

Extract of Report on the Examination into the Lichfield District Local Plan: Strategy

Ref: PINS/K3415/429/5

Please refer to paragraph 162 highlighted below which assists in the interpretation of Local Plan Strategy Core Policy 6's reference to "other rural areas", as discussed in the Planning Proof of Evidence.

Report to Lichfield District Council

by **Robert Yuille Msc DipTP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

16 January 2015

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE LICHFIELD DISTRICT LOCAL PLAN: STRATEGY

Document submitted for examination on 22 March 2013

Examination hearings held between 24 June and 10 July 2013 and between 9 October and 17 October 2014

File Ref: PINS/K3415/429/5

Non-Technical Summary

This report concludes that the Lichfield District Local Plan: Strategy provides an appropriate basis for the planning of the District, as long as a number of modifications are made. Lichfield District Council has specifically requested me to recommend any modifications necessary to enable this plan to be adopted.

All of the necessary modifications were proposed by the Council.

The Main Modifications can be summarised as follows:

- That the Council will carry out an early review or partial review of the plan if further housing provision is needed to meet the needs of Birmingham or Tamworth. Alternatively, in the case of Tamworth, the need for further housing provision could be dealt with through the Lichfield District Local Plan: Allocations document (**MM1**);
- That the housing requirement is expressed as a minimum (**MM2**);
- That the role of the sites identified as having the greatest opportunity for wind energy development be clarified (**MM3**);
- That phasing restrictions be removed from the Strategic Development Allocations and the Broad Development Location identified in the plan (**MM4- MM8**);
- That the extent of the zone of influence of the Cannock Chase Special Area of Conservation be defined (**MM9**);
- That the end date of the plan be extended from 2028 to 2029 (**MM10**);
- That the minimum housing requirement for the period 2008 – 2029 be increased to 10,030 dwellings (**MM11**);
- That additional Strategic Development Allocations at Cricket Lane, Deanslade Farm and Fradley East be identified (**MM12 – MM24**); and
- That Policy H2 be amended to bring it in line with nationally set thresholds (**MM25**).

planning judgement. I consider that there is a reasonable basis for the planning judgements the Council has made and see no support for the suggestion that the Council has used the Sustainability Appraisal to bolster predetermined decisions.

102. The Sustainability Appraisal is not a simple document. The commonest criticism of it is that it is hard to understand. There is some truth in this. Indeed the Council was itself hard pressed at times to explain the intricacies of the Sustainability Appraisal and only did so by way of additional explanatory notes - although to be fair it needed to do so only when the document was subjected to forensic examination. However, a document of this scope is necessarily complex and while parts of it require close reading, its main points are clearly drawn out in the non-technical summary. Having considered the various criticisms made of the Sustainability Appraisal, and mindful of the point that the preparation of such a document is not to be treated as an obstacle course, I am of the opinion that it is a reliable piece of evidence.

Issue 3: The appropriateness of the Spatial Strategy

Background

103. This section seeks, firstly, to establish whether the Strategic Development Allocations and the Broad Development Location identified in the submitted Plan (the identified sites) are suitable and sustainable, whether they are deliverable or developable, whether they are viable and whether they are the most appropriate having considered reasonable alternatives. Secondly, it considers whether the sites selected by the Council to accommodate the identified shortfall in housing provision (the additional sites) are suitable and sustainable, whether they are deliverable or developable, whether they are viable and whether they are the most appropriate having considered reasonable alternatives.

Identified Sites

104. The Strategy in the Plan seeks to concentrate major growth within the urban area, at a Broad Development Location on the edge of an urban area and at five Strategic Development Allocations (SDA's) four of which are on the edge of urban areas - the fifth being Fradley which is centred on a former airfield. Other than that, development will for the most part be focussed on Key Rural Settlements ie those having the widest range of facilities and judged to be the most capable of accommodating growth.
105. On the face of it this is a sustainable strategy as it makes use of existing facilities and infrastructure in the urban areas, provides opportunities to travel by means other than the private car and reduces the need to travel. This is borne out by the findings of the Sustainability Appraisal which, for the reasons set out above, can be treated as a reliable piece of evidence. However, it is necessary to look at individual sites that go to make up the strategy in more detail.

