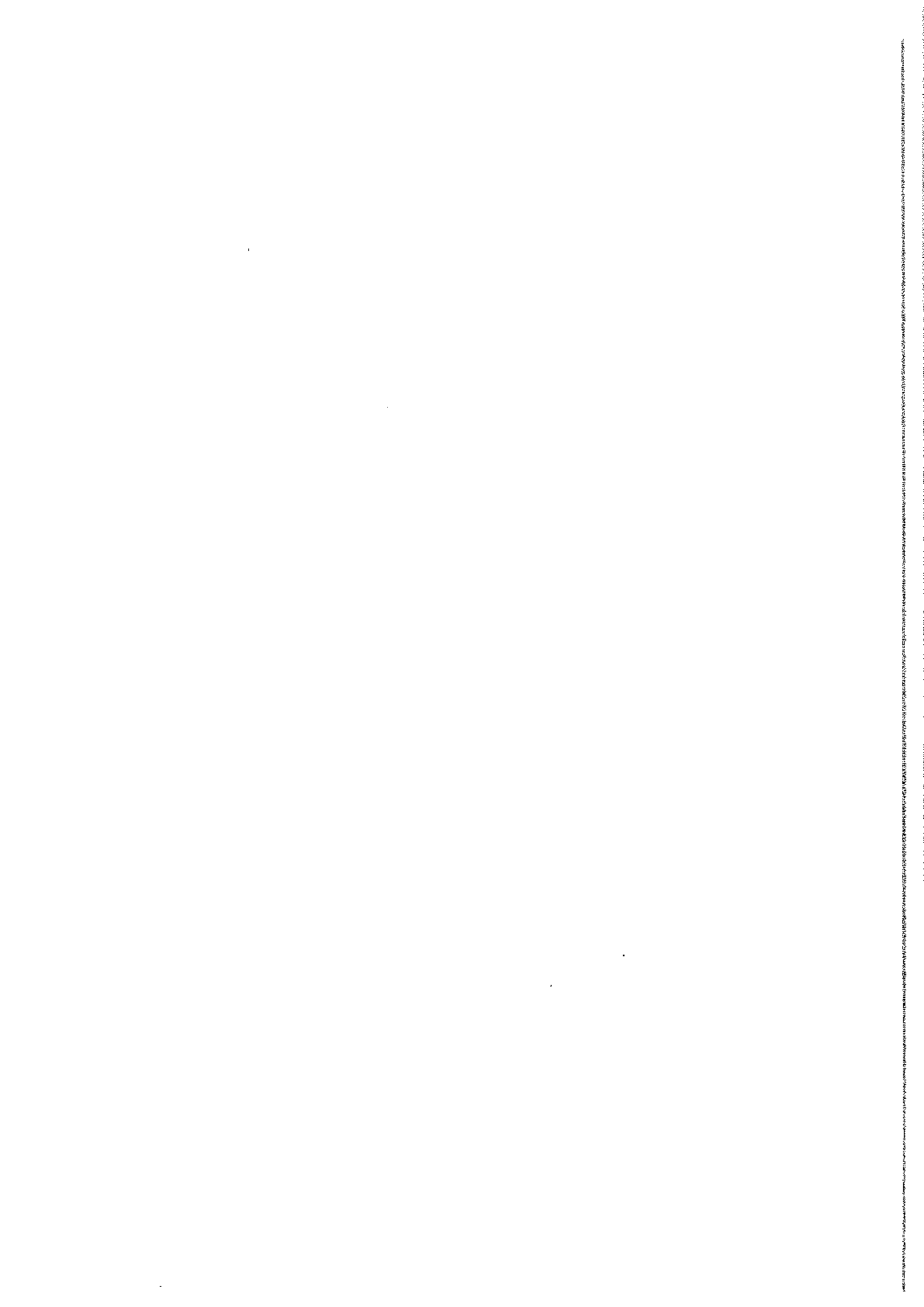


Neighbourhood Plan Committee: 19 September 2016 APPENDIX 1

**LIST OF RESPONSES RECEIVED TO THE PRE-SUBMISSION NEIGHBOURHOOD
PLAN CONSULTATION 15 JULY – 9 SEPTEMBER 2016**

Response Number	Author	Statutory/Non-Statutory
1	Ms B Mears Breeze	Non-statutory
2	LDC Planning	Statutory
3	Mr T Galloway	Non-statutory
4	Birmingham CC - Planning	Statutory
5	Sport England	Statutory
6	Highways England	Statutory
7	Michael Fabricant MP	Non-statutory
8	Mr A Smith	Non-statutory
9	Councillor P Ray	Non-statutory
10	Coal Authority	Statutory
11	Historic England	Statutory
12	Councillor R Awty	Non-statutory
13	Staffordshire County Council	Statutory
14	Lichfield Civic Society	Non-statutory
15	Lichfield District Council	Statutory
16	South Lichfield Residents Group	Non-statutory
17	Natural England	Statutory
18	Ms Lorna Bushell	Non-statutory
19	Walsall Council	Statutory
20	Mr M Bowers	Non-statutory
21	Persimmon/St Modwen	Non-Statutory



Response 1 (Public)

Dear Whom It may concern

I've Just finished reading the plan and have the following commented:

Figure 5.1 Primary Movement Routes. I would suggest that the pedestrian/cycle and vehicle movement there is a significant 'key note of conflict' at the junction of Saint John's Street and A157 and in addition at the point of entrance to the city train station. This junction is difficult to cross/cyclist as a pedestrian without stopping in the rather small central reserve and with a bike it's near impossible to stop in central reserve. Also beyond crossing the junction towards the station it is of mixed cycle/pedestrian usage which whilst preferable to mixed car/bike usage it's near impossible to navigate on your bike with pedestrians in the path. Will this be addressed as part of new Friarsgate development?

Also on the same figure you show cycle routes around the Walsall road estate on Walsall road. This cycle route is a mixed use area with vehicles. More often than not cars are parked on the bike cycle area, this I would say is a major discouragement to cyclists you constantly have to rejoin the main carriage way with cars. I would suggest this area needs looking at to improve experience for cyclists.

There appears to be no provision for bike safe routes from Boley Park to the city centre is this not something that can be aimed for?

More of a general question. With the large proposed site for development of residential area will there be a requirement of green open space within that area to maintain the open feel of Lichfield? What is the additions proposed provision for services such as schools and doctors/dentists? I would suggest lessons are learnt from Walsall Road estate development in terms of provision for parking (most houses have 2 or more cars it's necessary for work traveling to and from schools) yet the provision of either parking with houses or roadside parking is low. The roads are too narrow to navigate, whilst I appreciate you could say that was a design feature to slow down traffic it's also not it for purpose when you see emergency vehicles struggling to gain access. Can the report extend state the objectives for this? Surely this should be within the plan.

Finally as identified we want to encourage sustainable, green transport (I'm all for that) but as someone that used to commute to the City train station on her bike maybe the plan should include improved bike storage (suggest you look to Netherlands for an example of where this is done well), if you can't store your bike safely whilst you commute to work you're more likely to drive. Current situation has bike parking on station platforms which means either carrying them up the stairs or using the lift which is inconvenient. If you make the alternative to the car 'easy' and safe people are more likely to use it.

Regards

Bethany Mears-Breeze

RESPONSE 2 (STATUTORY)

Lichfield District Council
Planning Policy
PO Box 66
Lichfield
Staffordshire
WS13 6QB

Our ref: UT/2007/101798/AP-
03/PO1-L01
Your ref: Lichfield City
Neighbourhood Plan
Date: 20 July 2016

Dear Sir,

**LICHFIELD CITY NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION
(REGULATION 14)**

Thank you for consulting the Environment Agency on the above Neighbourhood Plan which was received on 15 July 2016.

We have **no objections** to the proposed Neighbourhood Plan as submitted.

We have the following comments to make in regards to City Centre Redevelopment Sites.

Redevelopment of sites outlined in the Lichfield City Neighbourhood Plan will be supported in principle if developed inline with Core Policy 3 of the Lichfield District Local Plan Strategy 2015. Core Policy 3 ensures sustainable development including remediation of contaminated brown field sites such as those sites outlined in the Lichfield City Neighbourhood Plan.

Yours faithfully,

Mr Tom Newman
Planning Advisor

Direct dial 01543404857
Direct e-mail tom.newman@environment-agency.gov.uk

Response 3 (Public)

Lichfield Neighbourhood Plan

There are some comments that I wish to make about this document that are relevant for cyclists and for the advantages that more cyclists will bring to Lichfield.

As I have lived here for less than a year, I maybe notice things that local people don't. Many houses here have several cars and they are used often for trivial short journeys. Buses are single deck and many nearby villages have a very poor service. Possibly this is part of the reason for the continuous stream of cars entering the city each morning. The city has devoted a large proportion of its town centre to car parking and the daily costs of using them are very low.

Missing from the plan is any reference to keeping cars out of the centre by the development of 'park & ride' facilities. Objectives of the plan include the following *'Improve pedestrian access into and around the City Centre and between Lichfield Railway Station, Trent Valley Rail Station and Cricket Lane'*. I worry that there is no enthusiasm for this objective because of the current meagre provision for cyclists and because of the lack of statistics to show how the Council wishes to change things. For example it is important to know the proportion of workers and students who travel by sustainable means. It is interesting to know the proportion of annual spending on cycle paths, cycle racks and path signs compared with the net cost of road maintenance and car parking.

An enthusiastic Council would at least employ an officer as a contact point for cyclists. It would publish an up-to-date map of cycle paths and routes (Issue 5 of 'Cycling in Lichfield District' will not be updated this year). Looking at the map I could not see why Darnford Park and Cathedral Walk in Leomansley are ignored?

Pre-submission period ends on September 9 2016. Please make changes to recognise that although Streethay is not in the District, the need for better cycle routes to the growing Streethay should be covered. After a transport census of modes of travel; targets for increasing cycle use should be published in this plan.

Tony Galloway

01827 867

cc: John Thompson, Chairman Lichfield Civic Society

Response 4 (Statutory)

Dear Mr Briggs,

Thank you for your letter of 15th July re the above.

As the draft plan accords with the Lichfield District Plan and does not about the boundaries of Birmingham, there is no impact as such. We therefore have no comments to make.

Thank you again for inviting us to comment and good luck with the examination and subsequent referendum.

Regards.

Neil Vyse
Principal Planning Officer
Planning and Regeneration - South
Birmingham City Council

0121 303 2238

Response 5 (statutory)

Thank you for consulting Sport England on the above document.

There is limited formal sport content in the plan due to the area therefore I have no comments in this regard.

However I would encourage you, within the 'movement' section to consider embedding the concept of 'active design' to help develop and improve legibility around the City and its connections with the wider area through active travel etc. I have provided a link below that will give you more information, access to the advice document which includes a checklist and case studies. The case study for Sheffield may be of particular interest as this has been very successful in retro-fitting improved public access and network of green/public spaces that encourage people to walk/cycle around the city and sit and enjoy green nodes along the way.

<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

Kind regards

Maggie Taylor
Principal Planning Manager - Central Hub

T: 020 7273 1753
M: 07795 603451
F: 01509 233 192
E: Maggie.Taylor@sportengland.org



RESPONSE 6 (STATUTORY)

LICHFIELD CITY COUNCIL
21 JUL 2016
RECEIVED

Our ref:
Your ref:

David Pyner
Assistant Asset Manager
9th Floor
The Cube
199 Wharfside Street
Birmingham B1 1RN

Deputy Town Clerk
Neighbourhood Plan
Lichfield City Council
Donegal House
Bore Street
Lichfield
WS13 6LU

Direct Line: 0300 470 3536

19 July 2016

For the attention of Tony Briggs

Dear Sir

NEIGHBOURHOOD PLAN- PRE SUBMISSION CONSULTATION

Thank you for contacting Highways England in relation to the Lichfield City Neighbourhood Plan.

Highways England are very keen to be included in the Neighbourhood Plan process especially for areas close to the Strategic Road Network such as Lichfield City, at this stage Highways England have no comment to make, however we would like to be consulted in all future on all further submissions

Yours sincerely

David Pyner
Area 9
Email: david.pyner@highwaysengland.co.uk



RESPONSE 7.

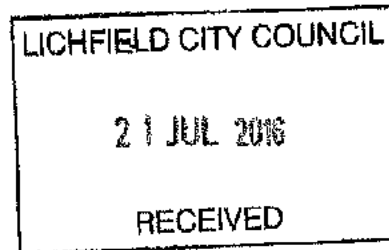


Michael Fabricant MP

House of Commons
Westminster
London
SW1A 0AA

19 July, 2016

Tony Briggs
Deputy Town Clerk
Lichfield City Council
Donegal Houses of Parliament Bore Street
Lichfield
Staffordshire WS13 6LU



Thank you for your letter and for the enclosure regarding the Lichfield City Neighbourhood Plan which I have had a chance to study. It is an impressive piece of work.

As requested, I shall use social media including Twitter and Facebook to publicise the consultation and I shall be interested to hear how many responses you receive.

With every good wish,

from the Member of Parliament for the Constituency of Lichfield
including the City of Lichfield, Abbots Bromley, Alrewas, Armitage, Burntwood, Chase Terrace, Chasetown, Colton,
Fradley, Hammerwich, Handsacre, Kings Bromley, Longdon, the Ridwares, Streechay, Whittington, and Yoxall.
website and email form: www.michael.fabricant.mp.co.uk

Response 8 (public)

Summary of a telephone conversation with Andrew Smith (Lichfield resident):

- **General support for the Neighbourhood Plan, but calls for greater emphasis on bus and coach access to the City, and particularly parking for coaches.**
- **Suggested previous site of furniture store at Cross Keys (currently a car park) as a suitable area for a coach park.**
- **Also put forward the possibility of using City Centre sites such as Quonians Lane in whole or in part as craft centres with demonstrations of historic skills such as pottery making to increase the tourist offer in the City and further encourage footfall**

Response 9

Dear Tony

As I said at the council meeting on 26 July I generally support the plan and in particular the definite need to increase employment in the city.

I make the following specific comments:

1. I see the Friarsgate development as a positive for Lichfield but as the plan identifies this does pose challenges for the Outer Retail Area.
2. I do though see that there are great opportunities for the Outer Retail Area with independent / niche shops and bars, cafes and restaurants set in the historic streets of the city and especially with the view of the Cathedral across Minster Pool if the development of the Bird Street Car Park goes ahead. I support that development in principle and in my view this could be a real game-changer for the city in developing the city's retail and leisure offering so that Lichfield becomes a destination for a niche and stylish shopping and leisure experience which will draw people from many miles away like eg Ludlow.
3. In addition to the City Council supporting the Outer Retail Area by promoting cultural events, providing improved signage etc I feel that the Outer Retail Area may well need financial support (at least initially after the opening of Friarsgate) to ensure that it thrives. This could be achieved by a reduction in business rates that apply to the Outer Retail Area under for example the discretionary reliefs that Lichfield District Council has. Hence I see that the City Council will have an important role in lobbying the District Council in this regard.

Regards. Paul

Paul Ray Chadsmead Ward Councillor
Lichfield District Council
07771 856931

RESPONSE 10 (STATUTORY)



The Coal
Authority

Resolving the impacts of mining

Coal Authority
200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T 0345 762 6848
T +44(0)1623 637000
www.gov.uk/coalauthority

Mr T Briggs
Lichfield City Council
BY EMAIL ONLY: deputyclerk@lichfield.gov.uk

31 August 2016

Dear Mr Briggs

Lichfield City Neighbourhood Plan – Submission

Thank you for the notification of the 19 July 2016 consulting The Coal Authority on the above NDP.

The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.

As you will be aware the Neighbourhood Plan area lies within the current defined deep coalfield. However as the area contains no mining legacy features or surface The Coal Authority has **no specific comments** to make on the Neighbourhood Plan.

In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to provide The Coal Authority with any future drafts or updates to the emerging Neighbourhood Plan. This letter can be used as evidence for the legal and procedural consultation requirements.

The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.

