

Sustainability Appraisal of the South Staffordshire Local Plan Review (2019-2039)

Regulation 19 SA Report

Volume 3 of 3: Appendices

October 2022



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the South Staffordshire Local Plan Review 2019-2039

Volume 3 of 3: Appendices

LC-829	Document Control Box
Client	South Staffordshire District Council
Report Title	Sustainability Appraisal of the South Staffordshire Local Plan Review 2019-2039 – Volume 3 of 3: Appendices
Status	Final
Filename	LC-829_Vol_3of3_Reg19_SA_Appendices_3_121022LB.docx
Date	October 2022
Author	LE & LB
Reviewed	LB
Approved	ND

Photo: Staffordshire and Worcestershire Canal by John McLinden

Appendices

Appendix A – Plan, Policy and Programmes Review

Appendix B – SA Framework

Appendix C – Consultation Responses (from Statutory Consultees)

Appendix D – Methodological Assumptions

Appendix E – Residential Growth Option Assessment

Appendix F – New/Amended Reasonable Alternative Site Assessments (Pre-Mitigation)

Appendix G – Pre- and Post-Mitigation Assessment of Reasonable Alternative Sites

Appendix H – Selection and Rejection of Reasonable Alternative Sites

Appendix I – Policy Assessments

Appendix A: Plan, Policy and Programme Review

A.1	Air	A1
A.2	Biodiversity, flora and fauna	A2
A.3	Climatic factors.....	A7
A.4	Cultural heritage	A10
A.5	Human health.....	A13
A.6	Landscape	A16
A.7	Population and material assets	A17
A.8	Soil.....	A23
A.9	Water	A24

A.1 Air

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to air	Implications for the LPR and SA
EC Air Quality Directive (1996)	Aims to improve air quality throughout Europe by controlling the level of certain pollutants and monitoring their concentrations. In particular, the Directive aims to establish levels for different air pollutants; draw up common methods for assessing air quality; methods to improve air quality; and make sure that information on air quality is easily accessible to Member States and the public.	The LPR and SA should consider the recommended actions in this document to improve air quality.
Clean Air Strategy (2019)	This Clean Air Strategy sets out how the Government will tackle all sources of air pollution, making air healthier to breathe, protecting nature and boosting the economy. The strategy includes targets such as a commitment to reduce PM2.5 concentrations across the UK, so that the number of people living in locations above the World Health Organisation (WHO) guideline level of 10 µg/m ³ is reduced by 50% by 2025.	The LPR and SA should consider the recommended actions in this document to improve air quality.
National Planning Policy Framework (MHCLG, 2021)	The NPPF states that plans should prevent development from contributing to, or being put at risk of, air or water pollution. Plans should consider the presence of Air Quality Management Areas and cumulative impacts on air quality from individual sites in local areas.	The LPR and SA should adhere to the principles of the Planning Policy Framework.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	<p>The document sets out Government action to help achieve natural world regain and retain good health. The main goals of the Plan are to achieve:</p> <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment. <p>The Plan seeks to achieve clean air by:</p> <ul style="list-style-type: none"> • Meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030; • Ending the sale of new conventional petrol and diesel cars and vans by 2040; and • Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework. <p>The 2021 Environment Act (9th November, 2021) embeds several of these aspects into the new legislation.</p>	
2008 Air Quality Action Plan South Staffordshire Council	This document summarises the status of all AQMAs in the district. It sets out a series of actions to address poor air quality in these areas and records the progress to date against each of these actions.	The LPR and SA should consider the impacts of, and on, air quality.

A.2 Biodiversity, flora and fauna

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	<p>The document sets out government action to help achieve natural world regain and retain good health. The main goals of the Plan are to achieve:</p> <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment. 	The LPR and SA should consider how environmental challenges can be addressed and environmental goals can be met.
The Pan-European Biological and Landscape Diversity Strategy (1995)	The strategy aims to stop and reverse the degradation of biological and landscape diversity values in Europe.	The LPR and SA should consider how biological and landscape diversity values can be protected and enhanced.
UN Convention on Biological Diversity (1992)	The aims of the Convention include the conservation of biological diversity (including a commitment to significantly reduce the current rate of biodiversity loss), the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.	The LPR and SA should consider how biological diversity can be enhanced and protected.
Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992 (the Habitats Directive)	<p>The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status, introducing robust protection for those habitats and species of European importance. In applying these measures Member States are required to take account of economic, social and cultural requirements, as well as regional and local characteristics.</p> <p>The provisions of the Directive require Member States to introduce a range of measures, including:</p> <ul style="list-style-type: none"> • Maintain or restore European protected habitats and species listed in the Annexes at a favourable conservation status as defined in Articles 1 and 2; • Contribute to a coherent European ecological network of protected sites by designating Special Areas of Conservation (SACs) for habitats listed on Annex I and for species listed on Annex II. These measures are also to be applied to Special Protection Areas (SPAs) classified under Article 4 of the Birds Directive. Together SACs and SPAs make up the Natura 2000 network (Article 3); • Ensure conservation measures are in place to appropriately manage SACs and ensure appropriate assessment of plans and projects likely to have a significant effect on the integrity of an SAC. Projects may still be permitted if there are no alternatives, and there are imperative reasons of overriding public interest. In such cases compensatory measures are necessary to ensure the overall coherence of the Natura 2000 network (Article 6); 	The LPR and SA will need to have due regard to the SACs in the area.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
	<ul style="list-style-type: none"> Member States shall also endeavour to encourage the management of features of the landscape that support the Natura 2000 network (Articles 3 and 10); Undertake surveillance of habitats and species (Article 11); Ensure strict protection of species listed on Annex IV (Article 12 for animals and Article 13 for plants). Report on the implementation of the Directive every six years (Article 17), including assessment of the conservation status of species and habitats listed on the Annexes to the Directive. 	
The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations)	This transposes into national law the Habitats Directive and also consolidates all amendments that have been made to the previous 1994 Regulations. This means that competent authorities have a general duty in the exercise of any of their functions to have regard to the Directive.	The LPR and SA will need to have due regard to the SACs in the area.
DEFRA: Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)	<p>The England biodiversity strategy 2020 ties in with the EU biodiversity strategy in addition to drawing links to the concept of ecosystem services. The strategy's vision for England is:</p> <p>"By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone".</p> <p>The Strategy's overall mission is:</p> <p>"to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people".</p>	The LPR and SA should consider how biodiversity can be enhanced and protected.
TCPA: Biodiversity by Design: A Guide for Sustainable Communities (2004)	The development process should consider ecological potential of all areas including both greenfield and brownfield sites. Local authorities and developers have a responsibility to mitigate impacts of development on designated sites and priority habitats and species and avoid damage to ecosystems.	The LPR and SA should consider how biodiversity can be enhanced and protected.
National Planning Policy Framework (MHCLG 2021)	<p>The updated NPPF seeks to streamline the planning system and sets out the Government's planning policies and how these should be applied. At the heart of the NPPF is presumption in favour of sustainable development.</p> <p>The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and 	The LPR and SA should adhere to the principles of the Planning Policy Framework.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
	<ul style="list-style-type: none"> remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. 	
Making Space for Nature: a review of England's wildlife sites and ecological network (2010)	<p>The Making Space for Nature report, which investigated the resilience of England's ecological network to multiple pressures, concluded that England's wildlife sites do not comprise of a coherent and resilient ecological network. The report advocates the need for a step change in conservation of England's wildlife sites to ensure they are able to adapt and become part of a strong and resilient network. The report summarises what needs to be done to improve England's wildlife sites to enhance the resilience and coherence of England's ecological network in four words; more, bigger, better, and joined. There are five key approaches which encompass these, which also take into account of the land around the ecological network:</p> <ul style="list-style-type: none"> Improve the quality of current sites by better habitat management. Increase the size of current wildlife sites. Enhance connections between, or join up, sites, either through physical corridors, or through 'stepping stones'. Create new sites. Reduce the pressures on wildlife by improving the wider environment, including through buffering wildlife sites. 	The LPR and SA should consider how England's wildlife sites and ecological network can be enhanced and protected.
The England Trees Action Plan 2021-2024 (2021)	<p>The Trees Action Plan sets out how the Government will tackle the challenges of biodiversity loss and climate change, in line with the goals of the 25 Year Environment Plan. The plan provides a strategic framework for implementing the Nature for Climate Fund and outlines over 80 policy actions the government is taking over this Parliament to help deliver this vision. Planting vastly more trees in England, and protecting and improving our existing woodlands, will be key to the Government's plan to achieve net zero and to create a Nature Recovery Network across the length of England.</p>	The LPR and SA should consider how trees, woods and forests can be enhanced and protected.
The Natural Choice: Securing the Value of Nature. The Natural Environment White Paper. (HM Government 2011)	<p>Published in June 2011, the Natural Environment White paper sets out the Government's plans to ensure the natural environment is protected and fully integrated into society and economic growth. The White Paper sets out four key aims:</p> <p>(i) <u>Protecting and improving our natural environment</u></p> <p>There is a need to improve the quality of our natural environment across England, moving to a net gain in the value of nature. It aims to arrest the decline in habitats and species and the degradation of landscapes. It will protect priority habitats and safeguard vulnerable non-renewable resources for future generations. It will support natural systems to function more effectively in town, in the country and at sea. It will achieve this through joined-up action at local and national levels to create an ecological network which is resilient to changing pressures.</p> <p>(ii) <u>Growing a green economy</u></p> <p>The ambition is for a green and growing economy which not only uses natural capital in a responsible and fair way but also contributes to improving it. It will properly value the stocks and flows of natural capital. Growth will be green because it is intrinsically linked to the health of the country's natural resources. The economy will</p>	The SA Framework should include objectives relating to the protection and enhancement of the natural environment.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
	<p>capture the value of nature. It will encourage businesses to use natural capital sustainably, protecting and improving it through their day-to-day operations and the management of their supply chains.</p> <p>(iii) <u>Reconnecting people and nature</u></p> <p>The ambition is to strengthen the connections between people and nature. It wants more people to enjoy the benefits of nature by giving them freedom to connect with it. Everyone should have fair access to a good-quality natural environment. It wants to see every child in England given the opportunity to experience and learn about the natural environment. It wants to help people take more responsibility for their environment, putting local communities in control and making it easier for people to take positive action.</p> <p>(iv) <u>International and EU leadership</u></p> <p>The global ambitions are:</p> <ul style="list-style-type: none"> internationally, to achieve environmentally and socially sustainable economic growth, together with food, water, climate and energy security; and to put the EU on a path towards environmentally sustainable, low-carbon and resource-efficient growth, which is resilient to climate change, provides jobs and supports the wellbeing of citizens 	
UK National Ecosystem Assessment (2011)	<p>The UK National Ecosystem Assessment is the first analysis of the UK's natural environment and the benefits it provides to society and economic prosperity. The assessment leads on from the Millennium Ecosystem Assessment (2005) and analyses services provided by ecosystem set against eight broad habitat types. The ecosystem services provided by these habitat types have been assessed to find their overall condition. The assessment sought to answer ten key questions:</p> <ol style="list-style-type: none"> 1) What are the status and trends of the UK's ecosystems and the services they provide to society? 2) What are the drivers causing changes in the UK's ecosystems and their services? 3) How do ecosystem services affect human well-being, who and where are the beneficiaries, and how does this affect how they are valued and managed? 4) Which vital UK provisioning services are not provided by UK ecosystems? 5) What is the current public understanding of ecosystem services and the benefits they provide? 6) Why should we incorporate the economic values of ecosystem services into decision-making? 7) How might ecosystems and their services change in the UK under plausible future scenarios? 8) What are the economic implications of different plausible futures? 9) How can we secure and improve the continued delivery of ecosystem services? 10) How have we advanced our understanding of the influence of ecosystem services on human well-being and what are the knowledge constraints on more informed decision making? 	The SA Framework should include objectives relating to the protection and enhancement of the natural environment.
CABE Making Contracts Work for Wildlife: How to Encourage Biodiversity in Urban Parks (2006)	<p>Advises on how to make the most of the potential for biodiversity in urban parks and it shows how the commitment of individuals and employers can make the difference between failure and inspiring success.</p>	The LPR and SA should consider how biodiversity can be enhanced and protected.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna	Implications for the LPR and SA
Severn river basin district: river basin management plan (2015) and Humber river basin management plan (2015)	<p>Both river basin management plans present the ecological, chemical and quantitative status of the surface and groundwater bodies present in each river basin. In accordance with the RBMPs, new development should not lead to deterioration of these water bodies. Objectives for each, according to the Water Framework Directive, are as follows:</p> <ul style="list-style-type: none"> • To prevent deterioration of the status of surface waters and groundwater; • To achieve objectives and standards for protected areas; • To aim to achieve good status for all water bodies or, for heavily modified water bodies and artificial water bodies, good ecological potential and good surface water chemical status; • To reverse any significant and sustained upward trends in pollutant concentrations in groundwater; • The cessation of discharges, emissions and losses of priority hazardous substances into surface waters; and • Progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants. 	The LPR and SA should aim to be in accordance with the RBMP for the Severn River basin. In particular, any potential impact on the ecological, chemical or quantitative status of waterbodies should be addressed.
Site Improvement Plan, Cannock Chase Special Area of Conservation, Natural England (2015)	The Site Improvement Plan for Cannock Chase SAC sets out the qualifying features of Cannock Chase for which it was designated as a SAC. It informs of the threats and pressures to which the SAC is vulnerable and lays out plans for management of the SAC to avoid and mitigate adverse impacts of development.	The LPR and SA should aim to be in accordance with the LGAP and raise awareness of geological heritage in the area.
Staffordshire Biodiversity Action Plan	The Staffordshire Biodiversity Action Plan (SBAP) has been in place since 1998 in order to co- ordinate conservation efforts in delivering the UK BAP targets at a more local level. SBAP sets out strategies for conservation projects and providing ecological objectives and targets within a strategic framework.	The LPR should aim to ensure new development contributes towards the strategic aims of the SBAP.

A.3 Climatic factors

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors	Implications for the LPR and SA
UN Framework Convention on Climate Change (1992)	Sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change.	The LPR and SA should consider ways to reduce the impact of climate change in South Staffordshire.
IPCC Kyoto Protocol to the United Nations Framework Convention on Climate Change (1997)	Commits member nations to reduce their emissions of carbon dioxide and other greenhouse gases or engage in emissions trading if they maintain or increase emissions of these gases.	The LPR and SA should consider ways to reduce the impact of climate change in South Staffordshire.
EC Sixth Environmental Action Programme Community 2002-2012 (2002)	Climate change has been identified as one of four priority areas for Europe. The EAP's main objective is a reduction in emissions of greenhouse gases without a reduction in levels of growth and prosperity, as well as adaptation and preparation for the effects of climate change.	The LPR and SA should consider ways to reduce the impact of climate change in South Staffordshire.
EU Sustainable Development Strategy (2006)	This Strategy identifies key priorities for an enlarged Europe. This includes health, social inclusion and fighting global poverty. It aims to achieve better policy integration in addressing these challenges, and to ensure that Europe looks beyond its boundaries in making informed decisions about sustainability. The Sustainable Development Strategy was review in 2009 and "underlined that in recent years the EU has mainstreamed sustainable development into a broad range of its policies. In particular, the EU has taken the lead in the fight against climate change and the promotion of a low-carbon economy. At the same time, unsustainable trends persist in many areas and the efforts need to be intensified". Sustainable development is a key focus of the EU and the strategy continues to be monitored and reviewed.	The LPR and SA should consider ways to promote sustainable development in South Staffordshire.
UK Renewable Energy Strategy (2009)	The UK has committed to sourcing 15% of its energy from renewable sources by 2020 – an increase in the share of renewables from about 2.25% in 2008. The Renewable Energy Strategy sets out how the Government will achieve this target through utilising a variety of mechanisms to encourage Renewable Energy provision in the UK. This includes streamlining the planning system, increasing investment in technologies as well as improving funding for advice and awareness raising.	The LPR and SA should consider ways to promote renewable energy generation in the districts.
UK Renewable Energy Roadmap Update (2013)	This is the second Update to the 2011 Renewable Energy Roadmap. It sets out the progress that has been made and the changes that have occurred in the sector over the past year. It also describes the continuing high ambitions and actions along with the challenges going forward.	The LPR and SA should consider ways to promote renewable energy generation in the districts.
The UK Low Carbon Transition Plan (2009)	The UK Low Carbon Transition Plan sets out how the UK will meet the Climate Change Act's legally binding target of 34 per cent cut in emissions on 1990 levels by 2020. It also seeks to deliver emissions cuts of 18% on 2008 levels. The main aims of the Transition Plan include the following:	The LPR and SA should consider ways to reduce greenhouse gas emissions in the districts.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors	Implications for the LPR and SA
	<ul style="list-style-type: none"> Producing 30% of energy from renewables by 2020; Improving the energy efficiency of existing housing; Increasing the number of people in 'green jobs'; and Supporting the use and development of clean technologies. 	
National Planning Policy Framework (MHCLG, 2012)	<p>At the heart of the NPPF is presumption in favour of sustainable development.</p> <p>The NPPF includes guidance on climate change, flooding, and coastal change. Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>To support the move to a low carbon future, planning authorities should:</p> <ul style="list-style-type: none"> plan for new development in locations and ways which reduce greenhouse gas emissions; actively support energy efficiency improvements to existing buildings; and when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. <p>Local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:</p> <ul style="list-style-type: none"> applying the Sequential Test; if necessary, applying the Exception Test; safeguarding land from development that is required for current and future flood management; using opportunities offered by new development to reduce the causes and impacts of flooding. 	The LPR and SA should adhere to the principles of the Planning Policy Framework.
DfT An Evidence Base Review of Public Attitudes to Climate Change and Transport Behaviour (2006)	Summary report of the findings of an evidence base review investigating the research base on public attitudes towards climate change and transport behaviour.	The LPR and SA should consider how to increase public awareness towards climate change in the districts.
Carbon Trust: The Climate Change Challenge: Scientific Evidence and Implications (2005)	This report summarises the nature of the climate change issue. It explains the fundamental science and the accumulating evidence that climate change is real and needs to be addressed. It also explains the future potential impacts, including the outstanding uncertainties.	The LPR and SA should consider ways to reduce the impact of climate change in the districts.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors	Implications for the LPR and SA
Energy Saving Trust: Renewable Energy Sources for Homes in Urban Environments (2005)	Provides information about the integration of renewable energy sources into new and existing dwellings in urban environments. It covers the basic principles, benefits, limitations, costs and suitability of various technologies.	The LPR and SA should consider ways to integrate renewable energy technology into new and existing dwellings.
Environment Agency, Adapting to Climate Change: A Checklist for Development (2005)	The document contains a checklist and guidance for new developments to adapt to climate change. The main actions are summarised in a checklist.	The LPR and SA should consider ways to reduce the impact of climate change in the districts.
Staffordshire Climate Change Mitigation & Adaptation Plan, AECOM, 2020	<p>The document summarises the findings with respect to sustainability-focused interventions that the Staffordshire local authorities should consider as part of their emerging Local Plans.</p> <p>Stage 1 of the study (which was summarised in a Baseline Report) provided an overview of the current emissions baseline and potential future emissions scenarios, as well as an appraisal of the climate baseline against which future climate risks could be identified.</p> <p>Stage 2 of the study focused on three key themes of reducing energy demand, offsetting and sequestering emissions, and climate risks. The report set out a range of recommendations and measures that the Councils could consider with respect to topics such as design measures, carbon offsetting, roll-out of EVs, land management and opportunities for new technologies.</p>	The LPR and SA should seek to incorporate recommendations made in the plan to reduce and offset carbon emissions.
Climate Change Strategy, South Staffordshire Council, 2020	This strategy sets out the steps the Council, its partners and local residents can take to help reduce the district's contribution to climate change. This includes a range of actions that may be undertaken within the Council and also those that are district wide. They focus on promoting sustainability, energy efficiency, education and identifying local solutions to the causes and impacts of climate change.	The LPR and SA should seek to be in accordance with, and potentially enhance, measures of the climate change strategy.
Climate Change Action Plan, South Staffordshire Council, 2020	In order to meet statutory and environmental responsibilities, the South Staffordshire Council utilise the Climate Change Action Plan. The action plan consists of quarterly actions which focus on: raising awareness; strategic planning responsibilities; influencing partners; and council operations. Actions over longer terms progress until 2025 under this current action plan.	The LPR and SA should seek to be in accordance with, and potentially enhance, measures of the Climate Change Action Plan.

A.4 Cultural heritage

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage	Implications for the LPR and SA
Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985)	Aims for signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.	The LPR and SA should consider the recommended actions in this document to protect architectural heritage in the districts.
Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention) (1992)	The convention defines archaeological heritage and identifies measures for its protection. Aims include integrated conservation of the archaeological heritage and financing of archaeological research and conservation.	The LPR and SA should consider the recommended actions in this document to protect archaeological heritage in the districts
National Planning Policy Framework (MHCLG, 2021)	<p>The updated NPPF seeks to streamline the planning system and sets out the Governments planning policies and how these should be applied. At the heart of the NPPF is presumption in favour of sustainable development.</p> <p>The NPPF includes guidance on conserving and enhancing the historic environment. It seeks to ensure local authorities plan recognise heritage assets as an irreplaceable resource and conserve them in a manner that reflects their significance.</p> <p>Planning authorities should take into account:</p> <ul style="list-style-type: none"> • The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; and • The desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place. 	The LPR and SA should adhere to the principles of the Planning Policy Framework.
English Heritage and CABE: Buildings in Context: New Development in Historic Areas (2002)	Aims to stimulate a high standard of design when development takes place in historically sensitive contexts by showing 15 case studies in which achievement is far above the ordinary and trying to draw some lessons both about design and about the development and planning process, particularly regarding building in sensitive locations.	The LPR and SA should consider the recommended actions in this document regarding building new homes in historically sensitive locations.
Historic England: Conservation Principles Policies and Guidance for the Sustainable	<p>This Historic England document sets out the framework for the sustainable management of the historic environment. This is presented under the following six headline 'principles':</p> <p>Principle 1: The historic environment is a shared resource</p>	The LPR and SA should consider the recommended actions in this

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage	Implications for the LPR and SA
Management of the Historic Environment (2008)	<p>Principle 2: Everyone should be able to participate in sustaining the historic environment</p> <p>Principle 3: Understanding the significance of places is vital</p> <p>Principle 4: Significant places should be managed to sustain their values</p> <p>Principle 5: Decisions about change must be reasonable, transparent and consistent</p> <p>Principle 6: Documenting and learning from decisions is essential.</p>	document to protect the historic environment in the districts.
Historic England: Tall Buildings: Historic England Advice Note 4 (2015)	This Historic England Advice Note updates previous guidance by Historic England and CABE, produced in 2007. It seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. The advice is for all relevant developers, designers, local authorities and other interested parties.	The LPR and SA should consider the recommended actions in this document to protect heritage assets in the districts.
Historic England (2015) The Historic Environment in Local Plans, Historic Environment Good Practice Advice in Planning: 1	Practice Advice note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).	Development proposed in the LPR should be in accordance with Historic England's advice.
Historic England (2015) Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2	The purpose of this Historic England Good Practice Advice note is to provide information in relation to assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.	Development proposed in the LPR should be in accordance with Historic England's advice.
Historic England (2015) The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3	This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.	Development proposed in the LPR should be in accordance with Historic England's advice.
The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015)	The purpose of this Historic England advice note is to support all those involved in the Local Plan site allocation process in implementing historic environment legislation, the relevant policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG). In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.	Development proposed in the LPR should be in accordance with Historic England's advice.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage	Implications for the LPR and SA
Staffordshire County Council Guidance Note (2015): Historic Structures and Areas, Practical Conservation and Design	This advice is aimed at all general works of design, maintenance and repair to historic structures within the public realm, as well as advice on highway schemes. It provides guidance in relation to various works, including re-pointing, cleaning brickwork, band traffic management.	The LPR should ensure any development which seeks to impact the design, maintenance and/or repair of historic buildings follows this guidance.
Historic Environment Character Assessment: South Staffordshire, January 2011	This assessment identifies heritage assets in the district, including national and local designations. It offers an overview of their current condition and makes recommendations for their conservation and enhancement. Assets include historic landscapes, historic buildings and conservations areas.	The LPR and SA should take opportunities to protect and enhance heritage assets and have regard to the assessment's recommendations.

A.5 Human health

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health	Implications for the LPR and SA
DCMS: Playing to win: a new era for sport. (2008)	The Government's vision for sport and physical activity for 2012 and beyond is to increase significantly levels of sport and physical activity for people of all ages and to achieve sustained levels of success in international competition. The ambition is for England to become a truly world leading sporting nation. The vision is to give more people of all ages the opportunity to participate in high quality competitive sport.	The LPR and SA should consider how to support access to sports facilities and increase participation in sport for the South Staffordshire residents.
DoH: Healthy Lives, Healthy People: Our strategy for public health in England White Paper (2011)	<p>Sets out the Government's approach to tackling threats to public health and dealing with health inequalities. It sets out an approach that will:</p> <ul style="list-style-type: none"> • Protect the population from health threats – led by central government, with a strong system to the frontline; • Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing, and tackle the wider factors that influence it; • Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework; • Reflect the government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and • Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation. 	The LPR and SA should consider how to support healthy lives of residents.
Public Health Strategy 2020-2025 (2019)	The strategy sets out priorities within the public health system and areas of focus including addressing health inequalities and narrowing the 'health gap' between poor and wealthy communities, reducing rates of infectious diseases, addressing unhealthy behaviours and ensuring the potential of new technologies is realised.	The LPR and SA should consider how to address health inequalities across the Plan area and promote healthy living.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health	Implications for the LPR and SA
DoH & Department for Work and Pensions. Improving health and work: changing lives: The Government's Response to Dame Carol Black's Review of the health of Britain's working-age population (2008)	<p>This sets out the Governments response to a review into the health of Britain's working age population conducted by Dame Carol Black.</p> <p>The vision is to: "create a society where the positive links between work and health are recognised by all, where everyone aspires to a healthy and fulfilling working life and where health conditions and disabilities are not a bar to enjoying the benefits of work".</p> <p>To achieve the vision three key aspirations have been identified:</p> <ol style="list-style-type: none"> 1. creating new perspectives on health and work; 2. improving work and workplaces; and 3. supporting people to work. <p>Through these three aspirations Britain's working population will fulfil their full potential, create stronger communities and help relive the financial burden of health problems on the economy.</p>	The LPR and SA should consider how to support healthy lives of residents.
DoH: Our health, our care, our say: a new direction for community services (2006)	Puts emphasis on moving healthcare into the community and will therefore have an impact on sustainable development considerations, including supporting local economies and how people travel to healthcare facilities.	The LPR and SA should consider how to support the provision of healthcare facilities in the districts.
Forestry Commission: Trees and Woodlands - Nature's Health Service (2005)	Provides detailed examples of how the Woodland Sector (trees, woodlands and green spaces) can significantly contribute to people's health, well-being (physical, psychological and social) and quality of life. Increasing levels of physical activity is a particular priority.	The LPR and SA should consider how green infrastructure can contribute to the health and well-being of residents.
Accessible Natural Green Space Standards Towns and Cities: Review & Toolkit for Implementation (2003)	Aims to help Local Authorities develop policies which acknowledge, protect and enhance the contribution natural spaces make to local sustainability. Three aspects of natural space in cities and towns are discussed: their biodiversity; their ability to cope with urban pollution; ensuring natural spaces are accessible to everyone.	The LPR and SA should consider how natural spaces can be enhanced and protected for the purpose of local sustainability in the districts.
LSP Health and Wellbeing Action Plan (2008 – 2011)	South Staffordshire District Council identify three priorities for improving the health and wellbeing of residents. These include working together to support older people to stay health and independent, working together to promote healthy lifestyles of adults and young people and working together to reduce health inequalities.	The LPR and SA should consider how to support the health and wellbeing of South Staffordshire's residents.
Health and Wellbeing Strategy, Staffordshire County Council, 2022-2027	The strategy aims to create communities and environments that enable healthy choices and delivering high quality support to keep people independent and well, with health at the centre. Aims also include reduction of inequality and increase of healthy life expectancy. The strategy incorporates the NHS, local government and other organisations.	The LPR and SA should The LPR and SA should consider how to support the health and wellbeing of South Staffordshire's residents, in line with Staffordshire County Council objectives.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health	Implications for the LPR and SA
Staffordshire County Council Rights of Way Improvement Plan for Staffordshire	This plan lays out the demand for access and needs of users in terms of the Public Rights of Way network in the county of Staffordshire. It assesses the existing provision and condition of the network and identifies areas for improvement. Measures to take action and achieve this improvement are identified with practical steps to be taken. Plans to monitor the effectiveness of improvement efforts are also made clear. A new version of the improvement plan is currently being consulted on.	The LPR and SA should consider how to improve and encourage access to the PRoW network.
South Staffordshire Council Open Space Strategy	The Open Space Strategy sets out the existing open space provision in the district, including the availability of natural and semi-natural space. It also sets out the way forward for enhancing the safety, vibrancy and quality of open space and, in so doing, improving its suitability for children and young people whilst supporting good health and wellbeing of residents.	The LPR and SA should maintain existing open space provision and promote the provision of new and high-quality open space.
Health and Wellbeing Strategy (2015-2020)	South Staffordshire District Council identify three priorities (Start Well, Live Well, Age Well) for improving the health and wellbeing of residents. Strategies involve working together to support older people to stay health and independent, working together to promote healthy lifestyles of adults and young people and working together to reduce health inequalities.	The LPR and SA should consider how to support the health and wellbeing of South Staffordshire's residents.
South Staffordshire District, Ageing Well Framework 2011	The ageing population of South Staffordshire is growing fast. This framework recognises that issue and lays out the facts, priorities and a plan for action for helping to ensure that older people in the district are health, independent, live in appropriate housing, are out and about and valued and involved, live in a safe environment and are financially secure.	The LPR and SA should consider the needs of the ageing population and ensure neighbourhoods are welcoming and accessible for residents of all ages.
Staffordshire County Council Cycling Strategy	There are 163.5 miles of cycle routes in the county of Staffordshire. The Cycling Strategy provides an overview of these routes. It also sets out that the emphasis for cycling development in the county will be to extend the National Cycle Network Routes 5 and 55 and to progress the Chase Heritage Trail between Rugeley and Cannock.	The LPR should seek to be in accordance with the Cycling Strategy.

A.6 Landscape

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape	Implications for the LPR and SA
Council of Europe: European Landscape Convention (2006)	Aims to promote the protection, management and planning (including active design and creation of Europe's landscapes, both rural and urban, and to foster European co-operation on landscape issues.	The LPR and SA should consider the recommended actions in this document to correctly manage the rural and urban landscape in the districts.
English Heritage and CABE: Guidance on Tall Buildings (2007)	Provides advice and guidance on good practice in relation to tall buildings in the planning process and to highlight other related issues, which need to be taken into account, i.e., where tall buildings would and would not be appropriate.	The LPR and SA should consider the recommended actions in this document to correctly manage the planning of tall buildings in the districts.
National Planning Policy Framework (MHCLG, 2021)	The NPPF states that development could seek to promote or reinforce local distinctiveness; both aesthetic considerations and connections between people and places should be considered. The NPPF also promotes the protection and enhancements of valued landscapes, giving greatest weight to National Parks and Areas of Outstanding Natural Beauty.	The LPR and SA should adhere to the principles of the Planning Policy Framework.
MHCLG: National Design Guide: Planning practice guidance for beautiful, enduring and successful places (2021)	This design guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.	The LPR and SA should seek to incorporate the principles of the National Design Guide within planning proposals.
Cannock Chase AONB Management Plan 2019 - 2024	The management plan sets out the key issues for the AONB, which include landscape, people, economy, recreation and support, in line with, Strategic Environmental Assessment Directive and Habitat Regulations. For each of these issues, the management plan sets out policies and plan delivery actions as well as monitoring programme. The management plan demonstrates how the AONB partnership will continue to protect the Cannock Chase environment from growing pressures such as climate change and population growth. It seeks to protect the AONB's tranquility, biodiversity value, perception amongst the public and to help establish somewhere prosperous, clean, sustainable and enjoyable.	The LPR should seek to be in accordance with the management plan and to avoid adverse impacts on the AONB. The SA should help to ensure the LPR does so.

A.7 Population and material assets

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
National Planning Policy Framework (MHCLG, 2021)	<p>The NPPF seeks to streamline the planning system and sets out the Governments planning policies and how these should be applied. At the heart of the NPPF is presumption in favour of sustainable development.</p> <p>The NPPF includes guidance on promoting healthy communities.</p> <p>The NPPF requires planning authorities to aim to achieve places which promote:</p> <ul style="list-style-type: none"> • Opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity; • Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and • Safe and accessible developments, containing clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas. <p>In order to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <ul style="list-style-type: none"> • Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; • Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and • Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. 	The LPR and SA should adhere to the principles of the Planning Policy Framework.
Social Exclusion Unit: Preventing Social Exclusion (2001)	The primary aims are to prevent social exclusion and reintegrate people who have become excluded. Improvement is required in the areas of truancy, rough sleeping, teenage pregnancy, youth at risk and deprived neighbourhoods.	The LPR and SA should consider how to prevent social exclusion and reintegrate people who have become excluded.
DCLG Homes for the future: more affordable, more sustainable (2007)	The Housing Green Paper outlines plans for delivering homes; new ways of identifying and using land for development; more social housing- ensuring that a decent home at an affordable price is for the many; building homes more quickly; more affordable homes; and greener homes - with high environmental standards and flagship developments leading the way.	The LPR and SA should consider how to deliver more affordable and environmentally sustainable homes.
ODPM & Home Office: Safer Places: The	Practical guide to designs and layouts that may help with crime prevention and community safety, including well-defined routes, places structured so that different uses do not cause conflict, places designed to include	The LPR and SA should consider how to prevent crime in new

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
Planning System and Crime Prevention (2004)	natural surveillance and places designed with management and maintenance in mind.	developments.
Cabinet Office: Reaching Out: An Action Plan on Social Exclusion (2006)	Sets out an action plan to improve the life chances of those who suffer, or may suffer in the future, from disadvantage. Guiding principles for action include: better identification and earlier intervention; systematically identifying 'what works'; promoting multi-agency working; personalisation, rights and responsibilities; and supporting achievement and managing underperformance.	The LPR and SA should consider how to reduce suffering and improve the life chances of disadvantaged people.
Staffordshire County Council Rights of Way Improvement Plan for Staffordshire	This plan lays out the demand for access and needs of users in terms of the Public Rights of Way network in the county of Staffordshire. It assesses the existing provision and condition of the network and identifies areas for improvement. Measures to take action and achieve this improvement are identified with practical steps to be taken. Plans to monitor the effectiveness of improvement efforts are also made clear. A new version of the improvement plan is currently being consulted on.	The LPR and SA should consider how to improve and encourage access to the PRoW network.
South Staffordshire Council Open Space Strategy	The Open Space Strategy sets out the existing open space provision in the district, including the availability of natural and semi-natural space. It also sets out the way forward for enhancing the safety, vibrancy and quality of open space and, in so doing, improving its suitability for children and young people whilst supporting good health and wellbeing of residents.	The LPR and SA should maintain existing open space provision and promote the provision of new and high-quality open space.
South Staffordshire District, Ageing Well Framework 2011	The ageing population of South Staffordshire is growing fast. This framework recognises that issue and lays out the facts, priorities and a plan for action for helping to ensure that older people in the district are health, independent, live in appropriate housing, are out and about and valued and involved, live in a safe environment and are financially secure.	The LPR and SA should consider the needs of the ageing population and ensure neighbourhoods are welcoming and accessible for residents of all ages.
EC Waste Framework Directive (1975, updated 2006)	Objective is the protection of human health and the environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste. Particular focus is placed on the re-use of recovered materials as raw materials; restricting the production of waste; promoting clean technologies; and the drawing up of waste management plans.	The LPR and SA should consider the recommended actions in this document to correctly manage waste disposal.
EC Landfill Directive (1999)	Aims to prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, groundwater, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the landfilling of waste, during the whole lifecycle of the landfill.	The LPR and SA should consider the recommended actions in this document to correctly manage waste disposal.
Cabinet Office: Waste Not, Want Not, A Strategy for tackling the waste problem (2002)	A study into how England's current waste management practices could be improved to reduce the current, and growing, waste problem.	The LPR and SA should consider the recommended actions in this document to correctly manage waste disposal.
DEFRA Waste Strategy for England (2007)	Aims are to reduce waste by making products with fewer natural resources; break the link between economic growth and waste growth; re-use products or recycle their materials; and recover energy from other wastes where possible. Notes that for a small amount of residual material, landfill will be necessary.	The LPR and SA should consider the recommended actions in this document to correctly manage waste disposal.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
Staffordshire Local Transport Plan 2011, Staffordshire County Council	The transport plan for the county has a range of objectives, including to support economic growth which avoids congestion, to improve employment and education opportunities for residents, to improve road safety to respond to current and future climate change and to encourage and provide for active travel.	The LPR and SA should adhere to the principles of the Transport Plan. Management of waste is achieved.
Infrastructure Delivery Plan, South Staffordshire Council, 2019	Sustainable development will not be achieved through the delivery of housing and employment development alone. The Infrastructure Delivery Plan sets out the Council's plans for supporting the delivery of infrastructure in the district, including social and community facilities, transport and utility services. This requires joint working between key partners and delivery agencies.	The LPR and SA should seek to match development with infrastructure delivery.
Spatial Housing Strategy & Infrastructure Delivery, South Staffordshire Council, October 2019	Focussing on housing growth within the district, the plan looks at broad locations, in order to bring benefits to infrastructure development in the future. The plan sets out structures to provide new homes for growing communities, whilst protecting the local Green Belt wherever possible.	The LPR and SA should seek to match development with spatial housing strategy and infrastructure delivery.
DECC Energy White Paper: Meeting the Energy Challenge (2007)	Sets out Government's long term energy policy, including requirements for cleaner, smarter energy; improved energy efficiency; reduced carbon emissions; and reliable, competitive and affordable supplies. The White Paper sets out the UK's international and domestic energy strategy, in the shape of four policy goals: 1) aiming to cut CO ₂ emissions by some 60% by about 2050, with real progress by 2020; 2) maintaining the reliability of energy supplies; 3) promoting competitive markets in the UK and beyond; and 4) ensuring every home is heated adequately and affordably.	The LPR and SA should consider ways to reduce the impact of climate change in the districts.
DTI Micro Generation Strategy (2006)	Acknowledges that local authorities can be pro-active in promoting small-scale, local renewable energy generation schemes through " <i>sensible use of planning policies</i> ".	The LPR and SA should consider promoting small scale renewable energy generation schemes.
EU Sustainable Development Strategy (2006)	This Strategy identifies key priorities for an enlarged Europe. This includes health, social inclusion and fighting global poverty. It aims to achieve better policy integration in addressing these challenges, and to ensure that Europe looks beyond its boundaries in making informed decisions about sustainability. The sustainable Development Strategy was reviewed in 2009 and " <i>underlined that in recent years the EU has mainstreamed sustainable development into a broad range of its policies. In particular, the EU has taken the lead in the fight against climate change and the promotion of a low-carbon economy. At the same time, unsustainable trends persist in many areas and the efforts need to be intensified</i> ". Sustainable development is a key focus of the EU and the strategy continues to be monitored and reviewed.	The LPR and SA should consider ways to promote sustainable development in the districts.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
EU Transport White Paper. Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system (2011)	The white paper sets out a European vision for a competitive and sustainable transport system for the EU. The white paper sets out an aim to achieve a 60% reduction in greenhouse gas emissions from the European transport system whilst growing transport systems and supporting mobility. The White paper sets out ten strategic goals.	The LPR and SA should consider ways to support sustainable transport systems in the districts.
National Planning Policy Framework (MHCLG, 2021)	<p>The updated NPPF seeks to streamline the planning system and sets out the Governments planning policies and how these should be applied. At the heart of the NPPF is presumption in favour of sustainable development.</p> <p>The NPPF includes guidance on promoting sustainable transport. The NPPF requires development plans to seek to reduce greenhouse gas emissions and congestion, reduce the need to travel, and exploit opportunities for the sustainable movement of people and goods. Developments should be located and designed where practical to:</p> <ul style="list-style-type: none"> • Accommodate the efficient delivery of goods and supplies; • Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; • Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; and • Incorporate facilities for charging plug-in and other ultra-low emission vehicles; and consider the needs of people with disabilities by all modes of transport. 	The LPR and SA should adhere to the principles of the Planning Policy Framework.
Department for Transport: Transport White Paper: The Future of Transport – A Network for 2030 (2004)	Sets out factors that will shape transport in the UK over the next thirty years. Also sets out how the Government will respond to the increasing demand for travel, while minimising the negative impact on people and the environment.	The LPR and SA should consider ways to reduce the impact of transport on the environment.
Department for Transport: Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon World (2008)	<p>Outlines five national goals for transport, focusing on the challenge of delivering strong economic growth while at the same time reducing greenhouse gas emissions. It outlines the key components of national infrastructure, discusses the difficulties of planning over the long term in the context of uncertain future demand and describes the substantial investments we are making to tackle congestion and crowding on transport networks. The National Goals for Transport are as follows:</p> <p>Goal 1: To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change.</p>	The LPR and SA should consider ways to reduce the impact of transport on the environment.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
	<p>Goal 2: To support economic competitiveness and growth, by delivering reliable and efficient transport networks.</p> <p>Goal 3: To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society.</p> <p>Goal 4: To contribute to better safety, security and health and longer life expectancy by reducing the risk of death, injury or illness arising from transport, and by promoting travel modes that are beneficial to health.</p> <p>Goal 5: To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.</p>	
Department for Transport: The Future of Rail White Paper (2004)	Sets out a blueprint for a new streamlined structure for Britain's Railway. The proposals aim to provide a single point of accountability for the network's performance, allow closer working between track and train and provide for greater devolution of decision-making.	The LPR and SA should consider ways to support the future of Britain's railway system.
Department for Transport: An Evidence Base Review of Public Attitudes to Climate Change and Transport Behaviour (2006)	Summary report of the findings of an evidence base review investigating the research base on public attitudes towards climate change and transport behaviour.	The LPR and SA should consider ways to encourage support for reducing greenhouse gas emissions.
Cycling and walking plan for England (2020)	<p>The 'Gear change: a bold vision for cycling and walking' document sets out a vision for a travel revolution in England's streets, towns and communities. The plan sets out the multiple benefits of increased cycling and walking including health, congestion, the economy and air quality, and the vision that <i>"cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030"</i>. The plan sets out four main themes to achieve this vision:</p> <ul style="list-style-type: none"> • Theme 1: Better streets for cycling and people; • Theme 2: Cycling at the heart of decision-making; • Theme 3: Empowering and encouraging Local Authorities; and • Theme 4: Enabling people to cycle and protecting them when they do. 	The LPR and SA should consider ways to support cycling as a sustainable mode of transport in the districts.
Staffordshire County Council Cycling Strategy	There are 163.5 miles of cycle routes in the county of Staffordshire. The Cycling Strategy provides an overview of these routes. It also sets out that the emphasis for cycling development in the county will be to extend the National Cycle Network Routes 5 and 55 and to progress the Chase Heritage Trail between Rugeley and Cannock.	The LPR should seek to be in accordance with the Cycling Strategy.
Secretary of State for Transport (2013) Aviation Policy Framework	This document will fully replace the 2003 Air Transport White Paper as Government's policy on aviation, alongside any decisions Government makes following the recommendations of the independent Airports Commission. Key aims of this document includes:	The LPR and SA should consider ways to encourage the aviation industry in the districts.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets	Implications for the LPR and SA
	<ul style="list-style-type: none"> • To ensure that the UK's air links continue to make it one of the best-connected countries in the world. This includes increasing our links to emerging markets so that the UK can compete successfully for economic growth opportunities; • To ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions; • To limit and where possible reduce the number of people in the UK significantly affected by aircraft noise; and • To encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together. 	
DEFRA, Noise Policy Statement for England (NPSE) (2010)	<p>This document seeks to clarify the underlying principles and aims in existing policy documents, legislation and guidance that relate to noise. The key aims of this document are as follows:</p> <ul style="list-style-type: none"> • Avoid significant adverse impacts on health and quality of life; • Mitigate and minimise adverse impacts on health and quality of life; and • Where possible, contribute to the improvement of health and quality of life. 	The LPR and SA should consider the recommended actions in this document to reduce the impact of noise on health and quality of life.
Strategy for Sustainable Construction (2008)	<p>"Themes for Action" include: re-use existing built assets; design for minimum waste; aim for lean construction; minimise energy in construction; minimise energy in building use; avoid polluting the environment; preserve and enhance biodiversity; conserve water resources; respect people and their local environment; and set targets (benchmarks & performance indicators).</p>	The LPR and SA should consider ways to support sustainable construction in the districts.
Planning for Town Centres: Practice guidance on need, impact and the sequential approach (2009)	<p>This practice guidance was intended to support the implementation of town centre policies set out in Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) (now replaced by PPG). It is aimed at helping those involved in preparing or reviewing need, impact and sequential site assessments.</p>	The LPR and SA should consider the recommended actions in this document to plan for sustainable economic growth.

A.8 Soil

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to soil	Implications for the LPR and SA
DEFRA: Safeguarding our Soils: A Strategy for England (2009)	<p>The Soil Strategy for England outlines the Government's approach to safeguarding our soils for the long term. It provides a vision to guide future policy development across a range of areas and sets out the practical steps that are needed to take to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve understanding of the threats to soil and best practice in responding to them. Key objectives of the strategy include:</p> <ul style="list-style-type: none"> • Better protection for agricultural soils; • Protecting and enhancing stores of soil carbon; • Building the resilience of soils to a changing climate; • Preventing soil pollution; • Effective soil protection during construction and development; and • Dealing with our legacy of contaminated land. 	The LPR and SA should consider the recommended actions in this document to safeguard soils for the long term in South Staffordshire.
DEFRA (2012) Environmental Protection Act 1990: Part 2A. Contaminated Land Statutory Guidance	<p>This document establishes a legal framework for dealing with contaminated land in England. This document provides guidelines for how local authorities should implement the regime, including how they should go about deciding whether land is contaminated land in the legal sense of the term.</p> <p>Key aims are as follows:</p> <ul style="list-style-type: none"> • To identify and remove unacceptable risks to human health and the environment. • To seek to ensure that contaminated land is made suitable for its current use. • To ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development. 	The LPR and SA should consider how contaminated land can be dealt with and include policies that promote the correct management of contaminated land.
National Planning Policy Framework (MHCLG, 2021)	<p>The NPPF states that plans should prevent development from contributing to, or being put at risk of, air or water pollution.</p> <p>The NPPF states that planning should protect and enhance soils, particularly those recognised as best and most versatile agricultural land (Grades 1, 2 and 3a).</p>	The LPR and SA should adhere to the principles of the Planning Policy Framework.

A.9 Water

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water	Implications for the LPR and SA
Water Framework Directive 2000/60/EC	This provides an overarching strategy, including a requirement for EU Member States to ensure that they achieve 'good ecological status' by 2015. River Basin Management Plans were defined as the key means of achieving this. They contain the main issues for the water environment and the actions we all need to take to deal with them.	The SA Framework should include objectives that consider effects upon water quality and resource.
HM Government Strategy for Sustainable Construction (2008)	Encourages the construction industry to adopt a more sustainable approach towards development; identifies eleven themes for targeting Action, which includes conserving water resources.	The LPR and SA should consider how the water environment can be protected and enhanced and include policies that promote the sustainable use of water resources.
DEFRA The Water Environment (Water Framework Directive) (England and Wales) Regulations (2003)	Requires all inland and coastal waters to reach "good status" by 2015. It mandates that: <ul style="list-style-type: none"> • Development must not cause a deterioration in status of a waterbody; and • Development must not prevent future attainment of 'good status', hence it is not acceptable to allow an impact to occur just because other impacts are causing the status of a water body to already be less than good. This is being done by establishing a river basin district structure within which demanding environmental objectives are being set, including ecological targets for surface waters.	The SA Framework should include objectives that consider effects upon water quality and resource.
Environment Agency: Building a Better Environment: Our role in development and how we can help (2013)	Guidance on addressing key environmental issues through the development process (focusing mainly on the issues dealt with by the Environment Agency), including managing flood risk, surface water management, use of water resources, preventing pollution.	The LPR and SA should consider how the water environment can be protected and enhanced and include policies that promote the sustainable use of water resources.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	The document sets out Government action to help achieve natural world regain and retain good health. The main goals of the Plan are to achieve: <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment. The Plan seeks to achieve clean and plentiful water by:	The LPR and SA should consider the vision and principles of the 25 Year Plan to improve the quality of the UK's waters to be close to their natural state, and respecting nature in how we use water.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water	Implications for the LPR and SA
	<ul style="list-style-type: none"> Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies; Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans; Supporting OFWAT's ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025; and Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters. We will make sure that potential bathers are warned of any short-term pollution risks. <p>The 2021 Environment Act (9th November, 2021) embeds several of these aspects into the new legislation.</p>	
Environment Agency: Water for people and the environment: A Strategy for England and Wales (2009)	Looks at the steps needed, in the face of climate change, to manage water resources to the 2040s and beyond, with the overall aim of improving the environment while allowing enough water for human uses.	The LPR and SA should consider how the water environment can be protected and enhanced and include policies that promote the sustainable use of water resources.
Severn River Basin District, River Basin Management Plan (2015)	The management plan lays out the objectives for the Severn River basin, which include avoiding deterioration of surface and groundwater, achieving good status for all water bodies, reversing significant and sustained pollution and progressively reducing pollution of groundwater. The plan also sets out measures by which objectives can be achieved.	The LPR should avoid pollution and over abstraction in the Severn basin.
Staffordshire Local Flood Risk Management Strategy (December 2015)	This is about managing flooding in Staffordshire. The Local Flood Risk Management Strategy sets out roles and responsibilities for flood risk management, assesses the risk of flooding in the County, where funding can be found to manage flood risk, what our policies are as a Lead Local Flood Authority and what our objectives and actions are to manage flood risk.	Discord between development and policies proposed in the LPR and this strategy should be avoided.
Severn Trent Water, Water Resource Management Plan (2019)	The Plan sets out how Severn Trent Water maintains the balance between supply and demand for water. Their priorities for the future include keeping bills for customers at a minimum, taking a fair and balanced approach for all stakeholders and delivering long term environmental benefits.	Development proposed in the LPR should seek to be in accordance with the future plans of the Severn Trent WRMP.
Strategic Flood Risk Assessment, South Staffordshire Council, 2019	<p>The key objectives of the Level 1 Strategic Flood Risk Assessment are to:</p> <ul style="list-style-type: none"> Inform the SSCs Local Plans by assessing flood risk from all sources, current and future. Identify which locations are most and least vulnerable to flooding from all relevant sources. Produce a comprehensive set of maps presenting flood risk from all sources that can be used as evidence base for flood management purposes. Provide sufficient detail to enable the Sequential Test to be applied to inform allocations of land for development. Provide clear advice for developers undertaking site-specific flood risk assessments. 	Development proposed in the LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water	Implications for the LPR and SA
	<ul style="list-style-type: none"> Assess or identify existing and proposed flood defences and the maintenance requirements of these defences. Summarise the role that the Lead Local Flood Authority will play in the management of flood risk. Consider outputs from the Preliminary Flood Risk Assessment and any local flood risk strategies. Take into account climate change. Assess the cumulative impact that development will have on flood risk. 	
Staffordshire Preliminary Flood Risk Assessments (PFRA) (2017, Addendum)	This assessment summarises the findings from the first two stages of the flood risk management cycle for the County of Staffordshire and presents the results of a high-level screening exercise, identifying areas of significant flood risk. An update to the original 2011 report was done at the end of 2017.	Development proposed in the LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.
Southern Staffordshire Water Cycle Study (2020)	The WCS considers the issues of flood risk, water resources, water supply, wastewater collection, wastewater treatment, water quality, environmental issues and demand management. It offers a relatively detailed look on the potential development in the area and the implications this may have for each of these issues.	Development proposed in the LPR should seek to take on board the advice and constraints noted in the WCS.
South Staffs Water, Water Resource Management Plan 2020	South Staffs Water provides water supply across part of the LPR area and sewerage services across the entire LPR area. The Water Resources Management Plan (WRMP) sets out how South Staffs Water plans to maintain the balance between supply and demand for water. This includes forecasting future supply and demand and proposing measures to align these two. Priorities of the plan include leakage reduction, improved efficiency, a higher proportion of metered customers, improved levels of service and better protection for the environment.	The LPR and SA should consider how the water environment can be protected and enhanced, and promote the sustainable use of water resources.
Severn River Basin Flood Risk Management Plan 2015-2021	Flood risk management plans (FRMPs) explain the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs. FRMPs set out how risk management authorities will work with communities to manage flood and coastal risk over the period 2015-2021. The FRMP helps to promote a greater awareness and understanding of the risks of flooding, particularly in those communities at high risk, and encourage and enable householders, businesses and communities to take action to manage the risks. The FRMP provides the evidence to support flood and coastal risk management decision making. The highest priority is to reduce risk to life.	LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.
Humber River basin Flood risk management plan 2015 - 2021	Flood risk management plans (FRMPs) explain the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs. FRMPs set out how risk management authorities will work with communities to manage flood and coastal risk over the period 2015-2021. The river basin district comprises 15 river catchments and 3 flood risk areas. Flood risk areas are areas with a high risk of surface water flooding.	Development proposed in the LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.
River Severn catchment flood management plan (2009)	The catchment flood management plan should be used to inform planning and decision making. The overall aim is to promote more sustainable approaches to managing flood risk.	LPR should take into consideration the areas at risk of flooding to avoid locating vulnerable development in areas of incompatible risk.