South Lichfield SDA

106. This site is located on the southern edge of Lichfield relatively close to the city centre. The development of this site would enable the construction of a link of the Lichfield southern by-pass.
107. The long term development potential of a sizeable proportion of this site is recognised in the existing Lichfield District Local Plan where it is designated as an Area of Development Restraint – that is a site which it is not essential to keep open for Green Belt purposes. The remainder of the site is in Green Belt but it is proposed that this land will be kept in open uses such as playing fields and green infrastructure. It is relevant to note that since the initial hearings the Council has resolved to grant outline planning permission for up to 450 houses on the site subject to the signing of a section 106 agreement⁴⁸.
108. The benefits of such an urban extension in terms of sustainability have already been mentioned, more information is contained in the Sustainability Appraisal⁴⁹. While it is important not to overstate the extent to which future occupants of this site would walk, cycle or use public transport, the fact remains that these options would be open to them. The site is, therefore, sustainable in these respects.
109. Nonetheless, the site will generate additional trips by car and it was the effect that these would have on roads in the vicinity and the role that developing the site would play in completing the southern by-pass which were the principal unresolved issues discussed at the initial hearings.
110. Dealing firstly with the issue of the southern by-pass, the uncompleted section of this road runs between Birmingham Road and London Road under the railway bridge a short distance to the east of Birmingham Road. It is common ground that this section of by-pass needs to be completed in the plan period. Previously the Council had taken the view that the completion of the by-pass was a pre-requisite for developing the South Lichfield SDA.
111. However, while the developer of the site proposes to construct, at their own expense, the section of by-pass between London Road and the railway, they do not control the land necessary to complete the link to Birmingham Road. The Council regards this as acceptable and no longer requires the completion of the by-pass as a condition of developing the site.
112. The completion of the final section will be the responsibility of Staffordshire County Council (the County Council) which will make a bid for the necessary funding. The additional housing site which the Council proposes to allocate at Deanslade Farm will also assist in the provision of

⁴⁸ Ref: 12/00182/OUTMEI.

⁴⁹ CD1-8 Sustainability Appraisal Update. Table 16.1. Pages 198-200.

this section of the by-pass. The contribution that the South Lichfield SDA would play in providing the last link in a by-pass that will perform an important function in traffic management for the City is a factor in its favour.

113. It was suggested that a site that requires a piece of infrastructure as costly as a section of the by-pass is neither sustainable nor viable and that there are more economic sites that could be developed. However, this overlooks two facts. Firstly, the role of the additional section of the by-pass is not simply to serve the site, it will assist in the completion of the by-pass which will have wider benefits to the City. Secondly, the evidence is that the development of the site is a viable proposition⁵⁰. This was confirmed by the developer at the initial hearings who made clear that the proposed scheme would pay for the section of by-pass to be provided and allow for an adequate profit.
114. As to the effect that developing this site would have on the nearby roads, it is common ground that local roads, particularly London Road, are congested at peak times. Proposals for gaining access to the site have changed over time, at the time of the initial hearings the latest proposal involved three linked junctions onto London Road where only one existed previously.
115. Although concern was expressed at the initial hearings about the effect that this would have in highway terms, traffic modelling carried out in support of the planning application on the site indicated that - assuming the existing modal split, taking account of all proposed uses on the site and assuming either that the by-pass has been completed or that it has not - the effect on local roads would not be severe.
116. Based on this and other highway evidence produced in the run up to the initial hearings⁵¹, the Highways Agency, which had issued a holding objection, and the County Council both unequivocally confirmed at those hearings that all outstanding highway objections to the development proposed on this site could be overcome. On that basis I am satisfied that the site is capable of being accessed and in this respect the selection of the site as a Strategic Development Allocation is soundly based.
117. Those opposing the development of the site pointed out that they had not seen or had the opportunity to comment on the latest modelling information. However that information relates to the latest junction design which is a matter to be dealt with as part of the planning application - something that is beyond the scope of the Examination. The purpose of the Examination is to decide whether the allocation is soundly based. To do this it is not necessary to know the full details of the proposed access but to be satisfied that an access is capable of being

⁵⁰ CD5-6. Initial Strategic Sites Viability Assessment: Summary Report. Table 4.2.6.