Yours sincerely

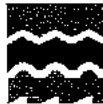
Mark Harrison

Mark Harrison *BA(Hons), DipTP, LLM, MInstLM, MRTPI*
Principal Manager

T 01623 637 119

E planningconsultation@coal.gov.uk

RESPONSE 11
(STATUTORY)



Historic England

WEST MIDLANDS OFFICE

Mr Tony Briggs
Lichfield City Council
Donegal House
Bore Street
Lichfield
WS13 6LU

Direct Dial: 0121 625 6887

Our ref: PL00030006

22 August 2016

Dear Mr Briggs

LICHFIELD CITY NEIGHBOURHOOD PLAN - REGULATION 14 CONSULTATION

Thank you for the invitation to comment on the Regulation 14 Neighbourhood Plan. Our comments remain substantively the same as those expressed in our earlier correspondence (4th March 2016) that is:

"Historic England welcome the protection afforded to the historic environment in Policy 12 "City Centre Redevelopment Sites". We have no other substantive comments on the Neighbourhood Plan".

I hope you find these comments helpful.

Yours sincerely,

Peter Boland
Historic Places Advisor
peter.boland@HistoricEngland.org.uk

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk



Subject:

FW: Neighbourhood Plan

Response 12

Dear Town Clerk,

I congratulate Cllr Thompson ,his committee, Lichfield City Council staff and Navigus for their work in producing an excellent Neighbourhood Plan.

My only observation, suggestions, are on the matter of City Centre pedestrianisation. I think we are rather behind our neighbouring towns and cities in still having a continual stream of traffic flowing around our ancient market square. I am aware that there have been earlier attempts, half-hearted in my opinion, to rectify the situation.

However, I do not believe that the problems are insurmountable nor do I believe that they should incur great expense. I believe that we should have a positive commitment to pedestrianisation and I am confident that our District and County Councils would give us their support. It is important that with the development of Friarsgate we do not, if traffic continues to flow through the City, create a split, ' north –south divide ' within the city centre.

I have picked quotes from the plan which generally support my case and have made suggestions which I hope will be considered including a very minor change to our 'Vision for Lichfield'.

5.3..... there will be increasing numbers of movements across the City and into the City Centre. It is important that the opportunity is taken for as many of these to be made by non-vehicular means as possible. In short, Lichfield City needs to become an easier place to navigate particularly on foot but also by bicycle.

2.11 District Council Local Plan.

Policy1

'People will be encouraged to enjoy the unique character of Lichfield City and its surroundings by walking or cycling.....'

Policy2

'Access to services and facilities will be enhanced to improve increased levels of walking and cycling....'

Vision for Lichfield City.

'The City Centre has reinvented itself into a popular leisure and retail destination which residents use has their first choice destination and has brought higher value tourism spend. One of the ways this has been achieved is by improving the linkages between the Cathedral- the jewel in its crown-and the City Centre itself. The retail offer has been improved and better linkages made between it and the range of creative events in the city.' It goes on to say 'The City centre has also become a more attractive place to navigate around. On arriving by train, it is easy to navigate and walk into and around the City Centre. There is a strong pedestrian connectivity between the various parts of the city channelling pedestrians from Friars gate through to the rest of the City Centre and the Cathedral.

Suggestions

*Change the sixth bullet point in Neighbourhood Plan Objectives to read...
Improve pedestrian access into and around the City and between Lichfield City Railway Station, Trent Valley Station and Cricket Lane.*

...and add a seventh bullet point.....

Create a traffic-free pedestrian area between Friarsgate and Lichfield Cathedral.

Regards Bob Awty.

Cllr Leomansley.

RESPONSE 13 (STATUTORY).



Wedgwood Building
Tipping Street
Stafford
ST16 2DH

Telephone: (01785) 276643
Email: james.chadwick@staffordshire.gov.uk
Please ask for: James Chadwick

Date: 9 September 2016

City Council Offices
Donegal House
Bore Street
Lichfield
WS13 6YX

VIA EMAIL ONLY

Dear Peter

Lichfield City Neighbourhood Plan

Thank you for consulting Staffordshire County Council on the pre-submission Neighbourhood Plan for Lichfield City.

The vision and ambition within the Plan is acknowledged though we do have some queries on the successful implementation of some of the policies.

Employment

It is noted that the some of the policies (particularly policy 1) are be dependent on an 'Economic Action Plan' that we have not seen. In order to assess the potential of success of these policies it would require the 'Economic Action Plan' to be produced in tandem with the final Plan or the Policies be re-framed.

The Plan makes reference to 'economic interventions' (para 4.15) to create market demand. It has to be questioned as to how interventions such as "subsidised rent or reduced business rates" can be delivered? Business rate relief potentially brings state aid issues into play and we ask how sensible it would be to try to force a developer to offer cheaper rents? If the aim of the City Council is to "create a market demand" for the site that's fine, but we query whether a policy in the neighbourhood plan is really the way to do this.

With this in mind we question the policy for "at least two hectares of office (Use Class B1a) and research and development (Use Class B1b) space" on Cricket Lane.



Whilst this level of B1 development may be desirable to include in the Plan policy a floor on acceptable employment uses may create issues for delivery. We consider an approach should simply be that B1 is an acceptable use for the site with support for a higher proportion of B1.

In relation to Policy 2 we question whether a planning policy could direct the terms of a leasehold agreement. In particular, the reference to using S106 to ensure that "such space is generally considered to be attractive to the start-up market." It is unclear how this would mitigate the impacts of a development. It is again questioned whether or not a planning policy is the right tool as opposed to an action for the City Council in negotiations with developers. It should also be noted that the wrap around support at managed workspace developments is often funded by local authorities, through EU funding etc. Before development takes place there will need to be clarity on whether funding for wrap around support etc is available.

Movement

We acknowledge the objective to encourage journeys by foot and bicycle and support the Policy provision for development to enhance key routes where appropriate. Improvements to sustainable routes are generally identified within Transport Assessments along with the impacts of new vehicular traffic on the local network. Suitable mitigation measures are then identified, Policy 4 will assist in securing improvements to the Primary Movement Routes where appropriate unless they already feature on the CIL R123 list. However, it is unclear in Policy 4 what is meant by the Primary Movement Routes being protected? How will they be protected; by whom; and are any of them at risk from development?

In relation to Paragraph 5.10 it is acknowledged that the City Council will use some of its meaningful proportion of CIL to help deliver improvements. The Plan goes on to state that the meaningful proportion could lever in funding from elsewhere but does not go into any detail, perhaps this section could be expanded to provide further clarity?

In relation to Non-policy Action A: Addressing points of pedestrian/vehicular conflict Clarity on pedestrian/vehicular conflicts and locations would be useful here as the scale of the maps in Figure 5.1 makes it difficult to understand exactly where the conflict is and the nature of the concerns at each particular location.

As a point of clarification when referring to movement routes there should be a distinction between routes that form part of the public right of way network and routes that could generally be defined as 'pavements'. In transport terminology 'Footpath' is used to describe a public right of way whereas footway (or footway/cycleway) is used to describe pavements adjacent to roads and made up pedestrianised areas/routes. Our Rights of Way team would be happy to provide advice and work together on any schemes which benefit residents through improvements to the path network.

Historic Environment

Section 1.1 of the draft Plan states that it considers '...economic and employment matters only,' and that all other issues are addressed within the 2015 Lichfield district Local plan. With this in mind it would be beneficial to provide a link at this point to the 2015 Lichfield District Local Plan for ease of access and to enable cross-referencing between relevant documents.

S3.2. The vision should include for the maintenance and enhancement of the city's historic character, particular within its medieval core. Developments must not be to the detriment of what makes Lichfield special – its unique historic character and sense of place.

S3.3. The Plan objectives could include a clear statement to 'maintain and where possible enhance the historic character of the city's medieval historic core through a sensitive sympathetic approach to the design of new build and the conversion of existing structures and the innovative use of public realm works.'

S5.12. Key within the provision of signage is the development of an appropriate strategy including considerations regarding design, scale, colour palette. This could extend to consider current and future historic interpretation within the city centre. This should also consider approaches to decluttering and could be part of a broader public realm strategy. – English Heritage (Historic England) Streets for All: West Midlands. This approach should link into the strategy regarding pedestrian linkages particularly within Lichfield's historic medieval core.

S7.0 (Tourism and Cultural Activities)

This section, particularly that element associated with Lichfield Cathedral might also like to draw attention to the Staffordshire Hoard, discovered in a field to the south of the A5 (Watling Street Roman Road). Evidence would suggest that there was activity in the area of the cathedral at the time that the hoard was gathered together and at the time of its deposition (c.660AD). Elements of the hoard were displayed in the Chapter House of the Cathedral along with the Lichfield Angel and the early medieval bible in the Cathedral's possession.

S8.0 (City Centre Redevelopment Sites)

S8.3. Bird Street car Park is highlighted as a potential redevelopment site. As part of the outline the text identifies 'certain key issues' which any development would need to address. The site lies within the historic core of Lichfield, the Lichfield Extensive Urban Survey (EUS, 2011) identified this site as lying within Historic Urban Character Area (HUCA) 1 which it considered to have high evidential (archaeological), historical, aesthetic and cultural significance. As such archaeological concerns would represent a key issue in a development proposal for

the site. Any scheme proposed for this site must, at the earliest opportunity, a full and detailed Historic Environment Desk-Based Assessment (HEDBA) to inform discussions and any future design process.

Flood Risk

It is noted that the Plan does not make any specific reference to Flood Risk or drainage and therefore Policies in the Local Plan will be applicable. However for information parts of the Outer Retail proposal area, around Minster Pool, are shown at risk on the indicative flood map published by the Environment Agency and any new development or re-development should take due regard of the flood risk posed in this area by raising finished floor levels of units and incorporating sustainable drainage to help lessen the burden on the sewer network around this area. Additionally, parts of the Inner Retail area - Frog Lane and Conduit Street especially - are also shown at risk from surface water, and again due regard should be given to rationalising the surface water risk to any development or redevelopment areas, to help prevent the displacement of surface water within any forthcoming proposals.

In terms of the redevelopment opportunities, Bird Street car park is not noted as having any major constraints and is afforded a surface water sewer network. Parts of the Quonians area is subject to the risk of surface water inundation so again, care should be taken during the design to rationalise these risks, whilst adhering to the rest of policy aims for pedestrian linkage and sightlines of the Cathedral.

As a general point of advice surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. The variety of SUDS techniques available means that virtually any development should be able to include a scheme based around these principles. Any drainage scheme should include water quantity, water quality and amenity benefits to help provide the adequate removal of pollutants, whilst incorporating an allowance for climate change within the design.

I trust the above will prove useful in amending the Plan as it progresses towards submission. If you have any further queries or would like to discuss please feel free to get in touch. Moving forward post implementation it would appear that you will need to liaise with our highways teams in relation to the Movement section. It may be worthwhile engaging in early discussion ahead of the final submission Plan being

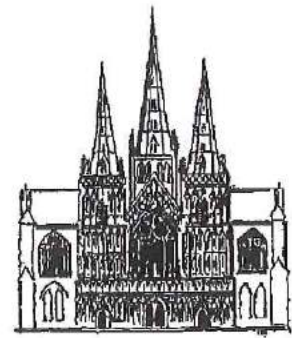
produced in case there are any matters that could be improved/enhanced through inclusion of wording in the Plan.

Yours sincerely

James Chadwick
Planning Policy Officer

RESPONSE N4 (PUBLIC)

LICHFIELD CIVIC SOCIETY



A Local Amenity Society founded in 1961
Founder Member of Civic Voice
Registered Charity No. 505302
<http://www.lichfieldcivicsociety.org.uk/>

President: Roger Hockney
Chairman: John Thompson
Secretary: David R. Mayes O.B.E.
Treasurer: Roger Chapman

Please reply to John Thompson 35 The Friary Lichfield Staffordshire WS13 6QH 01543 264140 chairman@lichfieldcivicsociety.org.uk

9th September 2016

Mr Tony Briggs
Deputy Town Clerk
Lichfield City Council
Donegal House
Bore Street
Lichfield
WS13 6LU

Dear Mr Briggs

Lichfield City Neighbourhood Plan 2016-2029

The Society welcomes the initiative of the City Council in proposing this plan and the opportunity to comment on it at this stage. However, the Society has a number of concerns relating to the current document which it would wish to be addressed by the City Council prior to final adoption.

The points of concern are included in the remainder of this submission.

1. Scope of the Plan.

The decision to prepare an "economic development" based neighbourhood plan for the City is considered to be somewhat unusual and is, in many ways, too narrow and restrictive in its scope and area of concern. Within the City area it does not enable a sufficiently comprehensive approach to be made in tackling issues in the planning of the City. Furthermore, because of the tightness of the City boundaries, and hence the plan boundaries, it excludes consideration of closely related and relevant locations, e.g. Streethay and Fradley. Another aspect of the scope and content is that much of the plan is concentrated on the City Centre. No reference is made to employment areas such as Eastern Avenue and Trent Valley where long standing employment land allocations are changing to retail or housing. Similarly, there is no consideration of the potential and most appropriate uses for the new commercial facilities to be provided on the Deans Slade SDA alongside the Birmingham Road and junction of the proposed southern bypass

2. There are a number of worthy aspirational statements included in the plan, but the practical steps for delivery of these, and in particular the lack of any information concerning financial resources for their achievement, is of concern. Allied to this, a number of matters and suggestions are raised, and then left unresolved or incomplete in the document.

3. One matter of critical concern to the Civic Society is the inadequate acknowledgement of the importance of the unique environmental and historic character (the Heritage asset) of the City Centre compared with the case being made for economic development. Simply put, if tourism is to bring about a great increase in visitor numbers to the City, we cannot justify eroding that asset by inappropriate design or over-development in the form of inappropriate levels of housing, retail and office detrimental to the existing character of the City. The plan should include explicit support for safe-guarding and enhancing the environment and historic character of the City Centre as a priority in the plan objectives in paragraph 3.3.

The scale, height and materials used in new buildings and restoration work in the City Centre and Conservation area is not considered in the Plan. There are several recent examples of buildings the height and scale of which dominate neighbouring properties and have used metal materials on the facade and roofing which starkly contrast with traditional materials used in the adjoining properties and the City Centre generally.

The Plan should indicate that developments should be of such a scale, height and finished in materials that is consistent with the inherent character of properties in the City Centre and Conservation area unless there are exceptional reasons to justify alternative proposals.

4. The suggestion for promoting office development within the Cricket Lane SDA employment area is welcomed, but does not go far enough. Based upon recent District Council Employment reports, which state that high paid, quality jobs in office-type developments are required in the City, and that there is very limited need for additional industrial or warehousing and distribution in the District, it is the view of the Society that the whole of the employment area should be safeguarded for office uses. This approach would be environmentally and visually much more compatible with the adjoining proposed housing area and siting at the sensitive gateway location to the City. Along with the suggested hotel and leisure development, the area could accommodate and satisfy the City's office requirements over the Plan period. We recommend that Policy 1 is modified accordingly.
5. There are concerns in relation to the proposals made in the plan in relation to "movement routes". The main concern with Policy 4 on Primary Movement Routes, which is sound in principle, is the scope of the routes defined in Figure 5.1 and the unnumbered Figure on the following page. Although the wording appears strong, their delivery seems unlikely and the routes indicated are either not suitable or are impractical particularly for routes from the south of the City into the Centre. Significant areas of the City do not have movement routes shown into the City. This includes access into the Centre from the south of the City, the north of the City such as Stafford Road, Beacon Street, the Dimbles, properties off Eastern Avenue and also access from Trent Valley. These areas should be indicated as being served by primary movement routes. The recent appeal decision permitting housing on the Eastern Avenue site on the corner of Watery Lane underlines the need for a safe movement routes for all areas on the City's edge.

It is the view of the Society that a detailed and feasible network of cycle and footpath routes should be prepared by the relevant authorities and given high priority for implementation, as well as being included in this plan. There seems to be an opportunity at this time for a number of these to be funded / provided in conjunction with the various about-to-be-approved SDA sites if the routes were to be properly defined.

A secondary but important concern is the timing of provision of safe pedestrian and cycle routes for new development to the main points of access and the City Centre. The provision for Darwin Park illustrates clearly that unreasonable delays occur. On Sainte Foy Avenue the two crossings needed were provided well after most of the development was completed on Darwin Park and Falklands Road/Chesterfield Road sites. Similarly, the crossing outside the former Victoria Hospital site was much delayed. Continuity of a safe route into the City Centre for

these sites is an issue which is still outstanding. The newly designated shared footpath for use by pedestrians and cyclists along Birmingham Road ends at St John Street where there is no phase in the traffic lights for safe crossing of St John Street.

