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**Submissions on Behalf on Mr M Neachell**

**LP063**

**Relating to**

**Matter 3      Sustainability Appraisal**

**3. Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA):**

*3.1 Is the spatial strategy of the Plan supported by the SA and HRA?*

*3.2 Have reasonable alternatives been considered in the SA?*

*3.3 Which adverse effects identified by the SA require significant mitigation, and how is the Council addressing these issues?*

*3.4 Does the SA report meet all the requirements of the 2004 Regulations?*

3.1

The Spatial strategy of the plan proposes to distribute new homes both within the Borough and to export 2,000 homes to the adjacent authorities of Lichfield and North Warks.

The SA does not support the strategy is so much as there is no analysis of the effect of the development of 1,000 homes in those adjoining districts. The initial 1000 homes are dealt with in the SAs to the adopted Lichfield and North Warks Local Plans but the second 1,000 which have emerged since the examination of those plans are not analysed.

This question was raised in our original objections to the submitted plan, and the pre examination correspondence was exercised by the matter. The Inspectors letter of the 30<sup>th</sup> March sets out that an indication of the effects of those developments on the highway and community and other services would be needed. The SA addendum does not however deal with the issue in any detail and simply recites the impacts of the first 1000 homes

through the adjoining local plans. On that basis the SA cannot be a reliable piece of evidence to support the spatial strategy of the distribution that relies heavily on dwellings being provided outside the administrative area.

### 3.2

The SA does not consider the option of meeting all of the OAHN within the Borough. The Council say in the SA Addendum that this would have been impossible to do. However it is not agreed that this is impossible, the implication of accommodating all of the OAHN could be considered by for example :-

- Additional housing in the Town Centre [ on the Gungate site]
- Releasing land from the Green belt

It would have been possible to accommodate the required OAN number by a more varied Approach. As matters stand there is no assessed impact of meeting all of the OAHN. Furthermore there is no assessment of accommodating more of the OAN than the plan proposes by a partial release of green belt and re distribution of uses within the Town Centre to residential.

### 3.3

The impact findings of the SA in Appendix A4c are not agreed with as they relate to the Land at Dosthill and are dealt with in detail in our submissions to the Green Belt debate. But in short it is considered that the Appraisal misconstrues the landscape impact of the

development of site 693 in particular, together with the impact of the heritage assets, the habitat impacts and the sustainability of the location. What the SA does not weigh up is the effect of releasing sites such as 693 against deporting a 2000 homes, to un designated locations the sustainability of which is completely unknown. The difficulties of decanting growth are now already amply illustrated by the situation north of Tamworth on sites within Lichfield District where the road infrastructure available cannot deal with the number of dwellings proposed. This was the subject of an objection by TBC at the Lichfield Local plan examination but which remained as a broad location in the Lichfield Plan with the resultant impass.