⁵¹ CD2-14 Transport Appraisal of Spatial Strategy for Lichfield City Addendum & SQ-M3iii-LDC1 Joint Statement of Persimmon Homes, Lichfield District Council, Staffordshire County Council and (in part) the Highways Agency.

provided. The evidence indicates that it is – a conclusion borne out by the Council's subsequent resolution to grant planning permission on the site.

Conclusions on South Lichfield SDA

118. Drawing together my findings on the South Lichfield SDA I conclude that it is in a suitable and sustainable location, there are no insurmountable technical barriers to its development, it is deliverable in the sense that it is in the control of a developer with a confirmed intention to develop it, it is viable and there is a reasonable prospect of housing coming forward on it within the next 5 years. The decision to allocate the site as a SDA is, therefore, soundly based.

East Rugeley SDA

119. This SDA is located on the eastern edge of Rugeley, a market town in the neighbouring district of Cannock Chase. It consists of three sites; the Power Station site on which planning permission has been granted for, and development commenced on, a scheme including some 600 houses; the Borrow Pit Land which has a capacity of approximately 450 houses; and the British Waterways site (now the Canals and Rivers Trust) with a capacity of some 80 dwellings. 500 of the approximately 1,130 dwellings on this SDA would be to meet the needs of Rugeley.

120. Retail and community facilities are planned within the development. The SDA, which relates well to Rugeley and involves the reclamation of brownfield land, is in a suitable and sustainable location⁵² and that part of it covered by the existing planning permission is certainly deliverable. The Borrow Pit site needs to be filled before it can be built on and given that Rugeley Power Station produces less ash than previously, this process is unlikely to be completed before 2021.

Alternative Sites at Rugeley

121. An alternative put forward was that the nearby Key Rural Settlement of Armitage with Handsacre should accommodate more growth. This settlement has a range of local facilities and is close to Rugeley Town Station but the option put forward would involve alterations to the Green Belt boundary to the west, south and south east of the settlement. The Rugeley SDA, by contrast, is not in Green Belt.

122. Green Belt boundaries should only be altered in exceptional circumstances. Given that there is an alternative, more sustainable, site outside the Green Belt capable of helping to meet both the Council's and Rugeley's housing needs then it is reasonable for the Council to select that site.

Conclusions on East Rugeley SDA

123. The site is in a suitable and sustainable location. There is a reasonable prospect of this site being available before 2021; the British Waterways site could be available earlier. These parts of the SDA are, therefore,

⁵² CD1-8. Sustainability Appraisal Update. Table 19.1, page 215

developable. The SDA as a whole is viable⁵³ and there are no substantial technical or environmental reasons why it should not be developed. The site is the most suitable having considered reasonable alternatives. The decision to allocate this site as a SDA is, therefore, soundly based.

East of Burntwood By-pass SDA

124. This site is well related to the urban area of Burntwood and within walking distance of existing services and facilities. It is in a suitable and sustainable location⁵⁴ and there are no technical or environmental reasons why it should not be developed. It was allocated as an industrial site in the 1990's and it was hoped that road improvements in the area would enhance its attractiveness to the market. They did not and following investigation of the site's potential⁵⁵ it was decided that there was no reasonable prospect of it being developed for that purpose.

125. The site has no ownership constraints and it was reported at the initial hearings that a development partner was shortly to be appointed with a view to submitting a planning application in the near future and starting building on site within 5 years. The indications are that the viability of the site is marginal⁵⁶ but this would improve as and when the economy recovers. The Council also indicated that if economic viability were to prove an issue it would look again at its affordable housing requirements.

Alternative Sites at Burntwood

126. Earlier versions of the Plan proposed a broad direction of growth to the south and south east of Burntwood. This included a site at Highfields Road and a site south east of Burntwood in the vicinity of Hammerwich both of which were promoted at the hearings. An additional site at Meg Lane, which lies to the north of Burntwood, was also promoted at the initial hearings.

127. Following public objections to the extent of Green Belt releases that developing to the south and south-east would cause, the Council elected to pursue an approach of limiting Green Belt release around Burntwood and bringing forward brownfield sites. It was assisted in this by the fact that further housing sites within the urban area had come forward - including the site at Mount Road Industrial Estate.