Appendix B: SA Framework for the South Staffordshire LPR

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators include (but are not limited to)
1	Climate Change Mitigation: Minimise the district's contribution to climate change.	<p>Increase energy consumption or GHG emissions?</p> <p>Generate or support renewable energy?</p>	<ul style="list-style-type: none"> • Energy consumption; • GHG emissions; • Access to sustainable transport; • Green infrastructure (carbon sink).
2	Climate Change Adaptation: Plan for the anticipated impacts of climate change.	<p>Increase the number of residents at risk of flooding?</p> <p>Increase the risk of flooding?</p>	<ul style="list-style-type: none"> • EA Flood Map for Planning; • Surface water flood risk; • The number of developments given planning permission on floodplains contrary to EA advice; • Presence or loss of green infrastructure.
3	Biodiversity and Geodiversity: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the district.	<p>Result in a net loss of vegetation?</p> <p>Protect or enhance wildlife sites or biodiversity hotspots?</p> <p>Protect or enhance geodiversity hotspots?</p>	<ul style="list-style-type: none"> • Number of planning approvals which generate adverse impacts on sites of biodiversity importance; • Length of greenways constructed; • Percentage of major development generating overall biodiversity enhancement; • Hectares of biodiversity habitat delivered through strategic site allocations; • Impacts on geodiversity sites.

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators include (but are not limited to)
4	Landscape and Townscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Protect or enhance the local landscape?	<ul style="list-style-type: none"> • Use of locally sourced materials; • Is development in-keeping with surroundings?; • Impacts on existing setting; • Alter the urban / rural fringe; • Increase the risk of coalescence; • Amount of new development in the AONB with commentary on likely impact.
		Protect or enhance the local townscape?	
5	Pollution and Waste: Reduce waste generation, increase the reuse of, and recycling of, materials whilst minimizing the extent and impacts of water, air and noise pollution.	<p>Increase waste production?</p> <p>Increase the risk of air, noise or water pollution?</p> <p>Increase the number of residents exposed to the risk of air, noise or water pollution?</p>	<ul style="list-style-type: none"> • Number of residents in areas of poor air quality; • Proximity to pollutants (e.g. busy roads, airports); • Quality of waterways in or adjacent to sites; • Local increases in road traffic or congestion; • The number of developments given planning permission contrary to Environment Agency advice relating to river water quality or the protection of groundwater; • Proximity to AQMAs and current AQMA status.
6	Natural Resources: Protect, enhance and ensure the efficient use of the district's land, soils and water.	<p>Impact on demand capacity of local water sources?</p> <p>Use previously developed land or existing buildings?</p> <p>Result in the loss of local soils?</p>	<ul style="list-style-type: none"> • Proportion of previously developed land; • Use of existing buildings; • Likely impacts on soil fertility, structure and erosion; • Agricultural Land Classification; • Mineral Safeguarding Sites; • Re-use of contaminated land.

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators include (but are not limited to)
7	Housing: Provide a range of housing to meet the needs of the community.	<p>Ensure that residents will have the opportunity to meet in a home which meets their needs?</p> <p>Result in the loss of, or otherwise impact on, any existing housing?</p>	<ul style="list-style-type: none"> Proportion of affordable housing; Impacts on existing houses and estates; Number of care homes; Total number of homes planned for site.
8	Health and Wellbeing: Safeguard and improve the physical and mental health of residents.	<p>Provide residents with adequate access to necessary health facilities and services?</p> <p>Encourage healthy lifestyles?</p>	<ul style="list-style-type: none"> Access to health facilities; Percentage of District's population with access to a natural greenspace within 400m of their home; Local air quality; Hectares of accessible open space per 1,000 population.
9	Cultural Heritage: Conserve, enhance and manage sites, features and areas of historic and cultural importance.	<p>Will the proposal conserve heritage assets/the historic environment?</p> <p>Will the proposal enhance heritage assets/the historic environment?</p>	<ul style="list-style-type: none"> Number of Listed Buildings adversely impacted by development; Number of Listed Buildings partially damaged or lost; Number of archaeological sites, scheduled monuments and registered parks adversely impacted by development; Quantity of development which is discordant with the relevant management plans but given planning permission in Conservation Areas.
10	Transport and Accessibility: Improve the choice and efficiency of sustainable transport in the district and reduce the need to travel.	<p>Improve travel choice, reduce journey need and shorten the length and duration of journeys?</p> <p>Improve accessibility to key services and amenities for existing and new residents?</p>	<ul style="list-style-type: none"> Distance and accessibility to public transport options; Distance and accessibility to key services and amenities, as well as employment opportunities; Suitability of existing routes of access into sites, considering anticipated increases in usage.

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators include (but are not limited to)
11	Education: Improve education, skills and qualifications in the district.	<p>Raise educational attainment levels for residents in the district?</p> <p>Offer residents with frequent, affordable and sustainable access to educational facilities?</p>	<ul style="list-style-type: none"> Distance and accessibility to educational facilities, including primary and secondary schools; Local education attainment levels.
12	Economy and Employment: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	<p>Encourage sustainable economic growth?</p> <p>Ensure high and stable levels of employment?</p>	<ul style="list-style-type: none"> Access and distance to local employment opportunities; Local employment rates; Increases or decreases in quantity of employment land in the district; Support for sustainable businesses.

Appendix C: Consultation Responses from Statutory Bodies

Table C.1: Consultation comments received from statutory consultees in response to the LPR Sustainability Appraisal Scoping Report (2018)

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
Environment Agency	<p>We note that flooding is addressed under the sustainability theme of Climate Change, and not under Soils & Water. We have no objection to this, however it should be noted that flooding is not a problem which is solely caused by climate change, and as such could just as easily sit under Soils & Water. We would recommend that some linkage is made between these two themes.</p> <p>We would also like to point out that the ecology of rivers sits under two Sustainability Themes – Biodiversity & Geodiversity and Soils & Water. We recommend that this is acknowledged within the report, as it currently not referenced.</p>	<p>The Regulation 19 SA Report includes Chapters 7-15 which relate to topics identified in Schedule 2 of the SEA Regulations including Soil and Water separately. These chapters draw on information from relevant SA Objectives assessed throughout the SA process including multiple objectives where necessary.</p>
	<p>Chapter 5 - This section addresses issues relating to Biodiversity & Geodiversity, however it does not include any reference to the Humber and Severn River Basin Management Plans which classify the Ecological Status of waterbodies, and set targets for their improvement. These documents should be referenced within the Summary of PPP, and should also feed into the baseline data for local state of water-based ecology.</p>	<p>The SA Scoping Report was updated to reflect the points raised. Additionally, the Humber and Severn RBMPs are discussed within Chapter 8 of the Regulation 19 SA Report which focuses on biodiversity, flora and fauna, as well as Appendix A (PPP Review), and have informed the SA process.</p>
	<p>We recommend section 6.2 references the climate change allowances for flood risk available as part of the NPPG here https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.</p>	<p>The SA Scoping Report was updated to reflect the points raised, and climate change allowances are also discussed within Chapter 15 of the Regulation 19 SA Report which focuses on water.</p>
	<p>SA Objective 2: climate change adaptation, lists the EA fluvial flood risk zones as an indicator. We query whether this should more accurately say 'EA Flood Map for Planning', or if the vague terminology is deliberate to encompass all our flood mapping outputs.</p> <p>We suggest that you may wish to add into the criteria and indicators 'the number of developments given planning permission on floodplains contrary to Environment Agency advice'.</p>	<p>The SA Framework criteria and indicators have been updated throughout the iterative SA process to include various recommendations; the latest version is presented in Appendix B of the Regulation 19 SA Report.</p>

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
	<p>We query whether there are any other non-flood related adaptation criteria or indicators that could be used to give a broader scope to this objective.</p> <p>SA Objective 6: Natural Resources could use Environment Agency data on water quality objections to indicate success, with criteria such as will development cause pollution of the water environment?. As such, the Indicator could be 'the number of developments given planning permission contrary to Environment Agency advice relating to river water quality or the protection of groundwater' - Target: no planning permissions to be granted contrary to Environment Agency advice on water quality grounds</p>	<p>Issues with regard to water pollution are considered under SA Objective 5: Pollution and Waste, as opposed to SA Objective 6: Natural Resources.</p>
	<p>The following documents should be added for consideration within the SEA/SA process:</p> <ul style="list-style-type: none"> • Preliminary Flood Risk Assessments (PFRAs) were originally published in 2011 under the Floods Directive and are in the process of being revised for publication in December 2017. • Flood Risk Management Plans (FRMPs) were published in March 2016. • Local Plans, Policies and Programmes should include the Staffordshire Local Flood Risk Management Strategy which includes policies, objectives and priorities for Staffordshire and an action plan for managing flood risk. • Your Strategic Flood Risk Assessment (SFRA) should be included, although this will require updating to support the Local Plan Review. • River Basin Management Plans should be included to reflect the current status of the water environment and to inform on the actions identified to bring your waterbodies up to Good Status as required by the Water Framework Directive. 	<p>The PPP Review has evolved over the iterative plan-making process; the latest version is presented in Appendix A of the Regulation 19 SA Report.</p>
Historic England	<p>Within paragraph 9.1.1 we would recommend that the section deals with protecting, and where possible, enhancing all heritage assets, designated and undesignated. We support the reference to historic landscapes. Paragraph 9.1.2 refers to regional guidance, is it possible to clarify which guidance this refers to?</p> <p>We would recommend that paragraph 9.2.1 refers to heritage assets, in line with National Planning Policy Framework (NPPF) terminology. Further heritage assets are protected through a variety of legislation, as well as national policy, not just 'conditions' attached to planning applications.</p> <p>Appendix A, Section 9, we would recommend that the question raised is whether the policy or proposal conserves and where possible enhances, heritage assets/ the historic environment. In the indicator section – we would recommend that there is a net</p>	<p>The SA Scoping Report was updated to reflect the points raised.</p> <p>Additionally, Chapter 10 of the Regulation 19 SA focuses on cultural heritage and brings together the updated baseline information and potential impacts on the historic environment identified throughout the SA process.</p> <p>The SA Framework criteria and indicators have been updated throughout the iterative SA process to include various</p>

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
	reduction in at risk heritage assets, no increase in at risk or damage to heritage assets as a result of policies and proposals in the Local Plan. Where the indicator section states that ‘impacts to xxx’ what is the aim? No negative impacts for example? We would recommend that targets are included in order to measure the success of the Local Plan.	recommendations; the latest version is presented in Appendix B of the Regulation 19 SA Report.
	Within the section on Plans and Programmes, we note the reference to Conservation Principles, which we support. Please be aware that a review of this document is currently available for consultation and it may be useful to refer to this updated version. We would further recommend listing the three Good Practice Advice Notes and our range of Historic Environment Advice Notes within the section on relevant plans, as these advice documents will assist in the delivery of the local plan review. This will also help to update the documents currently listed in this version of the SEA/SA.	The PPP Review has evolved over the iterative plan-making process; the latest version is presented in Appendix A of the Regulation 19 SA Report.
Natural England	5. Biodiversity and Geodiversity Whilst we acknowledge that paragraph 5.2.3 recognises the importance of Cannock Chase SAC and the need for appropriate mitigation measures to be applied to new development proposals, it does not specifically mention the Strategic Access Management & Monitoring (SAMM) measures agreed by the SAC Partnership which should be followed. These measures will facilitate sustainable residential development while safeguarding the SAC. We acknowledge that in Box 5.1 the report recognises that it will be necessary to ensure that there will be no likely significant effects of the Local Plan Review on Motte Meadows SAC or Cannock Chase SAC via a Habitat Regulations Assessment.	Chapter 8 of the Regulation 19 SA focuses on biodiversity, flora and fauna and includes reference to potential effects on Habitats sites including Cannock Chase SAC. Mitigation including SAMMMs are discussed within Box 8.2 .
	6. Climate Change In Box 6.1 which sets out key climate change issues for South Staffordshire we welcome the recognition that green infrastructure should be enhanced and expanded. 8. Health Natural England particularly welcomes paragraph 8.2.7 which recognises the benefits of natural habitats and green space on physical and mental health and well-being.	Lepus agree that conservation and enhancement of multi-functional green infrastructure is a key consideration for local plans. Green infrastructure and climate change adaptation are cross-cutting themes throughout the SA Objectives and are discussed within the Regulation 19 SA, notably within Chapter 8 (biodiversity, flora and fauna), Chapter 9 (climatic factors) and Chapter 11 (human health).

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
	<p>11. Landscape and Townscape We welcome reference to the National Character Areas (NCA). We also welcome the inclusion of tranquillity at paragraph 11.2.7 and the acknowledgement in Box 11.1 that development should seek to be in accordance with the Cannock Chase Management Plan.</p>	<p>Impacts on tranquillity arising as a result of the LPR have been brought out within Chapter 12 of the Regulation 19 SA Report.</p>
	<p>14. Water and Soil Whilst we generally welcome this section we suggest that paragraph 14.2.5 requires clarification. Natural England does not classify agricultural land as such but has a statutory role in advising local planning authorities about land quality issues and refers to the Agricultural Land Classification (ALC) Strategic Map information. We advise that the Local Plan should comply with the guidance set out at paragraph 118 of the NPPF i.e. that the Local Plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land.</p>	<p>The SA Scoping Report was updated to reflect the points raised. Additionally, issues relating to loss of BMV land are discussed further within Chapter 14 of the Regulation 19 SA Report which focuses on soil.</p>
	<p>Appendix A: SA Framework Natural England generally welcomes the SA Objectives and Framework. We note that the framework sets out indicators for each objective which are intended to monitor the significant environmental effects of implementing the local plan review. As far as the indicators for the natural environment are concerned it is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions. Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> • Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. • Percentage of major developments generating overall biodiversity enhancement. • Hectares of biodiversity habitat delivered through strategic site allocations. <p>Landscape:</p> <ul style="list-style-type: none"> • Amount of new development in the AONB with commentary on likely impact. 	<p>The SA Scoping Report was updated to reflect the points raised. The SA Framework criteria and indicators have been updated throughout the iterative SA process to include various recommendations; the latest version is presented in Appendix B of the Regulation 19 SA Report.</p>

Consultee	Summary, and selected extracts from, consultation response to the SA Scoping Report	How the consultation response has influenced the SA
	Green infrastructure: <ul style="list-style-type: none"> Percentage of the District's population having access to a natural greenspace within 400 metres of their home. Length of greenways constructed. Hectares of accessible open space per 1000 population. 	
	Appendix B: Plans, Policy and Programme Review In general we acknowledge that the Scoping Report has referenced a wide range of documents that are relevant to Biodiversity, Flora and Fauna. We note particularly that the Site Improvement Plan for Cannock Chase Special Area of Conservation and the Cannock Chase AONB Management Plan have been included. However we suggest that you may want to consider including reference to the Staffordshire Biodiversity Action Plan http://www.sbap.org.uk/ and any other relevant local documents.	The PPP Review has evolved over the iterative plan-making process; the latest version is presented in Appendix A of the Regulation 19 SA Report.

Table C.2: Consultation comments received from statutory consultees in response to the LPR Regulation 18 (I) Issues and Options SA (2018)

Consultee	Summary, and selected extracts from, consultation response to the Regulation 18 (I) SA	How the consultation response has influenced the SA
Environment Agency	It should be ensured that the above comments and upcoming SFRA and WCS evidence base are reflected within the SA and future drafts, particularly in relation to the levels and spatial distribution of new growth.	The findings from the latest available SFRA and WCS information at the time of writing have informed the SA and are discussed within Chapter 15 of the Regulation 19 SA Report.
	We note that the indicators relating to climate change adaption all relate to impacts on the water environment and ecology, and query whether there are any indicators which can also reflect impacts on human health, infrastructure, transport etc.	Impacts of flooding on human health and infrastructure have been discussed for each spatial option under SA Objective 2 – Climate Change Adaptation within the Issues and Options SA. The Regulation 19 SA Report includes Chapters 7-15 which relate to topics identified in Schedule 2 of the SEA Regulations including Climatic Factors, Human Health and Population and Material Assets (including infrastructure and transport). These chapters draw on information from relevant SA Objectives assessed throughout the SA process including multiple objectives where necessary.
	<i>Section 3.54: Open countryside</i> It is possible (if development is well designed) for developed land to have greater biodiversity value than green belt. In the case of intensive arable farming this is almost always the case as intensive farming practices leave very little space for biodiversity and the use of chemical fertilizers, pesticides etc. then pollute and poison what little remaining biodiversity is hanging on. Similarly many brownfield sites that have been left untouched for many years also frequently have more biodiversity than the average urban park due to the intensive management and use of non-native species that parks traditionally use. To assume that greenbelt is always of biodiversity value and that a brownfield is not is nonsensical almost every site needs to be assessed for its own merits. For this reason we support Option B.	It is acknowledged that brownfield land can be of environmental or biodiversity value. This is discussed further within Chapter 8 of the Regulation 19 SA Report.

Consultee	Summary, and selected extracts from, consultation response to the Regulation 18 (I) SA	How the consultation response has influenced the SA
	<p><i>Section 5.35: Landscape character</i></p> <p>Linear features such as hedgerows, watercourses need to be afforded protection within the landscape but also given sufficient room to allow natural processes such as functioning floodplains to proceed unhindered. We would be happy to feed into related SPDs. Our preferred Option is therefore B.</p>	<p>Option B performed the best in the SA assessment presented in the Issues and Options SA.</p> <p>Multi-functional green infrastructure is a cross-cutting theme throughout the SA Objectives and is discussed within the Regulation 19 SA, notably within Chapter 8 (biodiversity, flora and fauna), Chapter 9 (climatic factors) and Chapter 11 (human health).</p>
Historic England	<p>Appendix A - We look forward to developing the decision making criteria and indicators for the historic environment as the Plan progresses and when it becomes more clear which options for growth will be pursued. The following document may be of use to you at this time: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/></p>	<p>The SA Framework criteria and indicators have been updated throughout the iterative SA process to include various recommendations; the latest version is presented in Appendix B of the Regulation 19 SA Report.</p>
Natural England	<p>The reliance on the private car for transport will need to be considered in relation to Sustainability Appraisal e.g. with regard to air quality impacts from increased traffic generation.</p>	<p>Residents' reliance on personal car use has been discussed for each spatial option under SA Objective 5 – Pollution and Waste and SA Objective 10 – Transport and accessibility.</p> <p>Furthermore, Chapter 7 of the Regulation 19 SA focuses on air, and references private car use as a primary source of poor air quality within the plan area.</p> <p>This is also a relevant point that is brought out in several other SEA topic chapters including Chapter 9 (climatic factors) and Chapter 11 (human health).</p>

Table C.3: Consultation comments received from statutory consultees in response to the LPR Regulation 18 (II) Spatial Housing Strategy and Infrastructure Delivery SA (2019)

Consultee	Summary, and selected extracts from, consultation response to the Regulation 18 (II) SA	How the consultation response has influenced the SA
Environment Agency	<p>Sustainability Appraisal</p> <p>Please consider all the above factors when deciding what the best option, taking into consideration the water environment. This should ensure the upcoming SFRA and WCS evidence base are reflected within the SA and future drafts, particularly in relation to the levels and spatial distribution of new growth. Also taking into account the updated climate change allowances.</p> <p>Overall we would like to see any development outside the flood plain where possible which should be identified within the SFRA 1 and any development within the flood plain should have a detailed SFRA 2.</p> <p>Option A – G</p> <p>All options are located partly within Flood Zone 2 & 3 therefore new residents will be at a risk of flooding. A SFRA (Level 2) will need to be produced to support application of the Exception Test where required, and demonstrate deliverability of the plan proposals.</p> <p>There is generally an assumption that development on greenbelt has a greater impact to biodiversity than on brownfields. However this is often not the case if the brownfield site has been left unmanaged for any significant time or if the greenbelt land in question is used for intensive agriculture then the brownfield site will often have very high biodiversity value and the greenbelt will have little biodiversity value.</p> <p>Land drainage activities within greenbelt has also often degraded our smaller tributaries into little more than drainage ditches removing any natural features and subjecting them to significant pollution. Any opportunities to restore these tributaries should be built into any proposed development Master Plan at an early stage and will provide clear objectives for biodiversity net gain.</p>	<p>The findings from the latest available SFRA and WCS information at the time of writing have informed the SA and are discussed within Chapter 15 of the Regulation 19 SA Report.</p> <p>The LPR policies have addressed the recommendations made throughout the plan making process and ensure that developments within Flood Zones 2/3 are developed in accordance with the Sequential Test and Exception Test.</p> <p>It is acknowledged that brownfield land can be of environmental or biodiversity value. This is discussed further within Chapter 8 of the Regulation 19 SA Report.</p>
Historic England	No specific comments regarding the SA.	N/A
Natural England	No specific comments regarding the SA.	N/A

Table C.4: Consultation comments received from statutory consultees in response to the Regulation 18 (III) Preferred Options SA Report (2021)

Consultee	Summary, and selected extracts from, consultation response to the Regulation 18 (III) SA	How the consultation response has influenced the SA
Environment Agency	No specific comments regarding the SA.	N/A
Historic England	No specific comments regarding the SA.	N/A
Natural England	Having seen Table 6.1 assessment for Wheaton Aston, we would like to understand further how site 610 for example was selected when site 614 scored better.	The outline reasons for selection and rejection of each reasonable alternative site assessed throughout the SA process is set out in Appendix H .
	We note that the report has not been able to undertake a comprehensive assessment of impacts on best and most versatile land classed as grade 1,2,3a in the agricultural land classification due to a lack of site specific ALC studies. How is the Council justifying allocating on BMV land?	In line with the precautionary principle, and in absence of site-specific surveys to identify ALC subgrades 3a and 3b, the SA has assumed that Grades 1, 2 and 3 could represent some of South Staffordshire's BMV land. Methodological assumptions and limitations of the high-level assessment that has been carried out are set out within Appendix D .

Appendix D: Methodological Assumptions

Appendix D Contents

D.1	Introduction	D1
D.2	SA Objective 1 - Climate Change Mitigation	D2
D.3	SA Objective 2 - Climate Change Adaptation	D5
D.4	SA Objective 3 - Biodiversity and Geodiversity	D7
D.5	SA Objective 4 – Landscape and Townscape	D11
D.6	SA Objective 5 – Pollution and Waste	D16
D.7	SA Objective 6 – Natural Resources	D19
D.8	SA Objective 7 – Housing	D21
D.9	SA Objective 8 – Health and Wellbeing	D22
D.10	SA Objective 9 – Cultural Heritage	D25
D.11	SA Objective 10 – Transport and Accessibility	D27
D.12	SA Objective 11 – Education	D29
D.13	SA Objective 12 – Economy and Employment	D30

Boxes

Box D.2.1:	SA Objective 1: Climate Change Mitigation assessment methodology	D4
Box D.3.1:	SA Objective 2: Climate Change Adaptation assessment methodology	D6
Box D.4.1:	SA Objective 3: Biodiversity and Geodiversity assessment methodology	D10
Box D.5.1:	SA Objective 4: Landscape and Townscape assessment methodology	D14
Box D.6.1:	SA Objective 5: Pollution and Waste assessment methodology	D18
Box D.7.1:	SA Objective 6: Natural Resources assessment methodology	D20
Box D.8.1:	SA Objective 7: Housing assessment methodology	D21
Box D.9.1:	SA Objective 8: Health and Wellbeing assessment methodology	D24
Box D.10.1:	SA Objective 9: Cultural Heritage assessment methodology	D26
Box D.11.1:	SA Objective 10: Transport and Accessibility assessment methodology	D28
Box D.12.1:	SA Objective 11: Education assessment methodology	D29
Box D.13.1:	SA Objective 12: Economy and Employment assessment methodology	D31

D.1 Introduction

D.1.1 Overview

- D.1.1.1 This appendix provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the methodology used to assess policies, proposals, and reasonable alternatives within the emerging LPR.
- D.1.1.2 The appraisal uses objective geographic information relating to environmental receptors, the SA Framework (see **Appendix B**) and established standards (where available) to help make the assessment decisions transparent and robust. Each SA Objective is considered when appraising LPR site allocations, policies and reasonable alternatives.
- D.1.1.3 A number of topic specific methodologies and assumptions have been applied to the appraisal process for each SA Objective, as set out in this appendix, offering further insight into how each significant effect ‘score’ was arrived at. These should be borne in mind when considering the assessment findings.
- D.1.1.4 It should be noted that for some aspects of the SA, in particular the assessment of policies (see **Appendix I**), and the post-mitigation assessment of reasonable alternative sites (see **Appendix G**), a greater range of effects and mitigating measures are generally expected and so the assessment findings are more nuanced.
- D.1.1.5 The level of detail that can be expressed through the SA assessments depends on the level of detail provided associated with the part of the plan in question.

D.2 SA Objective 1 - Climate Change Mitigation

D.2.1 Climate Change

- D.2.1.1 A 'Climate Change Adaptation and Mitigation' (CCAM) study has been undertaken to inform the development of energy and sustainability policies across Staffordshire and the eight constituent Local Authorities¹. This study forms part of the Evidence Base to SSDC's Local Plan Review.
- D.2.1.2 The CCAM report sets out the baseline sources of carbon emissions across the county and makes recommendations in relation to the development of policies and changes to other Council duties that would serve to lead to a reduction in carbon emissions.
- D.2.1.3 In the study, baseline greenhouse gas (GHG) emissions in Staffordshire are estimated to be 6,421 kilotonnes of carbon dioxide equivalent (ktCO₂e) per year. Of this, those associated with fuel consumption and electricity use account for approximately 5,407 ktCO₂e (84.2% of the total).
- D.2.1.4 Overall, energy use is dominated by natural gas (33.7%), petroleum products (42.2%) and electricity (20.2%), which together account for over 96% of the total for Staffordshire County as a whole. However, in SSDC, 53.8% of its energy is sourced from petroleum products.
- D.2.1.5 Since 2005, CO₂ emissions have decreased by around 25%. Roughly half of this change is attributed to the rapid decrease in the carbon intensity of grid electricity ('grid decarbonisation'). Grid decarbonisation could theoretically result in a further 15% decrease in emissions by 2050 compared with 2017 levels.
- D.2.1.6 The study states that although future emissions are highly uncertain, it is estimated that:
- New development in Staffordshire could increase emissions by roughly 5%, although the actual amount could be less depending on future changes in Building Regulations and sustainable construction practices;
 - Switching to ULEVs (Ultra Low Emission Vehicles) could result in around a 28% decrease in annual CO₂ emissions, but the savings could improve even further in the event of future grid decarbonisation; and
 - Better standards for new buildings, combined with grid decarbonisation and switching to ULEVs, could decrease total emissions by over 50% compared with 2017 levels.

¹ AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Staffordshire_Final%20Report_Rev03%20%28Updates%29_2020-10-16_Accessibility_Comp....pdf [Date Accessed: 17/08/22].

- Additional measures to decrease energy demand and promote the use of LZC (Low and Zero Carbon) electricity instead of fossil fuels would provide further benefits.

- D.2.1.7 The report goes on to set out the key climate risks in Staffordshire, “*The analysis presented in the report demonstrates that Staffordshire is exposed to seven key climate hazards; severe storms and gales, cold and snow, river flooding, surface water flooding, heat waves, drought and wildfires. Between them, these hazards present 20 climate risks and their associated impacts that new development could be exposed to in both current day and future scenarios, across the natural environment, infrastructure and the people and the built environment sectors. Climate change is expected to exacerbate and enhance the impacts experienced throughout Staffordshire, due to warmer, wetter-winters and hotter, drier summers, with an increase in the frequency and intensity of extreme weather events*”.
- D.2.1.8 The increase in GHG emissions caused by development proposals are associated with impacts of the construction phase, the occupation and operation of homes and businesses, energy and water consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible.
- D.2.1.9 The incorporation of green infrastructure within developments presents several opportunities to mitigate climate change, for example, through providing natural cooling to combat the ‘urban heat island’ effect, reducing the effects of air pollution and providing more pleasant outdoor environments to encourage active travel².
- D.2.1.10 However, it is assumed that development on previously undeveloped or greenfield land would result in an increase in GHG emissions due to the increase in the local population and the number of operating businesses and occupied homes.
- D.2.1.11 One potential method to estimate GHG emissions would be based on per capita calculations, using the UK local authority emissions statistics which is published by the Government annually³, based on the average number of people per dwelling and the proposed number of dwellings for new development sites. However, at this stage in SSDC’s plan-making process the housing capacity of sites is uncertain. While site boundaries and site areas are known, as yet unknown on-site constraints may substantially affect housing capacity. The GHG emissions as a consequence of the allocation of sites is recorded as uncertain at this stage.
- D.2.1.12 The estimated carbon emissions in South Staffordshire in 2019 was approximately 873,100 tonnes CO₂/year. The estimated carbon emissions per person per year was 7.8 tonnes⁴. New residents in South Staffordshire could have annual carbon emissions of 7.8 tonnes CO₂ per person.

² TCPA (2007) The essential role of green infrastructure: eco-towns green infrastructure worksheet. Available at: <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=dd06b21d-6d41-4c4e-bec5-4f29a192f0c6> [Date Accessed: 14/12/20]

³ DBEIS (2021) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019> [Date Accessed: 17/08/22]

⁴ Ibid

- D.2.1.13 Sites proposed for employment or non-residential end use may present further negative effects on climate change; however, this would be dependent on the site-specific proposals and the nature of development, which is unknown at the time of assessment. Conversely, where renewable energy generation is incorporated within development, or proposed employment development locations would reduce commuting distances, potential adverse impacts could be offset, to some extent.
- D.2.1.14 It should be noted that the appraisal of the LPR is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects. For example, specific carbon footprint data for the plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the plan in terms of (a) evolution of the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the plan.

Box D.2.1: SA Objective 1: Climate Change Mitigation assessment methodology

As the capacity at each residential-led development proposal and the nature of non-residential proposals are unknown at this stage of assessment, all site assessments have been identified as uncertain in regard to climate change mitigation.

+/-

D.3 SA Objective 2 - Climate Change Adaptation

D.3.1 Fluvial Flooding

D.3.1.1 The level of fluvial flood risk present across the Plan area is based on the Environment Agency's flood risk data, such that:

- Flood Zone 3: 1% or greater chance of flooding each year;
- Flood Zone 2: Between 0.1% - 1% chance of flooding each year; and
- Flood Zone 1: Less than 0.1% chance of flooding each year.

D.3.1.2 It is assumed that development proposals will be permanent, and it is therefore likely that the development would be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial flooding.

D.3.1.3 Where development proposals coincide with Flood Zone 2, a minor negative impact would be expected. Where development proposals coincide with Flood Zone 3 (either Flood Zone 3a or 3b), a major negative impact would be expected. Where development proposals are located within Flood Zone 1, a minor positive impact would be expected for climate change adaptation.

D.3.1.4 In selecting the residential-led development proposals to be assessed as part of the SA process, SSDC eliminated any residential-led proposal where there was no capacity for development due to flood risk present (i.e. Flood Zone 3). As such, it has been assumed that where a residential-led proposal coincides with areas of high flood risk, that the proposed development would be located on land not at risk of flooding.

D.3.2 Surface Water Flooding

D.3.2.1 According to Environment Agency data⁵, areas determined to be at high risk of surface water flooding have more than a 3.3% chance of flooding each year, medium risk between 1% and 3.3%, and low risk between 0.1% and 1% chance. Areas determined to be at very low risk of flooding (less than 0.1% chance) would be expected to result in a negligible impact on surface water flooding for the purposes of this assessment.

D.3.2.2 It is assumed that development proposals will be permanent, and it is therefore likely that the development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of surface water flooding.

⁵ Environment Agency (2013) Risk of flooding from surface water – understanding and using the map. Available at: <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map> [Date Accessed: 17/08/22]

Box D.3.1: SA Objective 2: Climate Change Adaptation assessment methodology

Fluvial Flooding

Where employment or Gypsy and Traveller-led development proposals coincide with Flood Zone 3, a major negative impact would be expected.

--

Residential-led development proposals that coincide with areas of Flood Zone 2 or 3 are assessed as having a minor negative impact on the climate change adaptation objective, as SSDC has excluded development from areas of Flood Zone 3.

-

Where employment or Gypsy and Traveller-led development proposals coincide with Flood Zone 2, a minor negative impact would be expected.

-

Where development proposals are located within Flood Zone 1, a minor positive impact is expected for climate change adaptation.

+

Surface Water Flooding

Development proposals within areas at high risk of surface water flooding are assumed to have a major negative impact. This impact is considered to be frequent and short-term.

--

Development proposals in areas at low and medium risk of surface water flooding are assumed to have a minor negative impact. This impact is considered to be occasional and short-term.

-

Where development proposals are not located in areas determined to be at risk of surface water flooding, a negligible impact is expected for climate change adaptation.

0

D.4 SA Objective 3 - Biodiversity and Geodiversity

D.4.1 Biodiversity and Geodiversity

- D.4.1.1 The biodiversity and geodiversity objective considers adverse impacts of the proposed development at a landscape-scale. It focuses on an assessment of development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area. These ecological receptors are listed in **Table D.4.1**.

Table D.4.1: *Ecological receptors considered in this SA*

Designated Sites:
Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar site.
Sites of Special Scientific Interest (SSSI).
National Nature Reserves (NNR).
Local Nature Reserves (LNR).
Sites of Biological Importance (SBI).
Regionally Important Geological Sites (RIGS).
Habitats and Species:
Ancient woodland.
Priority habitats.

- D.4.1.2 Where a site is coincident with, adjacent to or located in close proximity of an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

D.4.2 Internationally and European designated sites

- D.4.2.1 Habitats sites (formerly referred to as European sites) provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of Special Areas of Conservation (SACs), designated under European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive), and Special Protection Areas (SPAs), classified under European Directive 2009/147/EC on the conservation of wild birds (the Birds Directive). Additionally, paragraph 176 of the NPPF requires that sites listed under the Ramsar Convention (The Convention on Wetlands of International Importance, especially as Waterfowl Habitat) are to be given the same protection as fully designated Habitats sites.

- D.4.2.2 The area within which development proposals could potentially have direct, indirect and in-combination impacts on the integrity of a Habitats site is referred to as the Zone of Influence (ZOI). This is determined through an identification of sensitive receptors at each Habitats site (its qualifying features) and pathways via which the Local Plan may have an impact.
- D.4.2.3 A Habitats Regulations Assessment (HRA) has been prepared alongside the development of the Local Plan. This will inform the ZOIs within which impacts at Habitats sites will be considered. At the time of carrying out the SA assessments, the HRA had not been completed and so only existing agreed ZOIs have been referred to in the assessments. ZOIs for Cannock Chase SAC have been developed and agreed by the Cannock Chase SAC Partnership⁶. The evidence shows that any development which would increase the human population, tourism or visitor use within 15km of the Cannock Chase SAC may have a significant impact on the site. In this assessment, any proposed site which lies within or intersects with the 15km ZOI for Cannock Chase SAC has the potential to have negative effects. The effects of the potential sites on other Habitats sites in, or in proximity to, the district were recorded as uncertain for the purposes of this assessment.

D.4.3 Nationally designated sites

- D.4.3.1 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to SSSIs, SACs, SPAs and Ramsar sites. They define zones around each designated site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts⁷.
- D.4.3.2 Where a development proposal falls within, or interests with, more than one SSSI IRZ the worst-case risk zone is reported upon in the assessment. The IRZ attribute data draws a distinction between rural and non-rural development. For the purposes of this assessment, non-rural proposals are considered to be those that are located within an existing built-up area. Proposals at greenfield locations at the edge of a settlement or those that are more rural in nature have been considered to be rural. In this instance, a worst-case approach has been taken in respect to the allocation of an IRZ classification. As potential housing capacity at each development sites is unknown at this stage of assessment, a precautionary approach has been taken.

⁶ SSDC (undated) Cannock Chase Special Area of Conservation (SAC) Guidance to Mitigate the Impact of New Residential Development
Available at

<https://services.sstaffs.gov.uk/CMIS/Document.ashx?czJKcaeAi5tUFLIDL2UE4zNRBcoShgo=ENTAnvwD4CjSBRFBx6yYIC3IV%2B3aP3JYz9YI chNanMrXZ9zC26fQvw%3D%3D&rUzwRPf%2BZ3zd4E7lkn8Lvw%3D%3D=pwRE6AGJFLDNih225F5QMaQWctPHwdhUfCZ%2FLUQzgA2uL5JN RG4jdQ%3D%3D&mCtIbCubSFFxsDGW9IXnlq%3D%3D=hFfIUdN3100%3D&kCx1AnS9%2FpWZQ40DXFvdEw%3D%3D=hFfIUdN3100%3D&uJo vDxwdjMPoYv%2BAJvYtvA%3D%3D=ctNJf55vVA%3D&FgPIIEJYlotS%2BYGoBi5oIA%3D%3D=NHdURQburHA%3D&d9QjiOag1Pd993jsyOJqF vmyB7X0CSQK=ctNJf55vVA%3D&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJf55vVA%3D&WGewmoAfeNQ16B2MHuCPMRKZMwaGIP aO=ctNJf55vVA%3D> [Date Accessed: 17/08/22]

⁷ Natural England (2022) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 31 July 2022. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date Accessed: 17/08/22]

D.4.4 Locally designated sites

- D.4.4.1 For the purposes of this assessment, impacts on priority habitats protected under the 2006 NERC Act⁸ have been considered in the context of Natural England's publicly available Priority Habitat Inventory database⁹. It is acknowledged this may not reflect current local site conditions in all instances.
- D.4.4.2 It is assumed that development proposals located on previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. Proposals which result in the loss of greenfield land are expected to contribute towards a cumulative loss in vegetation cover. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, due to the loss of stepping-stones and corridors. This will restrict the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the natural resources objective (SA Objective 6) in this assessment.
- D.4.4.3 Protected species survey information is not available for the development proposals within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such impacts on protected species have not been assessed on a site-by-site basis.
- D.4.4.4 It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.
- D.4.4.5 It is anticipated that the SSDC will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of priority species and priority habitats protected under the NERC Act and other protected species.
- D.4.4.6 It is assumed that the loss of biodiversity assets, such as ancient woodland or an area of priority habitat, are permanent and irreversible effects. It is assumed that mature trees and hedgerows will be retained where possible.

⁸ Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 17/08/22]

⁹ Natural England (2022) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcd6/priority-habitat-inventory-england> [Date Accessed: 17/08/22]

Box D.4.1: SA Objective 3: Biodiversity and Geodiversity assessment methodology

Where any part of a development site coincides with a SAC, SPA, Ramsar site, a SSSI, NNR or ancient woodland, or is adjacent to a SAC, SPA, Ramsar site or SSSI, it is assumed that development would have a permanent and irreversible impact on these nationally important biodiversity assets, and a major negative impact would be expected.

--

Where any part of a development site coincides with LNRs, SBIs, RIGSs or priority habitats, is adjacent to an ancient woodland, NNR, LNR or SBI, is located within a SSSI IRZ which states to consult Natural England, is located within the zone of influence of a Habitats site or is located in close proximity to an NNR, LNR or stand of ancient woodland, it is assumed that development would have an impact on these biodiversity assets, and a minor negative impact would be expected.

-

Where any part of a development site is located within an IRZ which states that “*any residential developments with a total net gain in residential units*” or “*residential development of 50 units or more*” should be consulted on, a minor negative impact would be likely.

-

Where a development proposal would not be anticipated to impact a biodiversity or geodiversity asset, a negligible impact would be expected for this objective.

0

D.5 SA Objective 4 – Landscape and Townscape

D.5.1 Landscape and Townscape

D.5.1.1 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.

D.5.2 Cannock Chase Area of Outstanding Natural Beauty (AONB)

D.5.2.1 The Cannock Chase AONB is a nationally designated landscape, located to the north east of the District. Potential negative impacts on the AONB and its setting have been assessed with regard to the Cannock Chase AONB Management Plan 2019-2024¹⁰ and the special qualities it identifies.

D.5.3 Green Belt Boundary Review

D.5.3.1 SSDC identified the potential need to revise Green Belt boundaries in order to accommodate the identified housing need. A Green Belt Study has been undertaken¹¹ to inform the consideration of revisions to Green Belt boundaries in the district as part of the LPR. The study considered the five purposes of Green Belt, as set out in the NPPF:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

¹⁰ Cannock Chase Area of Outstanding Natural Beauty (2019) Cannock Chase Area of Outstanding Natural Beauty Management Plan 2019 – 2024. Available at: <https://cannock-chase.co.uk/wp-content/uploads/2019/10/AONB-Cannock-Chase-Management-Plan-2019-24.pdf> [Date Accessed: 17/08/22]

¹¹ LUC (2019) South Staffordshire Green Belt Study: Stage 1 and 2 Report. Available at: <https://www.sstaffs.gov.uk/doc/181123/name/South%20Staffs%20GB%20Stage%201%20and%202%20Report%20FINAL%20v1%20-%20web%20copy.pdf/> [Date Accessed: 17/08/22]

- D.5.3.2 The NPPF states that *“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*.
- D.5.3.3 In Stage 1, the Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt. In Stage 2, the study seeks to identify potential harm as a consequence of releasing land parcels from the Green Belt. This second stage resulted in a seven point ‘green belt harm’ scale based on the Stage 1 assessment:
- Very high;
 - High;
 - Moderate high;
 - Moderate;
 - Low-moderate;
 - Low; and
 - Very low.
- D.5.3.4 In this SA those land parcels with a Green Belt harm rating of ‘very high’, ‘high’ and ‘moderate high’ have been assessed as having a potential major negative effect on this Objective. ‘Moderate high’ and ‘moderate’ harm has been assessed as having minor negative effect on this objective and ‘low’ and ‘very low’ are assessed as having a negligible effect.
- D.5.3.5 As stated in the Green Belt Study, *“In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development but identifies the relative variations in the harm to the designation”*.
- D.5.3.6 Table 8.1 of the study sets out a range of potential measures to mitigate harm to the revised Green Belt. Many of these measures focus on identifying and enhancing strong boundaries to the revised Green Belt and reducing the potential urbanising influences of new development on adjacent areas of Green Belt through the sensitive masterplanning of new development.

D.5.4 Landscape Sensitivity Assessment

- D.5.4.1 Alongside the Green Belt Study, a Landscape Sensitivity Study¹² was undertaken, which forms Stage 3 of the Green Belt Study. As stated in the Green Belt Study, there is an interaction between the assessment of how parcels of land fulfil Green Belt purposes and the landscape character of the land,
- D.5.4.2 *“There is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character and sensitivity are also likely to play a role in the spatial relationship between urban areas and the*

¹² LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at: <https://www.sstaffs.gov.uk/planning-files/Spatial-Housing-Strategy/SHSID-Landscape-Study-2019.pdf> [Date Accessed: 17/08/22]

countryside. However there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land”.

D.5.4.3 The Landscape Sensitivity Study considered the landscape and visual aspects of the land parcels using ten criteria which were considered most likely to be affected by development. The criteria included natural features, landform, landscape pattern, recreational value, settlement setting and visual prominence, amongst others. Overall landscape sensitivity was assessed on a five-point scale,

- High;
- Moderate high;
- Moderate;
- Moderate low; and
- Low.

D.5.4.4 In this SA, sites located in land parcels assessed as ‘high’ and ‘moderate high’ landscape sensitivity are considered to have potentially major negative effects on this objective. Sites in land parcels assessed as ‘moderate’ and ‘moderate-low’ are assessed as having minor negative effects on this objective. Sites in land parcels assessed as low landscape sensitivity are assessed as having a negligible effect on this objective.

D.5.5 Country Parks

D.5.5.1 There are several Country Parks located within and around South Staffordshire. Potential impacts to Country Parks, including views from Country Parks, have been assessed based on the distance between the development proposal and the Country Park, as well as the landscape within and surrounding the proposal as determined through a desk-based appraisal.

D.5.6 Landscape Character Assessment

D.5.6.1 Baseline data on Landscape Character Types (LCTs) within the Plan area are derived from the Planning for Landscape Change: Supplementary Planning Guidance¹³. Key characteristics of each LCT have informed the appraisal of each site proposal against the landscape objective. The assessment of impact is based on the overall landscape character guidelines and key characteristics for each LCT, and the nature of the landscape within the site as determined through a desk-based appraisal.

¹³ Staffordshire County Council (2000) Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011. Volume 3: Landscape Descriptions. Available at: <https://www.staffordbc.gov.uk/landscape-character-assessment1> [Date Accessed: 17/08/22]

D.5.7 Views

- D.5.7.1 In order to consider potential visual effects of development, it has been assumed that the development proposals would, broadly, reflect the character of nearby development of the same type.
- D.5.7.2 Potential views from residential properties are identified using aerial photography.
- D.5.7.3 It is anticipated that the SSDC will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) or Landscape and Visual Appraisals (LVAs) to accompany any future proposals, where relevant. The LVIAs or LVAs should seek to provide greater detail in relation to the landscape character of the proposal and its surroundings, the views available towards the development proposal, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.

Box D.5.1: SA Objective 4: Landscape and Townscape assessment methodology

Cannock Chase AONB

Development proposals located within, partially within or adjacent to the AONB are expected to result in major negative impacts on the character and/or setting of the designated landscape.

--

Development proposals located in close proximity to the AONB are expected to result in negative impacts on the views experienced from the AONB and/or the setting of the designated landscape.

-

Green Belt Harm

Development proposals located within areas of 'moderate-high', 'high' or 'very high' Green Belt harm.

--

Development proposals located within areas of 'low-moderate' or 'moderate' Green Belt harm.

-

Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.

0

Landscape Sensitivity Study

Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.

--

Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.

-

Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.

0

Landscape Character Assessment

Development proposals which could potentially be discordant with the guidelines and characteristics provided in the published Supplementary Planning Guidance would be expected to have a minor negative impact on the landscape objective.

-

Box D.5.1: SA Objective 4: Landscape and Townscape assessment methodology

Development proposals located within areas classed as ‘urban’ within the Landscape Character Assessment, and therefore comprise built-up areas, would be expected to have a negligible impact on the landscape character.

0

Country Park:

Development proposals that are located adjacent or in close proximity to a Country Park, and therefore could potentially adversely affect views from Country Parks, are assumed to have a minor negative impact on the landscape objective.

-

Views

Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the Public Rights of Way (PRoW) network and/ or local residents are assumed to have minor negative impacts on the landscape objective.

-

Urban Sprawl/ Coalescence

Development proposals which are considered to increase the risk of future development spreading further into the wider landscape are assessed as having a minor negative impact on the landscape objective.

-

Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements are assessed as having a potential minor negative impact on the landscape objective.

-

Overall

Where a development proposal would not be anticipated to significantly impact the surrounding landscape, a negligible impact would be expected for this objective.

0

D.6 SA Objective 5 – Pollution and Waste

D.6.1 Air Pollution

- D.6.1.1 It is assumed that development proposals would result in an increase in traffic and thus traffic-related air pollution. Both existing and future site end users would be exposed to this change in air quality. At this stage of assessment, residential capacity at each site is unknown, and as such, it is uncertain the extent to which each development proposal could potentially increase air pollution in the local area.
- D.6.1.2 Exposure of new residents to air pollution has been considered in the context of the proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e. the road carriageway. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, *“beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant”*¹⁴. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers^{15 16}. A buffer distance of 200m has therefore been applied in this assessment. A proposed site which lies wholly or partially within an AQMA or a 200m buffer, as described above, is assessed as having potential negative effects on new residents.
- D.6.1.3 The proximity of a proposal in relation to a main road determines the exposure level of site end users to road related air and noise emissions¹⁷. In line with the DMRB guidance, it is assumed that site end users would be most vulnerable to these impacts within 200m of a main road. This distance has therefore been applied throughout this assessment to both existing road and rail sources. A proposed site which lies wholly or partially within a 200m buffer, as described above, is assessed as having potential negative effects on new residents.

D.6.2 Water Pollution

- D.6.2.1 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of

¹⁴ Department for Transport (2017) TAG unit A3 Environmental Impact Appraisal. Available at: <https://www.gov.uk/government/publications/webtag-tag-unit-a3-environmental-impact-appraisal-december-2015> [Date Accessed: 16/08/22]

¹⁵ Bignal, K., Ashmore, M & Power, S. 2004. The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

¹⁶ Ricardo-AEA, 2016. The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

¹⁷ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/section3/ha20707.pdf> [Date Accessed: 16/08/22]

pollutants. As such, any proposal that is located within a groundwater SPZ could potentially have an adverse impact on groundwater sources¹⁸.

- D.6.2.2 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water¹⁹. In this assessment, a 200m buffer zone was deemed appropriate. An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted²⁰.

D.6.3 Waste

- D.6.3.1 Waste management is jointly coordinated by the Staffordshire Joint Waste Management Board (JWMB) which incorporates Staffordshire County Council, Stoke-on-Trent City Council and the eight districts and boroughs within Staffordshire, including SSDC. SSDC has responsibility for the provision of collection and recycling services for households as part of the management of waste in the county. Less than 3% of Staffordshire's municipal waste is sent to landfill sites²¹ and Staffordshire County Council has set a target of Zero Waste to landfill²².
- D.6.3.2 The role of the Local Plan in waste management can be to set guidance or requirements for the reduction of construction waste in new development and to ensure design guidance requires new development to accommodate suitable spaces for recycling and waste storage and collection.
- D.6.3.3 One potential method to estimate household waste production would be based on per capita calculations, using the UK local authority statistics which is published by the Government annually²³, based on the average number of people per dwelling and the proposed number of dwellings for new development sites. However, at this stage in SSDC's plan-making process the housing capacity of sites is uncertain. While site boundaries and site areas are known, as yet unknown on-site constraints may substantially affect housing capacity. The

¹⁸ Environment Agency (2019) Groundwater source protection zones (SPZs). Available at: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs> [Date Accessed: 17/08/22]

¹⁹ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: https://www.who.int/water_sanitation_health/resourcesquality/wgmchap2.pdf [Date Accessed: 15/11/19]

²⁰ Department for Environment Food and Rural Affairs (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 17/08/22]

²¹ Staffordshire County Council (no date) Waste explained. Available at: <https://www.staffordshire.gov.uk/Waste-and-recycling/Waste-explained.aspx> [Date Accessed: 17/08/22]

²² <https://www.staffordshire.gov.uk/Waste-and-recycling/wastestrategy/JointMunicipalWasteManagementStrategy.aspx> [accessed on 22/06/21]

²³ Department for Environment Food and rural Affairs (2021) Statistics on waste managed by local authorities in England in 2020/21. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040756/Statistics_on_waste_managed_by_local_authorities_in_England_in_2020_v2rev_accessible.pdf [Date Accessed: 17/08/22]

household waste produced as a consequence of the allocation of sites is recorded as uncertain at this stage.