We recommend that Policy 4 ought to indicate that the provision specified in Policy 4 for new developments is to be provided at an early stage in the development of the site and provide continuity into the City Centre. This could be reinforced by including in respect of the Cricket Lane SDA by the following addition to Policy 1: "Safe pedestrian and cycle routes, including light controlled crossings, to and from the City Centre shall be provided at an early stage in the development of the site".

6. Section 8 of the Plan refers to two sites of redevelopment potential within the City, namely Bird Street Car Park and the "former Quonians site". These are recognised as being of importance in the future of the City by the Society, but not necessarily for the same reasons as suggested in the Plan e.g. the statements in the Plan that the site is on a critical pedestrian route to the Cathedral from the rail and bus stations is not accurate, as it is peripheral to the main route along Dam Street. Concerning the Bird Street site, this is currently an extremely important car park within the City Centre, and probably the most important of all. Its loss to built development would be detrimental to business in a major section of the City. At present the Plan contains a multitude of proposed uses for the future, many of which, even assuming the loss of car parking can be addressed satisfactorily, would destroy the "Heritage asset" of this unique location rather than enhance it. The site's relationship to Minister Pool and the Cathedral and the strategic open corridor running between Beacon Park and Stowe Pool and beyond in either direction should be the Plan's primary objective for the future, rather than as an economic development site. Retention of a large area as a public square or open space is essential to retain the amenity value of the current openness and views and should therefore feature as one of the proposed uses for the site. The Society made comment on the visual prominence of the site and critical importance of making the right decision for the future of the area in a submission to the draft City Centre Strategy, and this is now repeated.

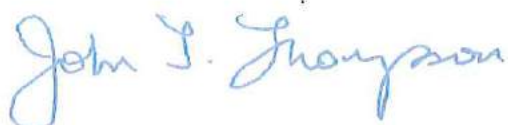
The future proposals for the Quonians site seem to be much less contentious, and, subject to appropriate and high quality design, the uses being suggested should enhance that part of the City. However, the future of two substantial sites in that general area need to be considered and included in the Plan before adoption. These are namely, the former What site and the former Regal Cinema/KwikSave site. In fact, the future of this whole backland area needs consideration in its planning, and should be included in this Plan.

7. An issue not considered in the Plan is the under-use of many upper floors within the City Centre. As these are both a wasted resource and a cause of poor maintenance, affecting the integrity of the historic fabric and leading to environmental harm, this should be addressed in the Plan. Residential re-use would be a principal potential approach at a time of significant levels of housing need in the District. In the past there were initiatives at national and local level with grant schemes to address the issue and such an approach should be considered anew.
8. Whilst the broad approach in the plan to economic development is sound and includes issues such as tourism and signage the importance of achieving and securing high standards in the local street scene is not sufficiently covered. Maintenance of footpaths, paved streets, grass verges, street furniture, direction signs and replacement of dead and dying trees in highway verges are cumulatively important issues in the attractiveness of the City for investors, established businesses and visitors. There is a need for improved co-ordination between the three tiers of local government to address these issues. A commitment from the City Council to proactively support these issues and where necessary use CIL monies to enhance the City centre and the street scene would be extremely helpful.

9. There is no reference to the City Council working with the voluntary sector on issues in connection with the conservation and enhancement of the City.
10. The comments in paragraph 5.7 mention a modification to the traffic regulation order and reduction in 'off-street' car parking in the pedestrianised area but makes no mention of the desirability of extended controls to reduce 'on street' parking, traffic passing through or improved traffic management or enforcement.
11. The reference to Sandfields Pumping station in relation to water supplies sourced from the City could be extended to Stowe Pool which was constructed by South Staffordshire Water. Stowe Pool is part of an initiative by the District Council to secure a HLF grant.

If you wish to discuss any of these matters, we are very happy to do so.

Yours sincerely



Chairman

RESPONSE 15 (STATUTORY)

Lichfield City Pre-submission Neighbourhood Plan Comments

Lichfield City Pre-submission Neighbourhood Plan – Lichfield District Council representation (Month 2016):

The following representation relates to the Lichfield City Pre-submission Neighbourhood Plan (NP) as consulted upon by Lichfield City Council between 15th July and 9th September 2016. The District Council has a number of general and specific comments to make at this stage.

General Comments:

The District Council appreciated the opportunity to provide informal comments on the NP prior to this formal pre-submission stage. The District Council notes that whilst some of the comments previously made have been taken on board many of the comments and issues raised do not appear to have been considered or resulted in changes to this pre-submission draft. LDC would encourage the City Council to revisit the informal comments made in March 2016, as many are still relevant to the current draft of the NP. These earlier comments are appended to these formal representations for your information.

As commented previously the draft NP is broadly supportive of the Local Plan Core Policy 7 and elements of the policy Lichfield 3 (Lichfield Economy). However due to the concentration on selected city centre sites and the Cricket Lane SDA the NP misses an opportunity to address wider economic development issues affecting the city. LDC would encourage the City Council to consider widening the scope of this document to include other sites.

The NP refers to a limited number of specific sites, to include references to certain sites and not others could be read to imply that the other places are of less importance. Regarding the historic and cultural sites identified it may not be appropriate to have specific references to these sites within this document. Historic sites that are missing references include: the market, parks, open space, bringing vacant buildings back into use etc.

The NP needs to ensure that sufficient consultation with residents within the Neighbourhood Area has been undertaken. The NP will need to demonstrate sufficient consultation has taken place within the consultation statement that will be submitted alongside the NP at Regulation 15. It is noted that limited detail of the consultation undertaken is included at paragraphs 1.9 to 1.10 which will need to be expanded upon within the Consultation Statement to be submitted alongside the plan. The District Council has some concerns that there has been limited 'wider' consultation with other stakeholders and the public prior to this formal consultation stage.

As commented previously the city council should be aware of the LDC timescales with regard to the emerging Local Plan Site Allocations document. This may affect some policies in the NP and potentially render them not in accordance with local policy at an early stage of adoption.

Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA):

You will be aware that an SEA & HRA screening assessment has been undertaken of the draft Neighbourhood Plan. The screening report concludes that in its current form neither SEA nor the further stages of HRA will be required. The screening report has been provided to the City Council and includes a full appendix of responses from the Statutory Consultees. Were the plan to change substantially between this consultation and submission to the Districts Council then additional screening may be required and would be undertaken at the discretion of the District Council.

Lichfield City Pre-submission Neighbourhood Plan Comments

Section specific comments:

- Para 1.1: Reference should be to the Local Plan Allocations Document which will form part of the development plan for the area. This will assist in providing clarity over the documents which will combine to form the development plan for the area. It is recommended that the first sentence be amended to read *"...the other part being the Lichfield District Local Plan which will be made up of the adopted Local Plan Strategy (adopted February 2015) and the Local Plan Allocations document."*
- Para 1.5: The scope of community involvement will need to be demonstrated within the consultation statement.
- Para 1.8: After "2029" include "this will be followed by the Lichfield District Local Plan Allocations Document".
- Para 1.9-1.10: The NP makes no reference to consultation with residents within the Neighbourhood Area. As has been suggested within the 'general comments' section the consultation undertaken will need to be expanded upon within the Consultation Statement which must be provided alongside the submission Neighbourhood Plan.
- Para 2.11 – This paragraphs references a select number of policies from the Local Plan Strategy which are considered to be of relevant to the Neighbourhood Plan along with extracted text from those policies. It should be made clear that the extracted text is not the comprehensive text of the policies and that other policies within the Local Plan Strategy are also relevant to the neighbourhood area.
- Para 3.2 Vision for Lichfield City: Defence Medial Services Whittington is outside of the Neighbourhood Area, whilst can be referenced it should be acknowledged that the policies within this Neighbourhood Plan would not be applicable to DMSW.
- Change Strategic Development Area to Strategic Development Allocation within vision (and throughout document) so as to be consistent with the terminology used within the Local Plan. This was raised previously and has not been addressed within this version of the plan.
- Para 3.3: There is no mention of engagement with residents in writing the objectives. As has been suggested within the 'general comments' the District Council has some concerns with regards to the engagement/consultation undertaken prior to this formal consultation.
- Section 4; Lichfield City Economic Action Plan: could also include references to the District Council's Economic Development Strategy and the City Centre Action Plan.
- Para 4.3: include the Greater Birmingham and Solihull Growth Hub and the Stoke-on-Trent and Staffordshire Growth Hub at the end of the final sentence of the paragraph.
- Para 4.5: Replace "Area" with "Allocation", SDA stands for Strategic Development Allocation. To be consistent with the Local Plan Strategy.
- Figure 4.1: concern over the use of these figures, they do not seem to be correct and are being used out of context.
- Para 4.7: The target of 30,000m² of gross office space may be reviewed In the Local Plan Allocations document.
- Para 4.10: Replace "Area" with "Allocation".
- Para 4.12: Insert "Strategy (February2015)" after Lichfield District Local Plan In the penultimate sentence of the paragraph.
- Para 4.15: Consider removing this paragraph, this kind of economic intervention is unlikely to be in the remit of the NP, or indeed any Development Plan Policy. Intervention would be beyond the scope of the NP.
- Para 4.16: The creation of a flagship location visible from the A38 would appear to be contrary to the requirement for good design and protecting views of the historic city and its spires.

Lichfield City Pre-submission Neighbourhood Plan Comments

- Para 4.19: 2 hectares of B1a and B1b employment use is not proposed within the Local Plan. We have previously questioned how this minimum has been calculated and whether there is market evidence to support this. Noting the comments below in relation to Policy 1 (Cricket Lane Strategic Development Area) any such policy would need to be fully justified by evidence. Also note that references to the SDA should be Strategic Development Allocation to be consistent with the terminology used within the Local Plan Strategy.
- Policy 1 (Cricket Lane Strategic Development Area): The restrictions of 2ha should be removed as this policy is not in line with the National Planning Policy Framework (NPPF) and the Local Plan Strategy. This policy is not entirely in conformity with the Local Plan Policy Lichfield 6 (South of Lichfield), which allocates approximately 12 Ha of land for employment, however does not specify that B1a would necessarily be an appropriate use. Any planning application for a town centre use (such as offices) would need to satisfy the NPPF sequential test and impact assessments (as per paras 24-27). Meanwhile, it should be noted that policy Lichfield 3 focuses offices provision on the city centre, which adds another reason why sequentially preferable sites would need to be discounted first in a planning application. Please refer to the informal comments made in March 2016 as these are still relevant. There is an opportunity to include references to high quality design within this policy.
- Para 4.26: Concern whether this is appropriate for section 106. There is some doubt such a 'contribution' secured through s106 agreements would be Regulation 122 compliant (Community Infrastructure Levy Regulations 2010 (As amended)) – i.e. being required to make the development acceptable in planning terms.
- Policy 2: Include "such development should only occur in a sustainable location" to the end of the first sentence of the policy. Consider expanding the geographical scope of this to other sites in the city (i.e. beyond the campus). There is also some concern as to whether leasehold terms is a matter of planning policy as such it is recommended that this element be revised or removed.
- Policy 3: Remove "strongly", insert "where it complies with other planning policy" at the end of the sentence.
- Para 5.1: Supportive of the need identified within the plan for increased coach parking within the city centre.
- Para 5.3: First sentence should read "Local Plan Strategy (2015)" rather than 'Local Plan'. The Consultation Statement will need to demonstrate the level of engagement with resident groups.
- Para 5.4: Replace "Areas" with "Allocations".
- Figure 5.1: Where has the 10 min walk time been measured from? The primary movement routes identified include some very sensitive historic routes, particularly those within the City centre perhaps these should be identified in a slightly different way on the figure to demonstrate that such routes might be considered differently in terms of the desires of Policy 4 (Primary Movement Routes). The policy itself could refer to the historic nature of certain routes.
- Para 5.6: Additional lighting and widening of footpaths may not be appropriate or desirable in sensitive locations (see above comment). Additional lighting would need to be carefully considered so not to harm the character and appearance of the historic area. Widening footpaths should not result in the loss of hedges, trees, grass verges or other greenery.
- Policy 4: The policy refers to "Developer contributions". It should be made clear what contributions the plan is referring to, is this part of the Parishes meaningful proportion of CIL or is the policy proposing to introduce its own developer contribution? Any additional contribution, above those normally collected, would likely add unacceptable burden to development. The Policy needs ensure there is significant evidence to support the chosen primary movement routes.

Lichfield City Pre-submission Neighbourhood Plan Comments

- Para 5.11: The type of signage needs to be clearly stated, it is assumed the text is referring the pedestrian signs rather than advertisements
- Para 5.12: It may be better to reword this paragraph to state that the City Council will work with the Lichfield BID which has identified improved signage as a key priority within the city centre and wider signage has also been identified as a priority by the Lichfield City Centre Development Strategy rather than state it will seek funds.
- Policy 5: Rationalisation of existing signage will be required to avoid street clutter. The policy should clarify the need to carefully consider locations and designs of signage. In addition to CIL payments there is already a requirement for developments to provide signage with the site confines (e.g. Friarsgate).
- Policy 5: The policy should state that it is the Parishes apportionment of CIL that will be used. It is recommended that the second sentence of the policy be modified to read as follows: *"Contributions from the Parishes meaningful proportion of the Community Infrastructure Levy (CIL) will be used to fund such provision"*.
- Chapter 6: The areas identified within the Neighbourhood Plan as 'Inner and Other Retail Areas' are different to the 'Primary and Secondary' retail areas identified on the Local Plan Strategy Policies Maps. The Inner & Outer Retail Area map (and all references to it) should be removed from the Neighbourhood Plan and reference to the Local Plan Strategy Policies Maps instead. The Saved Policies L15 & L16 (which relate to the primary and secondary retail areas) will be updated by the emerging Site Allocations Document. This will follow further up to date retail evidence in support of the Local Plan Allocations which will assist in identifying up to date retail areas.
- This also applies to figure 5.1 which also shows the Inner & Outer Retail Areas.
- Policy 6: remove "strongly" from the policy.
- Para 6.6: remove reference to the 'Inner Retail Area' and the proposals map and instead reference the Local Plan Policies Maps to be consistent with recommended modification above. The first part of the sentence should then be changed as follows for consistency: *"The primary retail area as identified on the Local Plan Strategy Policies Maps..."*
- Policy 7: First part of the first sentence should be reworded to be consistent with the above modifications relating to retail areas. Recommended wording is as follows: *"In the secondary retail area of Lichfield City Centre (as identified on the Local Plan Strategy Policies Maps)..."*
- Policy 7: Include an additional sentence advising that the change of use to residential will only be supported at first floor level or at ground floor level where it can be appropriately evidenced that the unit is no longer commercially viable.
- Policy 8: Remove repetition "employment (Use Class B) employment units". Replace "Inner and Outer Retail Areas" with "Local Plan Retail Area".
- Para 7.3: The final sentence could be made into a specific policy or 'non-policy action' given. It seems odd that this paragraph makes such specific reference to this one historic building, particularly given the number of historic buildings within the City as a whole. This is especially pertinent as the paragraph does not appear to relate to a specific policy. If the paragraph does not relate to a policy it would be better removed from the plan. As previously advised the reference to re-opening the Sandfield Pumping Station to the public should be removed – It is important that the building has a long-term sustainable use and recent appraisals of the site have indicated that public use is not the most sustainable. It may be more useful to make a more general objective, e.g. In future there may be opportunities for economic development linked to other heritage assets in the city.
- Para 7.4: The separation of the Cathedral from the rest of the city is due to the city's evolution, and the nature of the Cathedral Close. The Close was fortified in the C12th and these fortifications

Lichfield City Pre-submission Neighbourhood Plan Comments

played an important part during the Civil War when the Close was besieged. The remains of the gates, ditches and other fortification are still visible. While it is good to try and improve the legibility of the city, part of the significance and character of The Close is that it is enclosed and separate. This paragraph should recognise this significance.