128. It was suggested that reliance should not be placed on urban sites because their viability for housing had not been established, indeed a viability assessment of the Mount Road site prepared by a representor⁵⁷ concluded that it was not viable for housing.

129. However, there is no suggestion that the Mount Road site is likely to come forward in the short term, the Council's assessment is that the site

⁵³ CD5.6. Initial Strategic Sites Viability Assessment: Summary Report. Table 4.2.6

⁵⁴ CD1-8. Sustainability Appraisal Update. Table 17.1. Pages 205-206.

⁵⁵ CD2-32. Employment Land Review. Pages 89-91

⁵⁶ CD5.6. Initial Strategic Sites Viability Assessment: Summary Report. Table 4.2.6

⁵⁷ HD33. Mount Road Industrial Estate Viability Assessment

is developable in the next 5-10 years⁵⁸. Any improvement in market conditions over that time would have a positive effect on that site's viability as would any flexibility shown by the Council in affordable housing requirements. It cannot, therefore, be concluded that urban sites such as this will not come forward.

130. There is, therefore, no clear advantage in the suggestion that one or other of the greenfield sites referred to above should be allocated for housing either to replace urban capacity sites or to provide additional capacity should the East of Burntwood By-pass SDA not deliver the number or type of housing anticipated.
131. All of these other sites are in Green Belt and, to repeat a point made earlier, Green Belt boundaries should be altered only in exceptional circumstances. Exceptional circumstances have not been demonstrated. Moreover, one of the purposes of Green Belt is to assist in urban regeneration by encouraging the recycling of urban land. It is difficult to see how releasing housing sites in the Green Belt as an alternative to developing urban sites or the East of Burntwood By-pass SDA would assist the regeneration of Burntwood, which is one of the Strategic Objectives of the Plan.
132. The alternative sites put forward at Burntwood are not, therefore, preferable to the strategy proposed in the Plan of focussing development in the urban area.

Conclusions on the East of Burntwood By-pass SDA

133. The site is in a suitable and sustainable location, it is developable, it is or could be made to be viable and it is the most suitable having considered reasonable alternatives.

North of Tamworth

134. At the time of the initial hearings it was estimated that Tamworth's housing shortfall amounted to 1,000 dwellings and it was proposed that 500 of these would be accommodated in a Broad Development Location located to the north of Tamworth on land to the east and west of the railway. This Broad Development Location, which would also accommodate 500 houses to meet Lichfield's needs, was to be planned comprehensively with the adjoining Anker Valley Sustainable Urban Extension proposed in the emerging Tamworth Local Plan. Both would rely on improvements to the local highway network - possibly involving the construction of the Anker Valley Link Road.
135. As a result I concluded in my interim findings that while there was no certainty that the Anker Valley scheme would come forward there remained a reasonable prospect that it would - given Tamworth Borough Council's firm commitment to it. However, if this proved not to be the case then the Council (Lichfield Council that is) would need to reconsider its position when preparing the *Lichfield District Local Plan: Allocations*

⁵⁸ CD2.23. Strategic Housing Land Availability Assessment 2012. Table B.33, page 64.

document when it would be considering the Broad Development Location in more detail.