D.6.3.4 Sites proposed for employment or non-residential end use may present further negative effects on waste production; however, this would be dependent on the site-specific proposals and the nature of development, which is unknown at the time of assessment.

D.6.3.5 It is assumed that new residents in South Staffordshire will have an annual waste production of approximately 399kg per person, in line with the England average²⁴.

D.6.3.6 South Staffordshire reported 47,388 tonnes of total household waste in 2021 – 2022²⁵.

Box D.6.1: SA Objective 5: Pollution and Waste assessment methodology

Air Pollution

Development proposals located wholly or partly within 200m of an AQMA, a main road or a railway line are assumed to have a minor negative impact on local residents' exposure to air pollution, noise, and/or vibrations.	-
Development proposals located over 200m of an AQMA, a main road or a railway line are assumed to have a negligible impact on local residents' exposure to air pollution, noise, and/or vibrations.	0

Water Pollution

Development proposals located within the total catchment (Zone III), outer zone (Zone II) or inner zone (Zone I) of a groundwater SPZ would be likely to have a minor negative impact on groundwater sources.	-
Development proposals located within 200m of a watercourse are assumed to have a minor negative impact on local water quality.	-
Development proposals located outside of groundwater SPZs and over 200m from watercourses would be expected to have a negligible impact on water pollution.	0

Waste

At this stage of assessment, the residential capacity at each residential-led development proposal is unknown. As such, it is uncertain the extent to which each development proposal could potentially result in an increase household waste generation in the Plan area.	+/-
--	-----

²⁴ Department for Environment Food and rural Affairs (2021) Statistics on waste managed by local authorities in England in 2020/21. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040756/Statistics_on_waste_managed_by_local_authorities_in_England_in_2020_v2rev_accessible.pdf [Date Accessed: 17/08/22]

²⁵ Department for Environment Food and Rural Affairs (2022) Local authority collected waste generation from January 2010 to March 2021. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>. [Accessed 21/07/22]

D.7 SA Objective 6 – Natural Resources

D.7.1 Previously Developed Land

- D.7.1.1 In accordance with the core planning principles of the NPPF²⁶, development on previously developed land will be recognised as an efficient use of land. Development on previously undeveloped land is not considered to be an efficient use of land.
- D.7.1.2 Development proposals on previously undeveloped land are expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.
- D.7.1.3 In addition, proposals which would result in the loss of greenfield land would be expected to contribute towards a cumulative loss of ecological habitat. This would be expected to lead to greater levels of habitat fragmentation and isolation for the local ecological network restricting the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land has therefore been considered to have an adverse effect under this objective.

D.7.2 Agricultural Land Class

- D.7.2.1 The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and Subgrade 3a, are referred to as the ‘best and most versatile’ (BMV) land²⁷. Where site-specific ALC studies have not been completed, it is not possible to identify Subgrade 3a and 3b land. Therefore, a precautionary approach is taken, and potential BMV land is assessed as Grades 1, 2 and 3.
- D.7.2.2 Adverse impacts are expected for options which would result in a net loss of agriculturally valuable soils.

D.7.3 Water resource

- D.7.3.1 It is assumed that proposals will be in accordance with the national mandatory water efficiency standard of 125 litres per person per day, as set out in the Building Regulations 2010²⁸.
- D.7.3.2 It is assumed that all residential-led development proposals in the LPR will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.

²⁶ Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 16/08/22]

²⁷ MAFF. October 1988. Available at Natural England. <http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date Accessed: 16/08/22]

²⁸ The Building Regulations 2010. Available at: <http://www.legislation.gov.uk/ukxi/2010/2214/contents/made> [Date Accessed: 16/08/22]

Box D.7.1: SA Objective 6: Natural Resources assessment methodology

Previously Developed Land

As the proposed development at each site is currently unknown, it is uncertain the quantity of soil resource which would be lost. As such, the proposed development on all greenfield sites would be expected to have a minor negative impact on local soil resources.

-

Development of an existing brownfield site would be expected to contribute positively to safeguarding greenfield land in South Staffordshire and have a minor positive impact for this objective.

+

Agricultural Land Classification (ALC)

Development proposals which are situated on Grade 1, 2 or 3 ALC land, and would therefore risk the loss of some of the Plan area's BMV land, would be expected to have a minor negative impact for this objective.

-

Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural' and would therefore help prevent the loss of the Plan areas BMV land, would be expected to have a minor positive impact for this objective.

+

D.8 SA Objective 7 – Housing

D.8.1 Housing

- D.8.1.1 SSDC have prepared evidence documents in relation to the housing needs in South Staffordshire over the Plan period. Development proposals are assessed for the extent to which they will help to meet the diverse needs of current and future residents of the Plan area.
- D.8.1.2 Under this objective, development proposals which would result in an increase of 99 dwellings or less would usually be assessed as having a minor positive impact on the local housing provision. Development proposals which would result in an increase of 100 dwellings or more would be likely to have a major positive impact on the local housing provision.
- D.8.1.3 At this stage in SSDC's plan-making process the housing capacity of sites is unknown. While site boundaries and site areas are known, as yet unknown on-site constraints may substantially affect housing capacity. However, housing sites with a potential capacity of over 500 dwellings are considered to be likely to make a substantial contribution to housing needs.
- D.8.1.4 Unless otherwise stated, it is assumed that development proposals will provide a good mix of housing type and tenure opportunities.
- D.8.1.5 At this stage of assessment, the residential capacity for each residential and Gypsy and Traveller-led development proposal is unknown.

Box D.8.1: SA Objective 7: Housing assessment methodology

The potential capacity at each residential-led development proposal is unknown at this stage of assessment. However, sites identified as strategic sites, with a potential housing capacity of over 500 dwellings would be expected to result in a substantial increase in housing provision across the Plan area. A major positive impact in regard to housing provision would be expected.

++

The potential capacity at other residential-led development proposal is unknown at this stage of assessment. However, all sites would be expected to result in an increase in housing provision across the Plan area, to some extent. A minor positive impact in regard to housing provision has therefore been identified for each residential-led development proposal.

+

As all employment-led development proposals would not be anticipated to alter the total housing provision across the Plan area, a negligible impact would be expected.

0

Some of the Gypsy and Traveller-led development proposals are currently in use, either as authorised or unauthorised sites. As the potential capacity of each Gypsy and Traveller-led development proposal is unknown at this stage of assessment, the likely impact on accommodation provision across the Plan area is uncertain.

+/-

D.9 SA Objective 8 – Health and Wellbeing

D.9.1 Air Quality

- D.9.1.1 It is assumed that development proposals located in close proximity to main roads would expose site end users to transport associated noise and air pollution. In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road²⁹. Negative impacts on the long-term health of residents is anticipated where residents will be exposed to air pollution.
- D.9.1.2 AQMAs are considered to be an area where the national air quality objective will not be met. Site end users exposed to poor air quality associated with AQMAs would be expected to have adverse impacts on health and wellbeing.

D.9.2 Health Facilities

- D.9.2.1 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that SSDC should seek to ensure that residents have access to NHS hospitals, GP surgeries and leisure centres. Sustainable distances to each of these necessary services are derived from Barton *et al.*³⁰.
- D.9.2.2 For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of proposals to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment.
- D.9.2.3 There are no NHS hospitals with an A&E department located within South Staffordshire. The closest NHS hospitals with an A&E department include New Cross Hospital, Russell's Hall Hospital, County Hospital and Walsall Manor Hospital. There are numerous GP surgeries located across the Plan area. Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise.

D.9.3 Leisure centres

- D.9.3.1 Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise. Development proposals located within 1.5km of a leisure centre would be expected to have a minor positive impact on site end users' access to these facilities. Development proposal located over 1.5km from a leisure centre would be likely to have a minor negative impact on site end users' access to these facilities.

²⁹ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/section3/ha20707.pdf> [Date Accessed: 17/08/22]

³⁰ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

D.9.4 Green Network

- D.9.4.1 New development proposals have been assessed in terms of their access to the local PRow networks and greenspace. In line with Barton *et al.*³¹, a sustainable distance of 600m has been used for the assessments.
- D.9.4.2 Greenspace locations are taken from Ordnance Survey Open Data 'Open Greenspace' described as "*A specialised dataset depicting the location and extent of spaces such as parks and sports facilities that are likely to be accessible to the public*".
- D.9.4.3 It is recognised that this data set may have limitations in relation to the accuracy of those spaces which are included and excluded and the degree of accessibility to the public.

³¹ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010-

Box D.9.1: SA Objective 8: Health and Wellbeing assessment methodology

Air Quality

Development proposals located wholly or partly within 200m of a main road or an AQMA are assumed to have a minor negative impact on local residents' exposure to air pollution.

-

Development proposals located wholly over 200m from a main road or an AQMA are assumed to have a minor positive impact on local residents' exposure to air pollution.

+

Health Facilities

Development proposals located wholly or partly over 5km from one of the hospitals stated above, 800m of a GP surgery or 1.5km of a leisure centre would be likely to have a minor negative impact on site end users' access to health services.

-

Development proposals located wholly within 5km of one of the hospitals stated above, 800m of a GP surgery or 1.5km of a leisure centre are assumed to have a minor positive impact on site end users' access to health services.

+

Leisure Facilities

Development proposals located wholly or partially over 1.5km from a public leisure centre would be likely to have a minor negative impact on end users access to these services.

-

Development proposals located wholly within 1.5km from a public leisure centre would be likely to have a minor positive impact on end users access to these services.

+

Green Network

Development proposals located over 600m from a PRoW/ cycle path or a public greenspace could potentially have a minor negative impact on residents' access to natural habitats and therefore, have an adverse impact on the physical and mental health of local residents.

-

Proposals that are wholly located within 600m of a PRoW/ cycle path or a public greenspace are assumed to have a minor positive impact on residents' access to a diverse range of natural habitats.

+

Where a development proposal coincides with a public greenspace, it is assumed that the greenspace would be lost to some extent, and as such, a minor negative impact on the green network would be expected.

-

D.10 SA Objective 9 – Cultural Heritage

D.10.1 Cultural Heritage

- D.10.1.1 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. The risk of substantial harm to the significance of a heritage asset has been reflected in the assessment. The level of the impact has been assessed based on the nature and significance of, and proximity to, the heritage asset in question.
- D.10.1.2 Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG) and Conservation Areas.
- D.10.1.3 It is assumed that where a designated heritage asset coincides with a development proposal, the designated heritage asset will not be lost as a result of development (unless otherwise specified by SSDC). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible.
- D.10.1.4 Development proposals which would be discordant with the local character or setting, for example due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets that are important components of the local area. Views of, or from, the heritage asset are considered as part of the assessment of potential impacts on the setting of the asset.
- D.10.1.5 Heritage features identified on Historic England's Heritage at Risk Register may be identified as being at risk for a number of reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment³². Where Heritage at Risk assets could potentially be affected by the proposed development, this has been stated.
- D.10.1.6 It is anticipated that SSDC will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.

³² Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register> [Date Accessed: 16/08/22]

Box D.10.1: SA Objective 9: Cultural Heritage assessment methodology

Heritage Assets

Where a Grade I, Grade II* or Grade II Listed Building, SM or RPG coincides with a development proposal, it is assumed that the setting of these features will be permanently altered, and a major negative impact is expected. Where a development proposal is located adjacent to a Grade I Listed Building it is assumed that the proposal would also permanently alter the setting to the asset and a major negative impact on the historic environment is expected.

--

Where development proposals are located adjacent to, or in close proximity to, a Grade II* or Grade II Listed Building, a SM, or an RPG; located in close proximity to a Grade I Listed Building; or coincide with or are adjacent to an archaeological feature, it is assumed there will be an adverse impact on the setting of the asset, to some extent, and a minor negative impact is expected. Potential impacts on Conservation Areas and their setting are recorded as minor negative impacts.

-

Where development proposals are not located in close proximity to any heritage asset, or the nature of development is determined not to affect the setting or character of the nearby heritage asset, a negligible impact is expected for this objective.

0

Historic Environment Character

Where development proposals are located within areas of 'high' or 'medium' historic value, a minor negative impact on historic character would be expected.

-

Where development proposals are located within areas of 'low' historic value, a negligible impact on historic character would be expected.

0

D.11 SA Objective 10 – Transport and Accessibility

D.11.1 Public Transport

D.11.1.1 In line with Barton *et al.*'s sustainable distances, site end users should be situated within 2km of a railway station and 400m of a bus stop offering a frequent service. Consideration has been given to the proportion of a development proposal within the target distance of these transport options.

D.11.1.2 Bus service frequency and destination information has been obtained from Google Maps^{33,34}. To be sustainable, the bus stop should provide users with hourly services.

D.11.2 Pedestrian Access

D.11.2.1 Development proposals have been assessed in terms of their access to the surrounding footpath network. Access should be safe, where site end users would not have to cross roads where there are no pedestrian crossings. Safe access for wheelchair users and pushchairs has been considered as part of the assessment.

D.11.3 Road Access

D.11.3.1 Development proposals have been assessed in terms of their existing access to the surrounding road network. Where a development proposal is currently not directly linked to the road network, it is assumed that road infrastructure will need to be incorporated into the proposed development.

³³ Google Maps (no date) Available at: <https://www.google.co.uk/maps>

³⁴ Live departure boards available from Google Maps have been used to assess the frequency of services at bus stops within the Plan area. These are obtained from local bus timetables.

Box D.11.1: SA Objective 10: Transport and Accessibility assessment methodology

Public Transport

Development proposals located partially or wholly outside of the target distance of 2km for a railway station or 400m for a bus stop are assumed to have a minor negative impact on transport and accessibility.

-

Development proposals located wholly within the target distance to a railway station or bus stop are assumed to have a minor positive impact on local transport and accessibility.

+

Pedestrian Access

Development proposals which would not be anticipated to provide adequate access would be expected to result in a minor negative impact on pedestrian access. These negative impacts are considered to be occasional and reversible.

-

Development proposals which would be expected to provide site end users with adequate access to the surrounding footpath network would be expected to have a minor positive impact on pedestrian access.

+

Road Access

Development proposals which would not be anticipated to provide adequate access would be expected to have a minor negative impact on road access. This negative impact is considered to be occasional and reversible.

-

Development proposals which would be expected to provide site end users with adequate access to the surrounding road network would be expected to have a minor positive impact on road access.

+

Overall

Development proposals which would locate site end users away from all of the above receptors would be expected to have a major negative impact for this objective.

--

Development proposals which would locate site end users in close proximity to all of the above receptors would be expected to have a major positive impact for this objective.

++

D.12 SA Objective 11 – Education

D.12.1 Education

- D.12.1.1 It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents.
- D.12.1.2 In line with Barton *et al.*'s sustainable distances³⁵, for the purpose of this assessment, 800m is assumed to be the target distance for travelling to a primary school and 1.5km to a secondary school. All schools identified are publicly accessible state schools.
- D.12.1.3 It is recognised that not all schools within South Staffordshire are accessible to all pupils. For instance, independent and academically selective schools may not be accessible to all. Local primary schools may only be Infant, First, Junior or Middle schools, and therefore, not provide education for all children of primary school age. Some secondary schools may only be for girls or boys, and therefore, would not provide education for all. This has been considered within the assessment.
- D.12.1.4 At this stage, there is not sufficient information available to be able to accurately predict the effect of new development on the capacity of local schools, or to incorporate local education attainment rates into the assessment.

Box D.12.1: SA Objective 11: Education assessment methodology

Residential-led development proposals which would locate new residential sites partially or wholly outside of the target distance to both a primary and secondary school would be likely to have a major negative impact on the education objective.

--

Residential-led development sites located partially or wholly outside of the target distances for a primary or secondary school would be expected to have a minor negative impact for this objective.

-

Development proposals which are for employment end use have been assessed as negligible under the education objective.

0

Residential-led development sites located wholly within the target distances of a primary school or secondary school would be expected to have a minor positive impact for this objective.

+

Residential-led development sites located wholly within the target distances to both a primary and secondary school would be expected to have a major positive impact on the education objective.

++

³⁵ Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

D.13 SA Objective 12 – Economy and Employment

D.13.1 Employment Opportunities

- D.13.1.1 Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers.
- D.13.1.2 The South Staffordshire Economic Development Needs Assessment (EDNA) (2022)³⁶ identified that 21% of the district's working population live and work in South Staffordshire, with the majority commuting outside the district, which reflected the findings of the 2018 EDNA. As a result, a Rural Services and Facilities Audit³⁷ was completed to assess access to employment centres via rail and bus from areas within the district.
- D.13.1.3 Hansen scores for public transport access to employment opportunities were used, which measured the number of destinations which could be accessed within 60 minutes journey time.

D.13.2 Employment Floorspace

- D.13.2.1 An assessment of current land use at all development proposals has been made through reference to aerial mapping and the use of Google Maps³⁸.

³⁶ DLP Planning Ltd (2022) Economic Development Needs Assessment 2020-2040 for and on behalf of South Staffordshire District Council, June 2022. Available at: <https://www.sstaffs.gov.uk/doc/183444/name/0616KWST5049PSSSDC%20EDNA%202020-2040%20Final.pdf/> [Accessed on 14/09/22]

³⁷ South Staffordshire Council (2018) Rural Services and Facilities Audit. Available at: <https://www.sstaffs.gov.uk/doc/179887/name/Rural%20Services%20%26%20Facilities%20Audit%20Final%202018.pdf/> [Date Accessed: 16/08/22]

³⁸ Google Maps (no date) Available at: <https://www.google.co.uk/maps>

Box D.13.1: SA Objective 12: Economy and Employment assessment methodology

Employment Opportunities

Residential-led development proposals located in areas not assessed in the Rural Services and Facilities Audit are assumed have poor access to employment opportunities and therefore, a major negative impact would be expected.

--

Residential-led development proposals that would place site end users in locations with unreasonable or poor access to employment opportunities (the lower half Hansen scores, or adjacent to a village/urban area with Hansen score coverage to some extent) would have a minor negative impact on access to employment opportunities.

-

Residential-led development proposals that would place site end users in locations with good or reasonable access to employment opportunities (the upper half Hansen scores) would have a minor positive impact on access to employment opportunities.

+

Employment Floorspace

Development proposals which result in a net decrease in employment floorspace would be expected to have a major negative impact on the local economy.

--

Development proposals which result in a net increase in employment floorspace would be expected to have a major positive impact on the local economy.

++

Appendix E: Assessment of Residential Growth Options

Appendix E Contents

E.1	Introduction	E1
E.2	Assessment of Residential Growth Option F	E3
E.3	Conclusions	E5

Tables

Table E.1.1: Options for residential growth considered within the Issues and Options SA Report (2018)	E1
Table E.3.1: Summary SA findings for assessment of Residential Growth Options A-F	E6

E.1 Introduction

E.1.1 Overview

- E.1.1.1 The Issues and Options SA Report (2018)¹ included an appraisal of each option identified in SSDC's Issues and Options Paper, in order to help the Council to identify the most sustainable options for the LPR.
- E.1.1.2 This included options for the quantity of residential, employment and Gypsy and Traveller development that should be delivered through the LPR as well as various spatial strategy options which would help to deliver the development.
- E.1.1.3 Five options for the quantity of residential growth were assessed within the Issues and Options SA, which are reproduced in **Table E.1.1**.

Table E.1.1: Options for residential growth considered within the Issues and Options SA Report (2018)

Option	Description	Commentary
A	Provide enough housing to meet South Staffordshire's objectively assessed housing need. This option would equate to: <ul style="list-style-type: none"> 5,130 dwellings between 2018-2037 Average yearly minimum requirement of 270 dwellings throughout the plan period 	South Staffordshire would provide enough housing to meet its own local housing needs, but would not contribute towards the unmet needs of neighbouring authorities/regional housing shortfalls, such as the shortfall arising from the Greater Birmingham Housing Market Area.
B	Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and a modest contribution to the HMA's unmet housing needs. This additional contribution could reflect the maximum yearly completions historically achieved within the district amounting to 1520 dwellings. This option would equate to: <ul style="list-style-type: none"> Around 7,030 dwellings between 2018-2037 Average yearly minimum requirement of 370 dwellings throughout the plan period 	This would provide a moderate uplift in housing provision within the district to contribute towards the housing shortfall arising from the Greater Birmingham Housing Market Area, based upon the maximum levels of growth which have proved realistic and deliverable in the last 22 years. It would ensure a greater degree of certainty that the level of additional housing could be achieved. However, this approach would not be sufficient to deliver the levels of growth implied by the recommended strategic Green Belt and Open Countryside areas of search for South Staffordshire set out in the HMA Strategic Growth Study.
C	Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and provide enough land to accommodate a minimum of an additional 4,000 dwellings towards wider housing shortfalls from the HMA (having regard to the minimum capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to: <ul style="list-style-type: none"> A minimum requirement of 9,130 dwellings between 2018-2037 A minimum average yearly requirement of 481 dwellings throughout the plan period 	This would ensure South Staffordshire provided a significant contribution towards unmet needs of the HMA, based upon the levels of growth implied by the strategic areas of search for South Staffordshire within the HMA Strategic Growth Study. It would provide certainty to other HMA authorities that the Council was testing its recommended capacity to accommodate additional growth based upon a consistent HMA-wide evidence base. This quantum of dwellings represents a significant (30%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.

¹ Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options, September 2018. Available at: <https://www.sstaffs.gov.uk/doc/179873/name/South%20Staffs%20SA%20Issues%20Options.pdf/> [Date Accessed: 26/08/22]

Option	Description	Commentary
D	<p>Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and provide enough land to accommodate an additional 12,000 dwellings towards wider housing shortfalls from the HMA (having regard to the mid-point capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to:</p> <ul style="list-style-type: none"> • A minimum requirement of 17,130 dwellings between 2018-2037 • A minimum average yearly requirement of 902 dwellings throughout the plan period 	<p>This would ensure South Staffordshire provided a large contribution towards unmet needs of the HMA, based upon the levels of growth implied by the strategic areas of search for South Staffordshire within the HMA Strategic Growth Study. This quantum of dwellings represents a very significant (144%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.</p>
E	<p>Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and enough land to accommodate an additional 20,000 dwellings towards wider housing shortfalls from the HMA (having regard to the upper capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to:</p> <ul style="list-style-type: none"> • A minimum requirement of 25,130 dwellings between 2018-2037 • A minimum average yearly requirement of 1,323 dwellings throughout the plan period 	<p>Under this option South Staffordshire would provide around a third of the current HMA-wide housing shortfall set out in the HMA Strategic Growth Study, before any recommendations to increase supply and densities within the existing urban areas have been fully examined by other HMA authorities. This quantum of dwellings represents a very significant (257%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.</p>

- E.1.1.4 Since the Issues and Options stage, SSDC have identified a further reasonable alternative to the level of residential growth.
- E.1.1.5 Following the Issues and Options consultation, the Council received a number of representations from the development industry requesting that an option was tested for a level of housing growth between Options C and D. However, most gave no clear evidentiary basis for an alternative level of growth in this region, until Lichfields submitted evidence to identify a contribution to the HMA based on commuting and migration flows. This allowed a share of Birmingham and the Black Country's existing and emerging housing shortfalls to be attributed to South Staffordshire based on the strength of flows between it and the shortfall generating areas. This suggested that South Staffordshire should consider an option which provided for the district's own needs, plus 8,650 dwellings towards the unmet needs of the HMA, which has been reflected in Residential Growth Option F.
- E.1.1.6 The purpose of this appendix is to provide an assessment of the new Option F for residential growth, following the same methodology used to assess Options A-E within the Issues and Options SA.

E.2 Assessment of Residential Growth Option F

Option F for residential growth

Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and enough land to accommodate an additional 8,650 dwellings towards wider housing shortfalls from the HMA, reflecting South Staffordshire's migration and commuting links with the Black Country authorities and Birmingham. This would equate to:

- **A minimum requirement of 13,739 dwellings between 2018-2039**
- **A minimum average yearly requirement of 654 dwellings throughout the plan period**

Under this option South Staffordshire would provide a significant contribution to the unmet needs of the HMA-wide housing shortfall, based primarily on the relative strength of existing migration and commuting flows between South Staffordshire and HMA authorities generating housing shortfalls (the Black Country authorities and Birmingham). This quantum of dwellings represents a very significant (77%) annual increase above the single highest yearly level of housing completions achieved in the district in the 22 year period covered by its last two previous plan periods (1996-2018).

Residential Growth Option	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Option F	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-

E.2.1.1 Residential Growth Option F would deliver more than enough houses to satisfy the Objectively Assessed Need (OAN) for residential development in South Staffordshire over the Plan period. This Option would also make a significant contribution towards meeting the OAN for other authorities in the Housing Market Area (HMA) by accommodating 8,650 additional dwellings. Consequently, Option F would be likely to result in a major positive impact on SA Objective 7.

E.2.1.2 Similarly to the assessment of Option D (17,130 dwellings) as presented in the Issues and Options SA Report, assessing the impacts of Option F on SA Objectives other than housing is rendered difficult by the uncertainty over the distribution of development. However, it is likely that the quantity of development proposed would make it difficult for SSDC to avoid adverse sustainability impacts. The quantity of development proposed under this option would be highly likely to result in proposals for a large number of homes in locations where the development would discord with the existing character and setting of local landscapes and townscapes (SA Objective 4).

- E.2.1.3 Based on an average of 2.3 people per dwelling in South Staffordshire², the delivery of 13,739 new dwellings through Option F could be expected to increase the local population by approximately 31,600 people. It is likely that this increase in population would result in over-capacity issues at some key services and would place increased pressure on essential infrastructure, although the extent to which it would do so is dependent on the distribution of development and capacity of existing services. A minor negative impact on SA Objectives 8, 10 and 11 can therefore not be ruled out.
- E.2.1.4 In 2020, South Staffordshire's carbon emissions totalled approximately 858,771 tonnes CO₂, whilst residents of the district had an average annual carbon footprint of 7.6 tonnes CO₂ per person³. This represents a decrease compared to the available data for the assessments carried out for residential growth Options A-E within the Issues and Options SA, indicating a general trend of reduced carbon emissions over time which would be likely to continue over the Plan period to 2039. Nonetheless, the development of 13,739 dwellings under Option F would be expected to significantly increase the local area's contribution towards the causes of climate change in the short-medium term (SA Objective 1).
- E.2.1.5 In 2020-2021, South Staffordshire's total collected household waste totalled 47,388 tonnes⁴, which represents an increase compared to the 2018-2019 dataset which identified 43,662 tonnes. The average waste production per person per year in England was 399kg in 2020. Assuming new residents would generate 399kg waste per capita, the introduction of 31,600 new residents could be expected to increase the total household waste generation by 12,608 tonnes, or 27% compared to 2020-21 levels. This could result in a major negative impact on SA Objective 5.
- E.2.1.6 Impacts on SA Objectives 2, 3, 6, 9 and 12 are uncertain, as these impacts are largely dependent on the distribution of development. However, by pursuing a quantity of development that far exceeds the local OAN, it is thought to be likely that the Council will have less scope for avoiding adverse sustainability impacts. There could potentially be relatively dense populations in some locations under this option.

² Based on 2021 Census population data (110,500) and 2021 dwelling stock information (48,064).

ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> and DLUHC & MHCLG (2022) Live tables on dwelling stock. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date Accessed: 26/08/22]

³ DBEIS (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020> [Date Accessed: 26/08/22]

⁴ DEFRA (2022) Local authority collected waste generation from January 2010 to March 2021. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date Accessed: 26/08/22]

E.3 Conclusions

E.3.1 Likely impacts of not satisfying the OAN

- E.3.1.1 Six options for residential growth have been assessed in the SA process. Each of these options either meets or exceeds the OAN for residential growth in South Staffordshire for the Plan period.
- E.3.1.2 In general, it is easier to avoid adverse impacts on natural environment SA Objectives such as landscape, biodiversity, climate change adaptation and natural resources when there is less development. An option for development that does not support the local OAN may therefore be a relatively sustainable option.
- E.3.1.3 A growth option that does not satisfy the local development needs would be likely to result in strong adverse impacts on social and economic SA Objectives such as housing and the economy.
- E.3.1.4 The wider HMA area has a major shortfall in housing, with the Strategic Growth Study⁵ identifying an outstanding shortfall of 60,900 dwellings to 2036, when factoring in the need and current identified supply. The Council are therefore committed to assessing the potential impacts of taking on some of this unmet need, which could be an appropriate strategy for the predominantly urban HMA, given the relatively open nature of the district.
- E.3.1.5 Paragraph 35 of the NPPF (2021)⁶ states:
- E.3.1.6 *“Plans are ‘sound’ if they are: a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.”*
- E.3.1.7 For the purpose of ‘reasonable alternatives’, a growth option that does not satisfy the OAN of South Staffordshire, as a *minimum*, would not allow for a ‘sound’ plan and in that sense would not be considered reasonable.

E.3.2 Limitations of assessment

- E.3.2.1 Environmental assessment, as per the methodology, needs to have details of size, nature and location in order for impacts to be understood in relation to the environmental baseline. The housing numbers have only ‘nature’, in this case housing. The size and location details are not present which means that any attempt to evaluate impacts in a meaningful way is necessarily very high level. The housing number descriptions lack spatial prescription beyond the principles promoted by the NPPF para 119 to pursue brownfield first. Whilst size is implied by the total number of houses associated with each option, the distribution by size

⁵ Wood (2018) Greater Birmingham HMA Strategic Growth Study: Greater Birmingham & the Black Country, February 2018. Available at: https://www.birmingham.gov.uk/downloads/file/9407/greater_birmingham_hma_strategic_growth_study [Date Accessed: 30/08/22]

⁶ MHCLG (2021) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf [Date Accessed: 30/08/22]

and location is missing and consequently the SA process is only able to engage at a very high level with restricted diagnostic conclusions.

E.3.3 SA findings

E.3.3.1 **Table E.3.1** presents a summary of the SA findings for the assessment of Residential Growth Options A-E extracted from the Issues and Options SA Report, alongside the assessment of Option F as presented within this appendix.

Table E.3.1: Summary SA findings for assessment of Residential Growth Options A-F

Residential Growth Option	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Option A	--	+/-	+/-	+/-	--	+/-	+	+/-	+/-	+/-	+/-	+/-
Option B	--	+/-	+/-	+/-	--	+/-	++	+/-	+/-	+/-	+/-	+/-
Option C	--	+/-	+/-	+/-	--	+/-	++	+/-	+/-	+/-	+/-	+/-
Option D	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-
Option E	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-
Option F	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-

E.3.3.2 As discussed in **paragraph E.3.2.1**, the high-level assessment of housing growth is limited, resulting in uncertain impacts being identified for various SA Objectives.

E.3.3.3 Options D, E and F which propose the highest levels of growth (totalling 17,130, 25,130 and 13,739 dwellings respectively) would generally be expected to result in greater potential for adverse effects particularly in relation to environmental SA Objectives such as air quality, climate change, biodiversity, soil resources and landscape. These three options would also be likely to present the greatest challenge with respect to capacity issues and pressure on existing services and infrastructure required to deliver the proposed levels of growth and meet the day to day needs of the population.

E.3.3.4 Option A would meet South Staffordshire's OAN; however, this option does not include any provisions to meet other authorities' needs within the HMA. As such, this option performs the worst with respect to SA Objective 7 and would not seek to accommodate unmet needs from neighbouring authorities in accordance with the NPPF.

E.3.3.5 On balance, and drawing on the limitations as discussed in **paragraph E.3.2.1**, Options B and C could be considered the best options as these would be likely to have less potential for environmental impacts that are irreversible compared to D, E and F, such as loss of the soil resource, whilst still seeking to positively prepare the LPR by providing residential development to meet the needs of other authorities within the HMA.

Appendix F: New and Amended Reasonable Alternative Site Assessments

Appendix F Contents

F.1	Introduction.....	F1
F.2	Bilbrook and Codsall.....	F3
F.3	Brewood.....	F11
F.4	Cannock.....	F17
F.5	Cheslyn Hay and Great Wyrley	F22
F.6	Coven	F28
F.7	Essington.....	F33
F.8	Featherstone.....	F39
F.9	Huntington.....	F44
F.10	Kinver	F50
F.11	Pattingham.....	F55
F.12	Penkridge.....	F61
F.13	Penn and Lower Penn	F69
F.14	Sedgley	F74
F.15	Swindon.....	F79
F.16	Wall Heath	F85
F.17	Wheaton Aston	F91
F.18	Wombourne	F97
F.19	Employment Sites	F102
F.20	Gypsy and Traveller Sites.....	F113

F.1 Introduction

F.1.1 Overview

- F.1.1.1 The identification, description and evaluation of non-strategic development sites has been taking place throughout the plan making process at different stages. This is discussed further in **Chapter 5** of the main Regulation 19 SA Report.
- F.1.1.2 At the previous stage of plan making, the Regulation 18 (III) SA Report (2021)¹ included an assessment of 317 reasonable alternative sites, identified by the Council.
- F.1.1.3 This appendix provides an assessment of 58 reasonable alternative sites, within 19 clusters, as set out in **Table F.1.1**.
- F.1.1.4 Of these 58 sites, 39 are new sites that have been identified since the Preferred Options (PO) Stage and have been considered in addition to the 317 sites assessed within the Regulation 18 (III) SA. The remaining 19 sites are amended versions of those previously assessed in the Regulation 18 (III) SA Report, primarily relating to boundary alterations whereby landowners or site promoters have re-submitted their sites. As such, these 19 site assessments supersede those presented in the 2021 SA Report.
- F.1.1.5 All reasonable alternative sites have been assessed in the same way in the SA process against the methodology as presented in **Chapter 4**, alongside the topic-specific methodologies and assumptions presented in **Appendix D**. An overview of the assessment findings for all 356 reasonable alternative sites, pre- and post-mitigation, is presented in **Appendix G**.

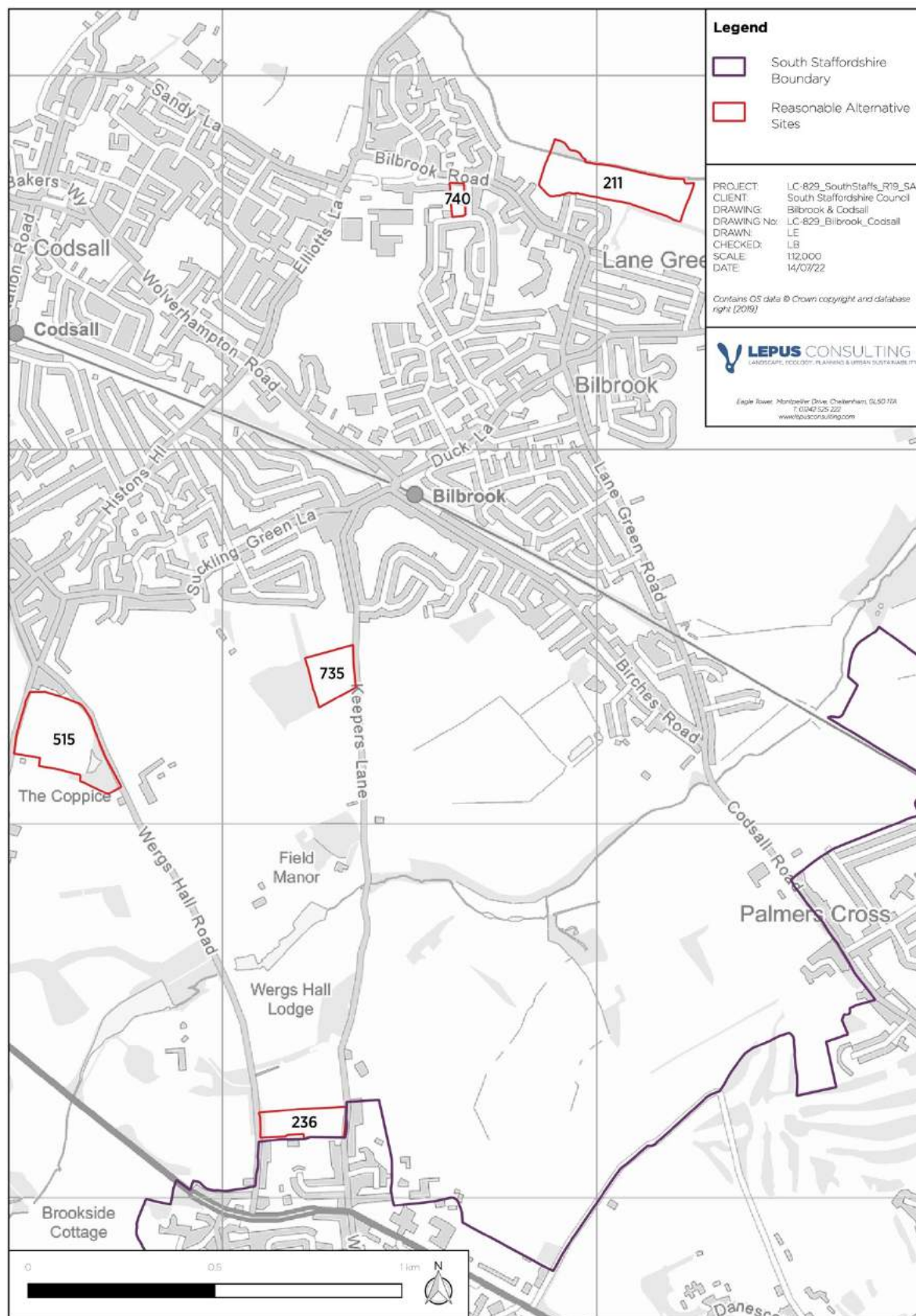
Table F.1.1: Reasonable alternative sites assessed within this report

Cluster	Site Ref	Site Address	Site use	Area (ha)	Site Status (since PO)
Bilbrook and Codsall	211	Land North of Manor House Park	Residential-led	3.99	Amended
	236	Land adjacent Wergs Hall Road and Keepers Lane	Residential-led	1.67	Amended
	515	Land off Heath House Lane	Residential-led	4.32	Amended
	735	Land west of Keepers Lane	Residential-led	1.49	New
	740	The Grange public house	Residential-led	0.33	New
Brewood	076	Site 3 land off Dirty Lane	Residential-led	1.75	Amended
	076a	Land off Dirty Lane	Residential-led	0.62	New
Cannock	720	Roman Way Hotel, Watling Street	Residential-led	0.94	New
Cheslyn Hay & Great Wyrley	730	Fishers Farm	Residential-led	0.43	New
	741	Meadowbank Grange/Station Rd	Residential-led	0.29	New
Coven	739	Croft Garage	Residential-led	0.3	New
Essington	163	Land off Sneyd Lane	Residential-led	2.09	Amended
	163a	Land off Sneyd Lane	Residential-led	0.44	New

¹ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan. Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 14/07/22]

Cluster	Site Ref	Site Address	Site use	Area (ha)	Site Status (since PO)
	163b	Land off Sneyd Lane	Residential-led	16.84	New
Featherstone	742	Red White and Blue public house	Residential-led	0.49	New
Huntington	592	Land at Oaklands Farm (south of Limepit Lane)	Residential-led	2.41	Amended
	732	Land north of Cocksparrow Lane	Residential-led	6.59	New
Kinver	272	Land East of Dunsley Drive	Residential-led	1.16	Amended
Pattingham	251	Hall End Farm	Residential-led	2.16	Amended
	253	Land off Westbeech Road	Residential-led	4.26	Amended
	255	Moor Lane	Residential-led	2.35	Amended
Penkridge	585	Land off Gailey Island	Residential-led	81.18	Amended
	585a	Land off Gailey Island (parcel 2)	Residential-led	99.34	Amended
	711	Hatherton House, Pinfold Lane	Residential-led	1.13	New
Penn and Lower Penn	579	East Holding 107 Westcroft Farm	Residential-led	27.77	Amended
Sedgley	567	Green Hill Farm Sandyfields	Residential-led	5.87	Amended
Swindon	437	Land at Church Road	Residential-led	2.14	Amended
	717	Land west of Church Road	Residential-led	2.56	New
	718	Land west of Church Road 2	Residential-led	1.36	New
Wall Heath	370	Land off Enville Road	Residential-led	8.77	Amended
Wheaton Aston	378a	Land off Broadholes Lane	Residential-led	0.93	New
	379	Land off Back Lane/Ivetsey Close	Residential-led	2.09	Amended
Wombourne	738	Wagon and Horses Public House	Residential-led	0.72	New
Employment Sites	E14	Vernon Park	Employment-led	2.73	New
	E18	ROF Featherstone	Employment-led	39.08	New
	E20a	Hilton Cross Business Park 1	Employment-led	2.50	New
	E20b	Hilton Cross Business Park 2	Employment-led	2.49	New
	E24	Land available within i54	Employment-led	4.87	New
	E30	Land south of Junction 13 (M6)	Employment-led	70.36	Amended
	E41	Land north of Bognop Road	Employment-led	33.56	Amended
	E44	i54 Western extension	Employment-led	16.55	New
	E58a	Gailey Lea Farm A	Employment-led	76.43	New
	E58b	Gailey Lea Farm B	Employment-led	10.89	New
	E59	Cocksparrow Lane A	Employment-led	6.58	New
	E60a	Land north of A5 parcel A	Employment-led	27.81	New
	E60b	Land north of A5 parcel B	Employment-led	6.75	New
	E61a	Land at Pendeford Mill Lane A	Employment-led	14.04	New
	E61b	Land at Pendeford Mill Lane B	Employment-led	15.44	New
Gypsy and Traveller Sites	SCC1	Land east of Levedale Rd	Gypsy and Traveller	41.15	New
	SCC2	Land west of Levedale	Gypsy and Traveller	54.79	New
	SCC3	Land at Water Eaton Lane	Gypsy and Traveller	154.79	New
	SCC4	Land North of Pinfold Lane / Whiston Road	Gypsy and Traveller	33.23	New
	SCC5	Land at Rodbaston	Gypsy and Traveller	56.57	New
	SCC6	Land south of Langley Road	Gypsy and Traveller	19.61	New
	SCC7	Land north of Springhill Lane	Gypsy and Traveller	17.72	New
	SCC8	Land off Dirtyfoot Lane	Gypsy and Traveller	11.70	New
	SCC9	Land north of Springhill Lane	Gypsy and Traveller	12.13	New
	SCC10	Land between Springhill Lane and Dirtyfoot Lane	Gypsy and Traveller	1.40	New

F.2 Bilbrook and Codsall



Bilbrook and Codsall Cluster			
This cluster is located in the centre of the South Staffordshire District. See the Bilbrook and Codsall cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
211	Land North of Manor House Park	Residential-led	3.99
236	Land adjacent Wergs Hall Road and Keepers Lane	Residential-led	1.67
515	Land off Heath House Lane	Residential-led	4.32
735	Land west of Keepers Lane	Residential-led	1.49
740	The Grange public house	Residential-led	0.33

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
211	+/-	--	+/-	-	-	-	+	-	-	++	-	-
236	+/-	-	+/-	--	-	-	+	-	-	-	--	-
515	+/-	+	-	--	-	-	+	-	-	-	--	-
735	+/-	+	+/-	--	-	-	+	-	-	-	++	-
740	+/-	-	+/-	-	-	-	+	-	-	++	++	+

F.2.1 SA Objective 1 – Climate Change Mitigation

F.2.1.1 See **Appendix D**.

F.2.2 SA Objective 2 – Climate Change Adaptation

F.2.2.1 **Fluvial Flooding:** Sites 236, 515, 735 and 740 are located entirely within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding. Proportions of Site 211 are located within Flood Zone 2 and 3. A minor negative impact would be expected at this site, as the proposed development at this location would be likely to locate site end users in areas at risk of fluvial flooding.

F.2.2.2 **Surface Water Flooding:** A small proportion of Sites 236 and 740 are determined to be at low risk of surface water flooding. The proposed development at these sites would be expected to have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at low risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

- F.2.2.3 A proportion of Site 211 is determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.2.3 SA Objective 3 – Biodiversity & Geodiversity

- F.2.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.
- F.2.3.2 **Priority Habitat:** Site 515 coincides with deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

F.2.4 SA Objective 4 – Landscape & Townscape

- F.2.4.1 **Green Belt Harm:** The release of Green Belt land at site 735 is considered by the Green Belt Study to result in ‘high’ levels of harm to the purposes of the Green Belt. Sites 236 and 515 are considered by the Green Belt Study to result in ‘moderate – high’ levels of harm to the purposes of the Green Belt. Development of these three sites has the potential to have a major negative impact.
- F.2.4.2 Site 211 is considered by the Green Belt Study to result in ‘moderate’ levels of harm to the purposes of the Green Belt. Development of this site has the potential to have a minor negative impact.
- F.2.4.3 Site 740 was not assessed in the Green Belt Study and is likely to have a negligible impact.
- F.2.4.4 **Landscape Sensitivity:** Sites 236, 515 and 735 are considered by the Landscape Sensitivity Study to be within areas of ‘moderate to high’ landscape sensitivity. Development of these sites has the potential to have a major negative impact.
- F.2.4.5 Site 211 considered by the Landscape Sensitivity Study to be within areas of ‘moderate’ landscape sensitivity. Development of this site is likely to have a minor negative impact.
- F.2.4.6 Site 740 was not assessed in the Landscape Sensitivity Study. Development of this site is likely to have a negligible impact.
- F.2.4.7 **Landscape Character:** Sites 236 and 735 are located within the RCA ‘Mid Severn Sandstone Plateau’ and the LCT ‘Sandstone Estatelands’. The characteristic landscape features of this LCT are “*estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal*”.

- F.2.4.8 Site 211 is located within the RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Settled Heathlands’. The characteristic landscape features of this LCT are “*mixed arable and pasture farming; flat to gently rolling landform; hedged fields; regular and irregular hedgerows; oak and birch hedgerow trees; straight and winding roads; wooded stream valleys; bracken; [and] broadleaved woodlands*”.
- F.2.4.9 Site 515 is located within the RCA ‘Staffordshire Plain’ and the LCT ‘Ancient Clay Farmlands’. The characteristic landscape features of this LCT include “*mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern*”.
- F.2.4.10 The proposed development at Sites 211, 236, 515 and 735 would be expected to have a minor negative impact on the characteristics identified in the published landscape character assessment.
- F.2.4.11 Site 740 is located on urban land which is already developed. The proposed development at this site would be expected to have a negligible impact on the characteristics identified in the published landscape character assessment.
- F.2.4.12 **Views from the ProW Network:** Sites 211, 236 and 735 are located in close proximity to the ProW network. The proposed development at these sites could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.
- F.2.4.13 **Views for Local Residents:** The proposed development at Sites 211, 236, 515, 735 and 740 could potentially alter the views experienced by local residents, including those on Orchard Lane and Lime Tree Road. Therefore, a minor negative impact on the local landscape would be expected.
- F.2.4.14 **Urbanisation of the Countryside:** Sites 211, 515 and 735 are located in the open countryside surrounding Codsall. The proposed development at these sites would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

F.2.5 SA Objective 5 – Pollution & Waste

- F.2.5.1 **AQMA:** Site 236 is located within 200m of Wolverhampton AQMA. The proposed development at this site would be likely to locate some site end users in areas of existing poor air quality, and therefore, a minor negative impact on local air quality would be expected.
- F.2.5.2 **Main Road:** Site 236 is located partially within 200m from the A41. The proposed development at this site could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A41 would be expected to have a minor negative impact on air quality and noise at this site.
- F.2.5.3 **Groundwater SPZ:** Sites 211, 236, 515, 735 and 740 coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these five sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

- F.2.5.4 **Watercourse:** The Moat Brook passes through Site 211, and Site 740 is partially within 200m of this watercourse. The proposed development at these two sites could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

F.2.6 SA Objective 6 – Natural Resources

- F.2.6.1 **Previously Developed Land:** All sites wholly or partially comprise previously undeveloped land. The proposed development at these five sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

- F.2.6.2 **ALC:** Sites 211, 735 and 740 are situated on 'urban' and/or ALC Grade 4 land, which is considered to be poor quality agricultural land. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.

- F.2.6.3 Sites 236 and 515 are situated on ALC Grade 2 or 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected at these sites, as the proposed development could cause the loss of BMV land across the Plan area.

F.2.7 SA Objective 7 – Housing

- F.2.7.1 See **Appendix D**.

F.2.8 SA Objective 8 – Health & Wellbeing

- F.2.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located to the south east of the cluster. All sites are located outside the target distance to this hospital. The proposed development at these five sites in this cluster could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.

- F.2.8.2 **GP Surgery:** The closest GP surgeries are Russell House Surgery and Bilbrook Medical Centre, located towards the centre of the cluster. Sites 211, 735 and 740 are located within the target distance to Bilbrook Medical Centre. The proposed development at these sites would be expected to have a minor positive impact on the access of site end users to GP surgeries. Sites 236 and 515 are located outside the target distance to these GP surgeries, therefore a minor negative impact would be expected.

- F.2.8.3 **Leisure Centre:** The closest leisure facility is Codsall Leisure Centre, located towards the centre of the cluster. Sites 211, 735 and 740 are located within the target distance to this leisure centre. The proposed development at these two sites would be expected to have a minor positive impact on the access of site end users to this facility. Sites 236 and 515 are located outside the target distance to this leisure centre. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users to this facility.

- F.2.8.4 AQMA:** Sites 211, 515, 735 and 740 are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at these two sites. Site 236 is located within 200m of Wolverhampton AQMA. The proposed development at this site could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.
- F.2.8.5 Main Road:** Sites 211, 515, 735 and 740 are located over 200m from a main road. The proposed development at these sites would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution. Site 236 is located within 200m from the A41. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- F.2.8.6 Access to Public Greenspace:** Sites 211, 236, 735 and 740 are located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits. Site 515 is located over 600m from a public greenspace. The proposed development at this site could potentially have a minor negative impact on the access of site end users to outdoor space.
- F.2.8.7 ProW/Cycle Network:** Sites 211, 236, 515, 735 and 740 are located within 600m of the ProW network. Sites 211 and 740 are also located within 600m of a cycle path. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.2.9 SA Objective 9 – Cultural Heritage

- F.2.9.1 Grade II Listed Building:** Site 236 is located approximately 250m from the Grade II Listed Building ‘Wergs Hall’, and Site 515 is located approximately 360m from ‘Greenhills’ and ‘Coach House west of Greenhills’. The proposed development at these sites could potentially have a minor negative impact on the settings of these Listed Buildings.
- F.2.9.2 Historic Character:** Sites 211, 735 and 740 are located within an area of ‘medium’ historic value. Site 515 is located within an area of ‘high’ historic value. The proposed development at these sites could potentially have a minor negative impact on historic character.