- Para 7.5: Not all of Bird Street is a busy vehicular route, much of it is pedestrianized with access to a limited number of vehicles to service the businesses. This paragraph should be amended to acknowledge this as currently it does not properly reflect the nature of all of Bird Street.
- Policy 9: This policy needs clarifying, proposals should only be supported if they are suitably well designed and considered. Recommended wording: *"Proposals to improve linkages between Lichfield Cathedral and Lichfield City Centre will be strongly supported where they do not have a detrimental impact upon the context and setting of the Cathedral and other heritage assets and where they are consistent with other national and local planning policy"*.
- Para 7.6: This relates to Core Policy 14 (Out Built & Historic Environment) of the Local Plan Strategy. However the sweeping statement that views of the cathedral could be improved from *all parts* of the city should be amended. Views could be improved from some parts but clearly not all. It needs to be ensured proposals to 'open-up' views would not result in the removal of mature trees, which is not something that should be advocated. The second sentence may need to be re-phrased given the impact of Friarsgate on a key view.
- Policy 10: Rewording "Views of Lichfield Cathedral from Lichfield City Centre should be considered and accounted for in development which could otherwise impact on these views". Such a change would assist with rectifying the issues discussed above.
- Para 7.7: Much like the paragraph relating to Sandfields Pumping Station (7.3) this paragraph doesn't seem to relate to a particular policy. It is recommended this paragraph is removed as it does not relate to a policy.
- Para 7.9: Amend typographical error "Car Par" with "Car Park".
- Policy 11: This policy simply provides repetition of Core Policy 9 (Tourism) of the Local Plan Strategy which provides support for proposals to which would improve the overnight visit capacity of the city and states that in line with local evidence proposals for new hotel developments should be directed within town centres.
- Policy 12: As has been raised previously as to whether the sites identified within Policy 12 are being 'allocated' or is the policy intending to provide a more generic policy which would be applicable to other potential city centre developments which would by default include the sites referenced within the policy?
- Policy 12: Replace "will be expected to deliver a mix of uses that include the following" with "which deliver a mix of the following will be supported" as this wording would be a more positive approach to achieving the goal of the policy.
- The explanatory text (para 8.6) identifies that a mixed use development of these sites would be supported, however the policy does not mention these uses and focusses on B1 and A1 uses. The policy needs to be more flexible and allow for the delivery of town centre uses within these sites, the current policy wording might restrict other viable and appropriate town centre uses as part of any potential redevelopment. There are also other potential options for Bird Street Car Park which do not include intensive development or any of the proposed uses, these are not referred to.
- Additionally, the policy would benefit from reference to high quality design, the quality of the development should be of equal importance to the end use. In addition please refer to our previous comments on this policy.

Lichfield City Pre-submission Neighbourhood Plan Comments

- **Proposals map:** Include all sites referred to in the proposals maps, e.g. the city centre redevelopment sites referred to in chapter 8 and remove the 'Inner and Outer Retail Areas' as has been recommended within these representations.

Appendix A

Lichfield City Draft Neighbourhood Plan - LDC informal comments (March 2016)

The following comments relate to the draft Lichfield City Neighbourhood Plan sent to Lichfield District Council (LDC) by Lichfield City Council (LCC). Please note these are informal comments and Lichfield District Council will provide a formal response to the Neighbourhood Plan at the appropriate consultation stage where necessary.

General Comments

In general terms, the draft Neighbourhood Plan (NP) is broadly supportive of Local plan Strategy Core Policy 7 (notably with regard to job creation) and elements of policy Lichfield 3 (Lichfield Economy) however it misses an opportunity to address wider Economic Development issues affecting the city. Essentially it concentrates quite narrowly on selective city centre sites and the Cricket Lane SDA at the expense of other locations which could potentially bring about the objectives identified in the *Vision for Lichfield City* (page 9).

In view of this, LDC would encourage the city council to consider widening the scope of this document to include priorities for the key existing employment areas along Eastern Avenue and around the Trent Valley station area. This is pertinent at a time where an increasing number of major employment sites are subject to developer interests from outside the employment sector (notably housing, leisure and retail). Given that adopted NPs could feasibly become part of the development plan, land use policies for these sites would lend further to weight to NP's economic objectives for the city via the planning process.

With regard to securing sites for high value office jobs, the group may also wish to *consider* other city centre buildings such as Minster Hall Youth Centre and the Registry Office adjacent to Beacon Park as well as edge of centre locations such as Guardian House.

With regard to the proposed 2 Ha B1a office Allocation on the Cricket Lane SDA, the drivers behind this policy are clear, however its delivery is not without its economic and planning policy challenges. It should be noted that any such development proposal on the site would be subject to the town centre first policies set out in the NPPF and the Local Plan Strategy. More detail on these below.

Whilst LDC is not expecting LCC to include all of these sites in the LCNP, there may be scope to explore their wider potential first. In particular SCC's property team may be able to advise on the availability or long term plans of sites in their ownership. LDC would be happy to facilitate contact with the relevant teams.

LCC should also be aware of LDC timescales with regard to the emerging Local Plan Site Allocations document which will affect some policies in the LCNP (notably retail areas) and potentially render them not in accordance with local policy at an early stage of adoption. These are dealt with in more detail below.

LDC acknowledges the economic focus of this NP and recognises that LCC has the option to expand this into other policy areas if so chooses.

Specific Comments

- **Paragraph 1.4** Add “which is contiguous with the civil parish of Lichfield” at the end of the sentence.
- **1.8** After “2029” insert sentence “This will be followed by the Lichfield District Local Plan Allocations Document.”
- **Vision for Lichfield City.** It would be worth citing the Vision for Lichfield District from the Local Plan Strategy (LPS para 3.1) and how this is supported by the NP vision.
- **3.2** (vision cont'd) 3rd para change to Cricket Lane Strategic Development Allocation.
- **4.3** The District Council is a member of the Stoke on Trent and Staffordshire LEP so this should be referenced as a stakeholder. It should be noted that a high level action plan with other stakeholders may not be within the remit of a NP.
- **4.4** SDA is an Allocation not “Area”
- **4.10** as above
- **4.12** Last sentence change “exceptional” to “very special circumstances” as this statement refers to decision taking rather than plan making
- **4.13** Consider rewording to “represents an opportunity to replicate the success of Lichfield South...”
- **4.15** Consider removing as this kind of economic intervention is unlikely to be in the remit of a NP (or indeed any Development Plan Policy).
- **Policy 1 Cricket Lane SDA** This policy is not entirely in conformity with local plan policy (Policy Lichfield 6) which allocates approx. 12 Ha of land for employment, however does not specify that B1a would necessarily be an appropriate use. This in recognition of the fact that any planning application for a town centre use (such as offices) would need to satisfy the NPPF sequential test and impact assessments (as per paras 24-27). Meanwhile, it should be noted that policy Lichfield 3 focuses offices provision on the city centre, which adds another reason why sequentially preferable sites would need to be discounted first in a planning application.
- **With regard to the Local Plan Strategy evidence base**, the ELR addendum 2013 which considers Cricket Lane SDA notes that the site is most likely to be delivered for B8 with ancillary B1 uses. As such the evidence does not suggest that office space is necessarily going to be deliverable on the site. The NP will need to demonstrate with evidence why Policy 1 (which is effectively allocating part of the site) is appropriate.
- **4.19** recognises that the market will dictate the overall mix of uses on the employment site. On this basis we would question how the minimum 2Ha B1a figure was arrived at and whether there are is market evidence to support it? The other town centre uses mentioned (fitness centre, hotels) would also be subject to the same tests
- **Policy 2.** The principle is supported and there is a recognised surplus of demand within the city. Consider expanding the geographical scope of this to other sites in the city (i.e. beyond the campus).

Lichfield City Pre-submission Neighbourhood Plan Comments

- **Policy 3** could be amended to the following wording:
"The expansion of managed workspace at Lichfield Business Village on the University of Staffordshire Campus or elsewhere in the city will be supported where it complies with other planning policies
- **Chapter 5: Movement.** Given that this plan makes a priority of Cricket Lane SDA it may be worth including the A5206 Upper St John St/ London Road as a primary movement route. The South of Lichfield SDA is not mentioned here and has been missed off from figure 5.1. Indeed it would be worth referring to all 4 Lichfield SDAs when considering movement patterns.
- **5.4** – second sentence only mentions Deans Slade and Cricket Lane and does not mention South of Lichfield (Shortbutts Lane) SDA. Second sentence could be reworded as follows: *"This reflects the potential to link up with the strategic development allocations (SDAs) across the south of Lichfield City."*
- **5.10** consider inserting "its meaningful proportion of" before "the Community Infrastructure Levy" as this is the name given to the proportion of CIL that is given to Parishes.
- **Policy 4.** Need to clarify what is meant by "make contributions". Is this with referring to S106 contributions or the proportion of CIL which may be collected? Is the policy seeking to set its own contribution or is it referring to onsite improvements?
- **5.12** References to signage need to be more specific as it is not clear whether this relates to highways, advertising or shopfront signage. Consider rewording "Contributions from development" as it needs to be made clear whether this refers to LCC's meaningful proportion of CIL monies. Furthermore, it may better to say that BID funding will be sought as the NP cannot direct which projects the BID invests its money in.
- **5.12 (cont'd)** for info the legal tests for when you can use a Section 106 agreement are set out in regulation 122 of the Community Infrastructure Levy Regulations 2010 as amended. The tests are:
 - necessary to make the development acceptable in planning terms
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development
- **Policy 5:** as above it would be useful to indicate what type of signage is being proposed here. Likewise, will it be a rationalisation of existing signage so as to avoid street clutter (something which would run counter to any public realm improvements).
- **Primary and Secondary Retail Areas Para 6.6.** Recommend removing the policies map and references to the retail areas from the NP as these are taken from saved policies L15/L16 of the 1998 Local Plan and will be updated by the emerging Site Allocations Document. Instead we suggest that this policy just refers to the Local Plan Strategy Policies Maps.
- **Policy 7.** As above re retail areas and consider rewording as not entirely clear what this is attempting to achieve. Most A1 units now have extensive Permitted Development (PD) rights under the GPDO with change of use allowed for up to 2 years, so this may not be necessary. However given that PD rights do not apply to listed

Lichfield City Pre-submission Neighbourhood Plan Comments

properties so it may be useful to specify when this applies. Suggest changing Proposals Map to Local Plan Policies Map to reflect recommended removal of map.

- **Para 7.3** The economic development potential of heritage is supported, however this paragraph specifies one heritage asset (Sandfields pumping station) when it may be useful to make a more general objective here. For instance, in the future there may be opportunities for economic development linked to other heritage assets in the city.
- **Policy 10** Suggest rewording in order to make it compliant with local policy: *“Views of the Cathedral from Lichfield City centre should be considered and accounted for in development which could otherwise impact on these views”*. We would suggest removing the sentence about new development reflecting the identity of the cathedral –as it is unclear what this means.
- **Policy 12** Suggest re wording to “Redevelopment sites within Lichfield City Centre, including the former Woolworths building and the Quonians site, which deliver a mix of the following will be supported...”
- **Policy 12** It should also be noted that the development potential of these two sites is recognised by the draft Lichfield City Centre Strategy, which brings together a number of stakeholders from across the city. It would be worth referencing this and seeking to support joint objectives. It may be helpful to clarify whether the NP is seeking to allocate only these sites or is it intended to provide a more generic policy in relation to all potential city centre development sites (which would by default include those referenced in policy 12).

RESPONSE 16 (PUBLIC).



Save the green belt

South Lichfield Residents Group

email: davidrwoods@hotmail.com

8 September 2019

Dear Sir

Lichfield City Neighbourhood Plan 2016-2029 (Pre-Submission Consultation)

We attended the consultation workshop last November, but were unaware until yesterday that the above consultation document had been issued with a closing date for comments of 9 September. We regret that as a consequence our comments are somewhat brief.

Yours faithfully

David Woods

For SLRGp

General Observations

- It is a pity that the opportunity to provide a comprehensive Neighbourhood Plan has been missed.
- It is difficult to make decisions in the context of this in the absence of other issues such as traffic and population dynamics, etc.
- The above goes against the ethos of current planning practice.

Comments on the Neighbourhood Plan (Pre-Submission Consultation Document)

2. Tourism

Undoubtedly, tourism is a major contributor to the City economy and every effort should be made to preserve and expand this vital sector. For this reason it is essential that development on the approach to the City centre from the A38 via London Road is sensitive to this 'gateway to the city.' The Lichfield District Local Plan conflicts with this aim since an inappropriate range of commercial development is indicated.

3.2 Vision for Lichfield City

This envisages high quality employment floor space at the Cricket Lane SDA, which we applaud. And this is supported by the table in 4.4 of the Plan document. The creation of a significant centre for high tech businesses and employment would fit with the high quality living environment of the City.

4.4 Employment

We applaud the emphasis given to quality employment opportunities at the Cricket Lane SDA focusing on computing, IT, financial, scientific, technical and other professional services. Such development would fit well with minimising damage to the 'gateway to Lichfield' tourism image. Equally importantly, it would create quality jobs and career opportunities the people of Lichfield rather than low grade jobs in warehousing.

The Neighbourhood Plan recognises that to achieve this will take skilful marketing of the site, and provision of appropriate infrastructure.

5. Movement

We support the promotion of cycling as a means of movement about the City. However, we believe that shared pavements that mix cyclists with pedestrians, and mean cyclists must stop at every road junction, are not the solution. If cycling is to be successfully promoted dedicated cycle routes from the outskirts to the City centre are essential. Secure cycle parking is another essential element.

In the absence of traffic information and a strategy for the improvement of traffic mobility in and across the City, it is impossible for us to make comment on the suitability of the Cricket Lane SDA for employment purposes. Local observation indicates that the development of this site would create significant disturbance to existing traffic flows. The proposed ring road extension will not resolve this issue. The Neighbourhood Plan is silent on this key economic issue. The map at 5.1 does not cover key aspects of the Cricket Lane SDA employment site and gives no indication of proposals to provide safe pedestrian and cycling links to the City centre, local schools etc.

8. City Centre Redevelopment Sites.

Local residents have indicated that the Bird Street car park should be retained. It provides the level access to the City shopping centre that is so essential to older and disabled residents and visitors. With 19.2% of residents over 65 and 28.8% between 45 and 64 this level parking need will only grow over, and beyond, the Plan period. Furthermore, closure of this carpark risks damage to commercial enterprises in the existing City centre. No economic justification is given for the redevelopment of the site other than improving pedestrian access to the cathedral and 'bringing the centre closer to the cathedral.' No

new, alternative and convenient parking spaces are indicated. We are not aware of any feasibility studies relating to this redevelopment.

RESPONSE 17 (STATUTORY)

Date: 09 September 2016
Our ref: 191023
Your ref: N/a



Lichfield City Council
For the attention of Tony Briggs
BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Tony

Lichfield City Neighbourhood Plan 2016-2029 – Regulation 14 consultation

Thank you for your consultation on the above dated 15/07/2016, which we received on the 17th.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

We have considered the content of the consultation plan in relation to those themes within our remit and concluded that Natural England does not have any specific comments to make.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For clarification of any points in this letter, please contact me on 020 802 60939. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Antony Muller
Lead Adviser
North Mercia Sustainable Development, Wildlife and Commercial Services Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

⁹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

RESPONSE 18 (PUBLIC)

City of
1
Civic
9.9.2016

Dear Sir,

Here are some comments on your Neighbourhood Plan.

The presentation and image of the City centre is perhaps the most important aspect to be considered for both tourists, current and present residents, and more importantly for businesses. The City needs to look 'careful', not only in the centre itself but the 'gateways' as these make an initial impact. Regular maintenance is needed for buildings, pavements, road surfaces, and highway trees and landscaping. Commercial and trade organisations, Town Team, and a Conservation Area monitoring group are necessary to supervise this. An example of a poor gateway, or entrance is the road from the Trent Valley Station, with its patched surfaces, redundant factory, empty buildings. Hardly inspiring for any visitor, in addition to residents. The Station itself could promote the City with a video of its assets.

Regulation of rents and rates need to provide a fair opportunity, with less discrepancies for commercial outlets.

For example, Ego and Moroccan (now closed) restaurants have the same overheads. Hardly a level 'playing field'.