136. As has been established earlier in this report (paragraph 11) the situation had changed radically by the time of the resumed hearings. Tamworth's estimated housing shortfall had increased from 1,000 to 2,000 dwellings and although the Council had agreed to take a proportion of the additional 1,000 dwellings it had yet to be determined how many that would amount to. What is more, Tamworth Borough Council decided that the Anker Valley Relief Road was not viable and deleted it from its emerging plan as well as significantly reducing the extent and capacity of the Anker Valley scheme so that it would now accommodate only some 500 dwellings or so. Moreover, Tamworth Borough Council had resolved to grant outline planning permission⁵⁹, subject to the signing of a section 106 agreement, for 535 dwellings on the land in Anker Valley that it is proposing to allocate.
137. The situation had also changed in Lichfield in that the Council had resolved to grant outline planning permission⁶⁰, subject to the signing of a section 106 agreement, for 165 dwellings in the western part of the Broad Development Location at Browns Lane. It was also considering an outline planning application⁶¹ for up to 1,000 dwellings on the eastern part of the Broad Development Location at Arkall Farm. The Council confirmed at the resumed hearings that it had resolved all matters relating to this application, including concerns about the way development would relate to the surrounding countryside, and the only outstanding matter related to the effect that such a scheme would have on the local highway network.
138. These various changes have not had an effect on the suitability and sustainability of the Broad Development Location in a number of respects as it is still, or has the potential to be, well related to the urban area of Tamworth with the range of facilities that this provides. Moreover, there was no suggestion at the resumed hearings that it was not deliverable or developable, subject to agreement on highway matters, or that it was not viable. Nonetheless, the lack of agreement as to the effect that developing the Broad Development Location as a whole would have on the highway network raises the question of whether it is capable of being developed in full.
139. Staffordshire County Council, supported by Tamworth Borough Council, is of the opinion that the Broad Development Location, other than Browns Lane, should be deleted from the Plan. In its judgement the evidence indicates that the local roads have the capacity to accommodate 700 or so extra dwellings - and that capacity had been used up by the resolutions to grant planning permission for 535 dwellings in Anker Valley and 165 dwellings at Browns Lane. The highway evidence produced by

⁵⁹ Ref: 0105/2014

⁶⁰ Ref: 14/00018/OUTM

⁶¹ Ref: 14/00516/OUTMEI

the developer of the Arkall Farm site, on the other hand, indicates that the local roads could accommodate up to 1,000 more dwellings.

140. The Council takes the view that the highways debate has far to go before it reaches its conclusion and that the Broad Development Location should be retained in the Plan as there is a reasonable prospect that some additional housing, over and above that which it has been resolved to permit, will be able to be accommodated.
141. I share the Council's view on this point. While I have no doubt about the seriousness of the problems of congestion and highway safety that could result from the overdevelopment of this Broad Development Location, I consider that it is too soon to conclude that local roads can accommodate no more development. I consider that, in principle, the 'monitor and manage' approach offers a way forward. With such an approach the actual impact of various increments of development is monitored annually as it is brought forward with trigger points being built in to any planning permission granted to govern the amount of development.
142. While I acknowledge that the County Council is wary of adopting such an approach in this instance, influenced no doubt by the breadth of the gap between its professional assessment of the capacity of the local roads and that of the developers professional advisers, I consider that there is still scope for discussion on the details of a 'monitor and manage' scheme insofar as it would apply to this site and on other matters which have yet to be agreed⁶².
143. I accept that it would have been preferable if agreement had been reached on the principle of access to the Broad Development Location but in this instance the Council is reacting to major changes that have occurred late in the day and which are beyond its control. Moreover, I agree with the Council that it is likely that the bulk of the Broad Development Location will not come forward until the later stages of the Plan so if alternative land needs to be found there will be time to do this.
144. For these reasons I consider that the Broad Development Location is a suitable and sustainable location, that it is deliverable or developable and that it is viable. If it transpires that the Broad Development Location as a whole is not capable of delivering something in the order of 1,000 dwellings then **MM1** provides the mechanism through which additional land could be identified either through a review of the Plan or through the preparation of the *Lichfield District Local Plan: Allocations* document.

Alternative Sites at Tamworth

145. An alternative approach suggested by representors was to cater for development needs in the area by developing on the edge of Fazeley, a Key Rural Settlement a short distance to the west of Tamworth where the Council is promoting development within the defined urban area. It was

⁶² RHD-02. Summary Statement – Land north of Ashby Road, Tamworth (Savills, Peter Brett & Staffordshire County Council).

pointed out that development on the edge of Fazeley has previously been assessed and found to be somewhat more sustainable than developing to the north of Tamworth⁶³. Such an approach would not be dependent on development at Anker Valley.

146. However, Fazeley, unlike the land north of Tamworth, is in Green Belt and development in the manner proposed would involve an alteration of Green Belt boundaries, something which should only be done in exceptional circumstances. No such exceptional circumstances have been demonstrated. It is quite legitimate for the Council, therefore, to select an option which - although somewhat less sustainable - avoids developing in Green Belt.

Streethay SDA

147. Streethay SDA is located on the eastern edge of Lichfield. It is within walking distance of a range of services and facilities within the City including Lichfield Trent Valley Station. Since the initial hearings the Council has passed a resolution to grant planning permission for 750 houses, shops and a care village on the site together with additional parking for the nearby station⁶⁴.