F.2.10 SA Objective 10 – Transport & Accessibility

- F.2.10.1 Bus Stop:** Sites 211, 236 and 740 are located within the target distance to bus stops on Bilbrook Road providing regular services. The proposed development at these sites would be likely to have a minor positive impact on site end users’ access to bus services. Sites 515 and 735 are located wholly or partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these sites could potentially have a minor negative impact on site end users’ access to bus services.
- F.2.10.2 Railway Station:** The closest railway stations are Bilbrook Railway Station and Codsall Railway Station, both located towards the centre of the cluster. All sites are located within the target distance to one or both of these railway stations, and therefore, the proposed

development at these five sites would be expected to have a minor positive impact on site end users' access to rail services.

- F.2.10.3 **Pedestrian Access:** Sites 211 and 740 are well connected to the existing footpath network. The proposed development at these sites would be expected to have a minor positive impact on site end users' opportunities to travel by foot. Sites 236, 515 and 735 currently have poor access to the surrounding footpath network. The proposed development at these sites could potentially have a minor negative impact on local accessibility.
- F.2.10.4 **Road Access:** All sites are well connected to the existing road network. The proposed development at these five sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.2.10.5 **Local Services:** The nearest convenience stores include Co-op Food, One Stop and Budgens. Sites 211 and 740 are located within the target distance to one of these convenience stores. Therefore, the proposed development at these sites would be expected to have a minor positive impact on site end users' access to local services. Sites 236, 515 and 735 are located either wholly or partially outside the target distance to these local services, therefore a minor negative impact would be expected on site end users' access to local services.
- F.2.10.6 Sites 211 and 740 are located in close proximity to a bus stop, railway station and convenience store, and are well connected to the current road and footpath networks. Therefore, a major positive impact on travel and accessibility would be expected at these sites.

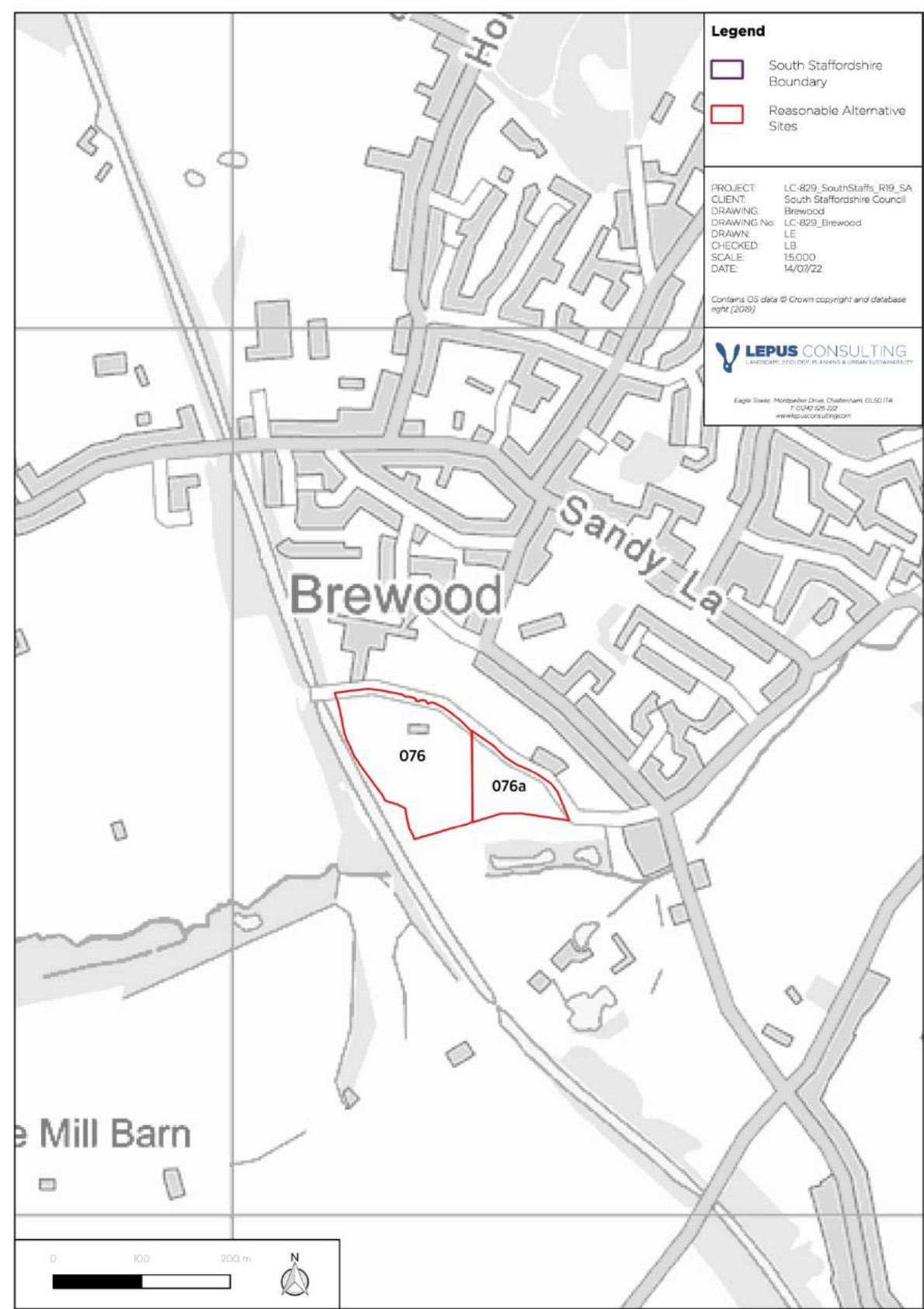
F.2.11 SA Objective 11 – Education

- F.2.11.1 **Primary School:** Bilbrook and Codsall are served by several primary schools, including St Nicholas C of E First School, Lane Green First School, St Christophers Catholic Primary School, Birches First School and Palmers Cross Primary School. Sites 735 and 740 are located within the target distance to schools providing education for all primary ages. The proposed development at these sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected. Sites 211, 236 and 515 are located outside the target distance to schools providing education for all primary ages. The proposed development at these sites would be expected to situate new residents in locations with poor access to primary education, and therefore, a minor negative impact would be expected.
- F.2.11.2 **Secondary School:** Bilbrook and Codsall are served by Codsall Community High School and Aldersley High School. Sites 211, 735 and 740 are located within the target distance to one of these secondary schools. The proposed development at these sites would be expected to situate new residents in locations with good access to secondary education, and therefore, a minor positive impact would be expected. Sites 236 and 515 are located outside the target distance to secondary schools. The proposed development at these sites would be expected to situate new residents in locations with poor access to secondary education, and therefore, a minor negative impact would be expected.
- F.2.11.3 The proposed development at Sites 236 and 515 would be expected to have a major negative impact on new residents' access to both primary and secondary education. The proposed development at Sites 735 and 740 would be expected to have a major positive impact on new residents' access to both primary and secondary education.

F.2.12 SA Objective 12 – Economy

- F.2.12.1 **Access to Employment:** Site 740 is located in an area with ‘reasonable’ sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor positive impact on site end users’ access to employment. Sites 211, 236, 515 and 735 are located in or adjacent to areas with ‘poor’ or ‘unreasonable’ sustainable access to employment opportunities, and therefore, the proposed development at these sites would be expected to have a minor negative impact on site end users’ access to employment.

F.3 Brewood



Brewood Cluster			
This cluster is located towards the north of the South Staffordshire District. See the Brewood cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
076	Site 3 land off Dirty Lane	Residential-led	1.75
076a	Land off Dirty Lane	Residential-led	0.62

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
076	+/-	+	-	--	-	-	+	-	-	-	-	-
076a	+/-	+	-	--	-	-	+	-	-	-	-	-

F.3.1 SA Objective 1 – Climate Change Mitigation

F.3.1.1 See **Appendix D**.

F.3.2 SA Objective 2 – Climate Change Adaptation

F.3.2.1 **Fluvial Flooding:** Sites 076 and 076a are located wholly within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

F.3.3 SA Objective 3 – Biodiversity & Geodiversity

F.3.3.1 **Habitats Sites:** Sites 076 and 076a are located within 12km south west of ‘Cannock Chase’ SAC. A minor negative impact would be expected as a result of the proposed development at these sites, due to the increased risk of development-related threats and pressures on this Habitats site.

F.3.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.3.3.3 **SSSI IRZ:** Sites 076 and 076a are located within an IRZ which states that “*Any residential development of 50 or more houses outside existing settlements/urban areas*” should be consulted on with Natural England. Therefore, the proposed development at these sites could potentially have a minor negative impact on the features for which nearby SSSIs have been designated.

F.3.4 SA Objective 4 – Landscape & Townscape

- F.3.4.1 **Green Belt Harm:** The release of Green Belt land at Sites 076 and 076a are considered by the Green Belt Study to result in ‘moderate’ harm to the Green Belt. Development of these sites has the potential to have a major negative impact.
- F.3.4.2 **Landscape Sensitivity:** Sites 076 and 076a are considered by the Landscape Sensitivity Study to be within areas of ‘high’ landscape sensitivity. Development at these two sites could potentially result in a major negative impact.
- F.3.4.3 **Landscape Character:** Sites 076 and 076a are located within the RCA ‘Staffordshire Plain’ and the LCT ‘Ancient Clay Farmlands’. The characteristic landscape features of this LCT include *“mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern”*. The proposed residential development at these sites could potentially be discordant with the key characteristics of the LCT. Therefore, a minor negative impact on the local landscape character would be expected.
- F.3.4.4 **Views from the ProW Network:** Site 076 is adjacent to and Site 076a coincides with a ProW. The proposed development at these sites could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.
- F.3.4.5 **Views for Local Residents:** The proposed development at Sites 076 and 076a could potentially alter the views experienced by local residents, including those on Dirty Lane. Therefore, a minor negative impact on the local landscape would be expected.
- F.3.4.6 **Urbanisation of the Countryside:** Sites 076 and 076a are located in the open countryside surrounding Brewood. The proposed development at these sites would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

F.3.5 SA Objective 5 – Pollution & Waste

- F.3.5.1 **Watercourse:** Site 076 is located approximately 10m from the Shropshire Union Canal and Site 076a is located within 200m of a stream and the Shropshire Union Canal. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.

F.3.6 SA Objective 6 – Natural Resources

- F.3.6.1 **Previously Developed Land:** Sites 076 and 076a comprise previously undeveloped land. The proposed development at these sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

- F.3.6.2 **ALC:** Sites 076 and 076a are situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these sites, due to the loss of this agriculturally important natural resource.

F.3.7 SA Objective 7 – Housing

- F.3.7.1 See **Appendix D**.

F.3.8 SA Objective 8 – Health & Wellbeing

- F.3.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located in the south east of the cluster. The proposed development at Sites 076 and 076a are outside of the target distance which could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.
- F.3.8.2 **GP Surgery:** The closest GP surgeries include Brewood Medical Practice. Sites 076 and 076a are located within the target distance to this GP surgery. The proposed development at these sites would be expected to have a minor positive impact on the access of site end users to GP surgeries.
- F.3.8.3 **Leisure Centre:** The closest leisure facility is Codsall Leisure Centre, located to the south of the cluster. Sites 076 and 076a are located outside the target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected.
- F.3.8.4 **AQMA:** Sites 076 and 076a are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- F.3.8.5 **Main Road:** Sites 076 and 076a are located over 200m from a main road. The proposed development at these sites would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.3.8.6 **Access to Public Greenspace:** Sites 076 and 076a are located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.3.8.7 **ProW/Cycle Network:** Sites 076 and 076a are located within 600m of the ProW and cycle networks. The proposed development at these sites would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.3.9 SA Objective 9 – Cultural Heritage

- F.3.9.1 **Grade I Listed Building:** Site 076a is located approximately 150m from the Grade I Listed Building 'Church of St Mary and St Chad'. The proposed development at this site could potentially have a minor negative impact on the settings of this Listed Building.

- F.3.9.2 **Grade II* Listed Building:** Sites 076 and 076a are located in close proximity to the Grade II* Listed Building 'Westgate Forecourt, Wall and Gate Piers'. The proposed development at these sites could potentially have a minor negative impact on the setting of this Listed Building.
- F.3.9.3 **Grade II Listed Building:** Sites 076 and 076a are located in close proximity to several Grade II Listed Buildings including: 'Deanery Cottage', 'The Old Deanery and Forecourt Railings', and 'Dean Street House'. The proposed development at these sites could potentially have a minor negative impact on the settings of these Listed Buildings.
- F.3.9.4 **Conservation Area:** Sites 076 and 076a are located adjacent to 'Brewood' Conservation Area. The proposed development at these sites could potentially alter the setting of this Conservation Area and, as a result, have a minor negative impact on the historic environment.
- F.3.9.5 **Archaeology:** Site 076 is adjacent to the 'Shropshire Union Canal' and Site 076a is adjacent to the archaeological feature 'possible fishpond'. The proposed development at these sites could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.
- F.3.9.6 **Historic Character:** Sites 076 and 076a are located within an area of 'high' historic value. The proposed development at these sites could potentially have a minor negative impact on historic character.

F.3.10 SA Objective 10 – Transport & Accessibility

- F.3.10.1 **Bus Stop:** Site 076 and 076a are located within the target distance to bus stops on Coven Road and Dean Street, providing regular services. The proposed development at these sites would be likely to have a minor positive impact on site end users' access to bus services.
- F.3.10.2 **Railway Station:** The closest railway station is Codsall Railway Station, located the south west of the cluster. Sites 076 and 076a are located outside of the target distance to a railway station. Therefore, the proposed development at these sites would be likely to have a minor negative impact on site end users' access to rail services.
- F.3.10.3 **Pedestrian Access:** Site 076a currently has good access to the surrounding footpath network. The proposed development at this site could potentially have a minor positive impact on local accessibility and on site end users' opportunities to travel by foot. Site 076a currently has poor access to the surrounding footpath network. The proposed development at this site could potentially have a minor negative impact on local accessibility and on site end users' opportunities to travel by foot.
- F.3.10.4 **Road Access:** Sites 076 and 076a are well connected to the existing road network. The proposed development at these sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.3.10.5 **Local Services:** The nearest convenience stores include Co-op Food and SPAR. Sites 076 and 076a are located within the target distance to one of these convenience stores. Therefore, the proposed development at these sites would be expected to have a minor positive impact on site end users' access to local services.

F.3.11 SA Objective 11 – Education

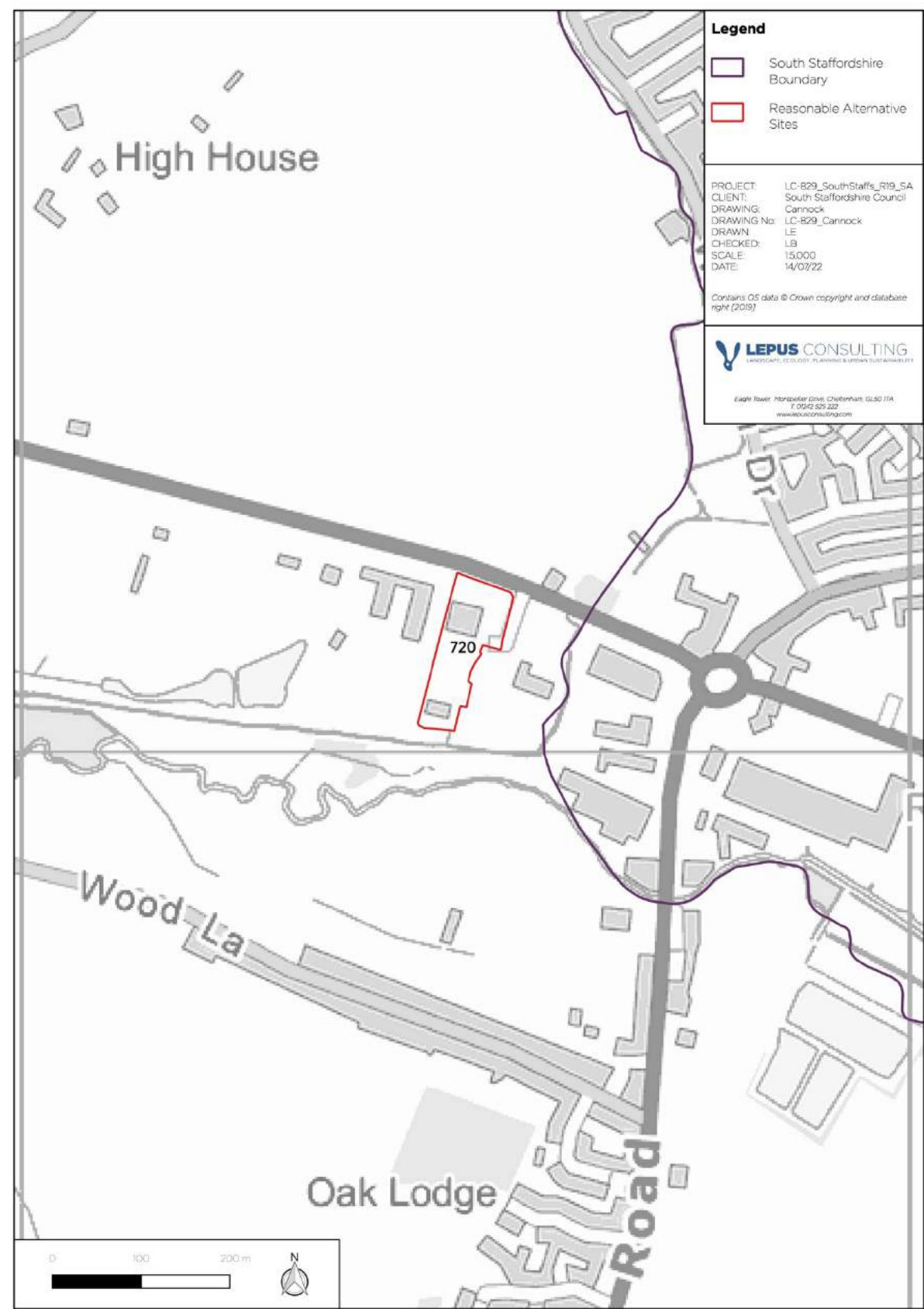
F.3.11.1 **Primary School:** Brewwood is served by several primary schools, including St Mary and St Chad First School, Brewwood C of E Middle School and St Mary’s Catholic Primary School. Sites 076 and 076a are located within the target distance to primary schools. The proposed development at these sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected.

F.3.11.2 **Secondary School:** Brewwood is served by St Dominic’s Grammar School, however, this is a selective school. The closest non-selective secondary school to Brewwood is Codsall Community High School, located approximately 5.5km to the south of the cluster. Sites 076 and 076a are located outside the target distance to this secondary school, and therefore, the proposed development at these sites would be expected to have a minor negative impact on the access of new residents to secondary education.

F.3.12 SA Objective 12 – Economy

F.3.12.1 **Access to Employment:** Sites 076 and 076a are located in areas with ‘unreasonable’ sustainable access to employment opportunities, and therefore, the proposed development at these sites would be expected to have a minor negative impact on site end users’ access to employment.

F.4 Cannock



Cannock Cluster This cluster is located to the east of the South Staffordshire District. See the Cannock cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
720	Roman Way Hotel, Watling Street	Residential-led	0.94

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
720	+/-	-	-	-	-	+	+	-	-	-	--	--

F.4.1 SA Objective 1 – Climate Change Mitigation

F.4.1.1 See **Appendix D**.

F.4.2 SA Objective 2 – Climate Change Adaptation

F.4.2.1 **Fluvial Flooding:** Site 720 is located partially within Flood Zone 2 and 3. A minor negative impact would be expected at this site, as the proposed development would be likely to locate site end users in areas at risk of fluvial flooding.

F.4.2.2 **Surface Water Flooding:** A small proportion of Site 720 is determined to be at low risk of surface water flooding. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at low risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.4.3 SA Objective 3 – Biodiversity & Geodiversity

F.4.3.1 **Habitats Sites:** Site 720 is located within 6km south of ‘Cannock Chase’ SAC. A minor negative impact would be expected as a result of the proposed development at this site, due to the increased risk of development-related threats and pressures on this Habitats site.

F.4.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA

F.4.3.3 **SSSI IRZ:** Site 720 is located approximately 1km from ‘Stowe Pool and Walk Mill Clay Pit’ SSSI, within an IRZ which indicates that “*Residential development of 50 units or more*” should be consulted on with Natural England. Development at this site could therefore result in a major negative impact on this SSSI due to development related threats and pressures.

F.4.4 SA Objective 4 – Landscape & Townscape

- F.4.4.1 **Green Belt Harm:** The release of Green Belt land at Site 720 is considered by the Green Belt Study to result in ‘Low-Moderate’ levels of harm to the purposes of the Green Belt. The development of this site could have a minor negative impact.
- F.4.4.2 **Landscape Sensitivity:** Site 720 is considered by the Landscape Sensitivity Study to be within areas of ‘Moderate’ landscape sensitivity. Development at this site has the potential to have a minor negative impact.
- F.4.4.3 **Landscape Character:** Site 720 is located within RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Settled Plateau Farmland Slopes’. The characteristic landscape features of this LCT are “*hamlets and villages; irregular fields; narrow winding lanes and hedge banks; hedgerow oaks; irregular pattern of mixed hedges; parklands with estate woodlands; red brick farm buildings; rolling landform; [and] mixed arable and pasture farming*”. Site 720 comprises previously developed land, and therefore, the proposed development at this site would be expected to have a negligible impact on the characteristics identified in the published landscape character assessment.

F.4.5 SA Objective 5 – Pollution & Waste

- F.4.5.1 **AQMA:** Site 720 is almost entirely situated within 200m of Cannock Chase AQMA. The proposed development at this site would be likely to locate some site end users in areas of existing poor air quality, and therefore, a minor negative impact on local air quality would be expected.
- F.4.5.2 **Main Road:** Site 720 is almost entirely situated within 200m of the A5. The proposed development at this site could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A5 would be expected to have a minor negative impact on air quality and noise at this site.
- F.4.5.3 **Watercourse:** A proportion of Site 720 is located within 200m of Wyrley Brook and the Saredon Brook. Additionally, the site is located entirely within 200m of the Staffordshire and Worcestershire Canal. The proposed development at this site could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.

F.4.6 SA Objective 6 – Natural Resources

- F.4.6.1 **Previously Developed Land:** Site 720 comprises previously developed land. The proposed development at this site would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected.

F.4.7 SA Objective 7 – Housing

- F.4.7.1 See **Appendix D**.

F.4.8 SA Objective 8 – Health & Wellbeing

- F.4.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located approximately 9.3km south west of Site 720. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.
- F.4.8.2 **GP Surgery:** The closest GP surgeries include Alderwood Medical Practice to the north east in Cannock and The Nile Practice and High Street Surgery located to the south east in Great Wyrley. The proposed development at Site 720 is located outside of the target distance to a GP surgery and would therefore be expected to have a minor negative impact on the access of site end users to these healthcare facilities.
- F.4.8.3 **Leisure Centre:** The closest leisure facility is Cheslyn Hay Leisure Centre, located over 2km from Site 720. Site 720 is located outside of the target distance to a leisure centre and therefore the proposed development at this site would be expected to have a minor negative impact on the access of site end users to these leisure facilities.
- F.4.8.4 **AQMA:** Site 720 is located almost entirely within 200m of Cannock Chase AQMA. The proposed development at this site could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.
- F.4.8.5 **Main Road:** The majority Site 720 is located within 200m of the A5. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- F.4.8.6 **Access to Public Greenspace:** Site 720 is located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.4.8.7 **ProW/Cycle Network:** Site 720 is located within the target distance to the ProW network. The proposed development at this site would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.4.9 SA Objective 9 – Cultural Heritage

- F.4.9.1 **Archaeology:** Site 720 coincides with the archaeological feature 'The Red Lion Inn/The Holly Bush Inn', and is adjacent to the archaeological feature 'Watling Street' Roman road. The proposed development at this site could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.

F.4.10 SA Objective 10 – Transport & Accessibility

- F.4.10.1 **Bus Stop:** Site 720 is located outside of the target distance to bus stops providing regular services. The proposed development at this site would be likely to have a minor negative impact on site end users' access to bus services.
- F.4.10.2 **Railway Station:** The closest railway station is Cannock Railway Station, located to the north east of the cluster. Site 720 is located entirely outside of the target distance to this railway station, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to rail services.
- F.4.10.3 **Pedestrian Access:** Site 720 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users' opportunities to travel by foot.
- F.4.10.4 **Road Access:** Site 720 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.4.10.5 **Local Services:** The nearest convenience stores include Food Warehouse. Site 720 is located within the target distance to this convenience store. Therefore, the proposed development at this site would be expected to have a minor positive impact on site end users' access to local services.

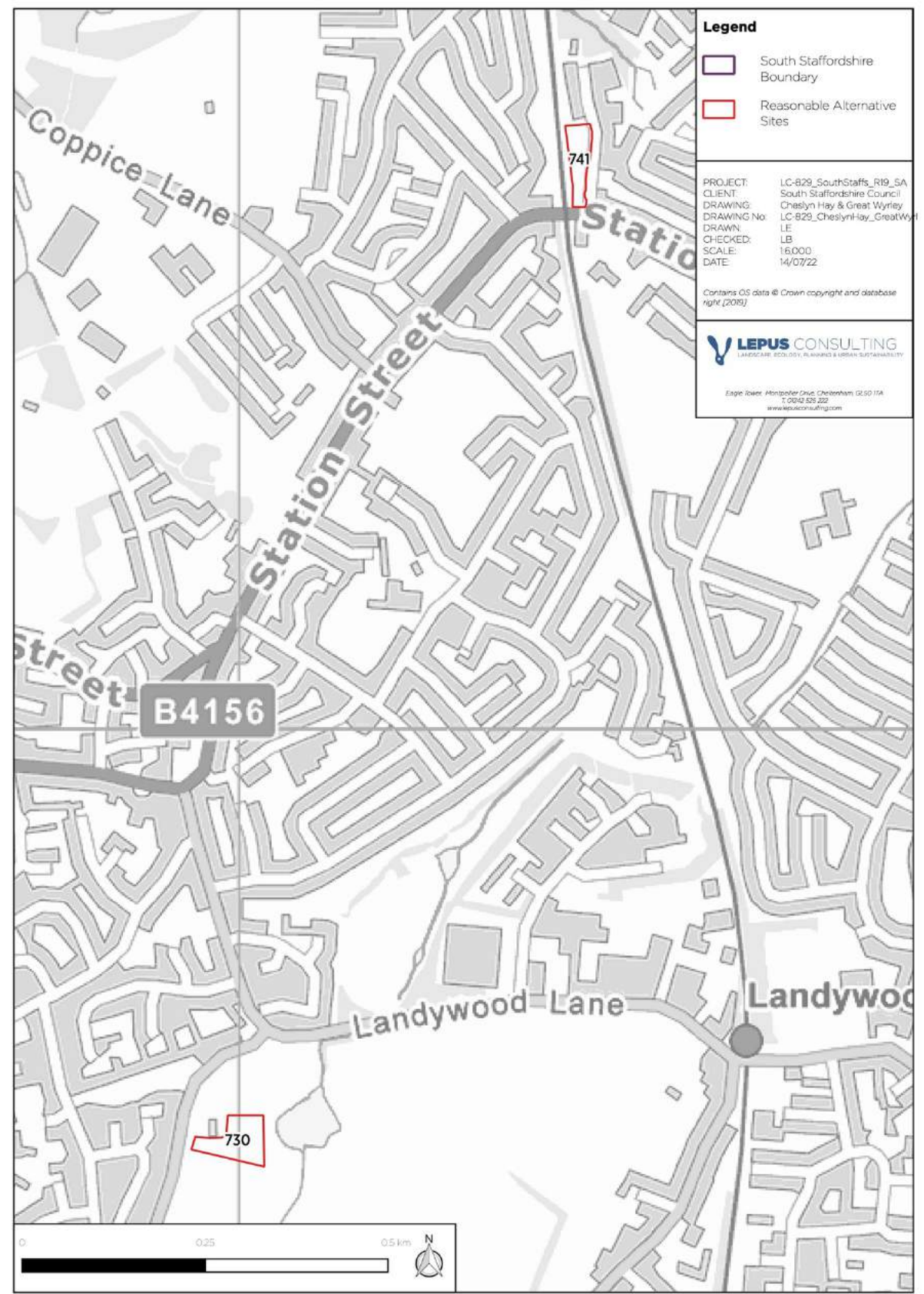
F.4.11 SA Objective 11 – Education

- F.4.11.1 **Primary School:** Cannock is served by several primary schools, including St Luke's C of E School and Longford Primary School. Site 720 is located outside the target distance to these primary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to these educational facilities.
- F.4.11.2 **Secondary School:** Cannock is served by several secondary schools, including Cheslyn Hay High School, South Staffordshire College and Cardinal Griffin Catholic High School. Site 720 is located outside of the target distance to these secondary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to these educational facilities.
- F.4.11.3 The proposed development at Site 720 would be expected to have a major negative impact on new residents' access to both primary and secondary education.

F.4.12 SA Objective 12 – Economy

- F.4.12.1 **Employment Floorspace:** Site 720 currently coincides with Roman Way Hotel, Cannock. The proposed residential-led development at this site could potentially result in loss of this business, and consequently the employment opportunities it provides. Therefore, a major negative impact could be expected following the proposed development at these sites.
- F.4.12.2 **Access to Employment:** Site 720 is located in an area with 'poor' sustainable access to employment opportunities, and therefore, the proposed development site would be expected to have a minor negative impact on site end users' access to employment.

F.5 Cheslyn Hay and Great Wyrley



Cheslyn Hay and Great Wyrley Cluster			
This cluster is located in the north east of the South Staffordshire District. See the Cheslyn Hay and Great Wyrley cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
730	Fishers Farm	Residential-led	0.43
741	Meadowbank Grange/Station Rd	Residential-led	0.29

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
730	+/-	-	-	-	-	+	+	-	-	-	++	--
741	+/-	-	-	-	-	-	+	-	-	++	++	+

F.5.1 SA Objective 1 – Climate Change Mitigation

F.5.1.1 See **Appendix D**.

F.5.2 SA Objective 2 – Climate Change Adaptation

F.5.2.1 **Fluvial Flooding:** Sites 730 and 741 are located entirely within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

F.5.2.2 **Surface Water Flooding:** A proportion of Site 730 coincides with areas determined to be at low risk of surface water flooding. A proportion of Site 741 coincides with areas determined to be at low and medium risk of surface water flooding. The proposed development at these sites would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.5.3 SA Objective 3 – Biodiversity & Geodiversity

F.5.3.1 **Habitats Sites:** Sites 730 and 741 are located within 8km south of ‘Cannock Chase’ SAC. A minor negative impact would be expected as a result of the proposed development at these two sites, due to the increased risk of development-related threats and pressures on this Habitats site.

F.5.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

- F.5.3.3 **SSSI IRZ:** ‘Stowe Pool and Walk Mill Clay Pit’ SSSI is located north west of Sites 730 and 741. Both sites in this cluster are located within an IRZ which states that “*Residential development of 50 units or more*” should be consulted on with Natural England. Therefore, the proposed development at these two sites could potentially have a minor negative impact on the features for which this SSSI has been designated.

F.5.4 SA Objective 4 – Landscape & Townscape

- F.5.4.1 **Green Belt Harm:** The release of Green Belt land at Site 730 is considered by the Green Belt Study to result in ‘moderate’ levels of harm to the purposes of the Green Belt. Development of Site 730 is assessed as having a potentially minor negative impact.
- F.5.4.2 Site 741 was not assessed in the Green Belt Study and is likely to have a negligible impact.
- F.5.4.3 **Landscape Sensitivity:** Site 730 is considered by the Landscape Sensitivity Study to be within areas of ‘moderate’ landscape sensitivity. Development of this site has the potential to have a minor negative impact.
- F.5.4.4 Site 741 was not assessed in the Landscape Sensitivity Study. Development of this site is likely to have a negligible impact.
- F.5.4.5 **Landscape Character:** Sites 730 and 741 are located in areas outside the scope of the character assessment, and therefore, the proposed development at these two sites would be expected to have a negligible impact on the characteristics identified in the published landscape character assessment.
- F.5.4.6 **Views for Local Residents:** The proposed development at Site 741 could potentially alter the views experienced by local residents, including those on Meadowbank Grange. Therefore, a minor negative impact on the local landscape would be expected.

F.5.5 SA Objective 5 – Pollution & Waste

- F.5.5.1 **Railway Line:** A railway line passes through the centre of Cheslyn Hay and Great Wyrley, linking Walsall to Rugeley. Site 741 is entirely within 200m of this railway line. The proposed development at this site could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway line. A minor negative impact would therefore be expected.
- F.5.5.2 **Watercourse:** Sites 730 and 741 are located wholly within 200m of a watercourse. The proposed development at these two sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.

F.5.6 SA Objective 6 – Natural Resources

- F.5.6.1 **Previously Developed Land:** Site 741 comprises partially developed land with undeveloped areas in the north of the site. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils. Site 730 comprises previously developed land. The proposed development at this site would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected.
- F.5.6.2 **ALC:** Site 741 is situated on ‘urban’ land. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.

F.5.7 SA Objective 7 – Housing

- F.5.7.1 See **Appendix D**.

F.5.8 SA Objective 8 – Health & Wellbeing

- F.5.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located approximately 7.5km south west of Site 730 and approximately 8.9km south west of Site 741. The proposed development at the sites in this cluster could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.
- F.5.8.2 **GP Surgery:** The closest GP surgeries are The Nile Practice, High Street Surgery, Southfield Way Surgery and Wardles Lane Surgery. Site 730 is located within the target distance to the Nile Practice GP surgery. The proposed development at this site would be expected to have a minor positive impact on the access of site end users these healthcare facilities. Site 741 is located entirely outside of the target distance to GP surgeries. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to these healthcare facilities.
- F.5.8.3 **Leisure Centre:** Sites 730 and 741 are located within the target distance to Cheslyn Hay leisure centre. The proposed development at these two sites would be expected to have a minor positive impact on the access of site end users to these leisure facilities.
- F.5.8.4 **AQMA:** Sites 730 and 741 are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at these two sites.
- F.5.8.5 **Main Road:** Sites 730 and 741 are located over 200m from a main road. The proposed development at these two sites would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.5.8.6 **Access to Public Greenspace:** Sites 730 and 741 are located within the target distance of a public greenspace. Therefore, a minor positive impact would be expected at these two sites, as the proposed development would be likely to provide site end users with good access to

outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

- F.5.8.7 **ProW/Cycle Network:** Sites 730 and 741 are located within the target distance to the ProW network. Site 741 is also located within 600m of a cycle path. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.5.9 SA Objective 9 – Cultural Heritage

- F.5.9.1 **Archaeology:** Site 730 coincides with the archaeological feature ‘Fisher’s Farm Mine’. The proposed development at this site could potentially alter the significance of this archaeological feature, and as such, have a minor negative impact on the historic environment.
- F.5.9.2 **Historic Character:** Sites 730 and 741 are located within an area of ‘medium’ historic value. The proposed development at these two sites could potentially have a minor negative impact on historic character.

F.5.10 SA Objective 10 – Transport & Accessibility

- F.5.10.1 **Bus Stop:** Site 741 is within the target distance to bus stops providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users’ access to bus services. Site 730 is located outside of the target distance to bus stops providing regular services. The proposed development at this site would be likely to have a minor negative impact on site end users’ access to bus services.
- F.5.10.2 **Railway Station:** The closest railway station is Landywood Railway Station, located in the centre of the cluster. Sites 730 and 741 are located within the target distance to this railway station, and therefore, the proposed development at these two sites would be expected to have a minor positive impact on site end users’ access to rail services.
- F.5.10.3 **Pedestrian Access:** Site 741 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users’ opportunities to travel by foot. Site 730 currently has poor access to the surrounding footpath network. The proposed development at this site could potentially have a minor negative impact on local accessibility.
- F.5.10.4 **Road Access:** Sites 730 and 741 are well connected to the existing road network. The proposed development at these two sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.5.10.5 **Local Services:** The nearest convenience stores include Co-op Food Great Wyrley, Tesco Express (Esso), Landywood Stores and Nisa Local. Site 741 is located within the target distance to Tesco Express. Therefore, the proposed development at this site would be expected to have a minor positive impact on site end users’ access to local services. Site 730 is located entirely outside of the target distance to these convenience stores. The proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

- F.5.10.6 Site 741 is located in close proximity to a bus stop, railway station and convenience store, and is well connected to the current road and footpath networks. Therefore, a major positive impact on travel and accessibility would be expected at this site.

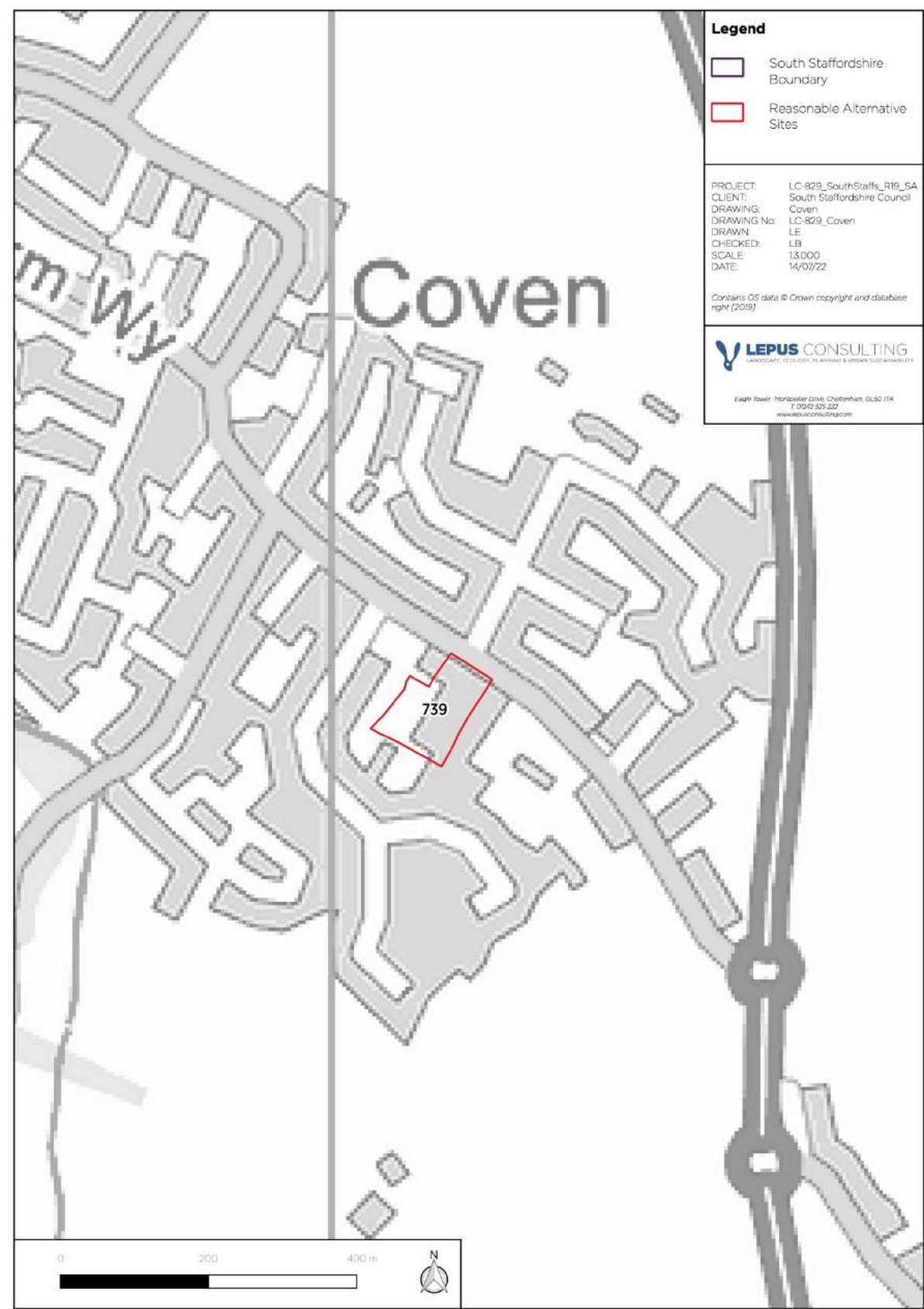
F.5.11 SA Objective 11 – Education

- F.5.11.1 **Primary School:** Cheslyn Hay and Great Wyrley are served by several primary schools, including Cheslyn Hay Primary School, St Thomas More Catholic Primary School, Landywood Primary School and Glenthorpe Community Primary School. Sites 730 and 741 are located within the target distance to one or more of these primary schools. The proposed development at these two sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected.
- F.5.11.2 **Secondary School:** Cheslyn Hay and Great Wyrley are served by Cheslyn Hay High School and Great Wyrley High School. Sites 730 and 741 are located within the target distance to one or both of these secondary schools. The proposed development at these two sites would be expected to situate new residents in locations with good access to secondary education, and therefore, a minor positive impact would be expected.
- F.5.11.3 The proposed development at Sites 730 and 741 would be expected to have a major positive impact on new residents' access to both primary and secondary education.

F.5.12 SA Objective 12 – Economy

- F.5.12.1 **Employment Floorspace:** Site 730 currently coincides with industrial development. The proposed residential-led development at this site could potentially result in loss of businesses operating there, and consequently the employment opportunities they provide. Therefore, a major negative impact could be expected following the proposed development at this site.
- F.5.12.2 **Access to Employment:** Site 741 is located in an area with 'reasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor positive impact on site end users' access to employment. Site 730 is located in an area with 'unreasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to employment.

F.6 Coven



Coven Cluster			
This cluster is located towards the north of the South Staffordshire District. See the Coven cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
739	Croft Garage	Residential-led	0.3

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
739	+/-	+	-	0	-	+	+	-	-	-	-	--

F.6.1 SA Objective 1 – Climate Change Mitigation

F.6.1.1 See **Appendix D**.

F.6.2 SA Objective 2 – Climate Change Adaptation

F.6.2.1 Fluvial Flooding: Site 739 is located entirely within Flood Zone 1. A minor positive impact would be expected at this site, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

F.6.3 SA Objective 3 – Biodiversity & Geodiversity

F.6.3.1 **Habitats Sites:** Site 739 is located within 12km south of ‘Cannock Chase’ SAC. A minor negative impact would be expected as a result of the proposed development at this site, due to the increased risk of development-related threats and pressures on this Habitats site.

F.6.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.6.3.3 **SSSI IRZ:** Site 739 is located within an IRZ which states that “*Residential development of 50 units or more*” should be consulted on with Natural England. Therefore, the proposed development at this site could potentially have a minor negative impact on the features for which nearby SSSIs have been designated.

F.6.4 SA Objective 4 – Landscape & Townscape

- F.6.4.1 Landscape Character:** Site 739 is located in an area outside the scope of the character assessment, and therefore, the proposed development at this site would be expected to have a negligible impact on the characteristics identified in the published landscape character assessment.
- F.6.4.2 Landscape Sensitivity:** Site 739 was not assessed in the Landscape Sensitivity Study. Development of this site is likely to have a negligible impact.

F.6.5 SA Objective 5 – Pollution & Waste

- F.6.5.1 Main Road:** Site 739 is located partially within 200m of the A449. The proposed development at this site could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A449 would be expected to have a minor negative impact on air quality and noise at this site.
- F.6.5.2 Groundwater SPZ:** Site 739 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

F.6.6 SA Objective 6 – Natural Resources

- F.6.6.1 Previously Developed Land:** Site 739 is located on previously developed land. The proposed development at site would be likely to result in a minor positive impact on natural resources, due to the use of previously developed land.

F.6.7 SA Objective 7 – Housing

- F.6.7.1** See **Appendix D**.

F.6.8 SA Objective 8 – Health & Wellbeing

- F.6.8.1 NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located approximately 6.8km south east of Site 739. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.
- F.6.8.2 GP Surgery:** The closest GP surgeries to this cluster includes Brewood Medical Practice. Site 739 is located outside of the target distance to GP surgeries. The proposed development at this site would be expected to have a minor negative impact on the access of site end users these healthcare facilities.
- F.6.8.3 Leisure Centre:** The closest leisure facility is Codsall Leisure Centre, located approximately 4.7km from Site 739. Site 739 is located outside of the target distance to leisure centres. The proposed development at this site would be expected to have a minor negative impact on the access of site end users these leisure facilities.

- F.6.8.4 **AQMA:** Site 739 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at this site.
- F.6.8.5 **Main Road:** Site 739 is located within 200m of the A449. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- F.6.8.6 **Access to Public Greenspace:** Site 739 is located within the target distance of a public greenspace. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.6.8.7 **ProW/Cycle Network:** Site 739 is located within the target distance to the ProW and cycle networks. The proposed development at this site would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.6.9 SA Objective 9 – Cultural Heritage

- F.6.9.1 **Grade II Listed Building:** Site 739 is located adjacent to the Grade II Listed Building 'Croft House' and within approximately 300m of several other Grade II listed buildings including: 'Church of St Paul', 'Nicol House the Homage', 'The Beeches' and 'Grange Farmhouse'. The proposed development at this site could potentially have a minor negative impact on the settings of these Listed Buildings.
- F.6.9.2 **Archaeology:** Site 739 is adjacent to the archaeological feature 'Croft House'. The proposed development at this site could potentially alter the significance of this archaeological feature, and as such, have a minor negative impact on the historic environment.
- F.6.9.3 **Historic Character:** Site 739 is located within an area of 'medium' historic value. The proposed development at this site could potentially have a minor negative impact on historic character.

F.6.10 SA Objective 10 – Transport & Accessibility

- F.6.10.1 **Bus Stop:** Site 739 is located outside of the target distance to bus stops providing regular services. The proposed development at this site would be likely to have a minor negative impact on site end users' access to bus services.
- F.6.10.2 **Railway Station:** Site 739 is located outside of the target distance to Bilbrook Railway Station and Codsall Station. The proposed development at this site would be likely to have a minor negative impact on site end users' access to bus services.
- F.6.10.3 **Pedestrian Access:** Site 739 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users' opportunities to travel by foot.
- F.6.10.4 **Road Access:** Site 739 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

- F.6.10.5 **Local Services:** The nearest convenience store is Co-op, located in the centre of the cluster. Site 739 is located within the target distance to this convenience store. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to local services.

F.6.11 SA Objective 11 – Education

- F.6.11.1 **Primary School:** Coven is served by St Paul's C of E First School. Although Site 739 is located within the target distance of a first school, the school only provides education for children up to age 9. Therefore, the proposed development at Site 739 would be expected to have a minor negative impact on the access of new residents to primary education

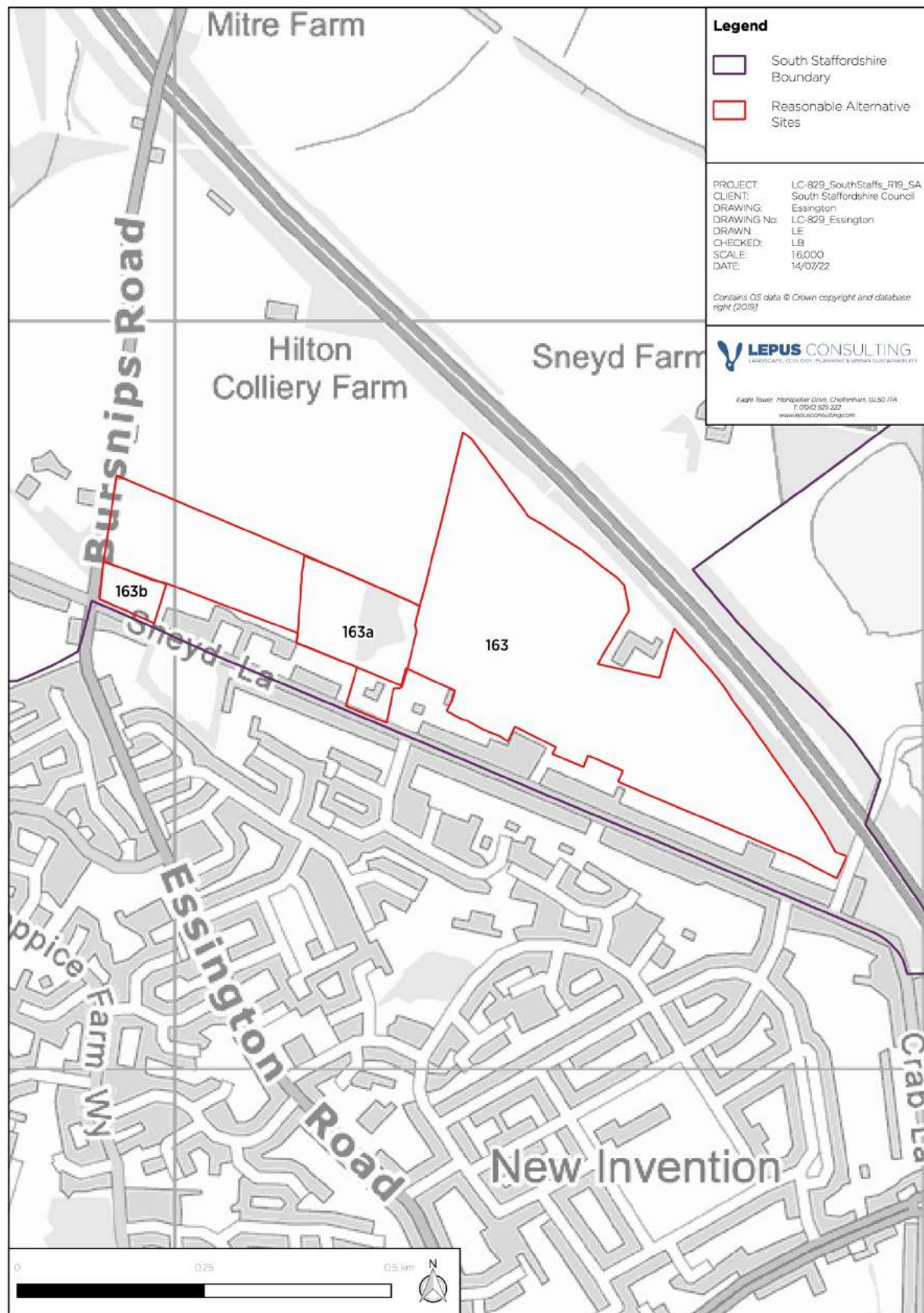
- F.6.11.2 **Secondary School:** The closest non-selective secondary school to Coven is Codsall Community High School. Site 739 is located outside the target distance to these secondary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to secondary education.

F.6.12 SA Objective 12 – Economy

- F.6.12.1 **Employment Floorspace:** Site 739 currently coincides with industrial/commercial development, where 'Coven Carpets & Flooring' and 'Midland Motors' are situated. The proposed residential-led development at this site could potentially result in loss of these businesses, and consequently the employment opportunities they provide. Therefore, a major negative impact on employment floorspace could be expected following the proposed development at this site.

- F.6.12.2 **Access to Employment:** Site 739 is located in an area with 'reasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor positive impact on site end users' access to employment.

F.7 Essington



Essington Cluster			
This cluster is located in the east of the South Staffordshire District. See the Essington cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
163	Land off Sneyd Lane	Residential-led	2.09
163a	Land off Sneyd Lane	Residential-led	0.44
163b	Land off Sneyd Lane	Residential-led	16.84

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
163	+/-	--	-	--	-	-	+	-	0	-	--	+
163a	+/-	-	-	--	-	-	+	-	0	-	--	-
163b	+/-	+	-	--	-	-	+	-	0	-	-	-

F.7.1 SA Objective 1 – Climate Change Mitigation

F.7.1.1 See **Appendix D**.

F.7.2 SA Objective 2 – Climate Change Adaptation

F.7.2.1 **Fluvial Flooding:** Sites 163, 163a and 163b are located entirely within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.