The challenge of providing higher value employment could be provided by expanding areas in Education, Arts, Medical and Leisure. Loss of college courses needs to be reversed encouraging business, education (higher level), courses for local employment, possibly sponsored by larger local employers. Available short courses to higher degree are required. A new art gallery for both permanent collection and temporary exhibitions, is needed, having been lacking for many years. This could provide workshops, links to the festivals, providing a cultural centre which has been lacking since the closure of the Arts Centre. This venue could be located in the Bird Street Car Park. Sports facilities are desirable close to the centre with good transport links close by.

Walking and cycling links while desirable are not ideal. For example the routes from the Cricket Lane side are not particularly attractive, i.e. along St John Street. Most people are likely to use cars, or public transport to access the centre. It would be a challenge to provide routes as attractive as Cathedral Walk. The division of pavements into cycle routes is problematical, as they are often too narrow.

Friarsgate could provide an opportunity for access to the centre via art works, relating to the City assets. For example Burton-on-Trent has pavement panels relating to local industry and buildings. Redditch and Birmingham have similar indicative trails.

Promotion of re-use of empty buildings, as they currently detract from the image of a thriving city. Empty areas above retail outlets need to be filled. Residents of these provide monitoring or sheds for safety, and promoting a city centre community.

Improving views of the Cathedral from parts of the City (p31) is obviously important, "the principles of maintaining key sight lines of the Cathedral should be integral to any development in the City centre" (7.6) But consider past mistakes, to be avoided, such as Ego which has destroyed the former iconic view from the former Arts Centre, one enjoyed by the Swan.

The new Inary development has destroyed the sight lines from the College Campus towards the spires, the objective of Aiden Ridyard, the architect.

English Heritage (Historic England) have stated that owners of listed buildings within the Conservation Area respect these assets, but it is not apparent in Lichfield in many instances.

Encouraging owners to maintain a higher standard of maintenance, would contribute massively to the City's image.

Overall, the City Council maintains the areas of their responsibility admirably, but needs to act with other agencies and organizations to maintain similar standards, consistently to ensure the success of the Plan.

Yours faithfully

J a Bostell

RESPONSE 19 (STATUTORY)



Walsall Council

Regeneration and Development

Your Ref:
Our Ref: Lichfield NP
Date: 9th September 2016
Please Ask For: Mike Smith
Direct Line: 01922 658024
Email: Mike-E.Smith@walsall.gov.uk

Tony Briggs
Deputy Town Clerk
Lichfield City Council
City Council Offices
Donegal House
Bore Street
Lichfield
WS13 6LU

Dear Sir,

Lichfield City Neighbourhood Plan _ Pre-Submission Consultation

Thank you for consulting Walsall Council on your neighbourhood Plan. I am pleased to reply on behalf of the Council.

I am afraid I have to make an objection to Policy 1 of the Draft Plan specifically in terms of the proposal for the inclusion of "at least" two hectares of B1(a) space and also other uses such as hotels and health and fitness centres.

The proposal is contrary to Policies 'Lichfield 3' and 'Lichfield 6' of the Lichfield District Local Plan 2015, which envisage that office and other town centre uses will be focussed on Lichfield City Centre and do not envisage that offices and other uses would be provided at Cricket Lane..

The justification for the proposal appears not to recognise the existence (however unfortunate) of the planning permission for offices (and other uses) at Wall Island, which together with the sites identified within the city centre.

Whilst the arguments about business growth are noted, it remains the case that office and hotel and leisure developments are key town centre uses and national planning policy requires the sequential approach should be carefully applied across the relevant catchment area a proposal is intended to serve, including centres in surrounding districts where relevant.

The approach taken to promote the Cricket Lane proposal in addition to the scheme at Wall Island means that the amount of office development in the southern part of Lichfield District would seem likely to exceed the 30,000 sq.m. gross proposed in the District Local Plan. The cumulative impact of the combined total of committed and

proposed office development and office activity and investment in existing centres, including in surrounding districts notably Walsall should be assessed.

The plan does seem to recognise that the implications and acceptability in policy terms of office (and other town centre uses should be assessed. However, this should be done before the site is allocated for such uses.

Whilst references are made to connectivity it is unclear how the proposed out-of-centre development would not be highly dependent on access by car.

Also, if the inclusion of the proposed town centre uses would reduce the amount of land for B1(b7c), B2 or B8 uses, is it proposed that additional provision should be made elsewhere?

I am sorry to have to be negative about this proposal, but my objection will have to stand until either the proposal is deleted or sufficient evidence is provided (including in terms of the sequential approach and impacts on centres in Walsall). I will, of course, be happy to discuss the issues raised.

Yours faithfully,



Mike Smith
Planning Policy Manager
Regeneration and Development

RESPONSE TO CPUBLIC

1 10 16 16

From: N
Sent: 09 September 2016 16:49
To: DeputyClerk
Subject: Neighbourhood Plan Pre-Submission Consultation (Regulation 14)

Dear Sir / Madam,

I would like to make the following representation in respect of the Regulation 14 Consultation on the Lichfield City neighbourhood Plan.

In relation to Policy 1, I do not agree that part of the Cricket Lane site should be given over to office development (Class B1a). This will lead to unsustainable development, increase the impact on local highways and is contrary to the NPPF that directs offices to town centres. This would be a more sustainable location, being easier to access by sustainable modes of travel and have the added benefit of sustaining and enhancing the town centre economy. Indeed, this neighbourhood plan should be seeking to allocate land within the town centre for office development.

Policy 3 should ensure that no more car parking is created on this site if additional development takes place. The car park at the University built on greenfield land was supposed to be a temporary car park whilst work was undertaken to the Friary Outer and Cross Keys car park but still remains. The Policy should seek the removal of that car park and the reinstatement of the green open space.

I support the principle of Policy 4 but I believe a key movement route and key nodes of conflict have been missed. Given the new school that the County Council have created on Cherry orchard, coupled with this route being the alternative for High Vehicles, and the decision by the County Council to ban cars from parking on this road, this will become an even more important Primary Movement Route and should be identified as such. Furthermore, a node of conflict exists at the western end of Cherry orchard (noting the eastern end has already been identified) at the junction with Upper St John Street. This is a very difficult place to cross at Peak times with children walking them to school and given the increase in children walking this way to school for the reasons above this conflict will get worse. In addition, crossing Upper St John street and the junction with Wiltell Road and Davidson Road is equally as difficult and dangerous and should be identified for improvement as a node of conflict. The junction of Birmingham Road and Upper St John street is also a node of conflict. It is heavily used pedestrian and cycle route between the city centre, the station and southern and western parts of the city yet there is no dedicated crossing facility for pedestrians and cyclists. Finally, the 'pedestrianised' part of the city centre is itself an area of conflict with high numbers of vehicles driving through, particularly on Friday and Saturdays. This should therefore be identified and a solution would be to remove disabled parking from the streets in this area, making it far easier to police.

Policy 7 should be expanded to support offices in the town centre, rather than directing them to greenfield developments at Cricket Lane and Lichfield South.

I support Policy 12 but it is undermined by Policy 1 directing offices to the greenfield site at Cricket Lane.

Kind Regards

Mr Bowers

RESPONSE 21 (NON-STATUTORY)

SEPTEMBER 2016 | NC | BIR.3962



**LICHFIELD CITY NEIGHBOURHOOD PLAN
PRE-SUBMISSION CONSULTATION
JULY 2016**

**REPRESENTATIONS ON BEHALF OF
PERSIMMON HOMES LTD & ST MODWEN
DEVELOPMENTS LTD**

Pegasus Group

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APPENDIX A: Employment Land Review 2012 Addendum

APPENDIX B: Economic Impact Report

1. INTRODUCTION

- 1.1 Persimmon Homes Ltd and St Modwen Developments Ltd welcome the opportunity to make observations about the 'Lichfield City Neighbourhood Plan 2016-2029: Pre-Submission Consultation (Regulation 14) Version July 2016'. As Lichfield City Council is aware, through dialogue to date, Persimmon Homes Ltd and St Modwen Developments Ltd have joint land interests in the Cricket Lane Strategic Development Allocation to the south of Lichfield City. It is therefore disappointing that neither Persimmon nor St Modwen were notified of the current consultation. The current consultation has therefore not met the requirement to consult with "bodies whose interests it considers may be affected by the draft plan or order proposal" set out in Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.
- 1.2 Persimmon Homes and St Modwen are in the process of preparing a planning application to be submitted to Lichfield District Council later this year. This planning application will demonstrate a proposal that is in conformity with the policies set out in the Lichfield District Local Plan, including the Concept Statement which relates to the site.
- 1.3 In providing comment, the emerging Lichfield City Neighbourhood Plan has been considered against the basic conditions relevant to the preparation of a Neighbourhood Plan:
- o Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - o The 'making' of the neighbourhood plan contributes to the achievement of sustainable development;
 - o The 'making' of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - o The 'making of the neighbourhood plan does not breach, and is otherwise compatible with EU obligations

- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

1.4 The purpose of making these representations is, therefore, to draw attention to those parts of the Neighbourhood Plan that do not meet the Basic Conditions to enable amendments to be made and to allow the Neighbourhood Plan to provide greater certainty that an examiner will allow the plan to proceed to referendum.

2. THE VISION FOR LICHFIELD CITY

- 2.1 The Lichfield City Neighbourhood Plan is proposed to be a plan that covers economic and employment matters only. This approach is supported on the basis that the Neighbourhood Plan is mindful of the strategic policy context already established for such matters through the Local Plan Strategy adopted in February 2015.
- 2.2 The Vision for the District set out in the Local Plan Strategy takes account of the evidence base and by 2029 envisages that *"people will be able to access quality homes, local employment and provision for skills and training which suits their aspirations and personal circumstances."* This is reflected in the spatial development strategy which seeks to deliver this Vision and *"aims to promote greater opportunities for high value employment within the District, including higher wage opportunities in growth sector related to business, education and research. Part of the strategy is to provide a balanced portfolio of employment land able to accommodate higher value employment opportunities serving both Lichfield and Burntwood and support for investment and redevelopment of older, well located, existing employment sites."*
- 2.3 Land at Cricket Lane is identified as a Strategic Development Allocation (SDA) in the adopted Local Plan and therefore represents a critical component of the District's spatial strategy and a key element of the development strategy for Lichfield City.
- 2.4 The proposed Settlement Hierarchy that accompanies Core Policy 1: The Spatial Strategy identifies a target, or upper limit, of 30,000sqm of office provision, directed to the City Centre as a town centre use.
- 2.5 The Local Plan Strategy provides more detail through settlement specific visions and policies. For Lichfield City the vision, in respect of employment and economic growth, states *"new retail, office, cultural and mixed-use developments will be delivered through regeneration of the City Centre and its fringe."* Within this vision the SDAs *"will deliver a range of homes including affordable housing, as well as local services, employment opportunities, open space, sport, renewable energy and community facilities and will achieve a high standard of sustainable design and construction."* The planning application currently being prepared for Cricket Lane SDA and the Persimmon proposal within the South of Lichfield SDA, will deliver in line with this Vision.

- 2.6 The Vision for Lichfield City set out in the Pre-submission Lichfield City Neighbourhood Plan seeks to address a number of challenges for facing the City identified as increasing the range of employment opportunities in Lichfield City; maintaining Lichfield's vibrancy as a City Centre; and increasing the role and value of tourism and related activities. Whilst Persimmon Homes and St Modwen understand the identified challenges, concerns are raised in respect of the Neighbourhood Plan Vision, which appears prescriptive and based on a number of aspirations rather than informed by a robust evidence base. There are also elements of the Vision that are unlikely to be delivered as implementation is beyond the control of Lichfield City Council and the promoters of Cricket Lane SDA.
- 2.7 The Vision places great emphasis on the expansion of economic activities connected with Defence Medical Services Whittington (DMSW), which lies outside the Neighbourhood Area Designation, and creates a direct link between these expanded economic activities and the delivery of new employment floorspace within Cricket Lane SDA. Whilst the expansion of economic activities connected with DMSW is generally supported and the location of such uses maybe welcomed within the Cricket Lane SDA, the type of economic activities connected with DMSW remain unknown, the amount of growth cannot be quantified and the geographic location for satisfying such growth will be very much determined by the market rather than any artificial policy constraints introduced through a Neighbourhood Plan.

Objection: *Specific reference to Cricket Lane SDA enabling economic activities connected with DMSW should be removed.*

- 2.8 The Vision makes reference to activities that lie outside of the Neighbourhood Area Designation, including Defence Medical Services Whittington (DMSW), as referred to above. However, the Vision fails to acknowledge the existing office park at Lichfield South (Wall Island) which now has planning permission which would allow for the delivery of a further 12,500sqm of B1a office space. This opportunity would assist in meeting the challenges set out for Lichfield City.

Objection: *Lichfield South (Wall Island) should be recognised within the Vision as a location that will provide new high quality employment floorspace. As with DMSW, Lichfield South is outside the Neighbourhood Development Area, but well related to the City.*

2.9 The Vision sees Lichfield City attracting a small number of medium sized company headquarters. This aspiration is supported by St Modwen and Persimmon Homes, however there are a number of locations, within the Council's balanced employment land portfolio, where such headquarters could be located dependent on the nature of these headquarter businesses. For B1a uses the Vision fails to recognise the role of the City Centre and the extant permission that exists at Lichfield South (Wall Island).

Objection: *The Vision should be clear that Cricket Lane SDA may provide an opportunity for delivering some offices either alone or as part of/integral to other uses (i.e. office component of a B2/B8 unit), however, delivery will be dependent on market forces including locational demand and the competition of other sites in the locality.*

3. LICHFIELD CITY ECONOMIC ACTION PLAN

3.1 The Lichfield City Economic Plan (LCEP) is intended to form a key part of the evidence base underpinning the Lichfield City Neighbourhood Plan. The Plan recognises that for many of the actions further work will be necessary to support the policies contained within the emerging Neighbourhood Plan, which in turn will deliver the Vision.

3.2 The LCEP provides little new evidence to support the Neighbourhood Plan, instead relying on evidence prepared by the District Council to underpin the now adopted Lichfield District Local Plan Strategy. Concern is also raised that the LCEP misinterprets elements of the District Council's published evidence base. This evidence includes the Employment Land Review published in 2012, an addendum to this report published in 2013 and the Employment Land Review Update published in 2014 alongside the Council's main modifications to the submitted Local Plan Strategy. The Employment Land Review Addendum provides a strategic assessment of land at Cricket Lane. This is appended at **Appendix A** to this response. The views expressed by GVA within this Addendum remain relevant to the development of the Cricket Lane SDA.

3.3 Referenced as Site 64 within the ELR the assessment concludes the following for land at Cricket Lane:

- It is a greenfield site that given its strategic gateway location would be attractive to the market, most likely sub-regional companies
- The site appears to only have minor obstacles to development.
- The site is a prime gateway location on the edge of the urban area and is adjacent to the A38 and London Road.
- Given its strategic location we would expect that the site would be attractive to sub-regional companies who are looking for easy access to the highway network.

3.4 The conclusions on market attractiveness were informed by discussions with commercial agents. These discussions determined that *"this site would be very attractive to the market given its strategic gateway location. We would advise that the majority of demand would come from B8 occupiers with some demand from B1c/B2 end users."* St Modwen consider this still reflects the current market view for land within the SDA.