148. Streethay SDA is well related to Lichfield City. Of particular significance is its proximity to Lichfield Trent Valley Station and the opportunity it offers to improve on the existing limited provision of parking at that station. Clearly if this station is to be used to its full potential then improvements to it will need to be made, including the provision of disabled access, and the Council is working with other interested bodies to this end. Nonetheless the proximity of this station to the SDA and the opportunity it would offer to the future occupants of the SDA to use the train is an important point in its favour.

149. There are, however, no plans to improve the frequency of train services to Birmingham and the fact remains that future occupants of the site will be largely reliant on the private car. Access to the site would be onto Burton Road, a busy approach road to the City with a nearby junction onto the A38. While Burton Road is undoubtedly congested at peak times neither Staffordshire County Council nor the Highways Agency have raised an objection in principle to the proposed SDA.

150. Streethay is not administratively part of the City and concerns were expressed that its identity as a separate community would be submerged by the development of the SDA. This is a matter which, to a large extent could be addressed through the detailed design of the site. Some sense of separation could, for example, be achieved by the suitable positioning of open space.

⁶³ CD2-31 Tamworth Future Development and Infrastructure Study. Table 9.1 page 78, Option F.

⁶⁴ Ref:12/00746/OUTME1.

151. Streethay SDA is, therefore, in a suitable and sustainable location⁶⁵ and there are no technical or environmental constraints to its delivery that cannot be overcome. The site is in the control of a developer with a confirmed intention to develop and there is a reasonable prospect that houses will be built on it in the next five years. The site is therefore, deliverable. Moreover, the evidence is that the site is economically viable⁶⁶ - a point confirmed by the developer. The proposal to allocate the Streethay SDA is, therefore, soundly based.

Fradley SDA

152. The existing housing provision at Fradley consists of an older, smaller residential area known as Fradley Village and a more recent, larger area known as Fradley South. The latter area is set on an old airfield as is the adjacent employment park, the largest employment location in the District. Some of this employment land has been judged to be surplus to requirements.⁶⁷

153. The proposed SDA at Fradley consists of some 750 houses on brownfield land formerly allocated for employment uses and some 250 houses on a greenfield site to the north of Hay End Lane. In the submitted Plan an area of land to the east of Gorse Lane was to be retained in employment use.

154. Fradley is defined as a Key Rural Settlement in the Plan. The question was raised as to whether it was a sufficiently sustainable settlement to warrant that designation. Alternatively it was argued that, given the amount of development allocated to it, it should have been given another designation more akin to that of a main settlement. However, these are largely semantic points - more important is whether it is a suitable and sustainable location for the level of growth proposed.

155. Judged in terms of accessibility by public transport to then existing services and facilities, Fradley has not previously been identified as one of the most sustainable rural settlements⁶⁸. However, the provision of further housing would create the opportunity to bolster the provision of facilities in the settlement⁶⁹. Furthermore, Fradley's potential to provide a suitable location for development outside the Green Belt has been recognised in previous plans and much of the development now proposed would make use of previously developed land - which is a point in its favour⁷⁰.

⁶⁵ CD1-8. Sustainability Appraisal Update. Table 16.1, pages 198-200 (where Streethay SDA is considered as part of the appraisal for Lichfield City). HD34 contains other references from CD1-8.

⁶⁶ CD5-6. Initial Strategic Sites Viability Assessment: Summary Report. Table 4.2.6.

⁶⁷ CD2-34. General Employment, Existing Estates and Land Allocations: A Market Assessment, page 44.

⁶⁸ CD2-69 Rural Settlement Sustainability Assessment 2011

⁶⁹ CD1-1 Lichfield District Local Plan: Strategy, Policy Frad2 page 124.

⁷⁰ National Planning Policy Framework, paragraph 111.