F.7.2.2 **Surface Water Flooding:** A small proportion of Site 163a coincides with areas determined to be at low risk of surface water flooding. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.7.2.3 A proportion of Site 163 is determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.7.3 SA Objective 3 – Biodiversity & Geodiversity

- F.7.3.1 **Habitats Sites:** Sites 163, 163a and 163b are located within 12km of ‘Cannock Chase’ SAC. A minor negative impact would be expected as a result of the proposed development at these three sites, due to the increased risk of development-related threats and pressures on this Habitats site.
- F.7.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.
- F.7.3.3 **SSSI IRZ:** Sites 163, 163a and 163b are located within an IRZ which states that “*Residential development of 50 units or more*” should be consulted on with Natural England. Therefore, the proposed development at these sites could potentially have a minor negative impact on the features for which nearby SSSIs have been designated
- F.7.3.4 **Priority Habitat:** Sites 163 and 163a coincide with deciduous woodland priority habitat. The proposed development at these sites could potentially result in the loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

F.7.4 SA Objective 4 – Landscape & Townscape

- F.7.4.1 **Green Belt Harm:** The release of Green Belt land at Sites 163, 163a and 163b is considered by the Green Belt Study to result in ‘moderate-high’ harm to the purposes of the Green Belt. Development of these sites is assessed as having a potentially major negative impact.
- F.7.4.2 **Landscape Sensitivity:** Sites 163, 163a and 163b are determined by the Landscape Sensitivity Study to be within an area of ‘low to moderate’ landscape sensitivity. Development of these sites has the potential to have a minor negative impact.
- F.7.4.3 **Country Park:** Roughwood Country Park is located approximately approximately 600m from Sites 163. The proposed development at this site could potentially have a minor negative impact on views from this Country Park.
- F.7.4.4 **Landscape Character:** Sites 163, 163a and 163b are located within the RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Coalfield Farmlands’. The characteristic landscape features of this LCT are “*flat landform, mixed arable and pasture farming; heathy pioneer woodlands; commons; medium scale hedged field pattern; hedgerow oaks; well treed brook courses; narrow winding lanes; [and] canal*”. The proposed residential development at these sites could potentially be discordant with the key characteristics of the associated LCTs. Therefore, a minor negative impact on the local landscape character would be expected.
- F.7.4.5 **Views from the ProW Network:** Site 163b coincides with a ProW. The proposed development at this site could potentially alter the views experienced by users of this footpath. As a result, a minor negative impact on the local landscape would be expected.
- F.7.4.6 **Views for Local Residents:** The proposed development at Sites 163, 163a and 163b could potentially alter the views experienced by local residents, including those on Bursnips Road and Sneyd Lane. Therefore, a minor negative impact on the local landscape would be expected.

F.7.4.7 Urbanisation of the Countryside: Sites 163a and 163b are located in the open countryside surrounding Essington. The proposed development at these sites could potentially increase the risk of sprawl between these settlements, and therefore, have a minor negative impact on the local landscape.

F.7.5 SA Objective 5 – Pollution & Waste

F.7.5.1 AQMA: Sites 163, 163a and 163b are entirely within 200m of Walsall AQMA. The proposed development at these sites would be likely to locate some site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality would be expected.

F.7.5.2 Main Road: Sites 163 and 163b are located entirely within 200m of the A462. The proposed development at these sites could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A462 would be expected to have a minor negative impact on air quality and noise at these sites.

F.7.6 SA Objective 6 – Natural Resources

F.7.6.1 Previously Developed Land: Sites 163 and 163b wholly comprise undeveloped land, and Site 163a comprises partially undeveloped land. The proposed development at these sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

F.7.6.2 ALC: Sites 163 and 163b are primarily situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these sites, due to the loss of this agriculturally important natural resource. Site 163a is situated on ALC Grade 4 land, which is considered to be poor quality agricultural land. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.

F.7.7 SA Objective 7 – Housing

F.7.7.1 See **Appendix D**.

F.7.8 SA Objective 8 – Health & Wellbeing

F.7.8.1 NHS Hospital: Sites 163, 163a and 163b are located within the target distance to New Cross Hospital. The proposed development at these sites would be expected to have a minor positive impact on the access of site end users to this essential health facility.

F.7.8.2 GP Surgery: The closest GP surgeries are Essington Medical Centre, located to the north of the cluster, and Sina Health Centre. Sites 163, 163a and 163b are located outside of the target distance to GP surgeries. The proposed development at these sites would be expected to have a minor negative effect on the access of site end users to GP surgeries.

- F.7.8.3 Leisure Centre:** The closest leisure facility is Cheslyn Hay Leisure Centre, located approximately 4km north of the cluster. Sites 163, 163a and 163b are located outside of the target distance to leisure centres. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users these leisure facilities.
- F.7.8.4 AQMA:** Sites 163, 163a and 163b are located within 200m of Walsall AQMA. The proposed development at these sites could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.
- F.7.8.5 Main Road:** Site 163a is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution. Sites 163 and 163b are located entirely within 200m of a main road. The proposed development at these sites would be expected to have a minor negative impact on health, as site end users would be located near to traffic related air and noise pollution.
- F.7.8.6 Access to Public Greenspace:** Sites 163, 163a and 163b are located within the target distance of a public greenspace. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.7.8.7 ProW/Cycle Network:** Sites 163, 163a and 163b are located within the target distance to the ProW network, with Site 163 also located within 600m of the cycle network. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.
- F.7.9 SA Objective 9 – Cultural Heritage**
- F.7.9.1 Historic Environment:** Sites 163, 163a and 163b are not located in close proximity to any identified heritage assets. Therefore, the proposed development at these three sites would be expected to have a negligible impact on cultural heritage.
- F.7.10 SA Objective 10 – Transport & Accessibility**
- F.7.10.1 Bus Stop:** Sites 163 and 163b are located within the target distance of bus stops providing regular services. The proposed development at these sites would be likely to have a minor positive impact on site end users' access to bus services. Site 163a is located outside of the target distance to bus stops providing regular services. The proposed development at this site would be likely to have a minor negative impact on site end users' access to bus services.
- F.7.10.2 Railway Station:** Site 163 and 163a are located inside of the target distance to Bloxwich North Station. The proposed development at these sites would be likely to have a minor positive impact on site end users' access to rail services. The majority of Site 163b is located outside of the target distance to this station. The proposed development at this site would be likely to have a minor negative impact on site end users' access to rail services.

- F.7.10.3 **Pedestrian Access:** Sites 163a and 163b are well connected to the existing footpath network. The proposed development at these sites would be expected to have a minor positive impact on site end users' opportunities to travel by foot. Site 163 has poor connections to existing footpath networks. The proposed development at this site would be expected to have a minor negative impact on site end users' opportunities to travel by foot.
- F.7.10.4 **Road Access:** Sites 163, 163a and 163b are well connected to the existing road network. The proposed development at these sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.7.10.5 **Local Services:** The nearest convenience store is Aldi, located in the centre of the cluster. Sites 163, 163a and 163b are located within the target distance to this convenience store. The proposed development at these sites would be expected to have a minor positive impact on the access of site end users to local services.

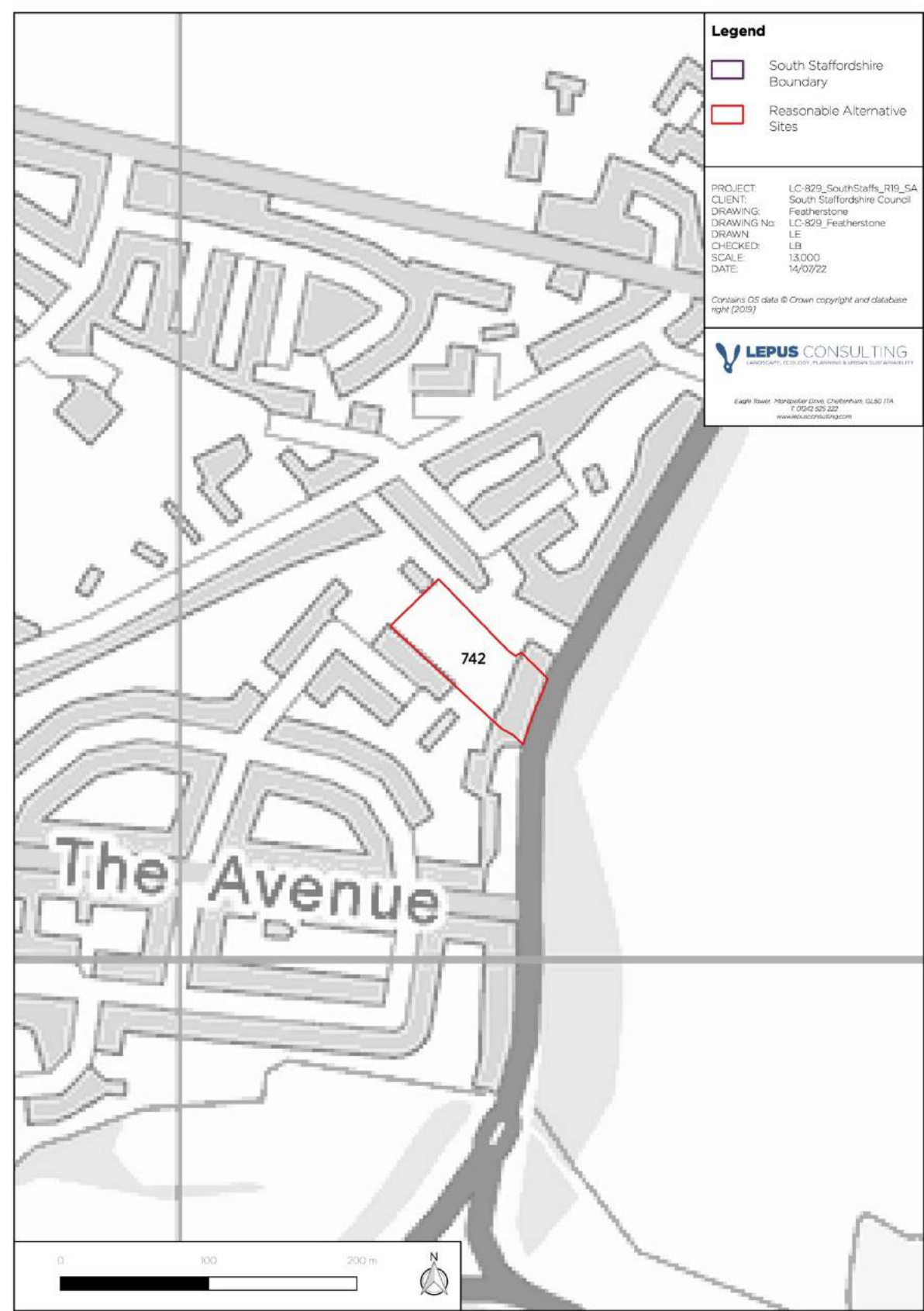
F.7.11 SA Objective 11 – Education

- F.7.11.1 **Primary School:** Essington is served by several primary schools, including St John's Primary Academy, St Albans C of E Primary School, Beacon Primary School, Berrybrook Primary School, Long Knowle Primary School and Corpus Christi Catholic Primary School. Site 163b is located within the target distance of a primary school. Therefore, the proposed development at this site would be expected to have a minor positive impact on the access of new residents to primary education. A large proportion of Sites 163 and Site 163a are located outside of the target distance to a primary school. Therefore, the proposed development at these two sites would be expected to have a minor negative impact on the access of new residents to primary education.
- F.7.11.2 **Secondary School:** Essington is served by Moreton School and Wednesfield High School. Sites 163, 163a and 163b are located outside the target distance to these secondary schools, and therefore, the proposed development at these sites would be expected to have a minor negative impact on the access of new residents to secondary education.
- F.7.11.3 The proposed development at Sites 163 and 163a would be expected to have a major negative impact on new residents' access to both primary and secondary education.

F.7.12 SA Objective 12 – Economy

- F.7.12.1 **Access to Employment:** Site 163 is located in an area providing 'reasonable' sustainable access to employment opportunities. The proposed development at this site would be expected to have a minor positive impact on site end users' access to employment. Sites 163a and 163b are located in areas providing 'unreasonable' or 'poor' sustainable access to employment opportunities, and therefore, the proposed development at these sites would be expected to have a minor negative impact on site end users' access to employment.

F.8 Featherstone



Featherstone Cluster			
This cluster is located in the east of the South Staffordshire District. See the Featherstone cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
742	Red White and Blue public house	Residential-led	0.49

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
742	+/-	+	-	-	-	-	+	-	-	-	-	--

F.8.1 SA Objective 1 – Climate Change Mitigation

F.8.1.1 See **Appendix D**.

F.8.2 SA Objective 2 – Climate Change Adaptation

F.8.2.1 Site 742 is located entirely within Flood Zone 1. A minor positive impact would be expected at this site, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

F.8.3 SA Objective 3 – Biodiversity & Geodiversity

F.8.3.1 **Habitats Sites:** Site 742 is located within 11km of ‘Cannock Chase’ SAC. A minor negative impact would be expected as a result of the proposed development at this site, due to the increased risk of development-related threats and pressures on this Habitats site.

F.8.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.8.3.3 **SSSI IRZ:** Site 742 is located within an IRZ which states that “*Residential development of 50 units or more*” should be consulted on with Natural England. Therefore, the proposed development at this site could potentially have a minor negative impact on the features for which nearby SSSIs have been designated

F.8.4 SA Objective 4 – Landscape & Townscape

F.8.4.1 **Landscape Sensitivity:** Site 742 was not assessed in the Landscape Sensitivity Study. Development of this site is likely to have a negligible impact.

F.8.4.2 Landscape Character: Site 742 is located in an area outside the scope of the character assessment, and therefore, the proposed development at this site would be expected to have a negligible impact on the characteristics identified in the published landscape character assessment.

F.8.4.3 Views for Local Residents: The proposed development at Site 742 could potentially alter the views experienced by local residents, including those on Olde Hall Road. Therefore, a minor negative impact on the local landscape would be expected.

F.8.5 SA Objective 5 – Pollution & Waste

F.8.5.1 Main Road: Site 742 is located entirely within 200m of the A460. The proposed development at this site could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A462 would be expected to have a minor negative impact on air quality and noise at this site.

F.8.6 SA Objective 6 – Natural Resources

F.8.6.1 Previously Developed Land: Site 742 comprises partially developed land, with undeveloped areas in the north/west. The proposed development at Site 742 would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

F.8.6.2 ALC: Site 742 is primarily situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

F.8.7 SA Objective 7 – Housing

F.8.7.1 See **Appendix D**.

F.8.8 SA Objective 8 – Health & Wellbeing

F.8.8.1 NHS Hospital: The majority of Site 742 is located outside of the target distance to New Cross Hospital. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.

F.8.8.2 GP Surgery: Sites 742 is located within the target distance to Featherstone Family Health Centre. The proposed development at this site would be expected to have a minor positive effect on the access of site end users to GP surgeries.

F.8.8.3 Leisure Centre: The closest leisure facility is Cheslyn Hay Leisure Centre, located approximately 3.5km from Site 742. Site 742 is located outside of the target distance to leisure centres. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users these leisure facilities.

- F.8.8.4 **AQMA:** Site 742 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at this site.
- F.8.8.5 **Main Road:** Site 742 is located entirely within 200m of the A460. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- F.8.8.6 **Access to Public Greenspace:** Site 742 is located within the target distance of a public greenspace. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.8.8.7 **ProW/Cycle Network:** Site 742 is located within the target distance to the ProW network. The proposed development at this site would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.8.9 SA Objective 9 – Cultural Heritage

- F.8.9.1 **Archaeology:** Site 742 is adjacent to the archaeological features ‘Streetway’ and ‘Wordsley Green’. The proposed development at this site could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.
- F.8.9.2 **Historic Character:** Site 742 is located within an area of ‘medium’ historic value. The proposed development at this site could potentially have a minor negative impact on historic character.

F.8.10 SA Objective 10 – Transport & Accessibility

- F.8.10.1 **Bus Stop:** Site 742 is located within the target distance to bus stops on South Crescent providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users’ access to bus services.
- F.8.10.2 **Railway Station:** Site 742 is located outside of the target distance to Bilbrook Railway Station and Codsall Station. The proposed development at this site would be likely to have a minor negative impact on site end users’ access to bus services.
- F.8.10.3 **Pedestrian Access:** Site 742 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users’ opportunities to travel by foot.
- F.8.10.4 **Road Access:** Site 742 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.8.10.5 **Local Services:** The nearest convenience store is Superfood Store. Site 742 is located within the target distance to this convenience store. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to local services.

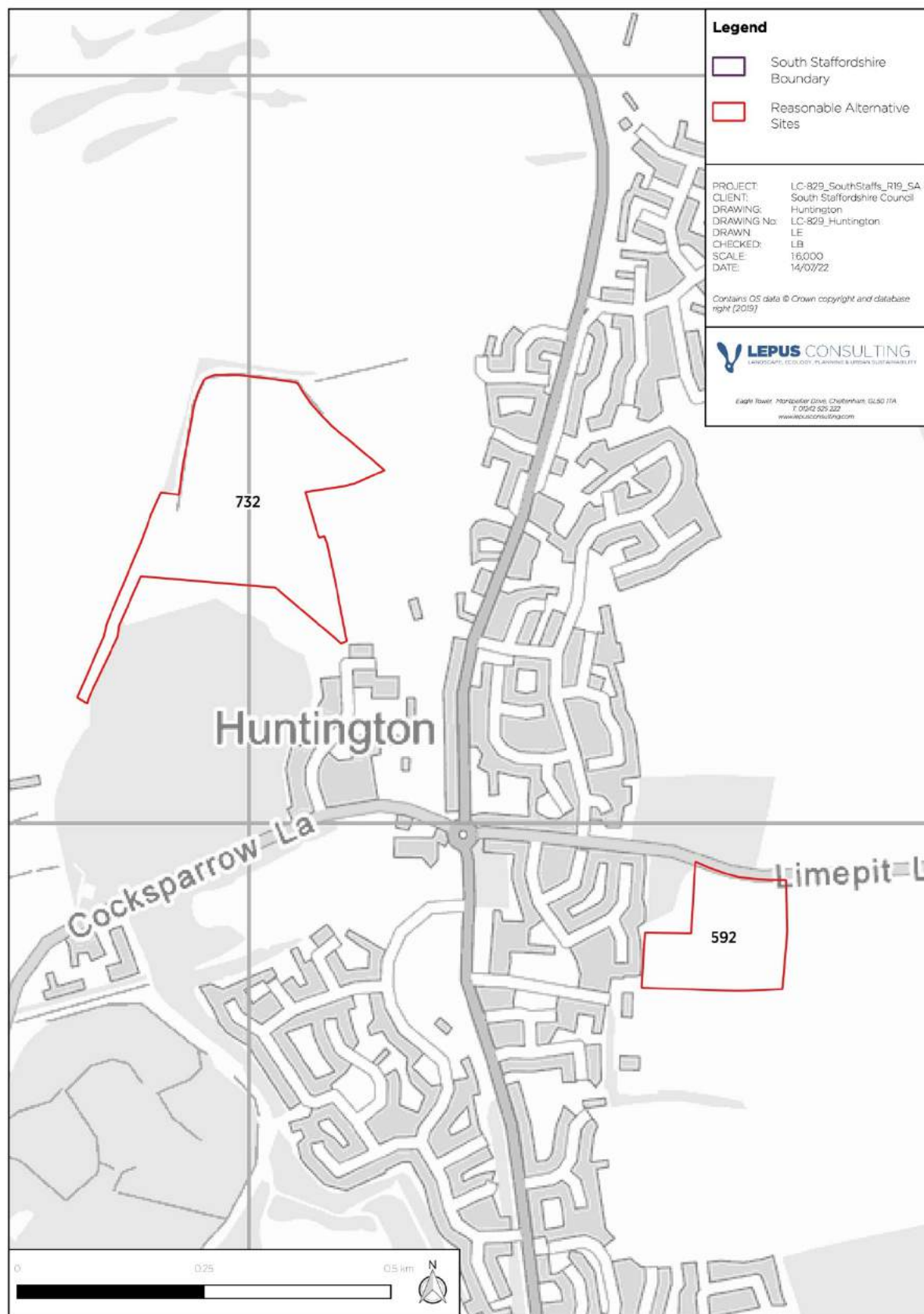
F.8.11 SA Objective 11 – Education

- F.8.11.1 Primary School:** The closest primary schools to Featherstone include Berrybrook Primary School, Featherstone Academy, St Paul's C of E First School and St Anthony's Catholic Primary School. Site 742 is located within the target distance to Featherstone Academy. Therefore, the proposed development at this site would be expected to have a minor positive impact on the access of new residents to primary education.
- F.8.11.2 Secondary School:** The closest secondary schools to Featherstone include Moreton School and Ormiston New Academy. Site 742 is located outside of the target distance to these secondary schools. Therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to secondary education.

F.8.12 SA Objective 12 – Economy

- F.8.12.1 Employment Floorspace:** Site 742 currently coincides with 'Red White & Blue' public house. The proposed residential-led development at this site could potentially result in loss of this business, and consequently the employment opportunities it provides. Therefore, a major negative impact on employment floorspace could be expected following the proposed development at this site.
- F.8.12.2 Access to Employment:** Site 742 is located in an area with 'reasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor positive impact on site end users' access to employment.

F.9 Huntington



Huntington Cluster			
This cluster is located in the north east of the South Staffordshire District. See the Huntington cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
592	Land at Oaklands Farm (south of Limepit Lane)	Residential-led	2.41
732	Land north of Cocksparrow Lane	Residential-led	6.59

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
592	+/-	+	-	--	-	-	+	-	-	-	-	-
732	+/-	--	-	--	0	-	+	-	-	-	-	-

F.9.1 SA Objective 1 – Climate Change Mitigation

F.9.1.1 See **Appendix D**.

F.9.2 SA Objective 2 – Climate Change Adaptation

F.9.2.1 **Fluvial Flooding:** Sites 592 and 732 are located entirely within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.

F.9.2.2 **Surface Water Flooding:** A proportion of Site 732 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.9.3 SA Objective 3 – Biodiversity & Geodiversity

F.9.3.1 **Habitats Sites:** Sites 592 and 732 are located within 2.5km of 'Cannock Chase' SAC. A minor negative impact would be expected as a result of the proposed development at these sites, due to the increased risk of development-related threats and pressures on this Habitats site.

F.9.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

- F.9.3.3 **SSSI IRZ:** Sites 592 and 732 are located within 2.5km of ‘Cannock Chase’ SSSI IRZ which states that *“Any residential development of 50 or more houses outside existing settlements/urban areas”* should be consulted on with Natural England. Therefore, the proposed development at these sites could potentially have a minor negative impact on the features for which this SSSI has been designated.
- F.9.3.4 **SBI:** Site 732 is adjacent to ‘Littleton Coillery spill mound’ SBI in Huntington. The proposed development at this site could potentially have a minor negative impact on this SBI, due to an increased risk of development-related threats and pressures.
- F.9.3.5 **Priority Habitat:** Site 732 coincides with deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

F.9.4 SA Objective 4 – Landscape & Townscape

- F.9.4.1 **AONB:** Sites 732 and 592 are located within 1km from Cannock Chase AONB. The proposed development at these two sites could potentially have a minor negative impact on the setting of this nationally designated landscape.
- F.9.4.2 **Green Belt Harm:** The release of Green Belt land at Sites 592 and 732 are considered by the Green Belt Study to result in ‘high’ harm to the purposes of the Green Belt. Development of these sites is assessed as having a potentially major negative impact.
- F.9.4.3 **Landscape Sensitivity:** Site 592 is determined by the Landscape Sensitivity Study to be within an area of ‘moderate-high’ landscape sensitivity. Development of this site has the potential to have a major negative impact.
- F.9.4.4 Site 732 is determined by the Landscape Sensitivity Study to be within an area of ‘moderate’ landscape sensitivity. Development of this site has the potential to have a minor negative impact.
- F.9.4.5 **Landscape Character:** Site 592 is located within the RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Sandstone Hills and Heaths’. The characteristic landscape features of this LCT are *“small winding lanes; irregular hedged field pattern; stunted hedgerow oaks; [and] pronounced rounded landform”*.
- F.9.4.6 Site 732 is located within RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Settled Heathlands’. The characteristic landscape features of this LCT are *“primarily arable and pasture farming; flat to gently rolling landform; hedged fields; regular and irregular hedgerows, trees; straight and winding”*.
- F.9.4.7 The proposed development at both sites have the potential to have a minor negative impact on the characteristics identified for the associated LCT in the published landscape character assessment.
- F.9.4.8 **Views from the ProW Network:** Site 732 coincides with a ProW. The proposed development at this site could potentially alter the views experienced by users of this footpath. As a result, a minor negative impact on the local landscape would be expected.

F.9.4.9 **Views for Local Residents:** The proposed development at Sites 592 and 732 could potentially alter the views experienced by local residents, including those on Stafford Road. Therefore, a minor negative impact on the local landscape would be expected.

F.9.4.10 **Urbanisation of the Countryside:** Sites 592 and 732 are located in the open countryside surrounding Huntington. The proposed development at these sites could potentially increase the risk of sprawl outside of the settlement, and therefore, have a minor negative impact on the local landscape.

F.9.5 SA Objective 5 – Pollution & Waste

F.9.5.1 **Main Road:** Site 592 is partially within 200m of the A34. The proposed development at this site could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using the A34 would be expected to have a minor negative impact on air quality and noise at this site.

F.9.6 SA Objective 6 – Natural Resources

F.9.6.1 **Previously Developed Land:** Sites 592 and 732 comprise previously undeveloped land. The proposed development at these sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

F.9.6.2 **ALC:** Sites 592 and 732 are primarily situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these sites, due to the loss of this agriculturally important natural resource.

F.9.7 SA Objective 7 – Housing

F.9.7.1 See **Appendix D**.

F.9.8 SA Objective 8 – Health & Wellbeing

F.9.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is County Hospital, located approximately 10km from this cluster. Sites 592 and 732 are located outside of the target distance to a hospital. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users to essential healthcare facilities.

F.9.8.2 **GP Surgery:** The closest GP surgeries include Chadsmoor Medical Centre and Penkridge Medical Practice. Sites 592 and 732 are located outside of the target distance to GP surgeries. The proposed development at these sites would be expected to have a minor negative effect on the access of site end users to GP surgeries.

F.9.8.3 **Leisure Centre:** The closest leisure facility is Penkridge Leisure Centre, located approximately 4km west of the cluster. Sites 592 and 732 are located outside of the target distance to leisure centres. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users these leisure facilities.

- F.9.8.4 **AQMA:** Sites 592 and 732 are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at these sites.
- F.9.8.5 **Main Road:** Site 732 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution. Site 592 is located within 200m of a main road. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- F.9.8.6 **Access to Public Greenspace:** Sites 592 and 732 are located within the target distance of a public greenspace. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.9.8.7 **ProW/Cycle Network:** Sites 592 and 732 are located within the target distance to ProW and partially within the target distance to cycle networks. The proposed development at these sites would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.9.9 SA Objective 9 – Cultural Heritage

- F.9.9.1 **Grade II Listed Building:** Site 732 is located approximately 200m from the Grade II Listed Building ‘Huntington Farmhouse’ and approximately 300m from ‘14’ and ‘16 Dundalk Lane’. The proposed development at this site could potentially have a minor negative impact on the settings of these Listed Buildings.
- F.9.9.2 **Archaeology:** Site 732 coincides with the archaeological features ‘Field Boundary, Huntington’ and ‘Post-medieval Coin Findspot, Huntington’. The proposed development at this site could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.
- F.9.9.3 **Historic Character:** Sites 592 and 732 are located within an area of ‘medium’ historic value. The proposed development at these sites could potentially have a minor negative impact on historic character.

F.9.10 SA Objective 10 – Transport & Accessibility

- F.9.10.1 **Bus Stop:** Sites 592 and 732 are located within the target distance to bus stops on Stafford Road providing regular services. The proposed development at these sites would be likely to have a minor positive impact on site end users’ access to bus services.
- F.9.10.2 **Railway Station:** Sites 592 and 732 are located outside of the target distance to Bilbrook Railway Station and Codsall Station. The proposed development at these sites would be likely to have a minor negative impact on site end users’ access to bus services.

- F.9.10.3 **Pedestrian Access:** Site 592 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users' opportunities to travel by foot. Site 732 is not connected to the existing footpath network. The proposed development at this site would be expected to have a minor negative impact on site end users' opportunities to travel by foot.
- F.9.10.4 **Road Access:** Sites 592 and 732 are well connected to the existing road network. The proposed development at these sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.9.10.5 **Local Services:** The nearest convenience store is the Co-op. Site 592 is located within the target distance to this convenience store. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to local services. The majority of Site 732 is located outside of the target distance to this convenience store. The proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

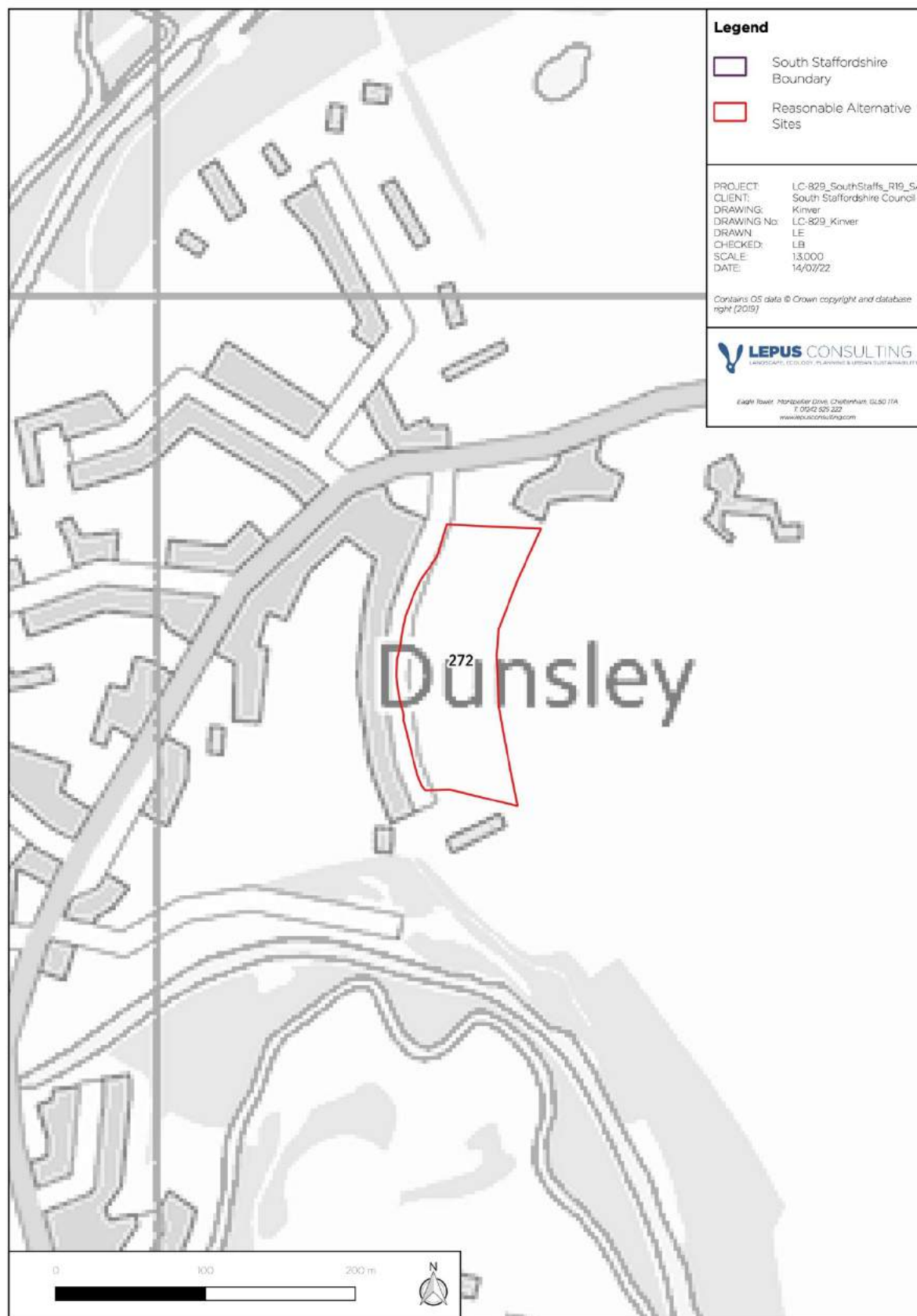
F.9.11 SA Objective 11 – Education

- F.9.11.1 **Primary School:** Huntington is served by Littleton Green Community School. Sites 592 and 732 are located within the target distance to this school. Therefore, the proposed development at these two sites would be expected to have a minor positive impact on the access of new residents to primary education.
- F.9.11.2 **Secondary School:** The closest secondary school to Huntington is Cardinal Griffin Catholic High School. Sites 592 and 732 are located outside the target distance to this secondary school, and therefore, the proposed development at these sites would be expected to have a minor negative impact on the access of new residents to secondary education.

F.9.12 SA Objective 12 – Economy

- F.9.12.1 **Access to Employment:** Sites 592 and 739 are located in areas with 'poor' or 'unreasonable' sustainable access to employment opportunities, and therefore, the proposed development at these sites would be expected to have a minor negative impact on site end users' access to employment.

F.10 Kinver



Kinver Cluster			
This cluster is located in the south of the South Staffordshire District. See the Kinver cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
272	Land East of Dunsley Drive	Residential-led	1.16

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
272	+/-	+	+/-	--	-	-	+	-	-	-	-	-

F.10.1 SA Objective 1 – Climate Change Mitigation

F.10.1.1 See **Appendix D**.

F.10.2 SA Objective 2 – Climate Change Adaptation

F.10.2.1 **Fluvial Flooding:** Site 272 is located entirely within Flood Zone 1. A minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

F.10.3 SA Objective 3 – Biodiversity & Geodiversity

F.10.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.10.4 SA Objective 4 – Landscape & Townscape

F.10.4.1 **Green Belt Harm:** The release of Green Belt land at Site 272 is considered by the Green Belt Study to result in ‘moderate’ harm to the Green Belt purposes. Development of this site is assessed as having a minor negative impact.

F.10.4.2 **Landscape Sensitivity:** Site 272 is considered by the Landscape Sensitivity Study to be within an area of ‘moderate-high’ landscape sensitivity. Development of this site has been assessed as having a potentially major negative impact.

F.10.4.3 Landscape Character: Site 272 is located within the RCA 'Mid Severn Sandstone Plateau' and the LCT 'Sandstone Estatelands'. The characteristic landscape features of this LCT are *"estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal"*. Site 272 comprises a relatively small site, in line with the existing residential development. Therefore, a negligible impact on the local landscape character would be expected.

F.10.4.4 Views for Local Residents: The proposed development Site 272 could potentially alter the views experienced by local residents, particularly those on Dunsley Drive. Therefore, a minor negative impact on the local landscape would be expected.

F.10.5 SA Objective 5 – Pollution & Waste

F.10.5.1 Groundwater SPZ: Site 272 coincides with the outer zone (Zone II) and the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

F.10.5.2 Watercourse: A proportion of Site 272 is located within 200m of the Staffordshire and Worcestershire Canal. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

F.10.6 SA Objective 6 – Natural Resources

F.10.6.1 Previously Developed Land: Site 272 comprises previously undeveloped land. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

F.10.6.2 ALC: Site 272 is situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

F.10.7 SA Objective 7 – Housing

F.10.7.1 See **Appendix D**.

F.10.8 SA Objective 8 – Health & Wellbeing

F.10.8.1 NHS Hospital: The closest NHS hospital with an A&E department is Russells Hall Hospital, located approximately 10km north east of the site. Site 272 is outside the target distance to this hospital. The proposed development at this site in this cluster could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.

- F.10.8.2 **GP Surgery:** The closest GP surgery is Moss Grove Surgery, located towards the centre of the cluster. The majority of Site 272 is located within the target distance to this GP surgery. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to GP surgeries.
- F.10.8.3 **Leisure Centre:** The closest leisure facility is Crystal Leisure Centre, located approximately 6.5km east of the cluster. Site 272 is located outside the target distance to this leisure facility, and therefore, a minor negative impact on the access to these leisure facilities of site end users would be expected.
- F.10.8.4 **AQMA:** Site 272 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- F.10.8.5 **Main Road:** Site 272 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.10.8.6 **Access to Public Greenspace:** Site 272 is located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.10.8.7 **ProW/Cycle Network:** Site 272 is located within 600m of the ProW and cycle networks. The proposed development at this site would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.10.9 SA Objective 9 – Cultural Heritage

- F.10.9.1 **Conservation Area:** Site 272 is located adjacent to ‘Kinver’ Conservation Area. The proposed development at this site could potentially alter the setting of this Conservation Area and, as a result, have a minor negative impact on the historic environment.
- F.10.9.2 **Archaeology:** Site 272 is located adjacent to ‘Former Dunsley Farm, Dunsley Road and Dunsley’. The proposed development at this site could potentially alter the significance of this archaeological feature, and as such, have a minor negative impact on the historic environment.
- F.10.9.3 **Historic Character:** Site 272 is located within an area of ‘high’ historic value. The proposed development at this site could potentially have a minor negative impact on historic character.

F.10.10 SA Objective 10 – Transport & Accessibility

- F.10.10.1 **Bus Stop:** Site 272 is located within the target distance of bus stops on Dunsley Road providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users’ access to bus services.
- F.10.10.2 **Railway Station:** The closest railway station is Stourbridge Town Railway Station, located approximately 6.9km to the east of the cluster. Therefore, the proposed development at Site 272 would be likely to have a minor negative impact on site end users’ access to rail services.

- F.10.10.3 **Pedestrian Access:** Site 272 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users' opportunities to travel by foot.
- F.10.10.4 **Road Access:** Site 272 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.10.10.5 **Local Services:** The nearest local services include Potters Cross Post Office, SPAR and Co-op Food. Site 272 is located wholly outside the target distance to these services. The proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

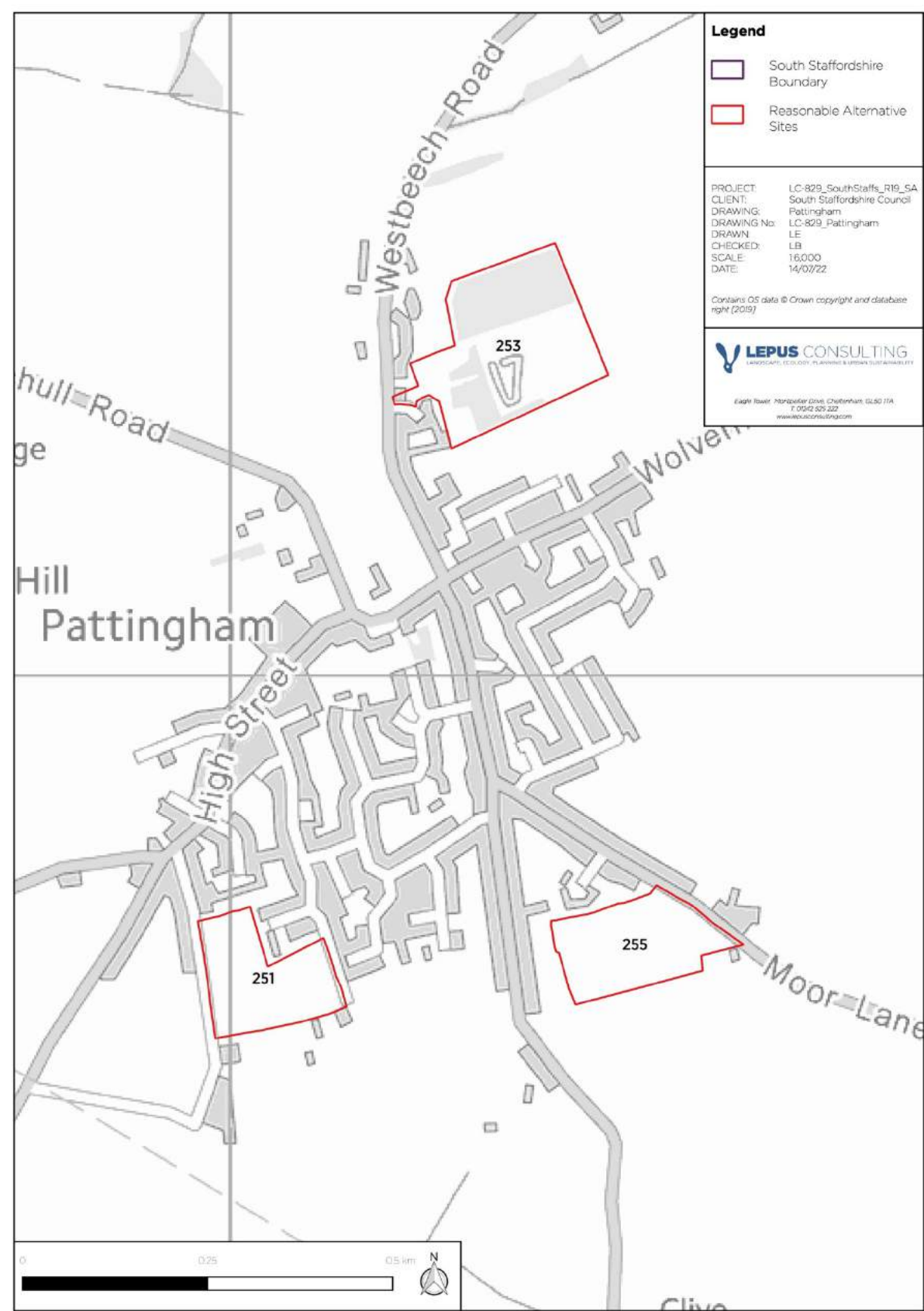
F.10.11 SA Objective 11 – Education

- F.10.11.1 **Primary School:** Kinver is served by Foley Infant School and Brindley Heath Junior School. Site 272 is located outside the target distance to these schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to primary education.
- F.10.11.2 **Secondary School:** Kinver is served by Kinver High School. Site 272 is located within the target distance to this secondary school. The proposed development at this site would be expected to situate new residents in locations with good access to secondary education, and therefore, a minor positive impact would be expected.

F.10.12 SA Objective 12 – Economy

- F.10.12.1 **Access to Employment:** Site 272 is located in an area with 'poor' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to employment.

F.11 Pattingham



Pattingham Cluster			
This cluster is located in the west of the South Staffordshire District. See the Pattingham cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
251	Hall End Farm	Residential-led	2.16
253	Land off Westbeech Road	Residential-led	4.26
255	Moor Lane	Residential-led	2.35

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
251	+/-	+	+/-	-	-	-	+	-	-	-	-	-
253	+/-	+	+/-	--	-	-	+	-	-	-	-	-
255	+/-	-	+/-	-	-	-	+	-	-	-	-	-

F.11.1 SA Objective 1 – Climate Change Mitigation

F.11.1.1 See **Appendix D**.

F.11.2 SA Objective 2 – Climate Change Adaptation

F.11.2.1 **Fluvial Flooding:** Sites 251, 253 and 255 are located wholly within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

F.11.2.2 **Surface Water Flooding:** A proportion of Site 255 coincides with areas determined to be at low risk of surface water flooding. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.11.3 SA Objective 3 – Biodiversity & Geodiversity

F.11.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.11.4 SA Objective 4 – Landscape & Townscape

- F.11.4.1 **Green Belt Harm:** The release of Green Belt land at Site 253 is considered by the Green Belt Study to result in ‘moderate-high’ levels of harm to the purposes of the Green Belt. Development of this site is assessed as having a potentially major negative impact.
- F.11.4.2 Sites 251 and 255 are considered by the Green Belt Study to result in ‘moderate’ levels of harm to the purposes of the Green Belt. Development of these sites is assessed as having a potentially minor negative impact.
- F.11.4.3 **Landscape Sensitivity:** Site 253 is considered by the Landscape Sensitivity Study to be within areas of ‘high’ landscape sensitivity. Development of this site has been assessed as having a potentially major negative impact.
- F.11.4.4 Sites 251 and 255 are assessed as being within an area of ‘moderate’ landscape sensitivity. Development of these sites is likely to have a minor negative impact.
- F.11.4.5 **Landscape Character:** All sites in this cluster are located within the RCA ‘Mid Severn Sandstone Plateau’ and the LCT ‘Sandstone Estatelands’. The characteristic landscape features of this LCT are “*estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal*”. The proposed residential development at these three sites could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character would be expected.
- F.11.4.6 **Views from the ProW Network:** Site 251 is located adjacent to a ProW. The proposed development at this site could potentially alter the views experienced by users of this footpath. As a result, a minor negative impact on the local landscape would be expected.
- F.11.4.7 **Views for Local Residents:** The proposed development at three sites in this cluster could potentially alter the views experienced by local residents, including those on End Lane, Marlbrook Lane, College Farm Close, Westbeech Road, and Moor Lane. Therefore, a minor negative impact on the local landscape would be expected.
- F.11.4.8 **Urbanisation of the Countryside:** Site 253 is located in the open countryside surrounding Pattingham. The proposed development at this site would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

F.11.5 SA Objective 5 – Pollution & Waste

- F.11.5.1 **Groundwater SPZ:** Sites 251, 253 and 255 are located partially or entirely within the catchment (Zone III) of a groundwater SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

F.11.6 SA Objective 6 – Natural Resources

- F.11.6.1 **Previously Developed Land:** All three sites comprise previously undeveloped land. The proposed development at these three sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- F.11.6.2 **ALC:** Sites 251, 253 and 255 are situated on ALC Grades 1 and/or 2 land, which are considered to be some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these sites, due to the loss of this agriculturally important natural resource.

F.11.7 SA Objective 7 – Housing

- F.11.7.1 See **Appendix D**.

F.11.8 SA Objective 8 – Health & Wellbeing

- F.11.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located east of the cluster. Sites 251, 253 and 255 are outside the target distance from this hospital. The proposed development at these three sites could potentially restrict the access of site end users to this essential healthcare facility. Therefore, a minor negative impact would be expected.
- F.11.8.2 **GP Surgery:** The closest GP surgery is Pattingham Surgery. Sites 251, 253 and 255 are located within the target distance to this GP surgery. The proposed development at these three sites would be expected to have a minor positive impact on the access of site end users to GP surgeries.
- F.11.8.3 **Leisure Centre:** The closest leisure facilities are Codsall Leisure Centre and Wombourne Leisure Centre. Sites 251, 253 and 255 are located outside the target distance to these leisure facilities, and therefore, a minor negative impact on the access to leisure facilities of site end users would be expected.
- F.11.8.4 **AQMA:** Sites 251, 253 and 255 are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- F.11.8.5 **Main Road:** Sites 251, 253 and 255 are located over 200m from a main road. The proposed development at these three sites would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.11.8.6 **Access to Public Greenspace:** All three sites are located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at these three sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.11.8.7 **ProW/Cycle Network:** Sites 251, 253 and 255 are located within 600m of the ProW network. The proposed development at these three sites would be likely to provide site end users with

good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.11.9 SA Objective 9 – Cultural Heritage

- F.11.9.1 **Grade II Listed Building:** Site 255 is located within 500m from several Grade II Listed Buildings including ‘Birdhouse Cottage’, ‘Number 69 with Dwarf Walls, railings and gate to front garden’ and ‘Farm Buildings immediately north of Number 69’. The proposed development at this site could potentially have a minor negative impact on the settings of these Listed Buildings.
- F.11.9.2 **Conservation Area:** Site 253 is adjacent to ‘Pattingham’ Conservation Area. Site 251 is located approximately 50m from this Conservation Area. The proposed development at these sites could potentially alter the setting of this Conservation Area and, as a result, have a minor negative impact on the historic environment.
- F.11.9.3 **Registered Parks and Gardens:** Site 253 is located within approximately 550m from ‘Patshull Hall’ RPG. The proposed development at this site could potentially have a minor negative impact on the setting of this RPG.
- F.11.9.4 **Historic Character:** Sites 251, 253 and 255 are located within an area of ‘medium’ historic value. The proposed development at these three sites could potentially have a minor negative impact on historic character.

F.11.10 SA Objective 10 – Transport & Accessibility

- F.11.10.1 **Bus Stop:** Site 253 is located within the target distance of bus stops on Wolverhampton Road providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users’ access to bus services. Sites 251 and 255 are located partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these two sites could potentially have a minor negative impact on site end users’ access to bus services.
- F.11.10.2 **Railway Station:** The closest railway station is Albrighton Railway Station, located approximately 6.1km to the north of the cluster. Sites 251, 253 and 255 are outside the target distance to this station. Therefore, the proposed development at these sites would be likely to have a minor negative impact on site end users’ access to rail services..
- F.11.10.3 **Pedestrian Access:** Site 251 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users’ opportunities to travel by foot. Sites 253 and 255 currently have poor access to the surrounding footpath network. The proposed development at these two sites could potentially have a minor negative impact on local accessibility.
- F.11.10.4 **Road Access:** Sites 251, 253 and 255 are well connected to the existing road network. The proposed development at these sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.11.10.5 **Local Services:** The nearest convenience store is Pattingham Co-op. Sites 251, 253 and 255 are located within the target distance to this convenience store. Therefore, the proposed

development at these three sites would be expected to have a minor positive impact on site end users' access to local services.

F.11.11 SA Objective 11 – Education

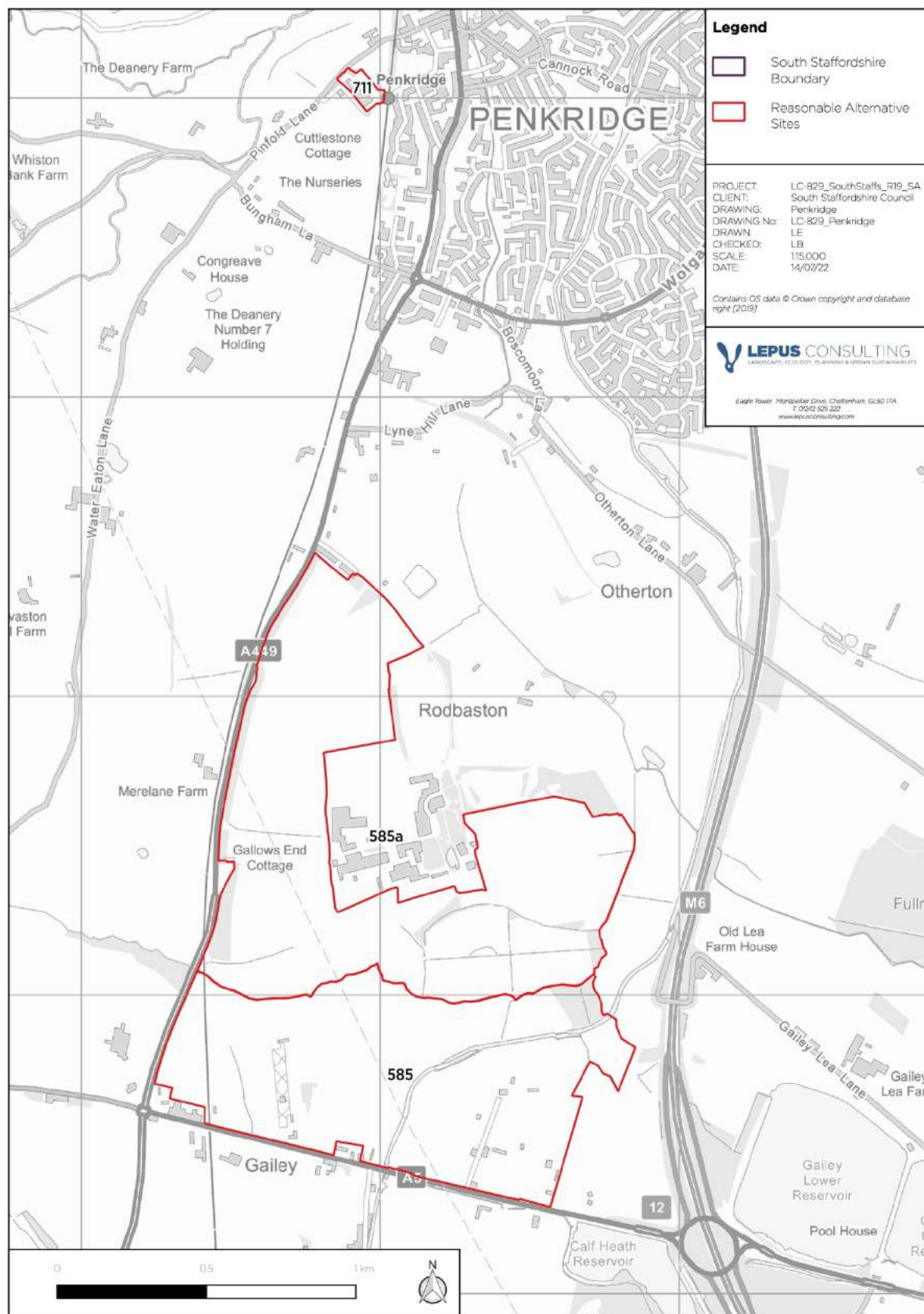
F.11.11.1 Primary School: Pattingham is served by St Chads C of E Primary School. Sites 251, 253 and 255 are located within the target distance to this primary school. The proposed development at these three sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected.