- 3.5 The Employment Land Review, in demonstrating an 85% job balance across the District by 2029, assumes that 75% of the employment element of the Cricket Lane SDA would be for B8 end users and the remaining 25% for B1c/B2 end users. It does not state that the Cricket Lane SDA would be attractive to office uses and places no reliance on the delivery of B1a/B1b floorspace within the Cricket Lane SDA to achieve this jobs balance aim.
- 3.6 The Lichfield City Economic Plan also makes reference to an Offices Market Capacity and Appropriate Locations for Growth Report published by the District Council in 2008. This report was prepared approximately 8 years ago and will not reflect today's office market in the District. Therefore, it should not be relied upon as evidence for the purpose of informing local policy. It is noted that the District Council is in the process of commissioning new evidence in respect of office demand within the District as part of the necessary robust evidence base to inform the emerging Local Plan Allocations document.
- 3.7 The view of a local agent has been sought to inform the Lichfield City Economics Plan, however the view expressed provides no firm evidence of demand for further B1a floorspace in Lichfield City. Instead the agents speculative view questions whether further office floorspace is viable, stating, *"there maybe some pent up demand which could push the rents up to make the site viable to develop now, however build costs are high, so speculative schemes are still likely to be marginal and most schemes are likely to be for an identified end occupier. To secure delivery, would entail identifying office space in the right location and it may require some kick start support."*
- 3.8 The LCEP recognises that most regional or national scale businesses would prefer to locate in a more prestigious 'office only' location. Whilst Cricket Lane SDA is identified as having potential for medium sized headquarters within the document, it is recognised that Lichfield South (Wall Island) has planning permission for a further 12,500 sqm of grade A office floorspace and upon completion would accommodate the vast majority of the identified B1a floorspace target for Lichfield City in the short term. Lichfield South is an 'office only' location supported by a hotel, restaurants and a private gymnasium. Cricket Lane SDA will certainly not represent an office only location.
- 3.9 Lichfield South (Wall Island) is located less than 1.5 miles from Lichfield City Centre and less than 1.5 miles from the Cricket Lane SDA. Whilst it lies outside the Neighbourhood Development Area boundary it should not be discounted as a

location that will influence economic growth within the City. With Lichfield South having an extant consent for a further 12,500 sqm of Grade A floorspace as a second phase to an existing 'office only' park, it is difficult to understand how the LCEP can conclude that the main focus for higher quality growth should be within the Cricket Lane SDA. The 12,500sqm of consented Grade A office provision seems to have been discounted purely on the basis of administrative boundaries rather than functional economic geography. This 12,500sqm of additional office floorspace forms part of the 30,000sqm gross target advocated within Policy Lichfield 3 (Lichfield Economy) of the Local Plan Strategy over the Plan period from 2008 to 2029.

- 3.10 The majority of the 30,000sqm office floorspace target has now been satisfied through development completions or commitments. The Table below establishes these completions and commitments in or around Lichfield City for clarity:

Site Location	Planning Ref	B1a Floorspace (m ²)	Status	AMR completions recorded
City Wharf	06/00308/REM	5,000	Complete 08/09	AMR 2008/2009
Greenhough Road	06/01000/FULM	5,300	Complete 08/09	AMR 2008/2009
Mount Villa, Trent Valley Road	09/00837/FUL	164	Complete 12/13	AMR 2012/2013
Access Bookings, St John Street	12/00523/COU	315	Complete 12/13	AMR 2012/2013
Former Decades Vintage, 22 St Johns Street	14/00710/COU	180	Complete 14/15	AMR 2014/2015
Land rear of 20 St John Street	14/00155/FUL	586	Complete 14/15	AMR 2014/2015
19B The Close	14/01087/COU	86	Complete 14/15	AMR 2014/2015
Greenhough Road Phase 2	13/00809/FULM	2,249	Consented	Not yet complete
Lichfield South Business Park	14/00395/OUTMEI	12,500	Consented	Not yet complete
31a Sandford Street	11/01319/FULM	202 ¹	Under Construction/ Complete	
Pool Dam House	11/00374/COU	139 ²	Under Construction/ Complete	
TOTAL		26,721m²		

¹ Floorspace taken from approved floorplans which show B1a element of scheme providing 202m². (Drawing reference - AAH4961 DRG04 Rev G)

² Floorspace taken from planning application forms of approved scheme.

- 3.11 The table above demonstrates that good progress has been made in reaching the office floorspace target of 30,000sqm between 2008 and 2029 as set out in the Local Plan Strategy, with a residual of approximately 3,000sqm left to identify. The evidence suggests therefore that the target of 30,000sqm of B1a floorspace to serve Lichfield City is likely to be delivered within the Plan period through windfalls alone without the need for further policy intervention.
- 3.12 These windfalls would include further opportunities that are present within the City Centre, including the following sites identified within the emerging Lichfield City Neighbourhood Plan:
- Bird Street Car Park;
 - Former Woolworths Building; and
 - Quonians.
- 3.13 These three sites, identified within Policy 12 of the Neighbourhood Plan, and located within the City Centre, could easily satisfy the residual 3,000sqm B1a floorspace alone. Therefore, requiring B1a/B1b floorspace within Cricket Lane SDA could undermine the expressed aim of the Neighbourhood Plan to maintain Lichfield City's vibrancy as a City Centre and would be in clear conflict with the Local Plan Strategy and national guidance.

4. CONFORMITY WITH THE LOCAL PLAN STRATEGY

- 4.1 Prior to looking at specific policies and paragraphs of the Plan and compliance or otherwise with the Basic Conditions we would wish to reinforce a fundamental point which applies to the Neighbourhood Plan as drafted, when read as a whole cognisant of the provisions of the NPPF and Neighbourhood Planning Practice Guidance (PPG). There is a clear Imperative, in national guidance, that Neighbourhood and Local Plans should be complementary. This is best encompassed in the PPG which states that:

"The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan." (Ref: ID 41-009-20140306)

- 4.2 This is relevant to the Basic Conditions since the plan led system is fundamental to the principles of sustainability (see NPPF s17). Unfortunately, there is no evidence in the emerging Neighbourhood Plan that its text, policies and proposals have been progressed in a manner that is complementary to the adopted Local Plan Strategy or the emerging Local Plan Allocations document with areas of conflict minimised. In contrast the opposite appears to be the case. Any reading of the emerging Neighbourhood Plan alongside the adopted Local Plan reveals that they are, in terms of the employment strategy, incompatible as drafted.
- 4.3 Core Policy 1 of the Local Plan Strategy sets out the spatial development strategy for the District, establishing the level of development and the spatial distribution of this development across the District. The spatial strategy establishes that a minimum of 10,030 homes should be delivered between 2008 and 2029 and, of particular relevance to the Lichfield City Neighbourhood Plan, a target of 30,000sqm of office floorspace within the City Centre.
- 4.4 The Lichfield City Neighbourhood Plan, as drafted, is not in general conformity with the strategic policies of the Local Plan Strategy as it seeks to deliver a level of B1a office floorspace that would significantly exceed this target. Information set out in section 3 of this representation highlights that Lichfield City is only

around 3,000sqm short of achieving this target. Requiring Cricket Lane SDA to deliver "at least 2 hectares of office (Use Class B1a) and research and development (Use Class B1b) space," could result in the delivery of approximately 6,500sqm+ of additional B1a and B1b floorspace utilising the plot ratio assumptions contained within the 2012 Employment Land Review (Table 5.14). This level of provision is therefore in conflict with the strategic policies contained within the adopted Local Plan.

- 4.5 In addition, the evidence base which underpins the Local Plan does not provide support for this policy. The evidence base, which also underpins the emerging Neighbourhood Plan, provides a market view that the Cricket Lane SDA is unlikely to be attractive to B1a and B1b uses and does not justify a level of office floorspace significantly in excess of 30,000sqm within the Plan period. These aspects of the Local Plan were of course considered by the Inspector against the tests of soundness at the Local Plan Strategy examination. In addition, the examination also considered legal requirements including the duty to co-operate. There is a danger that additional office floorspace provided outside the City Centre may have an effect on the vitality and viability of Lichfield City Centre. In addition, significantly exceeding the office floorspace requirement could also impact on the viability and viability within competing centres outside the District. An impact assessment has not been prepared to underpin the emerging Neighbourhood Plan. Instead, paragraph 4.21 relies upon evidence published in 1998, nearly 20 years out of date, to support the delivery of town centre uses out of centre.

Objection: Policy 1 and the supporting text (including paras. 4.13, 4.14, 4.19, 4.20) should be deleted or reference to the requirement to incorporate at least 2 hectares of office (Use Class B1a) and research and development (Use Class B1b) space, removed.

- 4.6 The Local Plan Strategy, through Core Policy 8 (Our Centres), directs development proposals for retail, leisure and cultural facilities to the commercial centres of Burntwood and Lichfield City. It is noted that Lichfield District Council intend to define the commercial centres through the forthcoming Local Plan Allocations document in due course. LCNP Policy 1 (Cricket Lane Strategic Development Area) as drafted supports other commercial uses such as hotels and health and fitness centres as "complementary uses that assist in creating an attractive office market location." Whilst the flexibility of allowing for the delivery

of non B use employment generating uses are supported by St Modwen and Persimmon Homes, the primary reason for supporting such uses should not be for supporting a dedicated office park. Again such wording would be in conflict with the strategic policies contained within the Local Strategy, namely Core Policy 8.

Objection: *Policy 1 should be deleted as set out above or reference to assisting the creation of an attractive office market location, removed.*

5. CRICKET LANE SDA

5.1 St Modwen Developments Ltd and Persimmon Homes Ltd are currently in the process of preparing a planning application for employment and residential development within Cricket Lane SDA. As part of this process a draft scheme has been prepared and subject to consultation. This scheme assumes the majority of the proposed employment floorspace will fall within B8 (Storage and Distribution) and B1c/B2 (light industrial/manufacturing) use classes. Some allowance is being made for the provision of offices either alone or as part of/integral to other uses (i.e. office component of a B2/B8 unit), however the exact mix of employment floorspace will be dependent on market forces.

5.2 **Appendix B** to this representation considers the economic benefits of the emerging proposal. This provides evidence that Cricket Lane SDA will address a number of challenges identified within the emerging Neighbourhood Plan, including increasing the range of employment opportunities in Lichfield City, including in higher value activities that align to the profile of the resident workforce, whilst protecting the role of Lichfield City Centre. These issues can be addressed without the expressed need to require B1a/B1b floorspace as part of the scheme.

5.3 The report evidences that the provision of traditional employment uses, without the need for economic intervention, would provide the following economic benefits:

- 720 FTE jobs supported on site
- Half of all jobs supported would be in higher value/higher income occupations
- £25m of economic output would be contributed from jobs supported by activities at the site each year
- The economic output would equate to £5.1m GVA each year during the build phase

5.4 The Neighbourhood Plan fails to recognise that non-B1a/B1b uses can also provide significant benefits to the economy in Lichfield City. These benefits, including the creation of higher value added jobs, are often overlooked:

- **Manufacturing and logistics as economic contributors:** Both sectors are already making a substantial contribution to the national and regional

economies. In the West Midlands for example, manufacturing and logistics account for more than 420,000 jobs³, or 17% of total employment in region. The gross value added (a proxy for economy output) contribution of manufacturing and logistics to the West Midlands economy is around £22.9billion according to the most recent estimates for 2014 published by the ONS – which represents 20% of the region’s entire economic output.

- **Challenging perceptions:** The manufacturing and logistics sectors are often said to be low skilled and low value, however both sectors are already making a substantial contribution to the local and regional economy, as well as providing jobs across a range of skill levels and occupation types.
- **Up-skilling:** Increasing use of technology in both sectors is likely to lead a rise in the need for people with higher level skills in the future. There number of people working in higher level roles is also expected to grow. For example, research by UKCES⁴ suggests that management positions in the logistics sector will increase by 18% and professional and associate professional & technical occupations by 26% and 21% respectively from 2012-22.

5.5 The emerging scheme at Cricket Lane, which is compliant with the adopted Local Plan Strategy, has the potential to make a significant contribution to job creation in Lichfield City and the District as a whole, without replicating the offer at Lichfield South and without the need for economic intervention. The scheme which assumes the majority of the floorspace will be provided within B8 and B1c/B2 uses will provide employment opportunities across a range of skill levels and occupation types, including a significant number of high value roles that will require higher level qualifications and/or are in managerial/professional roles.

³ Based on data from the 2014 Business Register & Employment Survey, published by the Office for National Statistics.

⁴ *Understanding Skills and Performance Challenges in the Logistics Sector*. UK Commission for Employment & Skills, October 2014

6. CONCLUSIONS

- 6.1 Policy 1 does not meet the Basic Conditions in failing to have regard to the strategic policies contained within the recently adopted Local Plan Strategy. The requirement for the Cricket Lane SDA to deliver at least 2 hectares of office floorspace would conflict with the spatial development strategy and would result in a level of office floorspace significantly in excess of the target set out in the Local Plan. The requirement could undermine the regeneration within Lichfield City, deliver a level of office floorspace that could cause negative effects in centres outside the District and would therefore undermine the achievement of sustainable development.
- 6.1 The conflict between the Local Plan and the emerging Neighbourhood Plan is also inherently at odds with national guidance which the Neighbourhood Plan must have regard to if it is to meet the Basic Condition. Paragraph 184 of the NPPF is clear stating that: *"The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan."* Certainly it cannot be said that the ambition of the neighbourhood is aligned with the strategic needs and priorities contained within the adopted Local Plan.
- 6.2 It is not clear from the evidence base before the reader the extent to which there has been discussion and agreement about the relationship between policies in the adopted Local Plan and the emerging Neighbourhood Plan having regard to national policy and guidance. If discussions have taken place it does not seem that they have proved to be successful given both the Local Plan and the emerging Neighbourhood Plan utilise much of the same evidence.
- 6.3 The clear intent of national guidance is that up to date, adopted Local Plans and Neighbourhood Plans would have a synergy and be mutually compatible on strategic planning issues. This is not being achieved with this Pre-Submission Neighbourhood Plan. As such, when read as a whole it cannot be said that the Plan is capable of accord with the Basic Condition to accord with national policy and guidance. It is considered that a fundamental redraft is required in order to allow the Neighbourhood Plan to align itself more effectively with the adopted Local Plan thus improving the opportunity to progress successfully through the independent examination. This redraft should remove Policy 1.

- 6.4 There is also a real concern that Policy 1 as drafted is undeliverable. The market views sought to date recognise the attractiveness of the Cricket Lane SDA as a location for employment development. The delivery of the type of such employment floorspace will of course be determined by the market. However, evidence set out in the Employment Land Review (Appendix A) is clear that the site is unlikely to be attractive to B1a and B1b end users. This evidence is endorsed within the LCEP which recognises that businesses have a desire to deliver prestigious office headquarters within office only developments. It is therefore difficult to understand why the Neighbourhood Plan considers that the Cricket Lane SDA would offer an opportunity to replicate Lichfield South (Wall Island). In reality, contrary to the Practice Guidance (ID 41-044-20140306) the Neighbourhood Plan will have the unintended consequence of constraining the delivery of the Cricket Lane SDA which is so critical for the delivery of the spatial strategy established in the adopted Local Plan.
- 6.5 Information provided at Appendix B to this representation demonstrates that a market led scheme at Cricket Lane that focusses on the delivery of B8 and B1c/B2 uses would provide significant benefits to the local economy including the provision of approximately 720 FTE jobs, of which around 50% would be within high value/higher income occupations. This is entirely consistent with the policy requirements of the adopted Local Plan.

