes. Growth in existing town centres and Growth Settlements outside the Green Belt.
26. Rural settlements are not appropriate as an overall housing supply strategy. They do not contain the services or infrastructure requirements for significant growth.
27. No comment.
28. No. The Shenstone Area New Settlement should be omitted as it is (a) the only new settlement option of three in the Green Belt (b) is the only new settlement option breaching the safeguarding from encroachment policy (c) is the only new settlement option breaching Strategic Separation policy and (d) is the only new settlement option breaching

Local Separation policy. These are designations made clear in the GBHMA, there is no reference or impact assessment of these designations in the LDC review.

The credibility Birmingham Growth Study assertion that a new settlement around Shenstone would have “good access to public transport” because it would be 1km (0.6 miles) from the nearest rail station to Birmingham must also be challenged. The challenge must be made on the accuracy of the distance assumed and station capacity. The assertion is made as part of a Venn diagram in the Growth Study.

29. The Alrewas/Fradley and Thorpe Constantine sites do not have the location disadvantages identified above in response to Q28.
30. Yes comparisons of Alrewas/Fradley and Thorpe Constantine sites against other GBHMA new settlement sites.
31. Yes as the most appropriate employment development access and capacity exists in these locations.
32. No comment.
33. No comment.
34. No, do not agree because of the inclusion of a new employment location in Shenstone. Shenstone has an existing employment area (Industrial Estate) with long-term vacancy rates due to unattractiveness in its location, space standards, building structure ages and the local infrastructure cannot sustain any increase in HGV volumes. Site turn over and current occupants relocation intentions further substantiate this.
35. No comment
36. No comment.
37. No comment.
38. See response to Q20.
39. Yes, it is critical.
40. No comment.
41. No comment.
42. No comment.
43. No comment.