F.11.11.2 Secondary School: The closest secondary school to Pattingham is Highfields School, located approximately 6km to the south east of the cluster. Sites 251, 253 and 255 are located outside the target distance to this secondary school, and therefore, the proposed development at these three sites would be expected to have a minor negative impact on the access of new residents to secondary education.

F.11.12 SA Objective 12 – Economy

F.11.12.1 Access to Employment: Sites 251, 253 and 255 are located in or adjacent to areas with 'poor' sustainable access to employment opportunities, and therefore, the proposed development at these three sites would be expected to have a minor negative impact on site end users' access to employment.

F.12 Penkridge



Penkridge Cluster			
This cluster is located in the north of the South Staffordshire District. See the Penkridge cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
585	Land off Gailey Island	Residential-led	81.18
585a	Land off Gailey Island (parcel 2)	Residential-led	99.34
711	Hatherton House, Pinfold Lane	Residential-led	1.13

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
585	+/-	--	-	--	-	-	+	-	-	-	-	--
585a	+/-	--	-	--	-	-	+	-	-	-	-	--
711	+/-	-	-	--	-	-	+	-	--	++	+	--

F.12.1 SA Objective 1 – Climate Change Mitigation

F.12.1.1 See **Appendix D**.

F.12.2 SA Objective 2 – Climate Change Adaptation

F.12.2.1 **Fluvial Flooding:** Site 585a is located partially within Flood Zones 2 and 3. Site 711 is located partially in Flood Zone 2. The proposed development at these two sites could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a minor negative impact would be expected. Site 585 is located within Flood Zone 1. A minor positive impact would be expected at this site, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

F.12.2.2 **Surface Water Flooding:** A proportion of Sites 585 and 585a coincide with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at these two sites would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.12.2.3 A proportion of Site 711 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.12.3 SA Objective 3 – Biodiversity & Geodiversity

- F.12.3.1 **Habitats Sites:** Sites 585, 585a and 711 are located within 8km of ‘Cannock Chase’ SAC. A minor negative impact would be expected as a result of the proposed development at these sites, due to the increased risk of development-related threats and pressures on this Habitats site.
- F.12.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.
- F.12.3.3 **SSSI IRZ:** ‘Cannock Chase’ SSSI and ‘Four Ashes Pit’ SSSI are located in the north east and south west of Sites 585, 585a and 711 respectively. All sites are located within an IRZ which states that *“Any residential development of 50 or more houses outside existing settlements/urban areas”* should be consulted on with Natural England. Therefore, the proposed development at these sites could potentially have a minor negative impact on the features for which these SSSIs have been designated.
- F.12.3.4 **SBI:** Site 585a is located adjacent to ‘Rodbaston College’ SBI. The proposed development at this site could potentially have a minor negative impact on this SBI, due to an increased risk of development-related threats and pressures.
- F.12.3.5 **Priority Habitat:** Site 585a coincides with deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

F.12.4 SA Objective 4 – Landscape & Townscape

- F.12.4.1 **AONB:** Sites 585 and 585a are located approximately 2.8km west of Cannock Chase AONB. The proposed development at these two sites could potentially have a minor negative impact on the setting of this nationally designated landscape.
- F.12.4.2 **Green Belt Harm:** The release of Green Belt land at Sites 585, 585a and 711 is considered by the Green Belt Study to result in ‘high’ levels of harm to the purposes of the Green Belt. Development of these sites is assessed as having a potentially major negative impact.
- F.12.4.3 **Landscape Sensitivity:** Site 711 is considered by the Landscape Sensitivity Study to be within areas of ‘moderate-high’ landscape sensitivity. Development of this site is likely to have a major negative impact.
- F.12.4.4 Sites 585 and 585a are considered by the Landscape Sensitivity Study to be within areas of ‘low-moderate’ landscape sensitivity. Development of these two sites is likely to have a minor negative impact.
- F.12.4.5 **Landscape Character:** A proportion of Site 585 is located within the RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Settled Heathlands’. The characteristic landscape features of this LCT are *“mixed arable and pasture farming; flat to gently rolling landform; hedged fields; regular and irregular hedgerows; oak and birch hedgerow trees; straight and winding roads; wooded stream valleys; bracken; [and] broadleaved woodlands”*.

- F.12.4.6 Site 585a, 711 and a proportion of Site 585 are located within the RCA ‘Staffordshire Plain’ and the LCT ‘Ancient Clay Farmlands’. The characteristic landscape features of this LCT include “*mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern*”.
- F.12.4.7 The proposed residential development at Sites 585 and 585a could potentially be discordant with the key characteristics of the associated LCTs. Therefore, a minor negative impact on the local landscape character would be expected.
- F.12.4.8 Site 711 comprises previously developed land, and therefore, the proposed development at this site would be expected to have a negligible impact on the characteristics identified in the published landscape character assessment.
- F.12.4.9 **Views from the ProW Network:** Site 585a coincides with a ProW. The proposed development at this site could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.
- F.12.4.10 **Views for Local Residents:** The proposed developments at Sites 585 and 585a could potentially alter the views experienced by local residents, including those on the A5 and Rodbaston Drive. Therefore, a minor negative impact on the local landscape would be expected at these two sites.

F.12.5 SA Objective 5 – Pollution & Waste

- F.12.5.1 **Main Road:** Site 585a is situated within 200m of the A449 and Site 585 is situated within 200m of the A5, A449 and M6. The proposed development at these two sites could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A5, A449 and M6 would be expected to have a minor negative impact on air quality and noise at these sites.
- F.12.5.2 **Railway Line:** A railway line passes to the west of Penkridge, linking Wolverhampton to Stafford. Sites 585, 585a and 711 are located within 200m of the railway line. The proposed development at these sites could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway line. A minor negative impact would therefore be expected.
- F.12.5.3 **Groundwater SPZ:** Sites 585a and 585 coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these two sites could potentially increase the risk of groundwater contamination within these SPZs, and therefore, result in a minor negative impact on local groundwater resources.
- F.12.5.4 **Watercourse:** The Staffordshire and Worcestershire Canal passes through Site 585, and Site 585a is located adjacent to the canal. The proposed development at these two sites could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

F.12.6 SA Objective 6 – Natural Resources

- F.12.6.1 **Previously Developed Land:** Sites 585, 585a and 711 wholly or partially comprise previously undeveloped land. The proposed development at these sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- F.12.6.2 **ALC:** Sites 585, 585a and 711 are situated on ALC Grades 2 and/or 3 land. Grade 2, and potentially Grade 3, are considered to be some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these sites, due to the loss of this agriculturally important natural resource.

F.12.7 SA Objective 7 – Housing

- F.12.7.1 See **Appendix D**.

F.12.8 SA Objective 8 – Health & Wellbeing

- F.12.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located approximately 10km south of Sites 585, 585a and 711. The proposed development at these sites could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.
- F.12.8.2 **GP Surgery:** The closest GP surgery is Penkridge Medical Practice, located in the centre of the cluster. Site 711 is located within the target distance to this GP surgery. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to GP surgeries. Site 585 and 585a are located outside the target distance to this GP surgery. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- F.12.8.3 **Leisure Centre:** The closest leisure facility is Penkridge Leisure Centre, located to the east of the cluster. Sites 585, 585a and 711 are located outside the target distance to this leisure centre. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users to this facility.
- F.12.8.4 **AQMA:** Sites 585, 585a and 711 are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at these sites.
- F.12.8.5 **Main Road:** Site 711 is located over 200m from main roads. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution. Sites 585 and 585a are located adjacent to the A449 and A5. The proposed development at these two sites could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- F.12.8.6 **Access to Public Greenspace:** Sites 585a and 711 are located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor

space and a diverse range of natural habitats, which is known to have physical and mental health benefits. The majority of Site 585 is located over 600m from a public greenspace. The proposed development at this site could potentially have a minor negative impact on the access of site end users to outdoor space.

- F.12.8.7 **ProW/Cycle Network:** Sites 585, 585a and 711 are located within 600m of the ProW and cycle networks. The proposed development at these sites would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.12.9 SA Objective 9 – Cultural Heritage

- F.12.9.1 **Grade I Listed Building:** Site 711 is approximately 190m from the Grade I Listed Building ‘Church of St Michael and All Angels’. The proposed development at this site could potentially have a minor negative impact on the setting of this Listed Building.

- F.12.9.2 **Grade II Listed Building:** Site 711 coincides with the Grade I Listed Building ‘Hatherton Restaurant’. The proposed development at this site could potentially have a direct major negative impact on this Listed Building.

- F.12.9.3 Site 585 is located approximately 20m from the Grade II Listed Building ‘The Round House’ and ‘Wharf Cottage’. The proposed development at this site could potentially have a minor negative impact on the setting of these Listed Buildings.

- F.12.9.4 **Conservation Area:** Site 711 is located roughly 5m from ‘Penkridge’ Conservation Area. The proposed development at this site could potentially alter the setting of this Conservation Area and, as a result, have a minor negative impact on the historic environment.

- F.12.9.5 **Scheduled Monument:** Site 585a is located within 500m of ‘Rodbaston Old Hall moated site and fishpond’ SM and ‘Roman camp, Kinvaston’ SM. Site 585 is located within 500m of ‘Roman camp, Kinvaston’ SM. Sites 585a and 585 comprise large undeveloped areas of land. The proposed development at these two sites could potentially have a minor negative impact on the setting of these SMs.

- F.12.9.6 **Archaeology:** Site 585 coincides with several archaeological features including ‘Ridge and Furrow, Penkridge’, ‘Staffordshire and Worcestershire Canal’ and ‘Rodbaston / Redbalfeston Deserted Settlement’. Site 585a coincides with features ‘Rodbaston Hall (Park)’, ‘Headland, Near Rodbaston’ and ‘Enclosure, Penkridge’. Site 711 coincides with ‘Hatherton Restaurant’, ‘Pinfold Lane’ and ‘Penkridge’. The proposed development at these sites could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.

- F.12.9.7 **Historic Character:** Site 585a is located within an area of ‘high’ historic value. Site 711 is located within an area of ‘medium’ historic value. The proposed development at these sites could potentially have a minor negative impact on historic character.

F.12.10 SA Objective 10 – Transport & Accessibility

- F.12.10.1 **Bus Stop:** Site 711 is located within the target distance to a bus stop providing regular services. Therefore, the proposed development at this site could potentially have a minor

positive impact on site end users' access to bus services. Sites 585 and 585a are located outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these two sites could potentially have a minor negative impact on site end users' access to bus services.

- F.12.10.2 **Railway Station:** The closest railway station is Penkridge Railway Station, located towards the centre of the cluster. Site 711 is located within the target distance this railway station. Therefore, the proposed development at this site could potentially have a minor positive impact on site end users' access to rail services. Site 585 and the majority of Site 585a are located outside the target distance to this railway station, and therefore, the proposed development at these two sites could potentially have a minor negative impact on site end users' access to rail services.
- F.12.10.3 **Pedestrian Access:** Sites 585, 585a and 711 are well connected to the existing footpath network. The proposed development at these sites would be expected to have a minor positive impact on site end users' opportunities to travel by foot.
- F.12.10.4 **Road Access:** Sites 585, 585a and 711 are well connected to the existing road network. The proposed development at these sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.12.10.5 **Local Services:** The nearest convenience stores include Costcutter, Co-op, Sainsburys Local, Post Office and Lifestyle Express. Site 711 is located within the target distance to Co-op. Sites 585 and 585a are expected to provide on-site local services alongside development. Therefore, the proposed development at these three sites would be expected to have a minor positive impact on site end users' access to local services.
- F.12.10.6 Site 711 is located in close proximity to a bus stop, railway station and convenience store, and is well connected to the current road and footpath networks. Therefore, a major positive impact on travel and accessibility would be expected at this site.

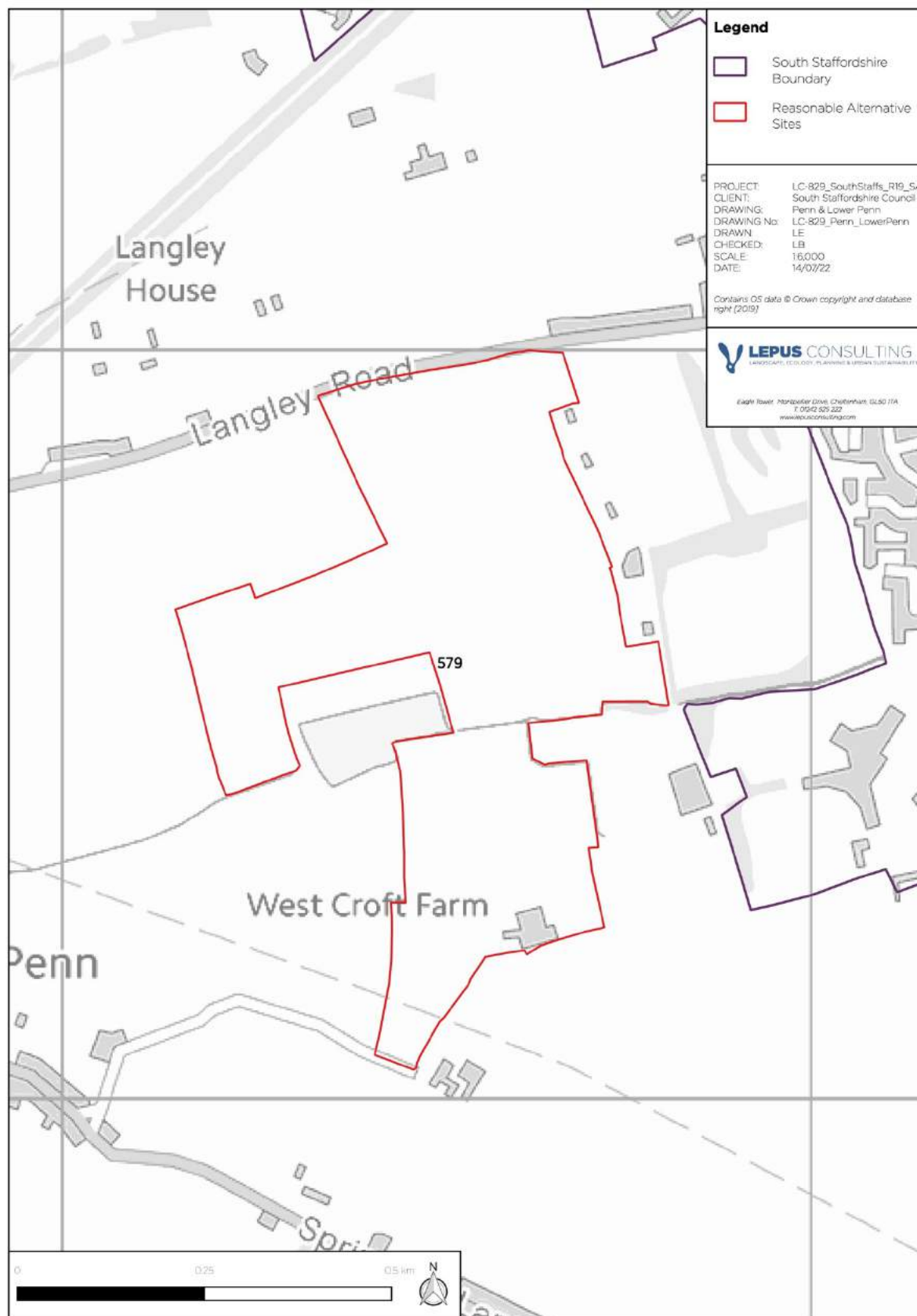
F.12.11 SA Objective 11 – Education

- F.12.11.1 **Primary School:** Penkridge is served by several primary schools, including Marshbrook First School, St Michael's C of E First School, Princefield First School and Penkridge Middle School. Sites 585 and 585a are expected to have on-site primary schools in the future. The proposed development at these two sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected. Although Site 711 is located within the target distance to St Michael's C of E First School, the school only provides education for children up to age 9. Therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to primary education.
- F.12.11.2 **Secondary School:** Penkridge is served by Wolgarston High School. Site 711 is located within the target distance to this secondary school, and therefore, the proposed development at this site would be expected to have a minor positive impact on the access of new residents to secondary education. Sites 585 and 585a are located wholly or partially outside the target distance to this secondary school, and therefore, the proposed development at these two sites would be expected to have a minor negative impact on the access of new residents to secondary education.

F.12.12 SA Objective 12 – Economy

- F.12.12.1 Employment Floorspace:** Site 585 currently coincides with 'Pro-Elite Saddlery', 'C Piper & Sons' and 'Piper Nurseries and Plant Centre', Site 585a coincides with 'Central Premier Paintball Series', and Site 711 coincides with 'Hatherton Restaurant'. The proposed residential development at these sites could potentially result in the loss of these businesses, and consequently the employment opportunities they provide. Therefore, a major negative impact could be expected following the proposed development at these sites.
- F.12.12.2 Access to Employment:** Sites 585, 585a and 711 are located in areas with 'reasonable' sustainable access to employment opportunities, and therefore, the proposed development at these sites would be expected to have a minor positive impact on site end users' access to employment.

F.13 Penn and Lower Penn



Penn and Lower Penn Cluster			
This cluster is located in the south east of the South Staffordshire District. See the Penn and Lower Penn cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
579	East Holding 107 Westcroft Farm	Residential-led	27.77

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
579	+/-	--	+/-	--	-	-	+	-	-	-	-	--

F.13.1 SA Objective 1 – Climate Change Mitigation

F.13.1.1 See **Appendix D**.

F.13.2 SA Objective 2 – Climate Change Adaptation

F.13.2.1 **Fluvial Flooding:** Site 579 coincides with Flood Zones 2 and 3. The proposed development at this site could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a minor negative impact would be expected.

F.13.2.2 **Surface Water Flooding:** A proportion of Site 579 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.13.3 SA Objective 3 – Biodiversity & Geodiversity

F.13.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.13.4 SA Objective 4 – Landscape & Townscape

F.13.4.1 **Green Belt Harm:** The release of Green Belt land at Site 579 is considered by the Green Belt Study to result in 'high' levels of harm to the purposes of the Green Belt. Therefore, development of this site is assessed as having a potentially major negative impact.

F.13.4.2 Landscape Sensitivity: Site 579 is considered by the Landscape Sensitivity Study to be within areas of ‘moderate’ landscape sensitivity. Therefore, development of this site has been assessed as having a potentially minor negative impact.

F.13.4.3 Landscape Character: Site 579 is located within the RCA ‘Mid Severn Sandstone Plateau’ and the LCT ‘Sandstone Estatelands’. The characteristic landscape features of this LCT are “*estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal*”. The proposed residential development at this site could potentially be discordant with the key characteristics of the associated LCT. Therefore, a minor negative impact on the local landscape character would be expected.

F.13.4.4 Views from the ProW Network: Site 579 coincides with a ProW. The proposed development at this site could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.

F.13.4.5 Urbanisation of the Countryside: Site 579 is located in the open countryside surrounding Penn and Lower Penn. The proposed development at this site would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

F.13.5 SA Objective 5 – Pollution & Waste

F.13.5.1 AQMA: Site 579 is within 200m of Wolverhampton AQMA. The proposed development at this site would be likely to locate some site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality would be expected.

F.13.5.2 Groundwater SPZ: Sites 579 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

F.13.6 SA Objective 6 – Natural Resources

F.13.6.1 Previously Developed Land: Site 579 comprises previously undeveloped land. The proposed development would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

F.13.6.2 ALC: Site 579 is situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire’s BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

F.13.7 SA Objective 7 – Housing

F.13.7.1 See **Appendix D**.

F.13.8 SA Objective 8 – Health & Wellbeing

- F.13.8.1 NHS Hospital:** The closest NHS hospital with an A&E department is New Cross Hospital, located approximately 7.4km north east of the cluster. Site 579 is located outside the target distance for this hospital. The proposed development at this site could potentially restrict the access of site end users to this essential healthcare facility. Therefore, a minor negative impact would be expected.
- F.13.8.2 GP Surgery:** The closest GP surgeries are Castlecroft Medical Centre, located to the north of the cluster, and Gravel Hill Surgery, located to the south. Site 579 is located outside the target distance of this GP surgery. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- F.13.8.3 Leisure Centre:** The closest leisure facility is Wombourne Leisure Centre, located approximately 4km south west of the cluster. Site 579 is located outside the target distance of this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected.
- F.13.8.4 AQMA:** Site 579 is located within 200m of Wolverhampton AQMA. The proposed development at this site could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.
- F.13.8.5 Main Road:** Site 579 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.13.8.6 Access to Public Greenspace:** Site 579 is located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.13.8.7 ProW/Cycle Network:** Site 579 is located within 600m of the ProW and cycle networks. The proposed development at this site would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.13.9 SA Objective 9 – Cultural Heritage

- F.13.9.1 Conservation Area:** Site 579 comprises a large area of undeveloped land, and is located approximately 300m from 'Lower Penn' Conservation Area. The proposed development at this site could potentially alter the setting of this Conservation Area and, as a result, have a minor negative impact on the historic environment.

F.13.10 SA Objective 10 – Transport & Accessibility

- F.13.10.1 Bus Stop:** Site 579 is located partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at this site could potentially have a minor negative impact on site end users' access to bus services.

- F.13.10.2 **Railway Station:** The closest railway station is St George's Metro Station, located approximately 5.4km to the north east of the cluster. Site 579 is located outside the target distance to this station. Therefore, the proposed development at this site would be likely to have a minor negative impact on site end users' access to rail services.
- F.13.10.3 **Pedestrian Access:** Site 579 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users' opportunities to travel by foot.
- F.13.10.4 **Road Access:** Site 579 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.13.10.5 **Local Services:** The nearest convenience stores include Lidl and Co-op, located approximately 2km east of the cluster and Tesco, located approximately 2km north east of the cluster. Site 579 is located wholly or partially outside the target distance to these convenience stores. The proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

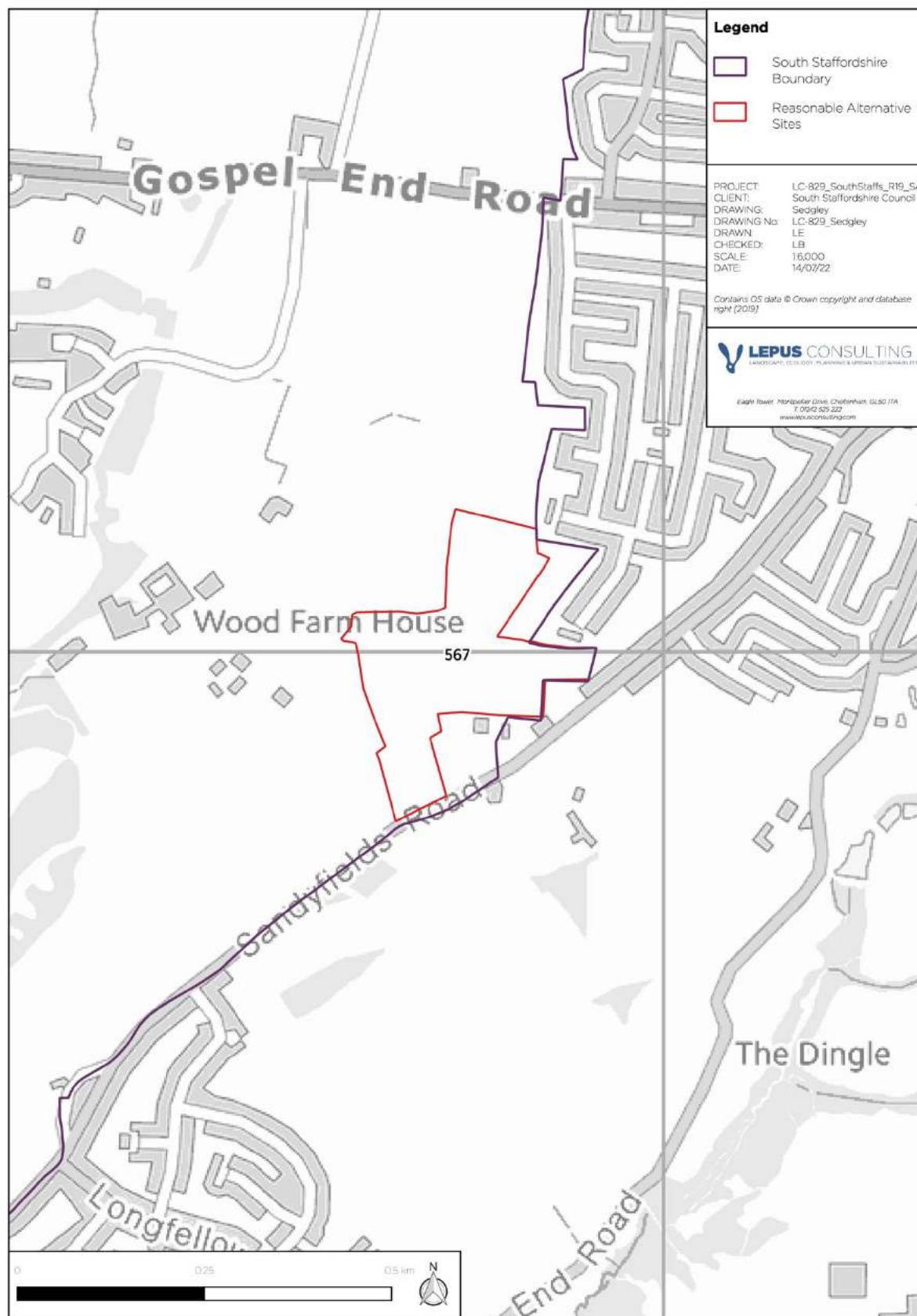
F.13.11 SA Objective 11 – Education

- F.13.11.1 **Primary School:** Penn and Lower Penn are served by several primary schools, including Bhylls Acre School, Castlecroft Primary School and Springdale Infant and Junior Schools. Site 579 is located wholly or partially outside the target distance to these primary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to primary education.
- F.13.11.2 **Secondary School:** Penn and Lower Penn are served by Highfields School. Site 579 is located within the target distance to this school. The proposed development at this site would be expected to situate new residents in locations with good access to secondary education, and therefore, a minor positive impact would be expected.

F.13.12 SA Objective 12 – Economy

- F.13.12.1 **Employment Floorspace:** Site 579 currently coincides with 'Westcroft Farm' and 'Westcroft Walkies' and is proposed for residential-led end use. The proposed residential development at this site could potentially result in the loss of this business, and consequently the employment opportunities it provides. Therefore, a major negative impact could be expected following the proposed development at this site.
- F.13.12.2 **Access to Employment:** Site 579 is located adjacent to an area with 'unreasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to employment.

F.14 Sedgley



Sedgley Cluster			
This cluster is located in the south east of the South Staffordshire District. See the Sedgley cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
567	Green Hill Farm Sandyfields	Residential-led	5.87

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
567	+/-	-	-	--	-	-	+	--	0	-	-	-

F.14.1 SA Objective 1 – Climate Change Mitigation

F.14.1.1 See **Appendix D**.

F.14.2 SA Objective 2 – Climate Change Adaptation

F.14.2.1 **Fluvial Flooding:** Site 567 is located within Flood Zone 1. A minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

F.14.2.2 **Surface Water Flooding:** A proportion of Site 567 coincides with areas determined to be at low risk of surface water flooding. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.14.3 SA Objective 3 – Biodiversity & Geodiversity

F.14.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.14.3.2 **LNR:** Site 567 is located approximately 340m from 'Baggeridge Country Park' LNR. The proposed development at this site could potentially have a minor negative impact on this LNR, due to an increased risk of disturbance.

F.14.4 SA Objective 4 – Landscape & Townscape

- F.14.4.1 Green Belt Harm:** The release of Green Belt land at Site 567 is considered by the Green Belt Study to result in ‘very high’ levels of harm to the purposes of the Green Belt. Therefore, development of this site is assessed as having a potentially major negative impact.
- F.14.4.2 Landscape Sensitivity:** Site 567 is considered by the Landscape Sensitivity Study to be within an area of ‘moderate-high’ landscape sensitivity. Development of this site has been assessed as having a potentially major negative impact.
- F.14.4.3 Country Park:** Site 567 is located within 600m of Baggeridge Country Park. The proposed development at this site could potentially have a minor negative impact on views from this Country Park.
- F.14.4.4 Landscape Character:** Site 567 is located within the RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Sandstone Hills and Heaths’. The characteristic landscape features of this LCT are “*small winding lanes; irregular hedged field pattern; stunted hedgerow oaks; [and] pronounced rounded landform*”. The proposed residential development at Site 567 could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character would be expected.
- F.14.4.5 Views from the ProW Network:** Site 567 is partially adjacent to a ProW. The proposed development at this site could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.
- F.14.4.6 Views for Local Residents:** The proposed development at Site 567 could potentially alter the views experienced by local residents, including those on Raglan Close. Therefore, a minor negative impact on the local landscape would be expected.
- F.14.4.7 Urbanisation of the Countryside:** Site 567 is located in the open countryside surrounding Sedgley. The proposed development at this site would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

F.14.5 SA Objective 5 – Pollution & Waste

- F.14.5.1 AQMA:** Site 567 is located within 200m of Dudley AQMA. The proposed development at this site would be likely to locate some site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality would be expected.

F.14.6 SA Objective 6 – Natural Resources

- F.14.6.1 Previously Developed Land:** Site 567 comprises previously undeveloped land. The proposed development would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

- F.14.6.2 **ALC:** Site 567 is partially situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

F.14.7 SA Objective 7 – Housing

- F.14.7.1 See **Appendix D**.

F.14.8 SA Objective 8 – Health & Wellbeing

- F.14.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the south east of the cluster. Site 567 is located within the target distance to this hospital. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to this essential health facility.
- F.14.8.2 **GP Surgery:** The closest GP surgeries to this cluster are Northway Medical Centre and Lower Gornal Medical Practice, located to the east of the cluster. Site 567 is located outside the target distance to these GP surgeries. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- F.14.8.3 **Leisure Centre:** The closest leisure facility is Wombourne Leisure Centre, located approximately 4km west of the cluster. Site 567 is located outside the target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected.
- F.14.8.4 **AQMA:** Site 567 is located within 200m Dudley AQMA. The proposed development at this site could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.
- F.14.8.5 **Main Road:** Site 567 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.14.8.6 **Access to Public Greenspace:** Site 567 is located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.14.8.7 **ProW/Cycle Network:** Site 567 is located within 600m of the ProW network. The proposed development at this site would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.14.9 SA Objective 9 – Cultural Heritage

- F.14.9.1 **Historic Environment:** Site 567 is not located in close proximity to any identified heritage assets. Therefore, the proposed development at this site would be expected to have a negligible impact on cultural heritage.

F.14.10 SA Objective 10 – Transport & Accessibility

- F.14.10.1 **Bus Stop:** Site 567 is located within the target distance to bus stops on Sandyfields Road, providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users' access to bus services.
- F.14.10.2 **Railway Station:** The closest railway station is Coseley Railway Station, located approximately 4.5km to the east of the cluster. Site 567 is located outside the target distance to this railway station. Therefore, the proposed development at this site would be likely to have a minor negative impact on site end users' access to rail services.
- F.14.10.3 **Pedestrian Access:** Site 567 currently has poor access to the surrounding footpath network. The proposed development at this site could potentially have a minor negative impact on local accessibility.
- F.14.10.4 **Road Access:** Site 567 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.14.10.5 **Local Services:** The nearest convenience stores include Londis, located approximately 800m east of the cluster, and Co-op, located approximately 2km north east of the cluster. Site 567 is located outside the target distance to these convenience stores. The proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

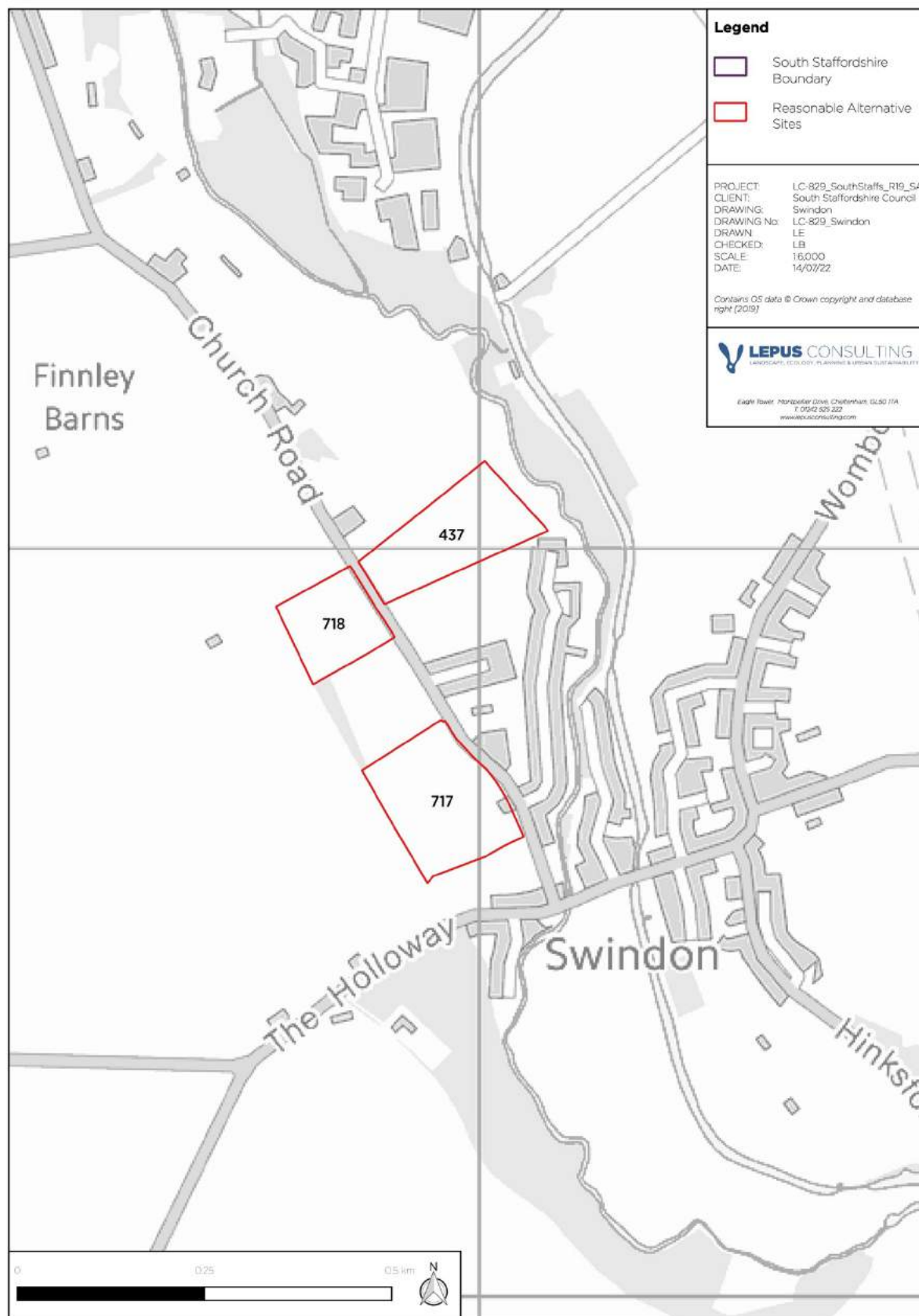
F.14.11 SA Objective 11 – Education

- F.14.11.1 **Primary School:** Sedgley is served by several primary schools, including Alder Coppice Primary School, Cotwall End Primary School and Straits Primary School. A large proportion of Site 567 is located outside the target distance to these primary schools, and therefore, the proposed development at this site could potentially have a minor negative impact on the access of new residents to primary education.
- F.14.11.2 **Secondary School:** The closest secondary schools to the Sedgley cluster include Ellowes Hall Sports College, The Dormston School and Colton Hills Community School. Site 567 is located within the target distance to these secondary schools. The proposed development at this site would be expected to situate new residents in locations with good access to secondary education, and therefore, a minor positive impact would be expected.

F.14.12 SA Objective 12 – Economy

- F.14.12.1 **Access to Employment:** Site 567 is located in an area with 'unreasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to employment.

F.15 Swindon



Swindon Cluster			
This cluster is located in the south east of the South Staffordshire District. See the Swindon cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
437	Land at Church Road	Residential-led	2.14
717	Land west of Church Road	Residential-led	2.56
718	Land west of Church Road 2	Residential-led	1.36

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
437	+/-	-	+/-	--	-	-	+	-	-	-	-	-
717	+/-	-	+/-	--	-	-	+	-	-	-	-	-
718	+/-	-	+/-	--	-	-	+	-	-	-	-	-

F.15.1 SA Objective 1 – Climate Change Mitigation

F.15.1.1 See **Appendix D**.

F.15.2 SA Objective 2 – Climate Change Adaptation

F.15.2.1 **Fluvial Flooding:** Site 437 is located partially within Flood Zone 2. The proposed development at this site could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a minor negative impact would be expected. Sites 717 and 718 are located wholly within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.

F.15.2.2 **Surface Water Flooding:** A proportion of Sites 437, 717 and 718 coincide with areas determined to be at low risk of surface water flooding. The proposed development at these three sites would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.15.3 SA Objective 3 – Biodiversity & Geodiversity

F.15.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.15.4 SA Objective 4 – Landscape & Townscape

- F.15.4.1 **Green Belt Harm:** The release of Green Belt land at Sites 717 and 718 is considered by the Green Belt Study to result in 'high' levels of harm to the purposes of the Green Belt. Development of Site 437 could cause 'moderate to high' levels of harm to the purposes of the Green Belt. Therefore, development of these three sites is assessed as having a potentially major negative impact.
- F.15.4.2 **Landscape Sensitivity:** Sites 437, 717 and 718 are considered by the Landscape Sensitivity Study to be within areas of 'low-moderate' landscape sensitivity. Therefore, development of these three sites have been assessed as having a potentially minor negative impact.
- F.15.4.3 **Landscape Character:** All sites in this cluster are located within the RCA 'Mid Severn Sandstone Plateau' and the LCT 'Sandstone Estatelands'. The characteristic landscape features of this LCT are "*estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal*". The proposed residential development at Sites 437, 717 and 718 could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character would be expected at these three sites.
- F.15.4.4 **Views for Local Residents:** The proposed development at Sites 473, 717 and 718 could potentially alter the views experienced by local residents, including those on Church Road and Baldwin Way. Therefore, a minor negative impact on the local landscape would be expected.
- F.15.4.5 **Urbanisation of the Countryside:** Sites 437, 717 and 718 are located in the countryside surrounding Swindon. The proposed development at these three sites would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

F.15.5 SA Objective 5 – Pollution & Waste

- F.15.5.1 **Groundwater SPZ:** Sites 437, 717 and 718 coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these three sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.
- F.15.5.2 **Watercourse:** The majority of Sites 437 and 717 are located within 200m of Smestow Brook. The proposed development at these two sites could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

F.15.6 SA Objective 6 – Natural Resources

- F.15.6.1 **Previously Developed Land:** Sites 437, 717 and 718 comprise previously undeveloped land. The proposed development at these three sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- F.15.6.2 **ALC:** Site 437 is situated on ALC Grades 2 and 3 land. Sites 717 and 718 are situated on Grade 3 land. Grade 2, and potentially Grade 3, are considered to be some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these three sites, due to the loss of this agriculturally important natural resource.

F.15.7 SA Objective 7 – Housing

- F.15.7.1 See **Appendix D**.

F.15.8 SA Objective 8 – Health & Wellbeing

- F.15.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is Russells Hall Hospital, located approximately 6.3km east of the cluster. Sites 437, 717 and 718 are located outside the target distance to this hospital. Therefore, the proposed development at these three sites could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.
- F.15.8.2 **GP Surgery:** The closest GP surgery is Dale Medical Practice, located approximately 2.6km north east of the cluster. Sites 437, 717 and 718 are located outside the target distance to this GP surgery. The proposed development at these three sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- F.15.8.3 **Leisure Centre:** The closest leisure facility is Wombourne Leisure Centre, located approximately 2.8km north of the cluster. Sites 437, 717 and 718 are located outside the target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected.
- F.15.8.4 **AQMA:** Sites 437, 717 and 718 are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- F.15.8.5 **Main Road:** Sites 437, 717 and 718 are located over 200m from a main road, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- F.15.8.6 **Access to Public Greenspace:** Sites 437, 717 and 718 are located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at these three sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

- F.15.8.7 **ProW/Cycle Network:** Sites 437, 717 and 718 are located within 600m of the ProW and cycle networks. The proposed development at these three sites would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.15.9 SA Objective 9 – Cultural Heritage

- F.15.9.1 **Scheduled Monument:** Site 717 is located approximately 130m and Site 718 is located approximately 290m from ‘Roman camp 600 yards (550m) WSW of Swindon iron works’ SM. The proposed development at these sites could potentially have a minor negative impact on the setting of this SM.
- F.15.9.2 **Archaeology:** Site 437 is located adjacent to ‘Site of mill pond, Swindon’. The proposed development at this site could potentially alter the significance of this archaeological feature, and as such, have a minor negative impact on the historic environment.
- F.15.9.3 **Historic Character:** Sites 437, 717 and 718 are located within an area of ‘medium’ historic value. The proposed development at these three sites could potentially have a minor negative impact on historic character.

F.15.10 SA Objective 10 – Transport & Accessibility

- F.15.10.1 **Bus Stop:** Sites 437, 717 and 718 are located wholly or partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these three sites could potentially have a minor negative impact on site end users’ access to bus services.
- F.15.10.2 **Railway Station:** The closest railway station is Stourbridge Town Railway Station, located approximately 7.7km to the south east of the cluster. Sites 437, 717 and 718 are outside the target distance to this railway station. Therefore, the proposed development at these three sites would be likely to have a minor negative impact on site end users’ access to rail services.
- F.15.10.3 **Pedestrian Access:** Sites 437, 717 and 718 currently have poor access to the surrounding footpath network. The proposed development at these three sites could potentially have a minor negative impact on local accessibility by foot.
- F.15.10.4 **Road Access:** Sites 437, 717 and 718 are well connected to the existing road network. The proposed development at these three sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.15.10.5 **Local Services:** The nearest local services include Swindon Post Office, Londis and Sainsburys. Sites 437, 717 and 718 are located within the target distance to one or more of these services. Therefore, the proposed development at these three sites would be expected to have a minor positive impact on site end users’ access to local services.

F.15.11 SA Objective 11 – Education

- F.15.11.1 **Primary School:** Swindon is served by St John’s C of E Primary School. Sites 437, 717 and 718 are located within the target distance to this primary school. The proposed development

at these three sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected.

- F.15.11.2 **Secondary School:** The closest secondary school to Swindon is Ounsdale High School, located approximately 2.8km north of the cluster. Sites 437, 717 and 718 are located outside the target distance to this secondary school, and therefore, the proposed development at these three sites would be expected to have a minor negative impact on the access of new residents to secondary education.

F.15.12 SA Objective 12 – Economy

- F.15.12.1 **Access to Employment:** Sites 437, 717 and 718 are located in or adjacent to areas with ‘unreasonable’ sustainable access to employment opportunities, and therefore, the proposed development at these three sites would be expected to have a minor negative impact on site end users’ access to employment.

F.16 Wall Heath



Wall Heath Cluster			
This cluster is located towards the south east of the South Staffordshire District. See the Wall Heath cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
370	Land off Enville Road	Residential-led	8.77

Site Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
370	+/-	--	-	--	-	-	+	-	-	-	--	-

F.16.1 SA Objective 1 – Climate Change Mitigation

F.16.1.1 See **Appendix D**.

F.16.2 SA Objective 2 – Climate Change Adaptation

F.16.2.1 **Fluvial Flooding:** Site 370 is located within Flood Zones 2 and 3. The proposed development at this site could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a minor negative impact would be expected.

F.16.2.2 **Surface Water Flooding:** Site 370 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.16.3 SA Objective 3 – Biodiversity & Geodiversity

F.16.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.16.3.2 **Priority Habitat:** Site 370 coincides with deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

F.16.4 SA Objective 4 – Landscape & Townscape

F.16.4.1 **Green Belt Harm:** The release of Green Belt land at Site 370 is considered by the Green Belt Study to result in 'high' levels of harm to the purposes of the Green Belt. Therefore, development of this site is assessed as having a potentially major negative impact.

- F.16.4.2 **Landscape Sensitivity:** Site 370 is considered by the Landscape Sensitivity Study to be within an area of ‘low-moderate’ landscape sensitivity. Therefore, development of this site has been assessed as having a potentially minor negative impact.
- F.16.4.3 **Landscape Character:** Site 370 is located within the RCA ‘Mid Severn Sandstone Plateau’ and the LCT ‘Sandstone Estatelands’. The characteristic landscape features of this LCT are “*estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal*”. The proposed residential development at Site 370 could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character would be expected.
- F.16.4.4 **Views from the ProW Network:** Site 370 coincides with a ProW. The proposed development at this site could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.
- F.16.4.5 **Views for Local Residents:** The proposed development Site 370 could potentially alter the views experienced by local residents, including those on Enville Road. Therefore, a minor negative impact on the local landscape would be expected.
- F.16.4.6 **Urbanisation of the Countryside:** Site 370 is located in the open countryside surrounding Wall Heath. The proposed development at this site would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

F.16.5 SA Objective 5 – Pollution & Waste

- F.16.5.1 **AQMA:** Site 370 is located within 200m of Dudley AQMA. The proposed development at this site would be likely to locate some site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality would be expected.
- F.16.5.2 **Groundwater SPZ:** Site 370 coincides partially with the outer zone (Zone II) and the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.
- F.16.5.3 **Watercourse:** Site 370 is located adjacent to a watercourse. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

F.16.6 SA Objective 6 – Natural Resources

- F.16.6.1 **Previously Developed Land:** Site 370 comprises previously undeveloped land, on the former Enville Road Quarry site which has been restored to greenfield. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

- F.16.6.2 **ALC:** Site 370 is situated wholly or partially on ALC Grades 2 and/or 3 land. Grade 2, and potentially Grade 3, are considered to be some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this agriculturally important natural resource.

F.16.7 SA Objective 7 – Housing

- F.16.7.1 See **Appendix D**.

F.16.8 SA Objective 8 – Health & Wellbeing

- F.16.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the east of the cluster. Site 370 is located within the target distance to this hospital. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to this essential health facility.
- F.16.8.2 **GP Surgery:** The closest GP surgery is Dale Medical Practice, located approximately 3.5km north of the cluster. The proposed development at Site 370 would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- F.16.8.3 **Leisure Centre:** The closest leisure facility is Wombourne Leisure Centre, located approximately 4km north of the cluster. Site 370 is located outside the target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected.
- F.16.8.4 **AQMA:** Site 370 is located within 200m of Dudley AQMA. The proposed development at this site could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.
- F.16.8.5 **Main Road:** Site 370 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.16.8.6 **Access to Public Greenspace:** Site 370 is located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.16.8.7 **ProW/Cycle Network:** Site 370 is located within 600m of the ProW network and partially within 600m of a cycle path. The proposed development at this site would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.16.9 SA Objective 9 – Cultural Heritage

- F.16.9.1 **Archaeology:** Site 370 coincides with the archaeological feature ‘Spindle Whorls, Kinver’. The proposed development at this site could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.

F.16.10 SA Objective 10 – Transport & Accessibility

- F.16.10.1 **Bus Stop:** Site 370 is located within the target distance to bus stops on Enville Road and Swindon Road, providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users’ access to bus services.
- F.16.10.2 **Railway Station:** The closest railway station is Stourbridge Town Railway Station, located approximately 6.9km to the south east of the cluster. Site 370 is located outside the target distance to this railway station. Therefore, the proposed development at this site would be likely to have a minor negative impact on site end users’ access to rail services.
- F.16.10.3 **Pedestrian Access:** Site 370 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users’ opportunities to travel by foot.
- F.16.10.4 **Road Access:** Site 370 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.16.10.5 **Local Services:** The nearest convenience store is Co-op, located approximately 1km south east of the cluster. The majority of Site 370 is located outside the target distance to this convenience store. The proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

F.16.11 SA Objective 11 – Education

- F.16.11.1 **Primary School:** Wall Heath is served by several primary schools, including Maidensbridge Primary School and Church of the Ascension C of E Primary School. Site 370 is located wholly or partially outside the target distance to these primary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to primary education.
- F.16.11.2 **Secondary School:** The closest secondary school to Wall Heath is Kingswinford School, located approximately 2.2km south east of the cluster. Site 370 is located outside the target distance to this secondary school, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to secondary education.
- F.16.11.3 The proposed development at Site 370 would be expected to have a major negative impact on new residents’ access to both primary and secondary education.

F.16.12 SA Objective 12 – Economy

- F.16.12.1 **Access to Employment:** Site 370 is located in an area with ‘unreasonable’ sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users’ access to employment.

F.17 Wheaton Aston



Wheaton Aston Cluster			
This cluster is located in the north west of the South Staffordshire District. See the Wheaton Aston cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
378a	Land off Broadholes Lane	Residential-led	0.93
379	Land off Back Lane/Ivetsey Close	Residential-led	2.09

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
378a	+/-	-	-	--	0	-	+	-	-	-	-	-
379	+/-	--	-	-	0	-	+	-	-	-	-	-

F.17.1 SA Objective 1 – Climate Change Mitigation

F.17.1.1 See **Appendix D**.

F.17.2 SA Objective 2 – Climate Change Adaptation

F.17.2.1 **Fluvial Flooding:** Sites 378a and 379 are located wholly within Flood Zone 1. A minor positive impact would be expected at these two sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.

F.17.2.2 **Surface Water Flooding:** A proportion of Site 379 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.17.2.3 A proportion of Site 378a coincides with areas determined to be at low risk of surface water flooding. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.17.3 SA Objective 3 – Biodiversity & Geodiversity

F.17.3.1 **Habitats Sites:** Site 378a is located within 14km of 'Cannock Chase' SAC. A minor negative impact would be expected as a result of the proposed development at this site, due to the increased risk of development-related threats and pressures on this Habitats site.

F.17.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.17.3.3 **SSSI IRZ:** ‘Motte Meadows’ SSSI is located approximately 550m north west of the cluster, and ‘Belvide Reservoir’ SSSI is located approximately 1.7km to the south east. Both sites are located within an IRZ which states that “*Any residential development of 50 or more houses outside existing settlements/urban areas*” should be consulted on with Natural England. Therefore, the proposed development at Sites 378a and 379 could potentially have a minor negative impact on the features for which these SSSIs have been designated.