APPENDIX A

Employment Land Review 2012 Addendum

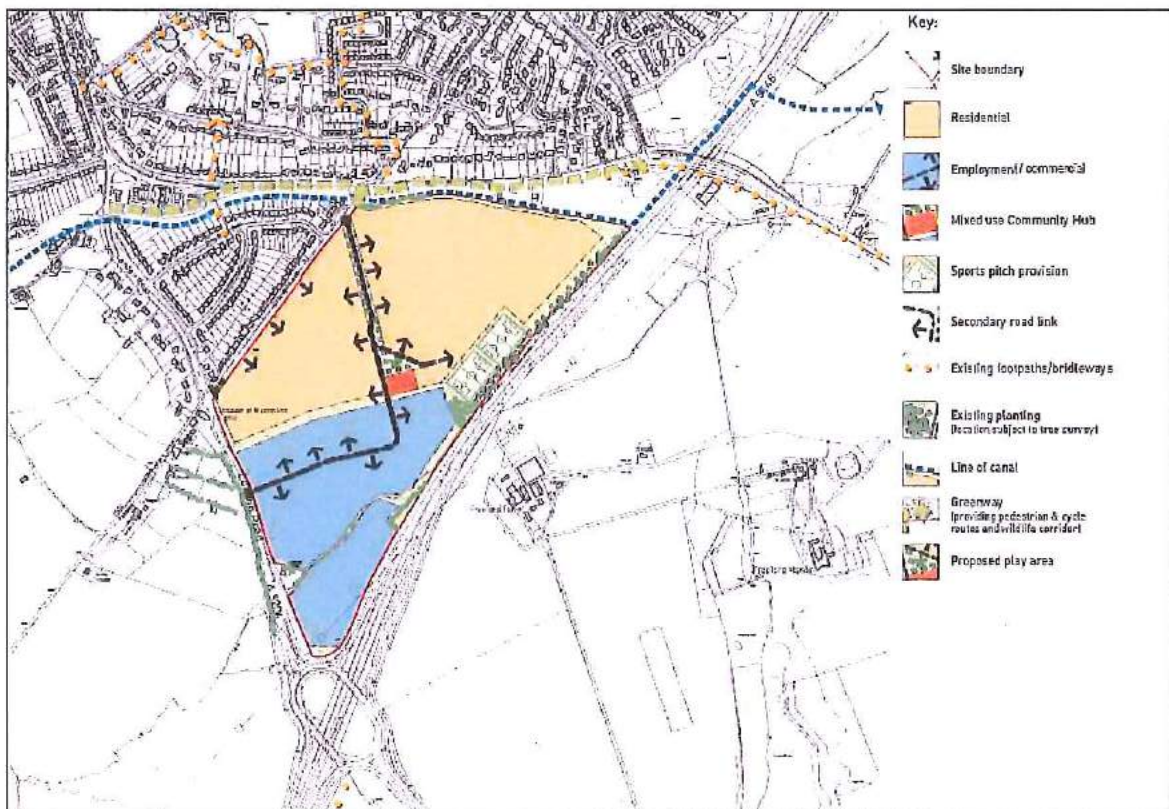
Cricket Lane, Lichfield - Employment Assessment Report
December 2013, for Lichfield District Council

Introduction

GVA have been instructed by Lichfield District Council (LDC) to undertake a strategic assessment of the employment land element of the scheme being promoted by Pegasus on behalf of Persimmon Homes at Cricket Lane, Lichfield. As agreed with LDC and to ensure consistency we have undertaken this assessment by applying the same methodology used in the completion of our Employment Land Review (February 2012).

The Site and its Promotion

The site is located to the south of Lichfield town centre adjacent to the east of the London Road (A5206) and the west of the A38, and is part of a wider scheme of 38 hectares of arable land which is designated as part of the greenbelt as below.

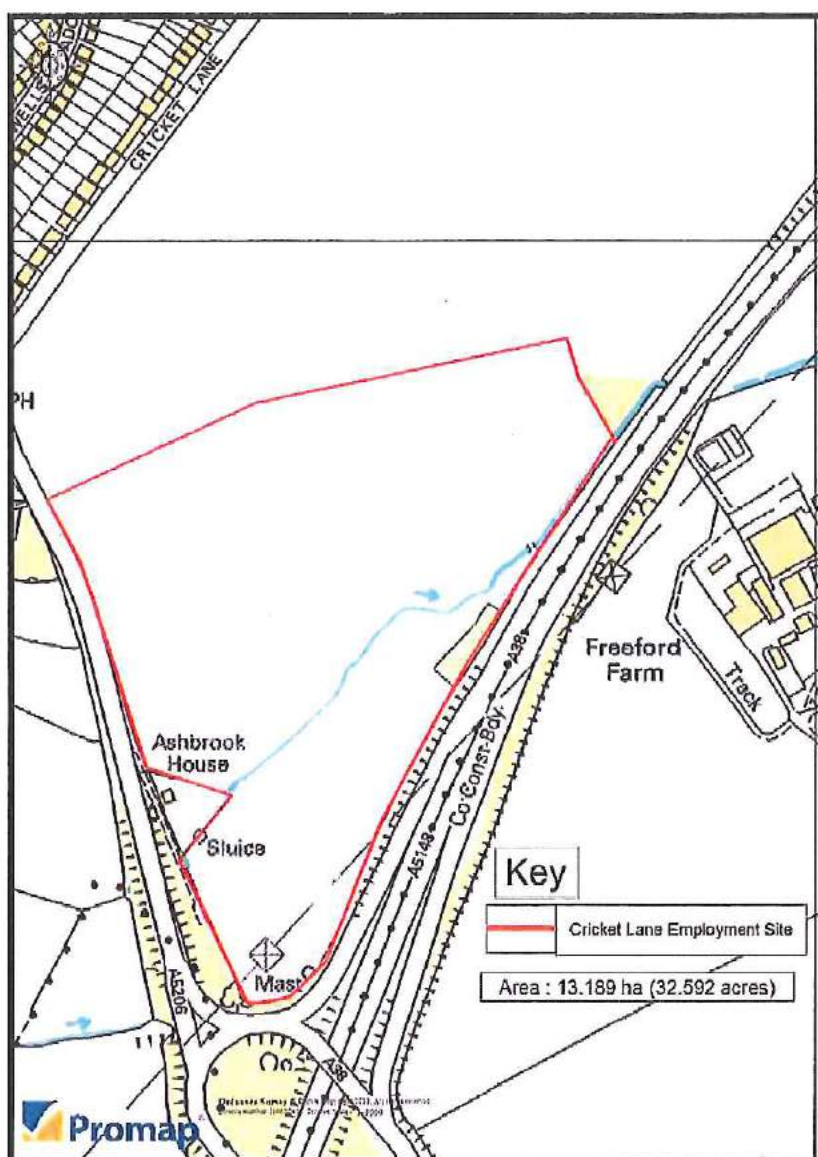


Source: Pegasus, Sept 2012

Pegasus, on behalf of Persimmon Homes is promoting the site for mixed uses including residential, employment and a community hub. Pegasus produced a site promotion background document during September 2012 for the site to support the site's inclusion in the Lichfield Local Plan as a strategic development location. This has helped inform this assessment.

The Pegasus document provides comprehensive detail on site context/description, the nature of the proposed development, landscape, ecology, transportation and cultural heritage matters and is a key document to be reviewed in order to understand the site's potential.

For the avoidance of doubt the September 2012 site promotion document produced by Pegasus was received some seven months after the completion of the GVA ELR. As a result this site was not included in the assessment work that informed the ELR. In this light, LDC has requested this assessment to inform their ongoing discussion as to its potential to form part of the District's future employment land supply. The employment element of the site is located to the south of the larger site and provides circa 13 hectares of development land as shown below.



Source: GVA, Dec 2013

Site Assessment

We have continued the numbering from the ELR and have given this additional site the reference P64 – Cricket Lane.

We have undertaken a site visit and provide at **Appendix A** photos from this site visit. At **Appendix B** we provide a copy of the employment sites proforma that formed the basis of the assessment. For continuity this is the same as that provided at Appendix G of our 2012 ELR Report.

We provide the key findings of our employment assessment below (this covers all of the criteria used to inform Appendix H of our 2012 ELR and should be read across as appropriate):

Table 1: Site P64: Cricket Lane – Proposed Employment Site Assessment

Criteria	Score	Notes
Site Area	Circa 13.2 hectares	This is the employment element of a 38 hectare site that will provide, in addition to employment use, in excess of 24 hectares of residential/community uses.
Availability	No	Site is not immediately available but is being promoted by developers for an allocation in the Local Plan.
Ownership	N/A	TBC.
Market Activity	No	Greenfield site that given its strategic gateway location would be attractive to the market, most likely sub-regional companies.
Access	5	Adjoins both the London Road and A38 providing easy access for all vehicles to the strategic infrastructure network.
Public Transport	3	Lichfield town centre bus and train station are approx. 1.5km to the north, the no. 765 service to Nuneaton has a stop 50m to the north of the site and its well served by both pedestrian and cycle routes.
Prominence	5	Gateway site that is visible from both London Road and the A38.
Local Amenities	3	Close to a limited range and quality of basic services including a pub/restaurant and petrol station/mini supermarket, with all town centre facilities within 1.5km of the site.
Layout	5	The site is largely flat with no obvious obstructions.
Character of area	1	Located on the edge of the urban area in a semi-rural setting. No adjacent commercial uses but adjacent to two main roads (A38/London Road) with the site abutting Cricket Lane on its north western edge which has residential accommodation on one side of the road.

Planning status	3	The site has no current planning status and is being promoted by its agents/developers to be included as an allocation in the emerging Local Plan.
Economic constraints	3	The site appears to have only minor obstacles to development. As these refer in the main to bringing forward greenbelt land and providing access off the existing highway network these may be both time consuming and expensive to resolve.
Strategic location	3	The site is in a prime gateway location on the edge of the urban area and is adjacent to the A38 and London Road.
Greenfield/Brownfield	1	The site is on greenfield land.
Market attractiveness	2	Given its strategic location we would expect that the site would be attractive to sub-regional companies who are looking for easy access to the highway network. The site is located approx. 5/10 minutes drive to the north of both the A5 and M6 Toll which provide fast links to the national motorway network.

Source: GVA, Dec 2013

After discussions with our agents it is our view (subject to greenbelt release and planning consent) that this site would be very attractive to the market given its strategic gateway location. We would advise that the majority of demand would come from B8 occupiers with some demand from B1c/B2 end users.

In this light we have moved away from the assumption in Table 4.18 of the 2012 ELR, splitting the quantum of B2/8 land use equally i.e. 50/50, and have assumed that 75% of the land (4,000 sqm per ha as per Table 5.14 of the 2012 ELR) would be for B8 end users and the remaining 25% for B1c/B2 end users (3,500 sqm per ha).

We have then applied the methodology used in Appendix I of our 2012 ELR to rank this proposed employment site as follows:

Table 2: Site P64: Cricket Lane – Proposed Employment Site Assessment (Ranking)

Criteria	Score
Market score	24
Physical score	10
Sustainability score	9
Total score	43
Market ranking	Average
Physical ranking	Excellent
Sustainability ranking	Average
Typology	B1c/B2 or B8
Office/Technology capacity	N/A
Industrial capacity (B1c/B2)	3.2 hectares and 11,200 sqm
Distribution capacity (B8)	9.9 hectares and 39,600 sqm
Total land	13.2 hectares and 50,800 sqm

Source: GVA, Dec 2013

As noted in Table 2 above it is our view, given the site's gateway location and current market demand that this site would be most suited for smaller scale B8 distribution employment uses and ancillary B1c/B2 industrial uses.

As noted elsewhere in this report this site is being promoted as a potential future employment land allocation and so its delivery is dependent upon achieving this. Further, given its location in the greenbelt a key consideration will be whether it receives political support to enable its release from the greenbelt. If this occurs any future planning application will need to clearly articulate the means by which access and egress to/from the highway network will be dealt within the site. The September 2012 Pegasus document provides some initial views on this including separate access for the residential and employment elements which we would support.

Conclusions

The 2012 ELR concluded that whilst there was a slight shortfall in the committed supply for B1a/B1b and B1c/B2 employment uses to meet the identified demand this turns into a substantial surplus when the potential future employment sites are added to the portfolio.

The availability of a further 13.2 hectares of employment land supply for B1c/B2 (3.3 ha) and B8 (9.9 ha) provides a supply surplus, over demand, of circa 34.75 hectares of B1c/B2 space and in excess of 77.1 hectares of B8 space.

The 2012 ELR recommended that LDC allocated circa 10 hectares of employment land from its potential future sites to meet the shortfall in demand from its committed employment sites.

The 2012 ELR also concluded that sites that have scored excellent or good should be considered further by LDC to determine their potential to be allocated to meet the identified shortfall.

It is not the purpose of this assessment to determine whether or not this site is allocated by LDC in its Local Plan. This determination will be for LDC as it assesses its portfolio of all potential future sites to identify those most suitable to meet market demand and provide additional employment space in the plan period.

We are also cognisant of the fact that since the ELR was completed in 2012 the Local Plan has been through its Examination in Public and it is possible that there may have been changes to the employment land supply information relied upon in this report from the 2012 ELR.

We also recognise that since the completion of the ELR the UK property market has slowly emerged from recession and is starting to show signs of growth. As a result LDC will be looking to allocate additional employment sites that meet their needs moving forwards.

It may be that LDC determines to provide additional supply, as a buffer, to the 10 hectares identified in the 2012 ELR. If this were to be the case LDC have sufficient supply to identify the most suitable sites to meet their employment land needs over the plan period.

Appendices

Appendix A – Photos from Cricket Lane Site Visit

Appendix B – Cricket Lane Employment Site Assessment Profarma

**Appendix A - Photos from Cricket Lane, Lichfield – Site Visit
(December 2013)**









Appendix B - Employment Sites Proforma

Site Ref No	P64	
Address	Cricket Lane, Lichfield, WS14	
Criteria	Score	Notes
Availability	N	<p>Yes – Site is advertised as being available, or there are no obvious obstructions to immediately develop the site.</p> <p>No – Site is not immediately available (please state reason why in space below)</p>
Site Ownership	N/A	Please note Site Ownership Details if available
Market Activity (any in last 5 years)	N	<p>Yes – Evidence of recent development in the immediate surrounding area (e.g. on the same part of an estate or road)</p> <p>No – No evidence of recent development. If the site is a new (Greenfield) site please state below whether it would be attractive to the market at present</p>
Access	5	<p>5. Either adjoining main road or motorway junction with easy site access for all vehicles or access to rail, air and sea facilities</p> <p>4. Close to major road network; easy site access for all vehicles</p> <p>3. Easy site access for all vehicles; indirect or restricted access to major road network</p> <p>2. Restricted access for HGVs; restricted access to major road network</p> <p>1. Restricted access for all commercial vehicles, severely restricted access to major road network</p>
Public Transport	3	<p>5. Close to a station, peak time bus route and cycle route; on a pedestrian route</p> <p>4. Close to a station or peak time bus route, close to cycle route, on a pedestrian route</p> <p>3. Close to either a station or peak time bus route or cycle route; on a pedestrian route</p> <p>2. Not near a station, peak time bus route or cycle route; on a pedestrian route</p> <p>1. Not on a pedestrian route; not near a station, peak time bus route or cycle route</p> <p>NB: "Close" = within about 10 minutes walk</p> <p>NB2: Peak time bus routes defined as more than 2 buses per hour</p>
Prominence	5	<p>5. Gateway site to a prominent estate, visible from major road network</p> <p>4. Visible site, on a main road or prominent estate</p> <p>3. On a main road or prominent estate, tucked away from view</p> <p>2. Visible, on a minor road or estate</p> <p>1. On a minor road or estate, tucked away from view</p>
Local Amenities	3	<p>5. Close to a town centre with a wide range and quality of services</p> <p>4. Close to local centre with a reasonable range and quality of services</p> <p>3. Close to a limited range and quality of basic services</p> <p>2. Close to one or two services</p> <p>1. No services in close proximity</p> <p>NB1: Employment related services such as banks, travel agents, shops, leisure/recreation, pubs/restaurants</p> <p>NB2: "Close" = within about 10 minutes walk</p>
Site Layout	5	<p>5. Clear plot, no obstructions</p> <p>4. Regular shaped plot, obstructed</p> <p>3. Regular shaped plot, fragmented</p> <p>2. Irregular shaped plot, obstructed</p> <p>1. Irregular shaped plot, fragmented</p>
Character of Area	1	<p>5. Well established commercial area</p> <p>4. Established commercial area, with residential area or rural area nearby</p> <p>3. Mixed commercial and residential area</p> <p>2. Mainly residential or rural area with few commercial uses</p> <p>1. Mainly residential or rural area with no existing commercial uses</p>
Planning Status	3	<p>5. Detailed planning permission</p> <p>4. Outline planning permission</p> <p>3. Published development brief</p> <p>2. Local Plan allocation</p> <p>1. Allocation in Deposit Draft Local Plan, or reserve site</p>
Economic Constraints	3	<p>5. No obstacles to development</p> <p>4. Minor obstacles to development; relatively easy, quick and cheap to resolve</p> <p>3. Minor obstacles to development; more difficult, expensive and time-consuming to resolve</p> <p>2. Major obstacles to development; very difficult, expensive and time-consuming to resolve</p> <p>1. Major obstacles to development; extremely difficult, expensive and time-consuming to resolve</p> <p>NB: Obstacles to development would include access difficulties, infrastructure requirements, contamination remediation costs, multiple ownership etc.</p>
Strategic Location	3	<p>4. Motorway Corridor</p> <p>3. Other Strategic Roads</p> <p>2. Elsewhere in Built up Area</p> <p>1. All other sites</p>
Greenfield / Brownfield	1	<p>1. Site is on Greenfield Land</p> <p>2. Site is on Brownfield Land</p>
Market Attractiveness	2	<p>3. Site attractive to National companies</p> <p>2. Site attractive to Sub-regional companies</p> <p>1. Site attractive to Local companies</p>

APPENDIX B

Cricket Lane SDA Economic Impact Report



LAND AT CRICKET LANE, LICHFIELD

ECONOMIC IMPACT OF PROPOSED EMPLOYMENT FLOORSPACE

PERSIMMON HOMES & ST MODWEN

Date: September 2016

Pegasus Reference: RC/BIR.3962

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APPENDIX 1 – ECONOMIC IMPACT INFOGRAPHIC

1. CONTRIBUTION OF THE SCHEME TO JOB CREATION

Introduction

- 1.1 St Modwen Developments Ltd and Persimmon Homes Ltd are currently in the process of preparing a planning application for residential and employment provision in line with the requirements established through the Lichfield District Local Plan Strategy.
- 1.2 This report examines the contribution that the assumed employment floorspace on the land at Cricket Lane, Lichfield, will make to job creation, based on the emerging scheme. It also provides commentary on the type and quality of jobs that will be created by such a scheme.