156. There is no substantial evidence to suggest that there are insurmountable technical or environmental constraints to the development of this SDA. It is outside the safeguarding zone for the preferred route of HS2 (the proposed high speed link) and there is little to indicate that the presence of a nearby pig farm would cause any air quality or odour problems that could not be dealt with at the planning application stage. Concerns about existing views across the site north of Hay End Lane could also be dealt with at the planning application stage.
157. There was discussion at the initial hearings about whether additional school facilities should be in the form of an extension to the existing school or on a new school site – with the existing school governors favouring the latter approach. It was confirmed that either approach could be accommodated in emerging proposals for the SDA. The Fradley SDA is, therefore, in a suitable and sustainable⁷¹ location.
158. Both of the proposed housing sites are controlled by developers who have expressed a firm intention to develop them. The Council has resolved to grant planning permission subject to signing a section 106 agreement for a 750 house scheme on the land formerly allocated for employment and for a 250 house scheme on the green field site⁷². These sites are, therefore, deliverable. The evidence is that these sites are economically viable⁷³ - something which the developers confirmed at the initial hearings. The decision to allocate the Fradley SDA is, therefore, soundly based.

Alternative sites at Fradley

159. At the initial hearings it was suggested that brownfield land to the east of Gorse Lane (Fradley East) currently allocated for employment should be used for housing rather than the greenfield site to the north of Hay End Lane. This proposal has attracted some local support. These arguments have been overtaken by events as the Council now proposes to allocate this land for housing as one of the additional sites needed to make up the identified shortfall in housing provision.
160. Land to the west of Gorse Lane (Fradley West) was also promoted as an additional site. This will be dealt with later in this report.
161. The question of whether smaller, non-strategic sites at Fradley, such as the site controlled by the Booth Trustees, should be developed for some form of housing is a matter that would more appropriately be dealt with through the preparation of the *Lichfield District Local Plan: Allocations* document.

Rural Areas

162. In addition to Fradley, which has been discussed above, five Key Rural Settlements have been identified in the Plan (Fazeley, Shenstone,

⁷¹ HD30 Updated Sustainability Appraisal: Fradley, particularly Table 20.1 on page 220.

⁷² Ref: 13/00633/OUTM.

⁷³ CD5.6. Initial Strategic Sites Viability Assessment: Summary Report. Table 4.2.6.

Armitage with Handsacre, Whittington and Alrewas). These settlements have been selected following an assessment of the sustainability of all rural settlements⁷⁴. It is proposed that these, along with 'other rural' settlements would accommodate some 16% of the housing growth in the District (around 11% in the key rural settlements and 5% in the 'other rural' areas). For each key settlement an upper and a lower figure is proposed with sites within the settlement boundaries that are judged to be deliverable or developable⁷⁵ making up the lower figure (a capacity of around 575 dwellings) while the upper figure is made up of these sites plus additional sites which will be identified through the *Lichfield District Local Plan: Allocations* document (sites with an additional capacity of some 440 dwellings).

163. The ability of these settlements to accommodate this level of growth in suitable, sustainable, deliverable and developable locations was not questioned at the initial hearings. On the contrary the suggestion was made that these figures would not reflect the sustainability credentials of the settlements and should be increased.

164. The figures are expressed as a minimum. There is a possibility, albeit one considered by representors to be remote, that more houses could be allocated through the *Lichfield District Local Plan: Allocations* document or through Neighbourhood Plans/Community Plans. Nonetheless, it is also the case that such an approach would increase the amount of land to be released from Green Belt and the exceptional circumstances that would warrant this have not been demonstrated. There is no clear evidence as to why such an approach would be superior to the strategy proposed by the Council of focussing development on large sites on the edge of principal settlements on land for the most part outside Green Belt.

165. It was also pointed out that Little Aston has not been identified as a Key Rural Settlement even though it has been assessed as one of the most sustainable of the rural settlements. The reasons for this are partly that it is not a freestanding settlement but an adjunct to the West Midlands conurbation and partly that it has few potential housing sites within its boundaries.

166. As a result additional development there would involve the release of Green Belt land in a position where there is a particular need to check the unrestricted sprawl of large built up areas and to safeguard the countryside from encroachment. The decision not to take this approach - which would conflict with two of the purposes of Green Belt - is, therefore, soundly based.

⁷⁴ CD2-69 & CD2-70 Rural Settlement Sustainability Study dated 2011 and 2008 respectively.

⁷⁵ CD2-23 Strategic Housing Land Availability Assessment 2012