F.17.3.4 **NNR:** Sites 378a and 379 are located less than 1.5km east of ‘Motte Meadows’ NNR. A minor negative impact would be expected as a result of the proposed development at these two sites, due to the increased risk of development-related threats and pressures on this NNR.

F.17.4 SA Objective 4 – Landscape & Townscape

F.17.4.1 **Landscape Sensitivity:** Site 378a is considered by the Landscape Sensitivity Study to be within areas of ‘moderate-high’ landscape sensitivity. Development of this site has been assessed as having a potentially major negative impact.

F.17.4.2 Site 379 is considered by the Landscape Sensitivity Study to be within areas of ‘moderate’ landscape sensitivity. Development of this site has been assessed as having a potentially minor negative impact.

F.17.4.3 **Landscape Character:** Both sites in this cluster are located within the RCA ‘Staffordshire Plain’ and the LCT ‘Ancient Clay Farmlands’. The characteristic landscape features of this LCT include “*mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern*”. The proposed residential development at these two sites could potentially be discordant with the key characteristics of this LCT. Therefore, a minor negative impact on the local landscape character would be expected.

F.17.4.4 **Views from the ProW Network:** Sites 378a coincides with and 379 is adjacent to a ProW. The proposed development at these two sites could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.

F.17.4.5 **Views for Local Residents:** The proposed development at Site 378a could potentially alter the views experienced by local residents, including those on Badgers End. Therefore, a minor negative impact on the local landscape would be expected at this site.

F.17.4.6 **Urbanisation of the Countryside:** Sites 378a and 379 are located in the open countryside surrounding Wheaton Aston. The proposed development at these two sites would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.

F.17.5 SA Objective 5 – Pollution & Waste

- F.17.5.1 **Pollution:** Sites 378a and 379 are located over 200m from AQMAs, main roads, railway lines, groundwater SPZs and watercourses. Therefore, at this stage of assessment, a negligible impact would be expected at these three sites under the pollution objective.

F.17.6 SA Objective 6 – Natural Resources

- F.17.6.1 **Previously Developed Land:** Sites 378a and 379 comprise previously undeveloped land. The proposed development at these two sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- F.17.6.2 **ALC:** Sites 378a and 379 are situated on ALC Grade 3 land, which could potentially represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these two sites, due to the loss of this agriculturally important natural resource.

F.17.7 SA Objective 7 – Housing

- F.17.7.1 See **Appendix D**.

F.17.8 SA Objective 8 – Health & Wellbeing

- F.17.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is County Hospital, located approximately 14km north east of the cluster. The proposed development at Sites 378a and 379 could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.
- F.17.8.2 **GP Surgery:** The closest GP surgery is Wheaton Aston Surgery, located towards the centre of the cluster. Sites 378a and 379 are located within the target distance to this GP surgery. The proposed development at the two sites in this cluster would be expected to have a minor positive impact on the access of site end users to GP surgeries.
- F.17.8.3 **Leisure Centre:** The closest leisure facility is Penkridge Leisure Centre, located approximately 9km north east of the cluster. Sites 378a and 379 are located outside the target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected.
- F.17.8.4 **AQMA:** Both sites are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- F.17.8.5 **Main Road:** Sites 378a and 379 are located over 200m from a main road. The proposed development at these two sites would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.17.8.6 **Access to Public Greenspace:** Sites 378a and 379 are located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at these two sites, as the proposed development would be likely to provide site end users with good access to outdoor

space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

- F.17.8.7 **ProW/Cycle Network:** Sites 378a and 379 are located within 600m of the ProW network. The proposed development at these two sites would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.17.9 SA Objective 9 – Cultural Heritage

- F.17.9.1 **Archaeology:** Sites 378a and 379 coincide with ‘Ridge and Furrow, West of Wheaton Aston’. The proposed development at these two sites could potentially alter the significance of this archaeological feature, and as such, have a minor negative impact on the historic environment.

- F.17.9.2 **Historic Character:** Sites 378a and 379 are located within an area of ‘high’ historic value. The proposed development at these two sites could potentially have a minor negative impact on historic character.

F.17.10 SA Objective 10 – Transport & Accessibility

- F.17.10.1 **Bus Stop:** Site 379 is located within the target distance to bus stops on the High Street providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users’ access to bus services. Site 378a is located outside the target distance to a bus stop providing regular services. Therefore, the proposed development at this site could potentially have a minor negative impact on site end users’ access to bus services.

- F.17.10.2 **Railway Station:** The closest railway station is Penkridge Railway Station, located approximately 6.9km to the north east of the cluster. Sites 378a and 379 are located outside the target distance to this railway station. Therefore, the proposed development at these sites would be likely to have a minor negative impact on site end users’ access to rail services.

- F.17.10.3 **Pedestrian Access:** Site 379 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users’ opportunities to travel by foot. Site 378a currently has poor access to the surrounding footpath network. The proposed development at this site could potentially have a minor negative impact on local accessibility.

- F.17.10.4 **Road Access:** Sites 378a and 379 are well connected to the existing road network. The proposed development at these two sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

- F.17.10.5 **Local Services:** The nearest convenience store is SPAR. Sites 378a and 379 are located within the target distance to this convenience store. Therefore, the proposed development at these two sites would be expected to have a minor positive impact on site end users’ access to local services.

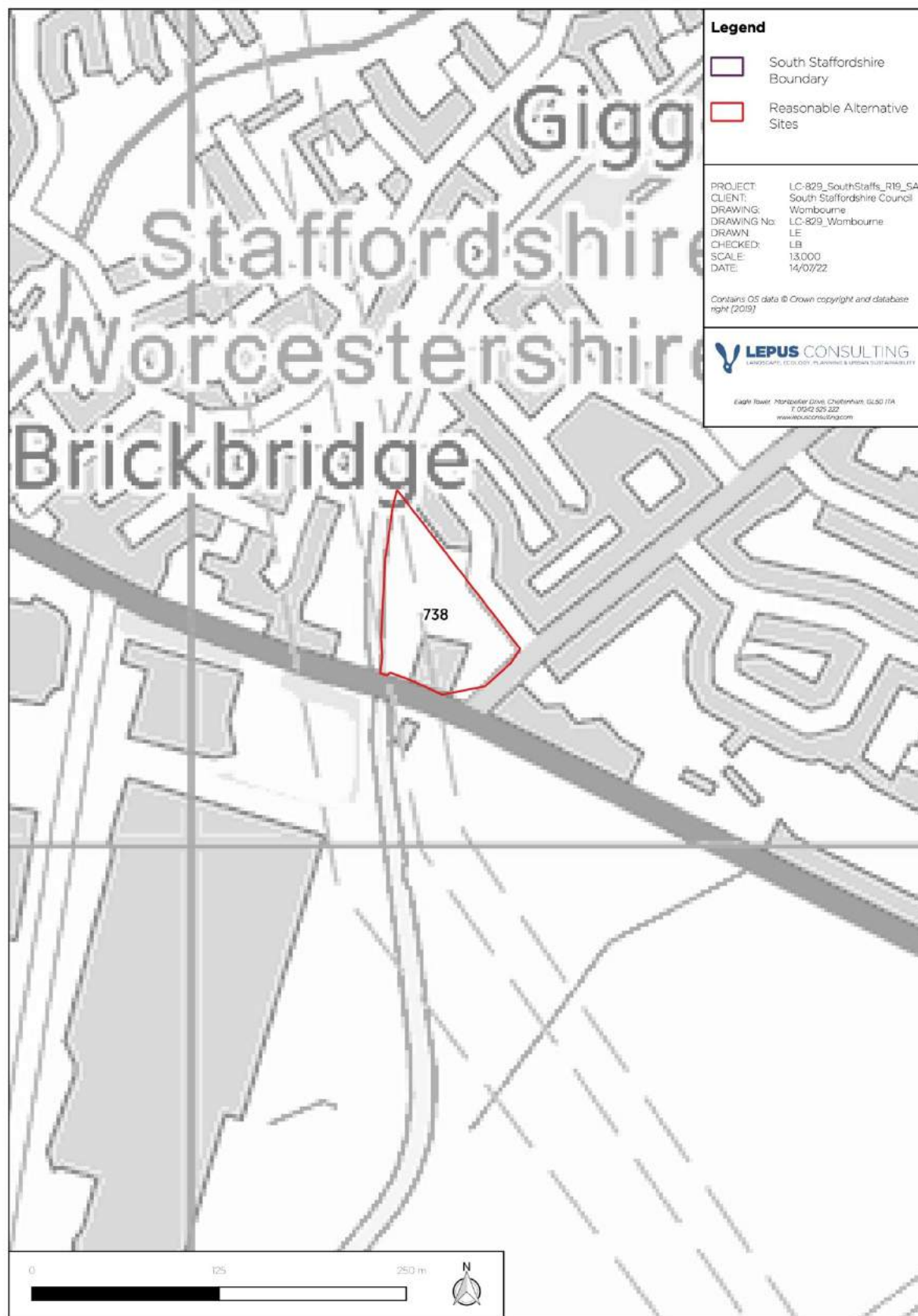
F.17.11 SA Objective 11 – Education

- F.17.11.1 **Primary School:** Wheaton Aston is served by St Mary's C of E First School and Nursery. Although both sites are located within the target distance to this school, the school only provides education for children up to age 9. Therefore, the proposed development at these two sites would be expected to have a minor negative impact on the access of new residents to primary education.
- F.17.11.2 **Secondary School:** The closest non-selective secondary school to Wheaton Aston is Wolgarston High School, located approximately 8.5km north east of the cluster. Sites 378a and 379 are located outside the target distance to this secondary school, and therefore, the proposed development at these two sites would be expected to have a minor negative impact on the access of new residents to secondary education.

F.17.12 SA Objective 12 – Economy

- F.17.12.1 **Access to Employment:** Sites 378a and 379 are located in or adjacent to areas with 'poor' sustainable access to employment opportunities, and therefore, the proposed development at these two sites would be expected to have a minor negative impact on site end users' access to employment.

F.18 Wombourne



Wombourne Cluster			
This cluster is located towards the south east of the South Staffordshire District. See the Wombourne cluster map for locations of each site.			
Site Reference	Site Address	Site use	Area (ha)
738	Wagon and Horses Public House	Residential-led	0.72

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
738	+/-	-	+/-	-	-	-	+	-	-	-	-	--

F.18.1 SA Objective 1 – Climate Change Mitigation

F.18.1.1 See **Appendix D**.

F.18.2 SA Objective 2 – Climate Change Adaptation

F.18.2.1 **Fluvial Flooding:** Site 738 is located wholly within Flood Zone 1. A minor positive impact would be expected at this site, as the proposed development at this location would be likely to locate site end users away from areas at risk of fluvial flooding.

F.18.2.2 **Surface Water Flooding:** A proportion of Site 738 coincides with areas determined to be at 'low' and 'medium' risk of surface water flooding. The proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.18.3 SA Objective 3 – Biodiversity & Geodiversity

F.18.3.1 **Habitats Sites:** At the time of writing the potential impact of development on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.18.4 SA Objective 4 – Landscape & Townscape

F.18.4.1 **Landscape Sensitivity:** Site 738 was not assessed in the Landscape Sensitivity Study. Development of this site is likely to have a negligible impact.

F.18.4.2 **Landscape Character:** Site 738 is located in an urban area outside the scope of the character assessment, and as such, the proposed development at this site would be expected to have a negligible impact on the characteristics identified in the published landscape character assessment.

- F.18.4.3 **Views for Local Residents:** The proposed development at Site 738 could potentially alter the views experienced by local residents, including those on Brickbridge Lane, Canal Walk and Waterdale. Therefore, a minor negative impact on the local landscape would be expected.

F.18.5 SA Objective 5 – Pollution & Waste

- F.18.5.1 **Groundwater SPZ:** Site 738 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

- F.18.5.2 **Watercourse:** Site 738 is located within 200m of the Staffordshire and Worcestershire Canal. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

F.18.6 SA Objective 6 – Natural Resources

- F.18.6.1 **Previously Developed Land:** Site 738 comprises partially undeveloped land. The proposed development at this site would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

- F.18.6.2 **ALC:** Site 738 is situated on ‘urban’ land. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.

F.18.7 SA Objective 7 – Housing

- F.18.7.1 See **Appendix D**.

F.18.8 SA Objective 8 – Health & Wellbeing

- F.18.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department is Russells Hall Hospital, located approximately 6.5km from Site 738, outside the target distance. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.

- F.18.8.2 **GP Surgery:** The closest GP surgeries are Dale Medical Centre and Gravel Hill Surgery, both located towards the centre of the cluster. Site 738 is located wholly or partially outside the target distance to these GP surgeries. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to GP surgeries.

- F.18.8.3 **Leisure Centre:** The closest leisure facility is Wombourne Leisure Centre, located in the centre of the cluster. Site 738 is located within the target distance to this leisure centre. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to this facility.

- F.18.8.4 **AQMA:** Site 738 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- F.18.8.5 **Main Road:** Site 738 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.18.8.6 **Access to Public Greenspace:** Site 738 is located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.
- F.18.8.7 **ProW/Cycle Network:** Site 738 is located within 600m of the ProW and cycle networks. The proposed development this site would be likely to provide site end users with good pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.18.9 SA Objective 9 – Cultural Heritage

- F.18.9.1 **Archaeology:** Site 738 coincides with the archaeological feature ‘Wagon and Horses, Wombourne’ and is adjacent to the archaeological feature ‘Staffordshire and Worcestershire Canal and Bridge’. The proposed development at this site could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.
- F.18.9.2 **Historic Character:** Site 738 is located within an area of ‘high’ historic value. The proposed development at this site could potentially have a minor negative impact on historic character.

F.18.10 SA Objective 10 – Transport & Accessibility

- F.18.10.1 **Bus Stop:** Site 738 is located within the target distance to bus stops on Brickbridge Lane providing regular services. The proposed development at this site would be likely to have a minor positive impact on site end users’ access to bus services.
- F.18.10.2 **Railway Station:** The closest railway station is St George’s Metro Station, located in the north east of the cluster. Site 738 is located outside of the target distance to this station. Therefore, the proposed development at this site would be likely to have a minor negative impact on site end users’ access to rail services.
- F.18.10.3 **Pedestrian Access:** Site 738 is well connected to the existing footpath network. The proposed development at this site would be expected to have a minor positive impact on site end users’ opportunities to travel by foot.
- F.18.10.4 **Road Access:** Site 738 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- F.18.10.5 **Local Services:** The nearest convenience stores include Costcutter, Sainsbury’s and Co-op. Site 738 is located within the target distance to Sainsbury’s. Therefore, the proposed

development at this site would be expected to have a minor positive impact on site end users' access to local services.

F.18.11 SA Objective 11 – Education

F.18.11.1 Primary School: Wombourne is served by several primary schools, including Blakely Heath Primary School, Westfield Community Primary School, St John's C of E Primary School, St Bernadettes Catholic School and St Benedicts Biscop C of E Primary School. Site 738 is located wholly or partially outside the target distance to primary schools, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of new residents to primary education.

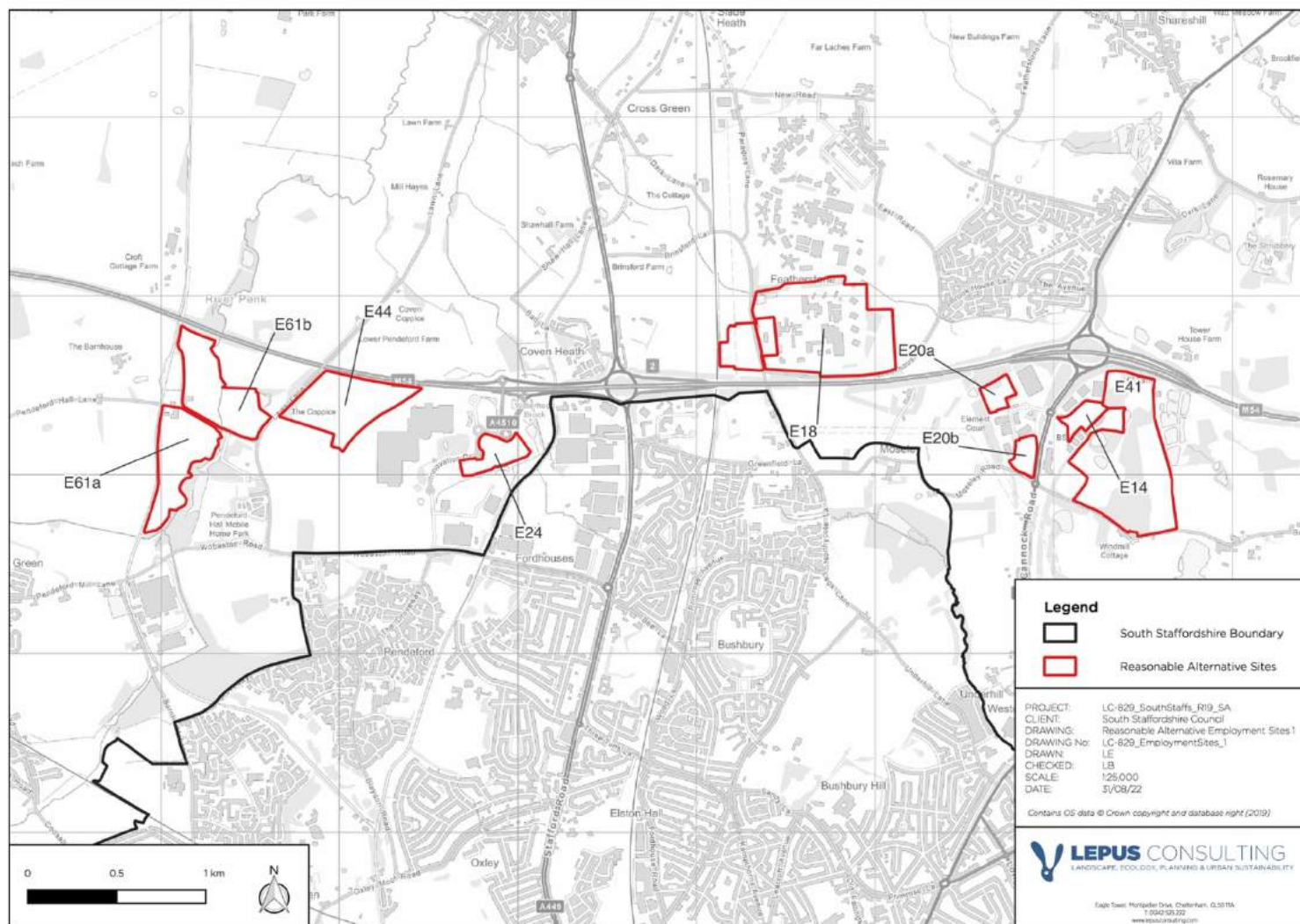
F.18.11.2 Secondary School: Wombourne is served by Ounsdale High School. Site 738 is located within the target distance to this secondary school. The proposed development at this site would be expected to provide new residents with good access to secondary education, and therefore, a minor positive impact would be expected.

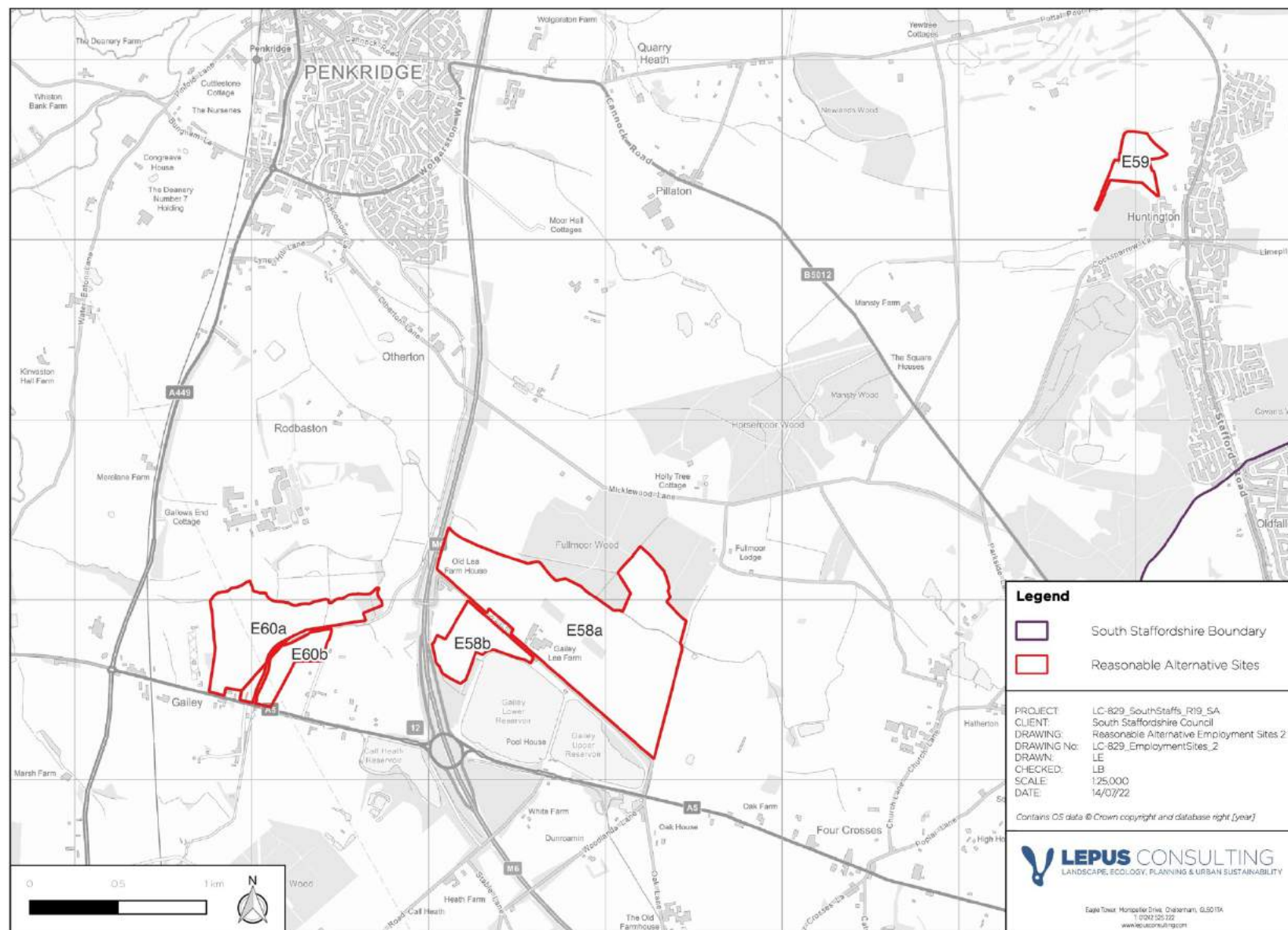
F.18.12 SA Objective 12 – Economy

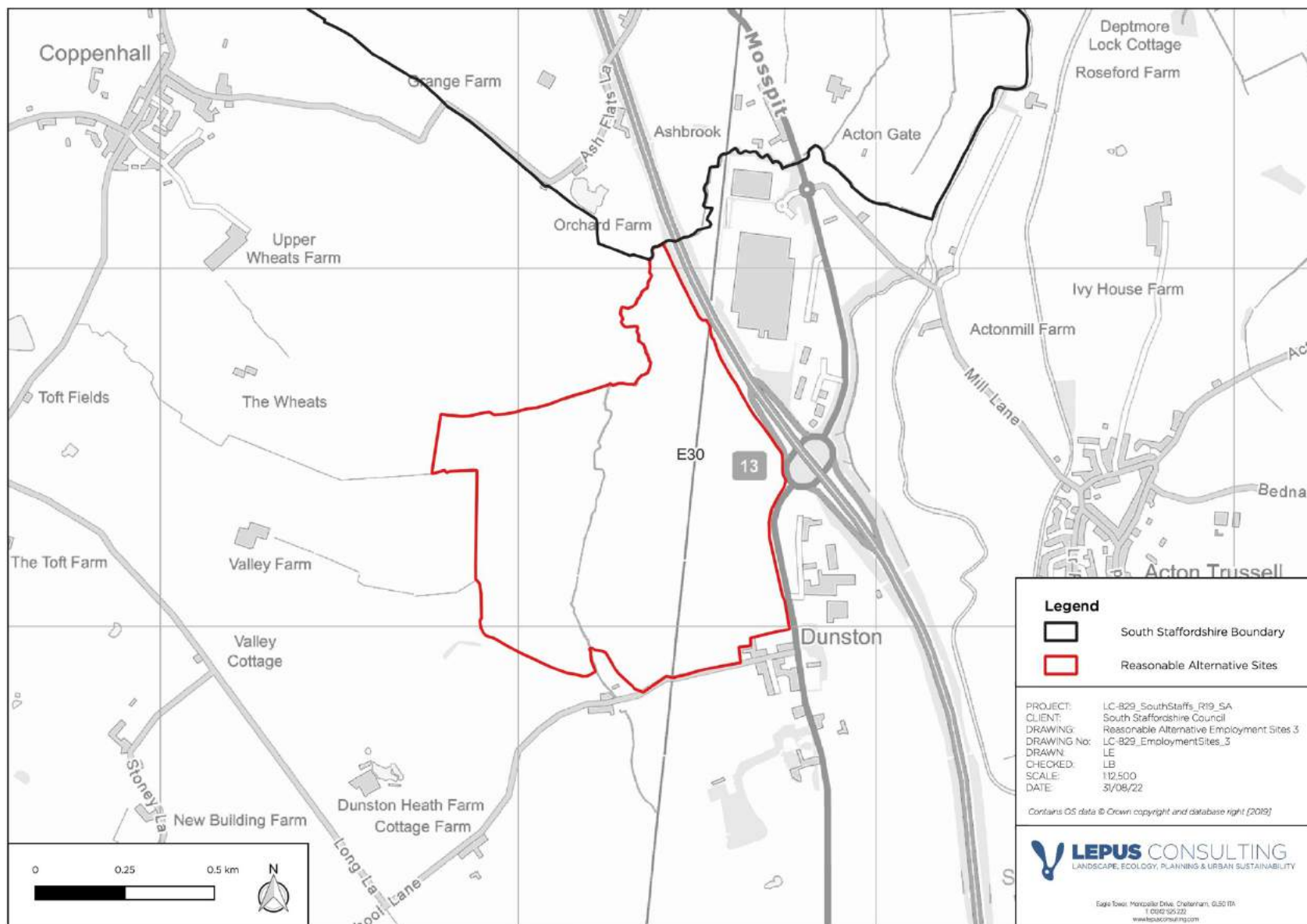
F.18.12.1 Employment Floorspace: Site 738 currently coincides with 'Waggon and Horses' public house. The proposed residential development at this site could potentially result in the loss of this business, and consequently the employment opportunities it provides. Therefore, a major negative impact could be expected following the proposed development at this site.

F.18.12.2 Access to Employment: Site 738 is located adjacent to an area with 'unreasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to employment.

F.19 Employment Sites







Employment Sites

See the Employment Sites maps for locations of each site.

Site Reference	Site Address	Site use	Area (ha)
E14	Vernon Park	Employment-led	2.73
E18	ROF Featherstone	Employment-led	39.08
E20a	Hilton Cross Business Park 1	Employment-led	2.50
E20b	Hilton Cross Business Park 2	Employment-led	2.49
E24	Land available within i54	Employment-led	4.87
E30	Land south of Junction 13 (M6)	Employment-led	70.36
E41	Land north of Bognop Road	Employment-led	33.56
E44	i54 Western extension	Employment-led	16.55
E58a	Gailey Lea Farm A	Employment-led	76.43
E58b	Gailey Lea Farm B	Employment-led	10.89
E59	Cocksparrow Lane A	Employment-led	6.58
E60a	Land north of A5 parcel A	Employment-led	27.81
E60b	Land north of A5 parcel B	Employment-led	6.75
E61a	Land at Pendeford Mill Lane A	Employment-led	14.04
E61b	Land at Pendeford Mill Lane B	Employment-led	15.44

Site Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
E14	+/-	-	-	0	-	-	0	-	-	-	0	++
E18	+/-	--	-	-	-	-	0	-	-	-	0	++
E20a	+/-	-	-	-	-	-	0	-	0	-	0	++
E20b	+/-	+	-	-	-	-	0	-	-	-	0	++
E24	+/-	--	-	-	-	-	0	-	0	-	0	++
E30	+/-	--	-	-	-	-	0	-	-	-	0	++
E41	+/-	--	-	--	-	-	0	-	-	-	0	++
E44	+/-	--	-	-	-	-	0	-	-	-	0	++
E58a	+/-	--	-	-	-	-	0	-	-	-	0	++
E58b	+/-	-	-	-	-	-	0	-	-	-	0	++
E59	+/-	--	-	--	0	-	0	-	-	-	0	++
E60a	+/-	--	-	--	-	-	0	-	-	-	0	++
E60b	+/-	--	-	--	-	-	0	-	-	-	0	++

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
E61a	+/-	--	-	--	-	-	0	-	-	-	0	++
E61b	+/-	--	-	--	-	-	0	-	-	-	0	++

F.19.1 SA Objective 1 – Climate Change Mitigation

F.19.1.1 See **Appendix D**.

F.19.2 SA Objective 2 – Climate Change Adaptation

F.19.2.1 **Fluvial Flooding:** Sites E18, E24, E30, E61a and E61b are located partially within Flood Zones 2 and 3. The proposed development at these five sites could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a major negative impact would be expected. Sites E14, E20a, E20b, E41, E44, E58a, E58b, E59, E60a and E60b are located wholly within Flood Zone 1. A minor positive impact would be expected at these 10 sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.

F.19.2.2 **Surface Water Flooding:** A proportion of Sites E18, E30, E41, E44, E58a, E59, E60a, E60b, E61a and E61b coincide with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at these 10 sites would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.19.2.3 A proportion of Site E20a coincides with areas determined to be at low and medium risk of surface water flooding. A proportion of Site E14 coincides with areas determined to be at low risk of surface water flooding. The proposed development at these two sites would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

F.19.3 SA Objective 3 - Biodiversity & Geodiversity

F.19.3.1 **Habitats Sites:** All sites are located within 15km of 'Cannock Chase' SAC. A minor negative impact would be expected as a result of the proposed development at these 15 sites, due to the increased risk of development-related threats and pressures on this Habitats site.

F.19.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

- F.19.3.3 **Ancient Woodlands:** Sites E44, E61a and E61b are located within close proximity to ‘Ash Coppice’. Sites E14 and E20b are located within close proximity to ‘Oxden Leasow Wood’, with Site E20a adjacent to ‘Oxden Leasow Wood’. Site E58a is located adjacent to, and E58b is located within close proximity to, ‘Mansty Wood’. The proposed development at these eight sites could potentially have a minor negative impact on these Ancient Woodlands, due to an increased risk of disturbance.
- F.19.3.4 **SBI:** Site E58a is adjacent to ‘Fullmoor Wood’ SBI. Site E58b is adjacent to ‘Gailey Reservoirs’ SBI. Site E49 is adjacent to ‘Littleton Coillery spill mound’ SBI. The proposed development at these three sites could potentially have a minor negative impact on these SBIs, due to an increased risk of development-related threats and pressures.
- F.19.3.5 **Priority Habitat:** Sites E18, E58a and E59 coincide with deciduous woodland priority habitat. The proposed development at these three sites could potentially result in the loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

F.19.4 SA Objective 4 – Landscape & Townscape

- F.19.4.1 **AONB:** Sites E41, E58a, E58b, E59, E60a and E60b are proposed for large-scale employment uses and are located within approximately 6km from Cannock Chase AONB. The proposed development at these six sites could potentially have a minor negative impact on the setting of this nationally designated landscape.
- F.19.4.2 **Green Belt Harm:** The release of Green Belt land at Sites E41, E61a and E61b is considered by the Green Belt Study to result in ‘very high’ levels of harm to the purposes of the Green Belt. Sites E59, E60a and E60b could cause ‘high’ levels of harm to the purposes of the Green Belt. Therefore, development of these six sites is assessed as having a potentially major negative impact.
- F.19.4.3 Sites E14, E18, E20a, E20b, E24, E30, E44, E58a and E58b were not assessed by the Green Belt study. Development of these nine sites is likely to have a negligible impact.
- F.19.4.4 **Landscape Sensitivity:** Sites E18, E30, E60a and E60b are considered by the Landscape Sensitivity Study to be within areas of ‘low to moderate’ landscape sensitivity. Sites E59, E61a and E61b are within areas of ‘moderate’ landscape sensitivity. Therefore, development of these six sites have been assessed as having a potentially minor negative impact.
- F.19.4.5 Sites E14, E20a, E20b, E24, E41, E44, E58a and E58b are within an area that was not assessed by the Landscape Sensitivity Study. Development of these eight sites is assessed as having a negligible impact.
- F.19.4.6 **Landscape Character:** Sites E18, E20a, E20b, E24, E44, E58a, E58b, E59, E60b, E61a and E61b, are located within the RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Settled Heathlands’. The characteristic landscape features of this LCT are “*mixed arable and pasture farming; flat to gently rolling landform; hedged fields; regular and irregular hedgerows; oak and birch hedgerow trees; straight and winding roads; wooded stream valleys; bracken; [and] broadleaved woodlands*”.

- F.19.4.7 Site E30 is located within the RCA ‘Staffordshire Plain’ and the LCT ‘Settled Farmlands’. The characteristic landscape features of this LCT are *“a gently undulating landform with pronounced occasional high points; mature broadleaved woodlands; hedgerow oaks and a strong irregular hedgerow pattern; well treed field ponds and stream corridors; traditional red brick farmsteads and settlements; [and] small ancient winding lanes”*.
- F.19.4.8 Sites E14 and E41 are located within the RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Settled Plateau Farmland Slopes’. The characteristic landscape features of this LCT are *“hamlets and villages; irregular fields; narrow winding lanes and hedge banks; hedgerow oaks; irregular pattern of mixed hedges; parklands with estate woodlands; red brick farm buildings; rolling landform; [and] mixed arable and pasture farming”*.
- F.19.4.9 Site E60a is located within the RCA ‘Staffordshire Plain’ and the LCT ‘Ancient Clay Farmlands’. The characteristic landscape features of this LCT include *“mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern”*.
- F.19.4.10 The proposed employment development at Sites E18, E24, E30, E41, E44, E58a, E58b, E59, E60a, E60b, E61a and E61b could potentially be discordant with the key characteristics of the associated LCTs. Therefore, a minor negative impact on the local landscape character would be expected at these 12 sites.
- F.19.4.11 Sites E14, E20a and E20b are situated in existing built-up industrial areas, and therefore, the proposed development at these three sites would be expected to have a negligible impact on the characteristics identified in the published landscape character assessment.
- F.19.4.12 **Views from the PRoW Network:** Sites E20a, E20b, E30, E44, E58a, E58b, E59, E60a, E61a and E61b are adjacent or coincide with PRoWs. The proposed development at these ten sites could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.
- F.19.4.13 **Views for Local Residents:** The proposed development at Sites E30, E59, E60a and E60b could potentially alter the views experienced by local residents, including those on School Lane, Croft Lane and Harrisons Lane. Therefore, a minor negative impact on the local landscape would be expected at these four sites.
- F.19.4.14 **Urbanisation of the Countryside:** Sites E18, E30, E41, E44, E58a, E58b, E59, E60a, E60b, E61a and E61b are located in the open countryside surrounding settlements. The proposed development at these eleven sites would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.
- F.19.4.15 **Coalescence:** Sites E61a and E61b are situated between the settlements of Codsall and Wolverhampton. The proposed development at these two sites could potentially increase the risk of coalescence between these settlements, and therefore, have a minor negative impact on the local landscape.

F.19.5 SA Objective 5 – Pollution & Waste

- F.19.5.1 **AQMA:** A proportion of Sites E18 and E24 are located within 200m of Wolverhampton AQMA. The proposed development at these two sites would be likely to locate some site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality would be expected.
- F.19.5.2 **Main Road:** Sites E14, E18, E20a, E20b, E30, E41, E44, E58a, E58b, E60a, E60b, E61a and E61b are located wholly or partially within 200m of various main roads, including the A449, A460, A461, A601, A5, M54 or M6. The proposed development at these 12 sites could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using this network of main roads would be expected to have a minor negative impact on air quality and noise at these sites.
- F.19.5.3 **Railway Line:** Sites E18 and E30 are located within 200m of the railway line linking Wolverhampton to Stafford. The proposed development at these two sites could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway line. A minor negative impact would therefore be expected.
- F.19.5.4 **Groundwater SPZ:** Sites E18, E24, E44, E58a, E58b, E60a, E60b, E61a and E61b coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these nine sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.
- F.19.5.5 **Watercourse:** Site E60a and E60b are adjacent to the Staffordshire and Worcestershire Canal. Site E58b is adjacent to Gailley Reservoir. Sites E61a and E61b are within 200m of the Shropshire Union Canal. Approximately half of Site E24 is located within 200m of the Waterhead Brook. Sites E18, E30 and E58a coincide or are within 200m of unnamed watercourses. The proposed development at these nine sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.

F.19.6 SA Objective 6 – Natural Resources

- F.19.6.1 **Previously Developed Land:** All sites comprise previously undeveloped land. The proposed development at these 15 sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- F.19.6.2 **ALC:** All sites are situated on ALC Grades 2 and/or 3 land. ALC Grade 2, and potentially Grade 3, are considered to be some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these 15 sites, due to the loss of this agriculturally important natural resource.

F.19.7 SA Objective 7 – Housing

- F.19.7.1 See **Appendix D**.

F.19.8 SA Objective 8 – Health & Wellbeing

- F.19.8.1 NHS Hospital:** The closest NHS hospital with an A&E department to Sites E30 and E59 is County Hospital, located to the north. The closest hospital to Sites E14, E18, E20a, E20b, E24, E41, E44, E58a, E58b, E60a, E60b, E61a and E61b is New Cross Hospital. Sites E14, E18, E20a, E20b, E24 and E41 are located within the target distance to hospitals. The proposed development at these six sites would be expected to have a minor positive impact on the access of site end users to this essential health facility. Sites E30, E44, E58a, E58b, E59, E60a, E60b, E61a and E61b are located wholly or partially outside the target distance to these hospitals. The proposed development at these nine sites could potentially restrict the access of site end users to these essential health facilities. Therefore, a minor negative impact would be expected.
- F.19.8.2 GP Surgery:** All proposed employment sites are located wholly or partially outside the target distance of the nearest GP surgeries. The proposed development at these 15 sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- F.19.8.3 AQMA:** A proportion of Sites E18 and E24 are located within 200m of the Wolverhampton AQMA. The proposed development at these two sites could potentially expose site end users to poor air quality associated with these AQMAs, and therefore, have a minor negative impact on health. Sites E14, E20a, E20b, E30, E41, E44, E58a, E58b, E59, E60a, E60b, E61a and E61b are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users at these 13 sites.
- F.19.8.4 Main Road:** Sites E14, E18, E20a, E20b, E30, E41, E44, E58a, E58b, E60a, E60b and E61b are located wholly or partially within 200m of various main roads, including the A449, A460, A461, A601, A5, M54 or M6. The proposed development at these 12 sites could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users. Sites E24, E59 and E61a are located over 200m from a main road. The proposed development at these three sites would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- F.19.8.5 Access to Public Greenspace:** Sites E18, E24 and E59 are located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at these three sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits. Sites E14, E20a, E20b, E30, E41, E44, E58a, E58b, E60a, E60b, E61a and E61b are located wholly or partially over 600m from a public greenspace. The proposed development at these 12 sites could potentially have a minor negative impact on the access of site end users to outdoor space.
- F.19.8.6 PRow/Cycle Network:** Sites E14, E20a, E20b, E24, E30, E41, E44, E58a, E58b, E59, E60a, E60b, E61a and E61b are located within 600m of the PRow network. Sites E24, E30, E41, E44, E58a, E58b, E59, E60a, E60b, E61a and E61b are also located within 600m of a cycle path. The proposed development at these 14 sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents. Site E18 is located over 600m from the PRow and cycle networks, and therefore, the proposed

development at this site could potentially have a minor negative impact on pedestrian and cycle access.

F.19.9 SA Objective 9 – Cultural Heritage

F.19.9.1 Grade II Listed Building: Site E30 is located within close proximity to the Grade II Listed Buildings ‘Dunston Farmhouse’, ‘Dunston House’, ‘Church of St Leonard’ and ‘Former Stable’. E59 is located within 200m of ‘Huntington House’. Sites E60a and E60b are located roughly 30m from ‘Wharf Cottage’. Site E61a is located adjacent to ‘Shropshire Union Canal, Number 5 Upper Hattons Bridge, 30m from Shropshire Union Canal Aqueduct’. The proposed development at these six sites could potentially have a minor negative impact on the setting of these Listed Buildings.

F.19.9.2 Archaeology: Sites E14, E18, E20b, E30, E41, E44, E58a, E58b, E59, E60a, E60b and E61a either are adjacent to or coincide with numerous archaeological features, including ‘Hilton Main Colliery, Hilton and Hinton Point, Streetway, Wordsley Green and Turnpike Road’, to name a few. The proposed development at these 12 sites could potentially alter the setting of these archeological features, and as such, have a minor negative impact on the local historic environment.

F.19.9.3 Historic Character: Site E59 is located within an area of medium historic value. The proposed development at this site could potentially have a minor negative impact on the local historic character.

F.19.10 SA Objective 10 – Transport & Accessibility

F.19.10.1 Bus Stop: Sites E14, E20a, E20b and E59 are located within the target distance to a bus stops, providing regular services. The proposed development at these four sites would be likely to have a minor positive impact on site end users’ access to bus services. Sites E18, E24, E30, E41, E44, E58a, E58b, E60a, E60b, E61a and E61b are located wholly or partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these 11 sites could potentially have a minor negative impact on site end users’ access to bus services.

F.19.10.2 Railway Station: Site E61a is located within the target distance to Bilbrook Station. The proposed development at this site is likely to have a minor positive impact on site end users’ access to railway services. All other proposed employment sites are located wholly or partially outside the target distance to the nearest railway stations. Therefore, the proposed development at these 14 sites would be likely to have a minor negative impact on site end users’ access to rail services.

F.19.10.3 Pedestrian Access: Sites E14, E20a, E20b, E24, E30, E44, E58a, E58b, E60a, E60b, and E61a are well connected to the existing footpath network. The proposed development at these 11 sites would be expected to have a minor positive impact on site end users’ opportunities to travel by foot. Sites E18, E41, E59 and E61b currently have poor access to the surrounding footpath network. The proposed development at these four sites could potentially have a minor negative impact on local accessibility.

F.19.10.4 Road Access: All proposed employment sites have good links to the road network. Therefore, the proposed development at these 15 sites would therefore be expected to

provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

- F.19.10.5 **Local Services:** Site E59 is located within the target distance to Co-op Food. Therefore, the proposed development at this site would be expected to have a minor positive impact on site end users' access to local services. All other employment development sites are located outside the target distance to the nearest convenience stores. The proposed development at these 14 sites could potentially have a minor negative impact on the access of site end users to local services.

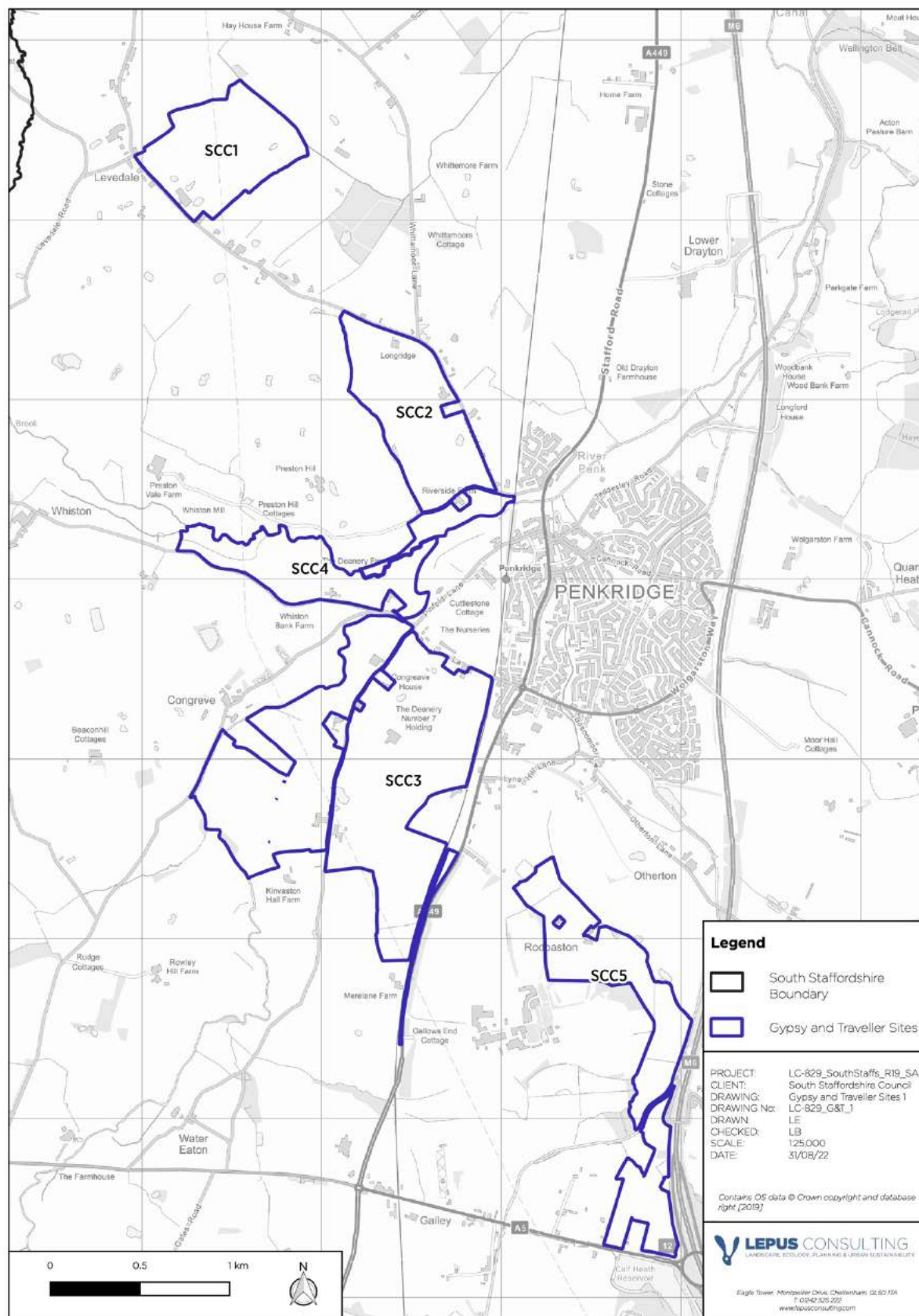
F.19.11 SA Objective 11 – Education

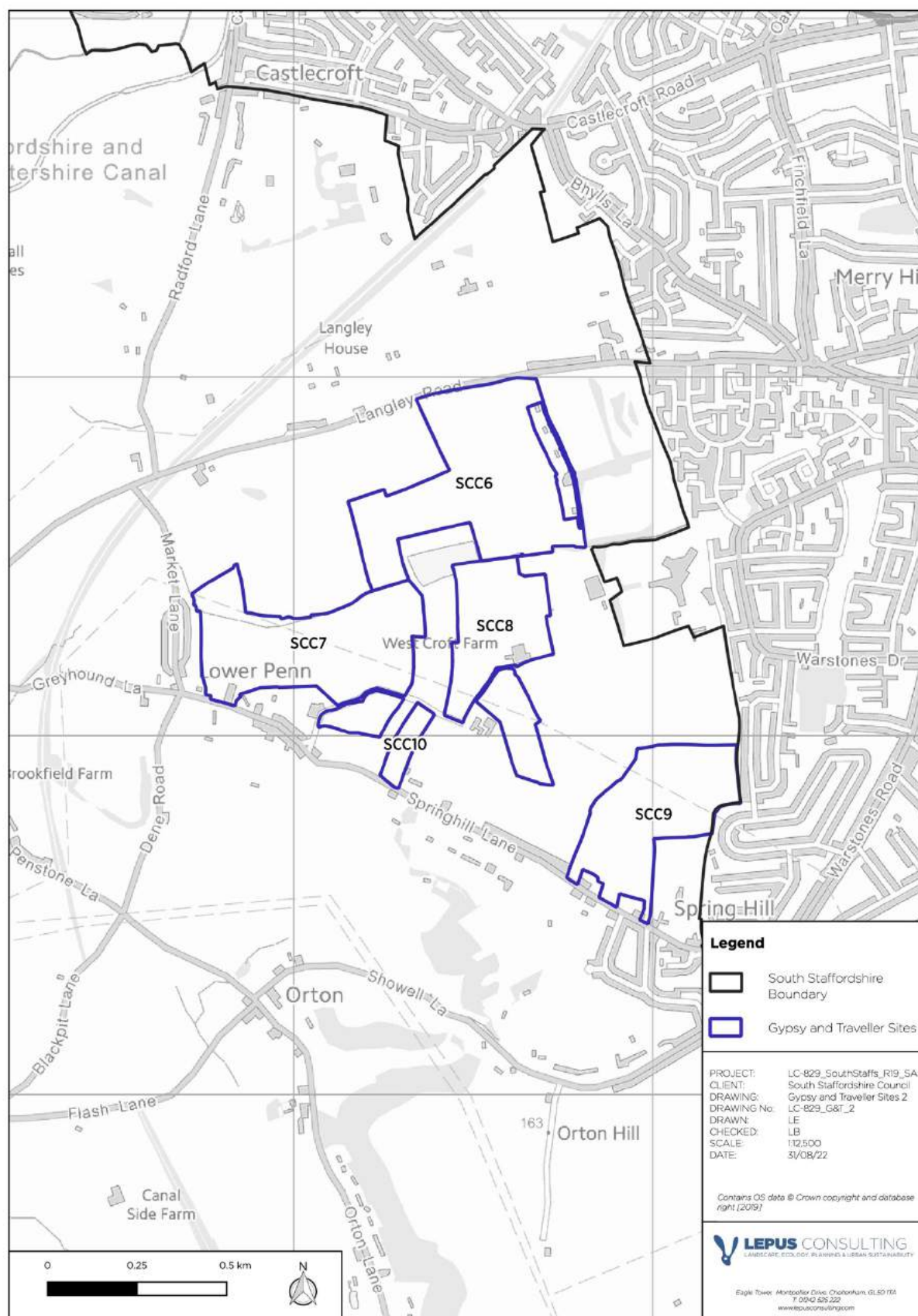
- F.19.11.1 **Primary/Secondary School:** The 15 sites in this cluster are proposed for employment end use, and therefore, have not been assessed under the Education objective.

F.19.12 SA Objective 12 – Economy

- F.19.12.1 **Employment Floorspace:** All sites in this cluster are proposed for employment-led end use. The proposed development at these 15 sites would be expected to result in a net gain in employment floorspace and provide local employment opportunities. Therefore, a major positive impact on the local economy would be expected.

F.20 Gypsy and Traveller Sites





Gypsy and Traveller Sites

See the Gypsy and Traveller Sites maps for locations of each site.