Job Creation

- 1.3 In order to quantify the number of jobs created by the development, estimates on the type of floorspace to be built are required. Based on work undertaken to date and the District Council's published evidence base, the gross floorspace breakdown is shown below. It should be noted that this is for illustrative purposes only at the current time:
- General office (B1a) – 2,090 sq. m.
 - Light industrial/manufacturing (B1c/B2) – 6,270 sq. m.
 - Storage/distribution (B8) – 33,445 sq. m.
- 1.4 The floorspace will be across a range of uses, with the office element (B1a) seen as being integral to supporting the B1c/B2/B8 elements of the scheme (i.e. the office component of these use types).
- 1.5 To quantify the number of jobs likely to be created a number of assumptions need to be made in terms of the density of employment that would normally be expected for the different elements of the proposed scheme. These densities have been sourced from *Employment Densities Guide (3rd Edition, November 2015)*, prepared for the Homes and Communities Agency (HCA) by Bilfinger GVA.
- 1.6 For office floorspace, employment densities relate to net internal area. The gross general office floorspace has been reduced by 15% to arrive at a net estimate, which is in line with the HCA employment densities guidance. Light industrial/manufacturing floorspace densities vary between net and gross area. The gross floorspace for B1c/B2 has also been reduced, but only by 10% in order to reflect this degree of variance. Storage/distribution densities relate to the gross area, therefore the size remains the same in the analysis.

- 1.7 Table 1.1 shows the employment densities used, along with the gross job estimates associated with each floorspace type. Once fully developed and occupied the development, based on the emerging B1a, B1c/B2, B8 mix, will provide around **720 gross FTE jobs on-site**.

Table 1.1: Estimated gross employment impact by floorspace type for the proposed scheme at Cricket Lane

Development	Illustrative Gross size (sq. m)	Net size (sq. m)	Sq. m per employee	Gross Jobs
General office	2,090	1,777	12	148
Light industrial/manufacturing	6,270	5,643	42 ¹	134
Storage/distribution	33,445	-	77	434
Total	41,805	-	-	717

- 1.8 In addition to the permanent employment impacts associated with the scheme, other benefits such as contribution to economic output and also temporary jobs supported by the construction phase will be created. Appendix 1 presents a number of these benefits in summary format using an infographic. These other benefits include:

- **£25million** annual economic output contribution supported by activities at the site.
- **50%** of jobs estimated to be in higher value occupations.
- **1 in 3** jobs at Level 4+ (including degrees) qualifications.

Type of jobs created

- 1.9 A scheme of the size proposed on the land at Cricket Lane SDA will create many different types of jobs. It is therefore helpful from an economic development perspective to anticipate what type of jobs the scheme will create. This can be done in two ways: firstly, by using data from the 2011 Census; and secondly by looking at what research on the issue says.

2011 Census Analysis

- 1.10 The approach used within this report has been to identify the industry most closely associated with each floorspace type for the scheme at Cricket Lane; and then to use Census data for Lichfield District local authority to look at the higher level skills and higher value occupation mix for these industrial sectors. The following sectors (based on Standard Industrial Classifications produced by the Office for National Statistics) have

¹ Represents a median floorspace based on suggested densities for light industrial (47 sq. m. per employee) and manufacturing (36 sq. m. per employee)

been identified as those most closely aligning with the emerging floorspace types at Cricket Lane:

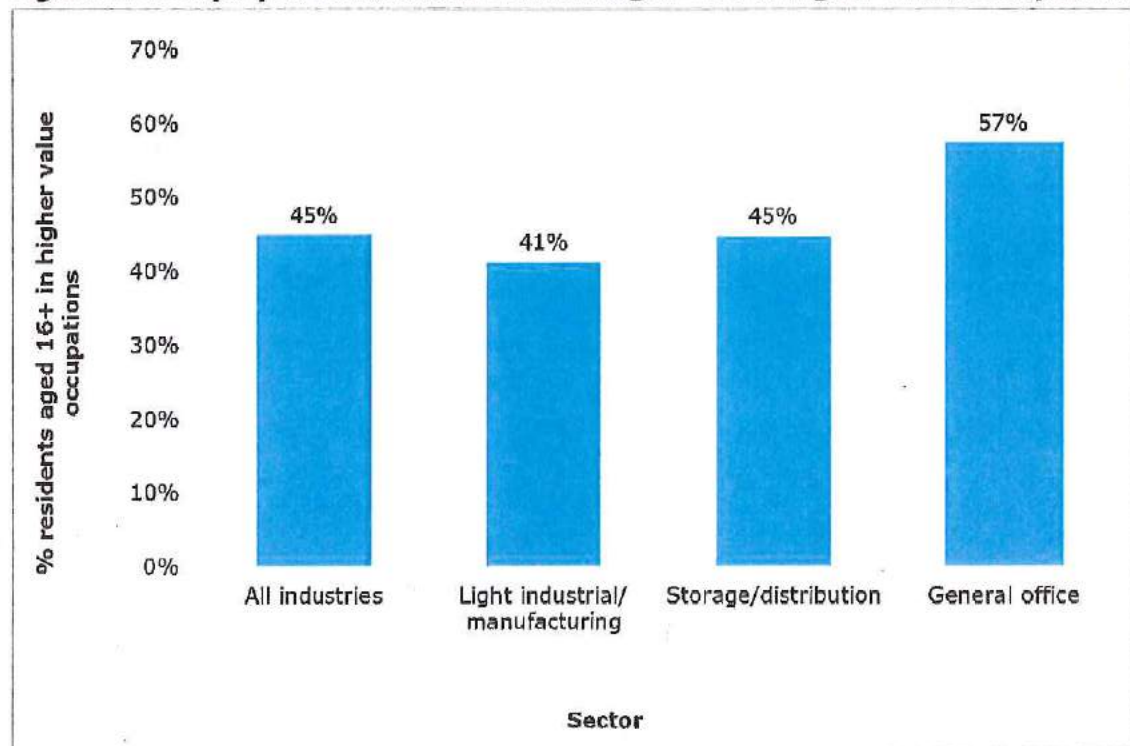
- General office (B1a) – Financial, Real Estate etc. (SIC codes K, L, M & N)
- Light industrial/manufacturing (B1c/B2) – Manufacturing (SIC code C)
- Storage/distribution (B8) – Transport & Communication (SIC code H)

1.11 Figure 1.1 shows the proportion of employed Lichfield residents who can be classed as working in higher value occupations, split by the three sectors outlined above. For comparison purposes, the overall total for all industries is shown. Typically, higher value occupations can be defined as:

- Managers, directors & senior officials
- Professional occupations
- Associate professional & technical occupations

1.12 As can be seen in Figure 1.1, more than 40.0% of people in each of the three sectors are working in higher value occupations. General offices is highest at 57%, well above the 45% average for all industries. Storage/distribution is in line with the average, while manufacturing is only slightly below at 41%. If the three use types are averaged out, almost 50% of jobs are in higher value roles.

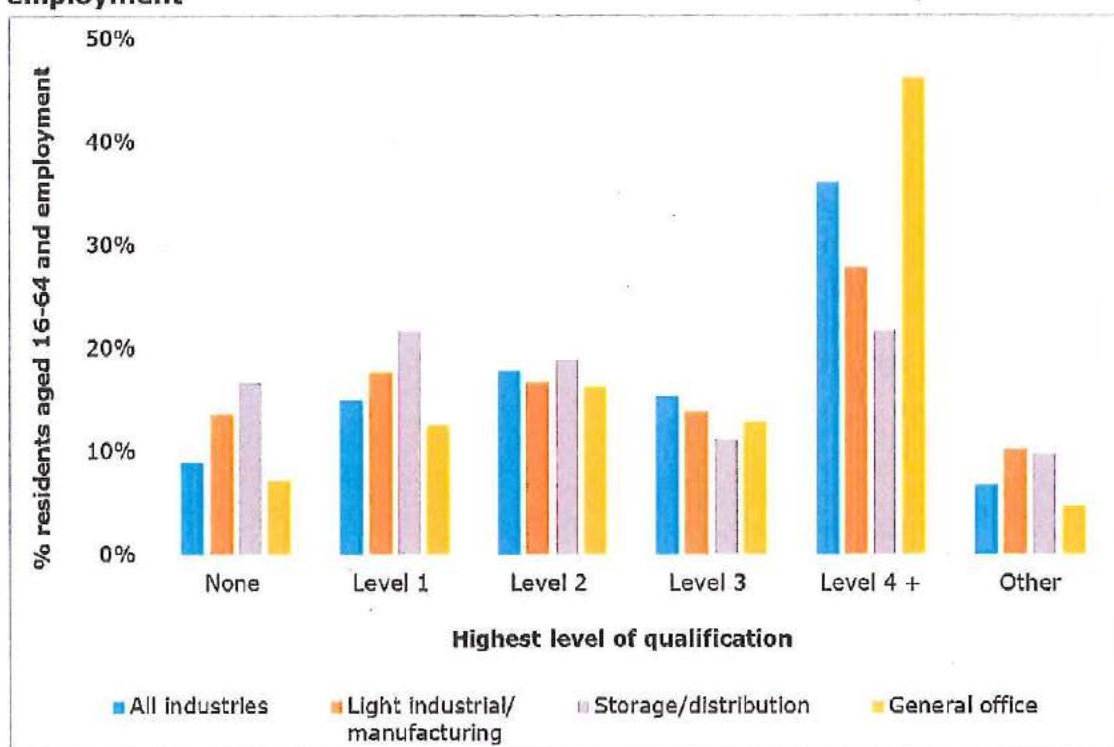
Figure 1.1: Employed residents in Lichfield aged 16+ in higher value occupations



Source: 2011 Census

1.13 Figure 1.2 shows the skills profiles of the three use types, highlighting a mix of qualifications across all levels². More than 45% of Lichfield residents working in office jobs etc. have a Level 4+ qualification, which includes degrees. This is substantially higher than the average of 36% for all industries in the district. Manufacturing (28%) and storage/distribution (22%) are both below this, although this still means that more than one in five people in these sectors hold a degree or equivalent qualification. If the three use types are averaged out, around one in three jobs are undertaken by people with higher level qualifications (Level 4+).

Figure 1.2: Highest level of qualification of Lichfield residents aged 16-64 in employment



² **Level 1:** 1-4 O Levels/CSE/GCSEs (any grades), Entry Level, Foundation Diploma, NVQ Level 1, Foundation GNVQ, Basic/Essential Skills;
Level 2: 5+ O Level (Passes)/CSEs (Grade 1)/GCSEs (Grades A*-C), School Certificate, 1 A Level/ 2-3 AS Levels/VCEs, Intermediate/Higher Diploma, Welsh Baccalaureate Intermediate Diploma, NVQ level 2, Intermediate GNVQ, City and Guilds Craft, BTEC First/General Diploma, RSA Diploma;
Level 3: 2+ A Levels/VCEs, 4+ AS Levels, Higher School Certificate, Progression/Advanced Diploma, Welsh Baccalaureate Advanced Diploma, NVQ Level 3; Advanced GNVQ, City and Guilds Advanced Craft, ONC, OND, BTEC National, RSA Advanced Diploma;
Level 4 and above: Degree (for example BA, BSc), Higher Degree (for example MA, PhD, PGCE), NVQ Level 4-5, HNC, HND, RSA Higher Diploma, BTEC Higher level, Foundation degree (NI), Professional qualifications (for example teaching, nursing, accountancy);
Other includes apprenticeships.

Source: 2011 Census

Other studies

1.14 A considerable amount of research has been undertaken in recent years looking at the employment profiles of sectors, including manufacturing and distribution/logistics. A review of research undertaken by organisations such as the UK Commission for Employment & Skills (UKCES)³ and the British Property Federation⁴ raises a number of points and three in particular are worth noting in relation to the emerging Cricket Lane SDA scheme:

- **Manufacturing and logistics as economic contributors:** Both sectors are already making a substantial contribution to the national and regional economies. In the West Midlands for example, manufacturing and logistics account for more than 420,000 jobs⁵, or 17% of total employment in region. The gross value added (a proxy for economy output) contribution of manufacturing and logistics to the West Midlands economy is around £22.9billion according to the most recent estimates for 2014 published by the ONS – which represents 20% of the region’s entire economic output.
- **Challenging perceptions:** The manufacturing and logistics sectors are often said to be low skilled and low value. As outlined above in the analysis of the 2011 Census data and GVA figures, both sectors are making are already making a substantial contribution to the local and regional economy, as well as providing jobs across a range of skill levels and occupation types.
- **Up-skilling:** Increasing use of technology in both sectors is likely to lead a rise in the need for people with higher level skills in the future. There number of people working in higher level roles is also expected to grow. For example, research by UKCES⁶ suggests that management positions in the logistics sector will increase by 18% and professional and associate professional & technical occupations by 26% and 21% respectively from 2012-22.

³ *Understanding Skills and Performance Challenges in the Logistics Sector*. UK Commission for Employment & Skills, October 2014.

⁴ *Delivering the Goods: The Economic Impact of the UK Logistics Sector*. British Property Federation, December 2015.

⁵ Based on data from the 2014 Business Register & Employment Survey, published by the Office for National Statistics.

⁶ *Understanding Skills and Performance Challenges in the Logistics Sector*. UK Commission for Employment & Skills, October 2014

Summary

- 1.15 The emerging scheme within the Cricket Lane SDA has the potential to make a significant contribution to job creation in the local area and wider region, with around 720 direct FTE jobs estimated to be created on-site once the development is complete and fully occupied. The employment opportunities will be across a range of skill levels and occupation types, including higher value roles that require higher level qualifications and/or are in managerial/professional roles.

APPENDIX 1 – ECONOMIC IMPACT INFOGRAPHIC

ECONOMIC BENEFITS

Land at Cricket Lane, Lichfield

Employment site

CONSTRUCTION BENEFITS

£24million

Estimated construction investment over 5-year build programme



223 jobs (person years¹)



45
direct full time equivalent (FTE) net temporary jobs per annum

62
indirect & induced net FTE temporary jobs per annum

£5.1million GVA²

Economic output per annum during build phase



OPERATIONAL BENEFITS

42,000 sq.m.

Employment space



720
direct FTE jobs supported on site

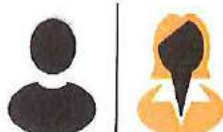
£25million

Annual economic output contribution from jobs supported by activities at the site



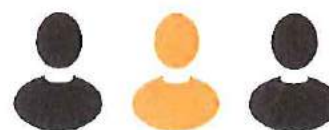
50%

Half of jobs estimated to be in higher value/higher income occupations



1 in 3

Jobs at Level 4³ or above qualifications



¹ Person years = the number of construction workers required to deliver a proposed scheme within a single year

² GVA, or gross value added, is the measure of the value of goods and services produced in an area, sector or industry

³ Level 4+=Degree (for example BA, BSc), Higher Degree (for example MA, PhD, PGCE), NVQ Level 4-5, HNC, HND, RSA Higher Diploma, BTEC Higher Level, Foundation degree (NI), Professional qualifications (for example teaching, nursing, accountancy)