Site Reference	Site Address	Site use	Area (ha)
SCC1	Land east of Levedale Rd	Gypsy and Traveller Pitches	41.15
SCC2	Land west of Levedale	Gypsy and Traveller Pitches	54.79
SCC3	Land at Water Eaton Lane	Gypsy and Traveller Pitches	154.79
SCC4	Land North of Pinfold Lane / Whiston Road	Gypsy and Traveller Pitches	33.23
SCC5	Land at Rodbaston	Gypsy and Traveller Pitches	56.57
SCC6	Land south of Langley Road	Gypsy and Traveller Pitches	19.61
SCC7	Land north of Springhill Lane	Gypsy and Traveller Pitches	17.72
SCC8	Land off Dirtyfoot Lane	Gypsy and Traveller Pitches	11.70
SCC9	Land north of Springhill Lane	Gypsy and Traveller Pitches	12.13
SCC10	Land between Springhill Lane and Dirtyfoot Lane	Gypsy and Traveller Pitches	1.40

Site Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
SCC1	+/-	-	-	-	0	-	+/-	-	-	-	--	--
SCC2	+/-	--	-	-	-	-	+/-	-	-	-	--	-
SCC3	+/-	--	-	--	-	-	+/-	-	-	-	--	+
SCC4	+/-	--	-	--	-	-	+/-	-	-	-	--	-
SCC5	+/-	--	-	--	-	-	+/-	-	--	-	--	-
SCC6	+/-	--	0	--	-	-	+/-	-	-	-	-	-
SCC7	+/-	--	0	-	-	-	+/-	-	-	-	-	--
SCC8	+/-	--	0	--	-	-	+/-	-	-	-	-	--
SCC9	+/-	-	0	--	-	-	+/-	-	0	-	++	-
SCC10	+/-	+	0	-	-	-	+/-	-	-	-	-	--

F.20.1 SA Objective 1 – Climate Change MitigationF.20.1.1 See **Appendix D**.

F.20.2 SA Objective 2 – Climate Change Adaptation

- F.20.2.1 **Fluvial Flooding:** Sites SCC2, SCC3, SCC4, SCC5, SCC6, SCC7 and SCC8 are located partially within Flood Zones 2 and 3. In particular, Site SCC4 has the highest proportion of Flood Zone 3 across the site area. The proposed development at these seven sites could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a major negative impact would be expected. Sites SCC1, SCC9 and SCC10 are located wholly within Flood Zone 1. A minor positive impact would be expected at these three sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.
- F.20.2.2 **Surface Water Flooding: Surface Water Flooding:** A proportion of Sites SSC1, SCC2, SCC3, SCC4, SCC5, SCC7 and SCC8 coincide with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at these seven sites would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.
- F.20.2.3 Sites SSC6 and SCC9 coincide with areas determined to be at low and medium risk of surface water flooding. The proposed development at these two sites would be expected to have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.
- F.20.2.4 Site SCC10 does not coincide with any identified areas of surface water flood risk; therefore, a negligible impact would be expected at this site.

F.20.3 SA Objective 3 - Biodiversity & Geodiversity

- F.20.3.1 **Habitats Sites:** Sites SCC1, SCC2, SCC3, SCC4 and SCC5 are located within 15km of 'Cannock Chase' SAC. A minor negative impact would be expected as a result of the proposed development at these five sites, due to the increased risk of development-related threats and pressures on this Habitats site.
- F.20.3.2 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.
- F.20.3.3 **LNR:** Sites SCC6 and SCC7 are located approximately 280m and 250m, respectively, from 'South Staffordshire Railway Walk' LNR. However, due to the nature of this LNR, the proposed development at these sites would be expected to have a negligible impact on the LNR.
- F.20.3.4 **SBI:** Site SCC5 is adjacent to 'Rodbaston College' SBI. The proposed development at this site could potentially have a minor negative impact on the SBI, due to an increased risk of development-related threats and pressures.

- F.20.3.5 **Priority Habitat:** Sites SCC2 and SCC4 coincide with large areas of ‘coastal and floodplain grazing marsh’ priority habitat. A small proportion of Site SCC3 coincides with ‘deciduous woodland’ priority habitat. The proposed development at these three sites could potentially result in the loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

F.20.4 SA Objective 4 – Landscape & Townscape

- F.20.4.1 **Green Belt Harm:** The release of Green Belt land at Sites SCC3, SCC5, SCC6, SCC8 and SCC9 is considered by the Green Belt Study to result in ‘high’ levels of harm to the purposes of the Green Belt. Therefore, development of these five sites is assessed as having a potentially major negative impact.
- F.20.4.2 Sites SCC1, SCC2, SCC4, SCC7 and SCC10 were not assessed by the Green Belt study. Development of these five sites are assessed as having a negligible impact.
- F.20.4.3 **Landscape Sensitivity:** Site SCC3 and a small proportion of Site SCC4 are considered by the Landscape Sensitivity Study to be within areas of ‘moderate-high’ landscape sensitivity. Development of these two sites has been assessed as having a potentially major negative impact.
- F.20.4.4 The majority of Site SCC6 and a small proportion of Sites SCC8 and SCC9 are located within areas of ‘moderate’ landscape sensitivity, and the majority of Site SCC5 is located within an area of ‘low-moderate’ landscape sensitivity. Therefore, development of these four sites have been assessed as having a potentially minor negative impact.
- F.20.4.5 Sites SCC1, SCC2, SCC7 and SCC10 were not assessed by the Landscape Sensitivity Study. Development of these four sites is assessed as having a negligible impact.
- F.20.4.6 **Landscape Character:** Sites: SCC1, SCC2, SCC3, SCC4 and SCC5 are located within the RCA ‘Staffordshire Plain’ and the LCT ‘Ancient Clay Farmlands’. The characteristic landscape features of this LCT include “*mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern*”.
- F.20.4.7 SCC5 is partially located with the RCA ‘Cannock Chase and Cankwood’ and LCT ‘Settled Heathlands’. The characteristic landscape features of this LCT include “*mixed arable and pasture farming; flat to gently rolling landform; hedged fields; regular and irregular hedgerows; oak and birch hedgerow trees; straight and winding roads; wooded stream valleys; bracken; [and] broadleaved woodlands*”.
- F.20.4.8 Site SCC6 and a small proportion of Site SCC7 are located within the RCA ‘Mid Severn Sandstone Plateau’ and the LCT ‘Sandstone Estatelands’. The characteristic landscape features of this LCT are “*estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal*”.

- F.20.4.9 Sites SCC8, SCC9, SCC10 and the majority of Site SCC7 are located within the RCA ‘Cannock Chase and Cankwood’ and the LCT ‘Sandstone Hills and Heaths’. The characteristic landscape features of this LCT are *“small winding lanes; irregular hedged field pattern; stunted hedgerow oaks; [and] pronounced rounded landform”*.
- F.20.4.10 The proposed employment development at all Gypsy and Traveller Sites could potentially be discordant with the key characteristics of the associated LCTs, as all sites comprise previously undeveloped land which is primarily arable or pasture land with hedgerow boundaries and other characteristic features noted above. Therefore, a minor negative impact on the local landscape character would be expected at these 10 sites.
- F.20.4.11 **Views from the PRow Network:** Sites SCC1, SCC2, SCC3, SCC4, SCC5, SCC6, SCC7, SCC8 and SCC10 comprise previously undeveloped land and are located in close proximity to, or coincide with, PRowWs. The proposed development at these nine sites could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.
- F.20.4.12 **Views for Local Residents:** The proposed development of all Gypsy and Traveller Sites could potentially alter the views experienced by local residents, including those on ‘Levedale Road’, ‘Preston Vale Lane’, ‘Bungham Lane’, ‘South Staffordshire Halls’ and ‘Langley Road’. Therefore, a minor negative impact on the local landscape would be expected at these ten sites.
- F.20.4.13 **Urbanisation of the Countryside:** All Gypsy and Traveller Sites are located in the open countryside surrounding settlements. The proposed development at these ten sites may have the potential to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape. However, due to the fact that these sites are proposed for Gypsy and Traveller pitches rather than built residential homes, the impact may be reversible.
- F.20.5 SA Objective 5 – Pollution & Waste**
- F.20.5.1 **AQMA:** Sites SCC6, SCC8 and SCC9 are located partially within 200m of Wolverhampton AQMA. The proposed development at these sites would be likely to locate some site end users in areas of existing poor air quality and therefore, a minor negative impact on local air quality would be expected.
- F.20.5.2 **Main Roads:** Site SCC3 is located adjacent to the A449 and Site SCC5 is located adjacent to the A5 and M6. The proposed development at these two sites could potentially expose site end users to higher levels of transport associated noise and air pollution. Traffic using this network of main roads would be expected to have a minor negative impact on air quality and noise at these sites.
- F.20.5.3 **Railway Line:** Sites SCC2 and SCC3 are located within 200m of the railway line linking Wolverhampton to Stafford. The proposed development at these two sites could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway line. A minor negative impact would therefore be expected.
- F.20.5.4 **Groundwater SPZ:** Sites SCC5, SCC6, SCC7, SCC8, SCC9, SCC10 and a proportion of Site SCC3 coincide with the catchment (Zone III) of a groundwater SPZ. The proposed

development at these seven sites could potentially increase the risk of groundwater contamination within these SPZs, and therefore, result in a minor negative impact on local groundwater resources.

- F.20.5.5 **Watercourse:** Sites SCC2, SCC3, SCC4 and SCC5 are located within 200m of various watercourses, including the River Penk, Staffordshire and Worcestershire Canal, and/or minor watercourses. The proposed development at these four sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.

F.20.6 SA Objective 6 – Natural Resources

- F.20.6.1 **Previously Developed Land:** All Gypsy and Traveller sites comprise previously undeveloped land. The proposed development at these ten sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

- F.20.6.2 **ALC:** All Gypsy and Traveller sites are situated wholly or partially on ALC Grades 2 and/or 3 land. ALC Grade 2, and potentially Grade 3, represent some of South Staffordshire's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these ten sites, due to the loss of this agriculturally important natural resource.

F.20.7 SA Objective 7 – Housing

- F.20.7.1 See **Appendix D**.

F.20.8 SA Objective 8 – Health & Wellbeing

- F.20.8.1 **NHS Hospital:** The closest NHS hospital with an A&E department to Sites SCC1, SCC2, SCC3 and SCC4 is 'County Hospital', located to the north. The closest hospital to Sites SCC5, SCC6, SCC7, SCC8, SCC9 and SCC10 is the 'New Cross Hospital', located to the south. All sites proposed are located wholly outside the target distance to these hospitals. The proposed development at these ten sites could potentially restrict the access of site end users to these essential health facilities. Therefore, a minor negative impact would be expected.

- F.20.8.2 **GP Surgery:** The closest GP surgery to Sites SCC1, SCC2, SCC3, SCC4 and SCC5 is 'Penkridge Medical Centre'. The closest GP surgeries to Sites SCC5, SCC6, SCC7, SCC8, SCC9 and SCC10 are 'Tamar Medical Centre' located to the north in Perton, or 'Gravel Hill Surgery' located to the south in Wombourne. All sites are located wholly or partially outside the target distance to GP surgeries. The proposed development at these ten sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.

- F.20.8.3 **Leisure Centre:** The closest leisure centre to Sites SCC1, SCC2, SCC3, SCC4 and SCC5 is Penkridge Leisure Centre, located to the east of these sites. The closest leisure centre to Sites SCC6, SCC7, SCC8, SCC9 and SCC10 is Wombourne Leisure Centre, located to the south of these sites. All sites are located wholly outside the target distance of the nearest leisure

centre; therefore, a minor negative impact on the health and wellbeing of site end users would be expected.

- F.20.8.4 AQMA:** Sites SCC6, SCC8 and SCC9 are located partially within 200m of Wolverhampton AQMA. The proposed development at these sites could potentially expose site end users to poor air quality associated with this AQMA, and therefore, a minor negative impact on local air quality would be expected. Sites SCC1, SCC2, SCC3, SCC4, SCC5, SCC7 and SCC10 are located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.

Main Roads: Site SCC3 is located adjacent to the A449 and Site SCC5 is located adjacent to the A5 and M6. The proposed development at these two sites could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users. Sites SCC1, SCC2, SCC4, SCC6, SCC7, SCC8, SCC9 and SCC10 are located over 200m from a main road. The proposed development at these eight sites would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.

- F.20.8.5 Access to Public Greenspace:** Sites SCC5, SCC6, SCC8 and SCC9 are located within 600m of a public greenspace. Therefore, a minor positive impact would be expected at these four sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits. Sites SCC1, SCC2, SCC3, SCC4, SCC7 and SCC10 are located wholly or partially over 600m from a public greenspace. The proposed development at these six sites could potentially have a minor negative impact on the access of site end users to outdoor space.

- F.20.8.6 PRow/Cycle Network:** Sites: SCC1, SCC2, SCC3, SCC5, SCC6, SCC7, SCC8, SCC9 and SCC10 are located within 600m of the PRow network. Sites SCC5 and a proportion of Sites SCC2, SCC7, SCC8 and SCC9 are also located within 600m of a cycle path. The proposed development at these nine sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents. The majority of Site SCC4 is located over 600m from the PRow and cycle networks, and therefore, the proposed development at this site could potentially have a minor negative impact on pedestrian and cycle access.

F.20.9 SA Objective 9 – Cultural Heritage

- F.20.9.1 Grade I Listed Building:** Sites SCC2 and SCC4 are located approximately 250m and 500m, respectively, from the Grade I Listed Building ‘Church of St Michael and all Angels’. The proposed development at these two sites could potentially have a minor negative impact on the setting of this Listed Building.
- F.20.9.2 Grade II* Listed Building:** Sites SCC2 and SCC4 are located approximately 180m and 460m, respectively, from the Grade II* Listed Building ‘The Old Deanery’. The proposed development at these two sites could potentially have a minor negative impact on the setting of this Listed Building.

- F.20.9.3 Grade II Listed Building:** Site SCC1 is located approximately 120m from the Grade II Listed Building 'Field House Farmhouse'. Site SCC2 is adjacent to 'Railway Viaduct approximately 150 yards west of Bull Bridge'. Site SCC3 is adjacent to 'Cuttleston Bridge' and located within approximately 100m from various Grade II Listed Buildings including 'The Manor House' and 'Manor Farmhouse and attached Barn and Granary'. Site SCC4 is located approximately 115m from 'Whiston Mill' and adjacent to 'Cuttleston Bridge'. Site SCC7 is located within 100m from 'Lower Penn Farmhouse', 'Malthouse Cottage and Attached Maltings' and 'Walnut Tree Cottage'. Site SCC10 is located approximately 240m from 'Lower Penn Farmhouse'. The proposed development at these six sites could potentially have a minor negative impact on the setting of these Listed Buildings.
- F.20.9.4 Conservation Area:** Sites SCC2, SCC3 and SCC4 are located in close proximity to 'Penkridge' Conservation Area. Sites SCC6, SCC8 and SSC10 are located in close proximity to 'Lower Penn' Conservation Area, whilst a small proportion of Site SCC7 coincides with this Conservation Area. The proposed development at these seven sites could potentially alter the character or setting of these Conservation Areas and, as a result, have a minor negative impact on the historic environment.
- F.20.9.5 Scheduled Monument:** A small proportion of Site SCC5 coincides with 'Rodbaston Old Hall Moated Site and Fishpond' SM. The proposed development at this site could potentially have a direct major negative impact on this SM.
- F.20.9.6** Site SCC1 is approximately 330m from 'Hay House Moated Site' SM and Site SCC3 is approximately 360m from 'Roman camp, Kinvaston' SM. The proposed development at these two sites could potentially have a minor negative impact on the setting of these SMs.
- F.20.9.7 Archaeology:** Sites: SCC2, SCC3, SCC4, SCC5 and SCC7 are either adjacent to or coincide with numerous archaeological features, including 'Water Meadow, South-West of Preston Hill, Penkridge', 'Palstave Findspot', 'Cuttleston Dovecot', 'Manor House', 'Headland, near Rodbaston', 'Lower Penn', 'Canal Feeder Channel' to name a few. The proposed development at these five sites could potentially alter the setting of these archeological features, and as such, have a minor negative impact on the local historic environment.
- F.20.9.8 Historic Character:** A proportion of Sites SCC2, SCC3 and SCC4 are located within an area of medium historic value. Moreover, a proportion of Site SCC5 coincides with an area of high historic character. The proposed development at these four sites could potentially have a minor negative impact on the local historic character.
- F.20.10 SA Objective 10 – Transport & Accessibility**
- F.20.10.1 Bus Stop:** All Gypsy and Traveller sites are located wholly or partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these ten sites could potentially have a minor negative impact on site end users' access to bus services.
- F.20.10.2 Railway Station:** Sites SCC2, SCC3 and SCC4 are located within the target distance to Penkridge Station. The proposed development at these three sites would be expected to have a minor positive impact on site end users' access to rail services. Sites SCC1, SCC5, SCC6, SCC7, SCC8, SCC9 and SCC10 are located wholly or partially outside the target distance to the nearest railway stations. Therefore, the proposed development at these

seven sites would be likely to have a minor negative impact on site end users' access to rail services.

F.20.10.3 Pedestrian Access: Sites SCC2, SCC3, SCC5, SCC6, SCC8 and SCC9 are connected to the existing footpath networks. The proposed development at these six sites would be expected to have a minor positive impact on site end users' opportunities to travel by foot. Sites SCC1, SCC4, SCC7 and SCC10 currently have poor access to the surrounding footpath network. The proposed development at these four sites could potentially have a minor negative impact on local accessibility.

F.20.10.4 Road Access: All Gypsy and Traveller sites are well connected to the existing road network. Therefore, the proposed development at these ten sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

F.20.10.5 Local Services: All Gypsy and Traveller sites are located outside the target distance to the nearest convenience stores. The proposed development at these ten sites could potentially have a minor negative impact on the access of site end users to local services.

F.20.11 SA Objective 11 – Education

F.20.11.1 Primary School: The majority of Site SCC9 is located within the target distance to Springdale Infant and Junior Schools. Therefore, the proposed development at this site would be expected to situate new residents in a location with good access to primary education, and therefore, a minor positive impact would be expected. On the other hand, Sites SCC1, SCC2, SCC3, SCC4, SCC5, SCC6, SCC7, SCC8 and SCC10 are located outside the target distance to primary schools, and therefore, the proposed development at these nine sites would be expected to have a minor negative impact on the access of new residents to primary education.

F.20.11.2 Secondary School: Sites SCC6, SCC7, SCC8, SCC9 and SCC10 are located within the target distance to Highfields School. Therefore, the proposed development at these five sites would be expected to situate new residents in locations with good access to secondary education, and therefore, have a minor positive impact. On the other hand, Sites SCC1, SCC2, SCC3, SCC4 and SCC5 are located wholly or partially outside the target distance to the nearest secondary school (Wolgarston High School), and therefore, the proposed development at these five sites would be expected to have a minor negative impact on the access of new residents to secondary education.

F.20.11.3 The proposed development at Sites SCC1, SCC2, SCC3, SCC4 and SCC5 would be expected to have a major negative impact on new residents' access to both primary and secondary education. The proposed development at Site SCC9 would be expected to have a major positive impact on new residents' access to both primary and secondary education.

F.20.12 SA Objective 12 – Economy

- F.20.12.1 **Access to Employment:** SCC3 is located in an area with ‘reasonable’ sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor positive impact on site end users’ access to employment. Sites SCC2, SCC4, SCC5, SCC6 and SCC9 are located in or adjacent to areas with ‘unreasonable’ sustainable access to employment opportunities, and therefore, the proposed development at these five sites would be expected to have a minor negative impact on site end users’ access to employment.
- F.20.12.2 Sites SCC1, SCC7, SCC8 and SCC10 are located in areas outside of the Rural Services and Facilities Audit. The proposed development at these four sites could potentially restrict the access of site end users to employment opportunities, and therefore, a major negative impact would be expected.

Appendix G: Pre and Post Mitigation Assessments of All Reasonable Alternative Sites

Appendix G Contents

G.1	Introduction.....	G1
G.1.1	Preface.....	G1
G.2	Pre-Mitigation Assessment.....	G2
G.2.1	Introduction.....	G2
G.3	Mitigating effects of LPR policies	G14
G.3.1	Introduction.....	G14
G.4	Post mitigation site assessments.....	G31
G.4.1	Overview	G31

Tables

Table G.2.1: Impact matrix of all reasonable alternative site assessments pre-mitigation	G3
Table G.3.1: Mitigating LPR Policy for SA Objective 1 - Climate Change Mitigation.....	G15
Table G.3.2: Mitigating LPR Policy for SA Objective 2 - Climate Change Adaptation.....	G17
Table G.3.3: Mitigating LPR Policy for SA Objective 3 – Biodiversity and Geodiversity.....	G18
Table G.3.4: Mitigating LPR Policy for SA Objective 4 – Landscape and Townscape.....	G20
Table G.3.5: Mitigating LPR Policy for SA Objective 5 – Pollution and Waste.....	G23
Table G.3.6: Mitigating LPR Policy for SA Objective 6 – Natural Resources	G24
Table G.3.7: Mitigating LPR Policy for SA Objective 7 – Housing	G24
Table G.3.8: Mitigating LPR Policy for SA Objective 8 – Health and Wellbeing.....	G25
Table G.3.9: Mitigating LPR Policy for SA Objective 9 – Cultural Heritage	G27
Table G.3.10: Mitigating LPR Policy for SA Objective 10 – Transport and Accessibility	G28
Table G.3.11: Mitigating LPR Policy for SA Objective 11 – Education	G29
Table G.3.12: Mitigating LPR Policy for SA Objective 12 – Economy and Employment	G30
Table G.4.1: Impact matrix of all reasonable alternative site assessments post-mitigation	G31

G.1 Introduction

G.1.1 Preface

- G.1.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through, for example, emergent local plan policies.
- G.1.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as Local Plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.
- G.1.1.3 The post-mitigation assessment considers how mitigating factors, including Local Plan policy and other guidance, would help to avoid or reduce the impacts that were identified at the pre-mitigation stage.
- G.1.1.4 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred option in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.
- G.1.1.5 **Chapter G.2** sets out the pre-mitigation impacts of the 356 reasonable alternative sites considered throughout the SA process, and **Chapter G.3** provides detail on the mitigation within the LPR and the post-mitigation impacts for these 356 sites.
- G.1.1.6 The full assessment of reasonable alternative sites considered at this stage pre-mitigation can be found in **Appendix F** of this report, with sites considered at the previous stage set out in Appendix B of the Regulation 18 (III) SA.

G.2 Pre-Mitigation Assessment

G.2.1 Introduction

G.2.1.1 The reasonable alternative sites have been assessed in the SA in two groups, across the iterative SA stages:

- 317 reasonable alternative sites were assessed as part of the Regulation 18 (III) SA (2021); and
- A further 58 reasonable alternative sites have been assessed in Appendix F of the Regulation 19 SA, including 39 new sites and 19 amendments to sites originally assessed in the Regulation 18 (III) SA.

G.2.1.2 **Table G.2.1** presents the pre-mitigation impact matrix for all 356 reasonable alternative sites considered throughout the preparation of the LPR at the Regulation 18 (III) stage and Regulation 19 stage.

Table G.2.1: Impact matrix of all reasonable alternative site assessments pre-mitigation

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Bednall												
023	+/-	+	-	--	-	-	+	-	-	-	-	--
024	+/-	+	-	--	-	-	+	-	-	-	-	--
026	+/-	+	-	--	-	+	+	-	--	-	-	--
Bilbrook and Codsall												
210	+/-	+	+/-	--	-	-	+	-	-	-	++	+
211	+/-	--	+/-	-	-	-	+	-	-	++	-	-
213	+/-	-	+/-	0	-	+	+	-	-	++	++	+
221	+/-	-	+/-	--	-	-	+	-	-	-	++	+
222	+/-	-	+/-	--	-	-	+	-	-	-	-	-
224	+/-	--	+/-	--	-	-	+	-	-	-	-	+
SAD 228	+/-	+	+/-	-	-	+	+	-	-	++	++	+
236	+/-	-	+/-	--	-	-	+	-	-	-	--	-
419a/b	+/-	+	+/-	-	-	-	+	-	-	-	--	-
447	+/-	--	+/-	--	-	-	+	-	-	-	-	+
503	+/-	--	+/-	--	-	-	+	-	-	-	++	+
507	+/-	-	+/-	--	-	-	+	-	-	-	-	-
510	+/-	--	-	--	-	-	+	-	-	-	++	+
512	+/-	--	-	--	-	-	+	-	0	-	--	-
515	+/-	+	-	--	-	-	+	-	-	-	--	-
519	+/-	--	+/-	--	-	-	+	-	-	-	-	-
630a	+/-	+	+/-	--	0	-	+	-	-	-	--	-
630b	+/-	--	+/-	--	-	-	+	-	-	-	--	-
666	+/-	--	-	--	-	-	+	-	-	-	-	-
703	+/-	+	+/-	--	-	-	+	-	-	-	-	-
735	+/-	+	+/-	--	-	-	+	-	-	-	++	-
740	+/-	-	+/-	-	-	-	+	-	-	++	++	+
Bishops Wood												
096	+/-	+	-	--	0	-	+	-	-	-	-	-
097	+/-	+	-	--	0	-	+	-	-	-	-	-
099	+/-	+	-	--	0	-	+	-	0	-	-	-
Bloxwich												
207	+/-	--	-	-	-	+	+	-	-	-	++	-
492a/b/c	+/-	--	-	--	-	-	+	-	-	-	-	-
Bobbington												
319	+/-	+	-	-	-	-	+	-	-	-	-	--

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
320	+/-	--	+/-	--	0	-	+	-	-	-	-	--
321	+/-	-	+/-	--	0	-	+	-	0	-	-	--
410	+/-	-	-	--	0	-	+	-	0	-	-	--
Brewood												
057	+/-	-	-	0	0	+	+	-	-	-	-	-
062	+/-	+	-	--	-	-	+	-	-	-	-	-
067	+/-	-	-	--	-	-	+	-	-	-	--	-
074	+/-	+	-	--	0	-	+	-	-	-	-	-
075/075a	+/-	+	-	--	0	-	+	-	-	-	-	-
076	+/-	+	-	--	-	-	+	-	-	-	-	-
076a	+/-	+	-	--	-	-	+	-	-	-	-	-
078	+/-	+	-	--	-	-	+	-	-	-	-	-
079	+/-	+	-	--	-	-	+	-	-	-	-	-
376	+/-	+	-	--	0	-	+	-	-	-	-	-
611	+/-	+	-	--	-	-	+	-	-	-	-	-
616	+/-	-	-	--	-	-	+	-	-	-	-	-
617	+/-	--	-	--	-	-	+	-	-	-	--	-
658	+/-	-	-	--	0	-	+	-	-	-	-	-
Cannock												
202	+/-	+	-	--	-	-	+	-	-	-	-	-
203	+/-	--	-	--	-	-	+	-	0	-	--	-
474	+/-	--	-	--	-	-	+	-	--	-	-	-
529	+/-	+	-	--	-	-	+	-	-	-	-	-
624	+/-	+	-	--	-	-	+	-	-	-	--	-
659	+/-	+	-	--	0	-	+	-	0	-	++	-
720	+/-	-	-	-	-	+	+	-	-	-	--	--
Cheslyn Hay and Great Wyrley												
116	+/-	--	-	--	0	-	+	-	-	-	-	-
119a	+/-	--	-	-	0	-	+	-	-	-	++	+
119b	+/-	+	-	-	-	-	+	-	-	-	++	-
120	+/-	--	-	-	-	-	+	-	-	-	-	+
131	+/-	--	-	--	-	-	+	-	-	-	-	-
134	+/-	+	-	-	-	-	+	-	-	-	-	--
136	+/-	-	-	-	-	-	+	-	-	++	-	+
SAD 136	+/-	+	-	-	-	-	+	-	-	++	++	+
136a	+/-	--	-	-	-	-	+	-	-	-	-	-
137	+/-	--	-	--	-	-	+	-	-	-	-	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
138	+/-	-	-	-	-	-	+	-	-	++	++	-
SAD 139	+/-	-	-	-	-	-	+	-	-	-	++	-
SAD 141	+/-	+	-	0	-	-	+	-	-	++	++	+
440	+/-	+	-	-	0	-	+	-	-	-	++	-
489	+/-	--	-	-	-	-	+	-	-	-	++	-
491	+/-	-	-	0	-	+	+	-	-	++	-	--
523	+/-	+	-	-	0	-	+	-	-	-	++	+
525	+/-	-	-	--	-	-	+	-	-	-	-	-
526	+/-	-	-	--	-	-	+	-	-	-	--	-
536a	+/-	-	-	--	-	-	+	-	-	-	-	-
536b	+/-	+	-	--	-	-	+	-	-	-	-	-
638	+/-	+	-	0	-	+	+	-	-	++	-	--
696	+/-	--	-	--	-	-	+	-	-	-	--	-
704	+/-	+	-	0	-	+	+	-	-	-	++	-
730	+/-	-	-	-	-	+	+	-	-	-	++	--
741	+/-	-	-	-	-	-	+	-	-	++	++	+
Coven												
082	+/-	+	-	-	-	-	+	-	-	-	-	-
082a	+/-	+	-	-	-	-	+	-	-	-	-	+
084a	+/-	-	-	--	-	-	+	-	0	-	--	-
085	+/-	-	-	-	-	-	+	-	-	-	-	-
087	+/-	+	-	-	-	-	+	-	-	-	-	-
615	+/-	-	-	-	-	-	+	-	-	-	--	-
618	+/-	+	-	--	-	-	+	-	0	-	-	+
739	+/-	+	-	0	-	+	+	-	-	-	-	--
Dunston												
029	+/-	--	-	-	-	-	+	-	-	-	-	--
029a	+/-	-	-	-	-	-	+	-	-	-	-	-
487	+/-	-	-	-	-	-	+	-	-	-	-	-
588	+/-	--	-	-	-	-	+	-	-	-	--	-
Essington												
150	+/-	-	-	--	-	-	+	-	-	-	--	+
151/662	+/-	-	-	--	-	-	+	-	-	-	--	-
154	+/-	+	-	--	-	-	+	-	-	-	--	+
157	+/-	+	-	0	0	-	+	-	-	-	-	+
160	+/-	--	-	--	-	-	+	-	-	-	--	+
163	+/-	--	-	--	-	-	+	-	0	-	--	+

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
163a	+/-	-	-	--	-	-	+	-	0	-	--	-
163b	+/-	+	-	--	-	-	+	-	0	-	-	-
164	+/-	-	-	--	-	-	+	-	0	-	--	+
164a	+/-	+	-	--	-	-	+	-	0	-	-	+
165	+/-	--	-	--	-	-	+	-	-	-	--	+
166	+/-	+	-	--	-	-	+	-	-	-	--	+
392	+/-	--	-	--	-	-	+	-	0	-	++	+
393	+/-	+	-	-	-	-	+	-	-	-	-	+
471	+/-	+	-	--	0	-	+	-	-	-	-	-
486a/b	+/-	--	-	--	-	-	+	-	-	-	--	+
486c	+/-	--	-	--	-	-	+	-	-	-	-	+
520	+/-	--	-	--	-	-	+	-	-	-	++	-
679	+/-	--	-	--	-	-	+	-	0	-	-	+
Featherstone												
102	+/-	-	-	--	-	-	+	-	-	-	--	+
SAD 168	+/-	+	-	-	-	+	+	-	-	-	-	-
169	+/-	+	-	--	0	-	+	-	-	-	-	+
170	+/-	--	-	-	-	-	+	-	-	-	-	-
172	+/-	-	-	--	-	-	+	-	-	-	--	-
204	+/-	+	-	--	-	-	+	-	-	-	--	+
206	+/-	+	-	--	-	-	+	-	-	-	--	+
396	+/-	-	-	--	-	-	+	-	-	-	--	-
397	+/-	-	-	-	-	-	+	-	-	-	-	-
527	+/-	--	-	--	-	-	+	-	-	-	--	+
537/537a	+/-	--	-	--	-	-	+	-	-	-	-	+
646a/b	+/-	--	-	--	-	-	+	-	-	-	-	+
742	+/-	+	-	-	-	-	+	-	-	-	-	--
Huntington												
016	+/-	-	-	-	-	-	+	-	-	-	-	-
017	+/-	+	-	--	0	-	+	-	-	-	--	-
022	+/-	+	-	--	0	-	+	-	-	-	--	-
591	+/-	+	-	--	0	-	+	-	-	-	-	-
592	+/-	+	-	--	-	-	+	-	-	-	-	-
732	+/-	--	-	--	0	-	+	-	-	-	-	-
Kinver												
272	+/-	+	+/-	--	-	-	+	-	-	-	-	-
273	+/-	+	+/-	--	-	-	+	-	-	-	-	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
274	+/-	+	+/-	-	-	-	+	-	-	-	-	-
SAD 274	+/-	+	+/-	-	-	-	+	-	-	-	-	-
409	+/-	+	+/-	--	-	-	+	-	-	-	-	-
546	+/-	+	+/-	--	-	-	+	-	-	-	-	-
549	+/-	+	+/-	--	-	-	+	-	-	-	-	-
576	+/-	-	+/-	--	-	-	+	-	-	-	-	-
Patttingham												
249	+/-	--	-	--	-	-	+	-	-	-	-	-
250	+/-	+	+/-	--	-	-	+	-	-	-	-	-
251	+/-	+	+/-	-	-	-	+	-	-	-	-	-
252	+/-	-	-	--	-	-	+	-	-	-	-	-
253	+/-	+	+/-	--	-	-	+	-	-	-	-	-
255	+/-	-	+/-	-	-	-	+	-	-	-	-	-
257	+/-	+	+/-	--	-	-	+	-	-	-	-	-
400	+/-	--	+/-	--	-	-	+	-	-	-	-	-
401	+/-	+	-	--	-	-	+	-	-	-	-	-
421	+/-	+	-	--	-	-	+	-	-	-	-	-
Penkridge												
005	+/-	-	-	-	-	-	+	-	-	-	++	-
006	+/-	-	-	-	-	-	+	-	-	-	-	-
010	+/-	--	-	--	-	-	+	-	-	-	--	-
420	+/-	-	-	-	-	-	+	-	-	++	++	+
430a	+/-	+	-	--	-	-	+	-	-	-	--	-
430b	+/-	+	-	--	-	-	+	-	-	-	--	-
584	+/-	--	-	--	-	-	+	-	-	-	--	-
585	+/-	--	-	--	-	-	+	-	-	-	-	--
585a	+/-	--	-	--	-	-	+	-	-	-	-	--
665	+/-	--	-	--	-	-	+	-	-	-	-	--
711	+/-	-	-	--	-	-	+	-	--	++	+	--
Penn and Lower Penn												
350c	+/-	--	+/-	--	-	-	+	-	-	-	-	-
350d	+/-	--	+/-	--	-	-	+	-	-	-	-	-
494a	+/-	-	-	--	-	-	+	-	0	-	-	-
494b	+/-	-	-	--	-	-	+	-	0	-	-	-
559	+/-	+	+/-	--	-	-	+	-	-	-	--	-
561	+/-	+	+/-	--	-	-	+	-	-	-	-	-
573	+/-	-	-	--	-	-	+	-	-	-	--	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
579	+/-	--	+/-	--	-	-	+	-	-	-	-	--
582	+/-	--	+/-	--	-	-	+	-	-	-	++	-
710	+/-	-	+/-	--	-	-	+	-	0	-	-	-
Perton												
238	+/-	-	+/-	--	-	-	+	-	-	-	--	-
239	+/-	-	+/-	-	-	-	+	-	-	-	--	-
241	+/-	+	+/-	--	-	-	+	-	-	-	-	-
243	+/-	--	+/-	--	-	-	+	-	-	-	-	-
245	+/-	-	-	-	-	+	+	-	-	-	--	--
246a	+/-	--	-	--	-	-	+	-	-	-	--	-
260	+/-	+	+/-	--	-	-	+	-	-	-	--	-
402	+/-	+	+/-	-	-	-	+	-	-	-	-	-
407	+/-	-	-	--	-	-	+	-	-	-	--	-
454	+/-	--	+/-	--	-	-	+	-	-	-	-	-
504	+/-	+	+/-	--	-	-	+	-	-	-	-	-
505	+/-	+	+/-	-	-	-	+	-	-	-	-	-
506	+/-	--	+/-	--	-	-	+	-	-	-	-	-
705	+/-	-	+/-	--	-	-	+	-	-	-	--	-
Sedgley												
339	+/-	--	+/-	--	-	-	+	-	-	-	++	-
548	+/-	--	-	--	-	-	+	-	0	-	-	-
560	+/-	+	-	--	-	-	+	-	-	-	++	-
566	+/-	-	-	--	-	-	+	-	-	-	-	-
567	+/-	-	-	--	-	-	+	--	0	-	-	-
Seisdon												
358	+/-	+	+/-	--	-	-	+	-	0	-	--	-
359	+/-	-	-	--	-	-	+	-	-	-	--	-
671	+/-	--	+/-	--	-	-	+	-	-	-	--	-
702	+/-	-	+/-	--	-	-	+	-	0	-	--	-
Shareshill												
181	+/-	+	-	--	0	-	+	-	-	-	-	-
183	+/-	+	-	--	0	-	+	-	-	-	-	-
184	+/-	-	-	-	-	-	+	-	0	-	-	-
185	+/-	+	-	-	0	-	+	-	-	-	-	-
Stafford												
036a	+/-	--	-	--	-	-	+	-	--	-	--	-
036c	+/-	+	-	--	-	-	+	-	-	-	++	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Swindon												
312a	+/-	+	+/-	--	-	-	+	-	-	-	-	-
313	+/-	+	-	--	-	-	+	-	-	-	-	-
SAD 313	+/-	+	+/-	-	-	-	+	-	-	-	-	-
314	+/-	+	-	--	-	-	+	-	-	-	-	-
315	+/-	-	-	--	-	-	+	-	-	-	-	-
412	+/-	-	+/-	-	-	-	+	-	-	-	-	-
437	+/-	-	+/-	--	-	-	+	-	-	-	-	-
682	+/-	--	+/-	--	-	-	+	-	-	-	-	-
717	+/-	-	+/-	--	-	-	+	-	-	-	-	-
718	+/-	-	+/-	--	-	-	+	-	-	-	-	-
Trysull												
327	+/-	+	+/-	--	-	-	+	-	-	--	-	--
328	+/-	+	+/-	--	-	-	+	-	-	-	-	--
329	+/-	-	+/-	--	-	-	+	-	-	-	-	--
544	+/-	--	+/-	--	-	-	+	-	-	-	-	--
558	+/-	-	+/-	--	-	-	+	-	-	-	-	--
Wall Heath												
368	+/-	--	-	--	-	-	+	-	-	-	--	-
370	+/-	--	-	--	-	-	+	-	-	-	--	-
577	+/-	+	+/-	--	-	-	+	-	-	-	--	-
684	+/-	-	+/-	--	-	-	+	-	-	-	--	-
Wheaton Aston												
090	+/-	--	-	--	-	-	+	-	-	-	-	-
091	+/-	--	-	--	-	-	+	-	-	-	-	-
092	+/-	+	-	-	0	-	+	-	-	-	-	-
094	+/-	+	-	--	-	-	+	-	-	-	-	-
377/093	+/-	+	-	-	0	-	+	-	-	-	-	-
378	+/-	-	-	--	0	-	+	-	-	-	-	-
378a	+/-	-	-	--	0	-	+	-	-	-	-	-
379	+/-	--	-	-	0	-	+	-	-	-	-	-
SAD 379	+/-	+	-	-	0	-	+	-	-	-	-	-
382	+/-	-	-	--	-	-	+	-	-	-	-	-
426a	+/-	+	-	-	-	-	+	-	-	-	-	-
426b	+/-	--	-	--	-	-	+	-	-	-	-	-
608	+/-	-	-	--	0	-	+	-	-	-	-	-
610	+/-	--	-	--	0	-	+	-	-	-	-	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
614	+/-	--	-	-	0	-	+	-	-	-	-	-
619	+/-	+	-	--	0	-	+	-	-	-	-	-
Wollaston and Wordsley												
364	+/-	+	-	--	-	-	+	-	-	-	++	-
365	+/-	-	-	--	-	-	+	-	-	-	-	-
654	+/-	+	-	--	-	-	+	-	-	-	--	-
655	+/-	+	-	--	-	-	+	-	-	-	--	-
673	+/-	+	+/-	--	-	-	+	-	-	-	++	-
Wombourne												
280	+/-	--	-	-	-	-	+	-	--	-	++	-
283	+/-	--	-	--	-	-	+	-	-	-	-	-
284	+/-	--	+/-	--	-	-	+	-	-	-	++	-
285	+/-	--	-	-	-	-	+	-	-	-	-	-
286	+/-	+	+/-	-	-	-	+	-	-	-	++	-
298	+/-	-	+/-	-	-	-	+	-	-	-	-	-
305	+/-	-	+/-	-	-	-	+	-	-	-	-	-
306	+/-	-	-	--	-	-	+	-	-	-	++	-
309	+/-	--	-	--	-	-	+	-	-	-	--	-
310a	+/-	--	-	--	-	+	+	-	-	-	-	--
310b	+/-	-	-	-	-	+	+	-	-	-	-	--
335a	+/-	+	+/-	-	-	-	+	-	-	-	--	-
335b	+/-	+	+/-	-	-	-	+	-	-	-	--	-
416	+/-	+	-	-	-	-	+	-	-	-	-	-
416a	+/-	+	-	--	-	-	+	-	-	-	-	-
417	+/-	+	+/-	-	-	-	+	-	-	-	-	-
438	+/-	-	-	-	-	-	+	-	-	-	++	-
458	+/-	-	-	-	-	-	+	-	-	-	-	-
459	+/-	--	+/-	-	-	-	+	-	-	-	++	-
460	+/-	-	-	0	-	+	+	-	-	-	-	--
463a	+/-	+	-	--	-	-	+	-	-	-	++	-
463b	+/-	-	-	--	-	-	+	-	-	-	++	-
463c	+/-	+	-	--	-	-	+	-	-	-	++	-
463d	+/-	-	-	--	-	-	+	-	-	-	++	-
477	+/-	+	+/-	-	-	-	+	-	-	-	++	-
479a	+/-	+	+/-	-	-	-	+	-	-	-	--	-
554	+/-	--	+/-	-	-	-	+	-	-	-	-	-
562/415	+/-	+	+/-	-	-	-	+	-	-	-	++	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
626	+/-	-	+/-	--	-	-	+	-	-	-	-	-
627	+/-	-	+/-	--	-	-	+	-	-	-	-	-
628	+/-	+	+/-	--	-	-	+	-	-	-	-	-
629	+/-	+	-	--	-	-	+	-	-	-	-	-
701	+/-	+	+/-	--	-	-	+	-	-	-	++	-
707	+/-	+	+/-	--	-	-	+	-	-	-	--	-
708	+/-	-	-	--	-	-	+	-	-	-	-	-
738	+/-	-	+/-	-	-	-	+	-	-	-	-	--
Employment Sites												
E04a	+/-	+	-	-	-	-	0	-	-	-	0	++
E04b	+/-	+	-	-	-	-	0	-	-	-	0	++
E05	+/-	+	-	-	-	-	0	-	-	-	0	++
E14	+/-	-	-	0	-	-	0	-	-	-	0	++
E15a	+/-	--	-	--	-	+	0	-	-	-	0	++
E18	+/-	--	-	-	-	-	0	-	-	-	0	++
E20a	+/-	-	-	-	-	-	0	-	0	-	0	++
E20b	+/-	+	-	-	-	-	0	-	-	-	0	++
E24	+/-	--	-	-	-	-	0	-	0	-	0	++
E30	+/-	--	-	-	-	-	0	-	-	-	0	++
E31	+/-	+	-	--	-	-	0	-	-	-	0	++
E32	+/-	-	-	--	-	-	0	-	-	-	0	++
E33	+/-	--	-	--	-	-	0	-	-	-	0	++
E37a/b	+/-	--	-	--	-	-	0	-	-	-	0	++
E38	+/-	+	-	--	-	-	0	-	-	-	0	++
E39	+/-	+	-	--	-	-	0	-	-	-	0	++
E41	+/-	--	-	--	-	-	0	-	-	-	0	++
E42	+/-	--	-	--	-	-	0	-	-	-	0	++
E43	+/-	--	-	--	-	-	0	-	-	-	0	++
E44	+/-	--	-	-	-	-	0	-	-	-	0	++
E45	+/-	--	-	--	-	-	0	-	-	-	0	++
E46	+/-	--	-	--	-	-	0	-	-	-	0	++
E47	+/-	+	-	--	-	-	0	-	-	-	0	++
E48	+/-	-	-	--	-	-	0	-	-	-	0	++
E49	+/-	+	-	--	-	-	0	-	-	-	0	++
E50	+/-	+	-	-	-	-	0	-	-	-	0	++
E51a	+/-	+	-	--	-	-	0	-	0	-	0	++
E51b	+/-	+	-	--	-	-	0	-	-	-	0	++

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
E52	+/-	+	-	--	-	-	0	-	-	-	0	++
E53	+/-	--	-	--	-	-	0	-	-	-	0	++
E54	+/-	+	-	--	-	-	0	-	-	-	0	++
E55	+/-	--	-	--	-	+	0	-	-	-	0	++
E56	+/-	--	--	--	-	-	0	-	-	-	0	++
E57	+/-	--	-	-	-	-	0	-	-	-	0	++
E58a	+/-	--	-	-	-	-	0	-	-	-	0	++
E58b	+/-	-	-	-	-	-	0	-	-	-	0	++
E59	+/-	--	-	--	0	-	0	-	-	-	0	++
E60a	+/-	--	-	--	-	-	0	-	-	-	0	++
E60b	+/-	--	-	--	-	-	0	-	-	-	0	++
E61a	+/-	--	-	--	-	-	0	-	-	-	0	++
E61b	+/-	--	-	--	-	-	0	-	-	-	0	++
Gypsy and Traveller Sites												
GT01	+/-	+	-	--	-	+	+/-	-	-	-	--	--
GT02	+/-	--	-	--	0	+	+/-	-	0	-	--	--
GT03	+/-	+	-	-	0	+	+/-	-	0	-	--	--
GT04	+/-	--	-	--	-	-	+/-	-	-	-	--	+
GT05	+/-	+	-	--	-	+	+/-	-	-	-	--	+
GT06	+/-	+	-	--	-	+	+/-	-	-	-	--	+
GT07	+/-	+	-	--	-	+	+/-	-	-	-	--	--
GT08	+/-	--	-	--	-	+	+/-	-	-	-	--	+
GT09	+/-	-	-	0	-	+	+/-	-	0	-	--	+
GT10	+/-	-	-	0	-	+	+/-	-	-	-	--	+
GT11	+/-	-	-	0	-	+	+/-	-	-	-	--	+
GT12	+/-	--	-	--	-	-	+/-	-	0	-	--	--
GT13	+/-	+	-	--	0	+	+/-	-	-	-	++	--
GT14	+/-	-	-	--	-	-	+/-	-	-	-	--	+
GT15	+/-	-	-	0	-	+	+/-	-	-	-	-	-
GT16	+/-	+	-	0	-	+	+/-	-	-	-	-	-
GT17	+/-	+	-	-	0	-	+/-	-	-	-	--	--
GT18	+/-	+	+/-	-	-	+	+/-	-	-	-	++	--
GT19	+/-	-	-	--	-	+	+/-	-	-	-	--	+
GT20	+/-	+	-	-	-	-	+/-	-	0	-	--	+
GT23	+/-	+	-	--	-	+	+/-	-	-	-	--	+
GT24	+/-	-	-	-	0	-	+/-	-	-	-	-	-
GT27	+/-	--	-	-	-	-	+/-	-	-	-	--	+

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
GT30	+/-	--	+/-	--	-	+	+/-	-	-	-	--	--
GT32	+/-	--	-	-	-	+	+/-	-	-	-	++	--
GT33	+/-	+	-	--	-	+	+/-	-	0	-	--	--
GT34	+/-	+	-	--	-	+	+/-	-	0	-	--	-
GT35	+/-	+	-	-	0	-	+/-	-	-	-	-	+
GT36	+/-	-	-	--	0	+	+/-	-	0	-	--	-
TSP01	+/-	+	-	-	-	+	+/-	-	-	-	-	+
SCC1	+/-	-	-	-	0	-	+/-	-	-	-	--	--
SCC2	+/-	--	-	-	-	-	+/-	-	-	-	--	-
SCC3	+/-	--	-	--	-	-	+/-	-	-	-	--	+
SCC4	+/-	--	-	--	-	-	+/-	-	-	-	--	-
SCC5	+/-	--	-	--	-	-	+/-	-	--	-	--	-
SCC6	+/-	--	0	--	-	-	+/-	-	-	-	-	-
SCC7	+/-	--	0	-	-	-	+/-	-	-	-	-	--
SCC8	+/-	--	0	--	-	-	+/-	-	-	-	-	--
SCC9	+/-	-	0	--	-	-	+/-	-	0	-	++	-
SCC10	+/-	+	0	-	-	-	+/-	-	-	-	-	--

G.3 Mitigating effects of LPR policies

G.3.1 Introduction

- G.3.1.1 The requirements set out in the six Strategic Policies and 41 Development Management policies (see **Appendix I**) would be anticipated to improve the sustainability performance of many of the reasonable alternative site assessments through the reduction or elimination of adverse effects and optimising positive effects.
- G.3.1.2 It should be noted that the requirements of the four strategic development Site Allocation Policies (SA1-4) and the over-arching master planning policy for the strategic development sites (Policy MA1) set out in the LPR have not informed the post-mitigation assessments as these do not relate to all reasonable alternative sites.
- G.3.1.3 **Tables G.3.1 to G.3.12** below set out the potential adverse impacts that have been identified through the sustainability assessments of sites pre-mitigation for each SA Objective, as presented in **Table G.2.1**, and indicate which, if any, of the emerging LPR policies would be likely to mitigate these effects.
- G.3.1.4 The assessment of the sustainability performance of sites post-mitigation, taking into account the mitigating effects of the LPR policies, is summarised in the matrix in **Table G.4.1**.

Table G.3.1: Mitigating LPR Policy for SA Objective 1 - Climate Change Mitigation

SA Objective 1. Climate Change Mitigation	
Identified adverse impacts	<p>Increased GHG emissions</p> <p>A 'Climate Change Adaptation and Mitigation' (CCAM) study¹ has been undertaken to inform the development of energy and sustainability policies across Staffordshire and the eight constituent Local Authorities. This study forms part of the Evidence Base to SSDC's Local Plan Review. Energy use is dominated by natural gas (33.7%), petroleum products (42.2%) and electricity (20.2%), which together account for over 96% of the total for Staffordshire County as a whole. However, in SSDC, 53.8% of its energy is sourced from petroleum products. The report states that new development in Staffordshire could increase emissions by approximately 5%, although the actual amount could be less depending on future changes in Building Regulations and sustainable construction practices.</p> <p>Climate change mitigation is a cross-cutting theme. A number of policies seek to address this SA Objective.</p>
Potential mitigating influence of LPR policies	<p>Policy DS5 sets out the spatial strategy for the district. By directing development towards Tier 1 settlements and the urban edge of existing larger towns outside the district, this policy would be likely to facilitate more sustainable communities by locating residents in closer proximity to services, facilities and public transport, including railway stations. The use of the private cars and associated fossil fuel consumption is identified as one of the district's larger contributors to carbon emissions. By seeking to reduce the need to travel and by locating development in settlements with existing public transport links, this policy could lead to a lower level of carbon emissions. There is a level of uncertainty in this assessment as the choice of more sustainable modes of transport relies on behavioural change of individuals.</p> <p>Policy DS6 'Longer Term Growth Aspirations for a New Settlement' sets out a number of objectives that new settlement proposals will need to deliver, including ensuring the developments are future-proofed to support reductions in greenhouse gas emissions through design and anticipating opportunities to incorporate renewable energy measures.</p> <p>Policy HC12 'Space About Dwellings and Internal Space' encourages development proposals to provide careful layout and design considerations to deliver multiple benefits to people and the environment including energy conservation.</p> <p>Policy HC13 'Parking Provision' sets out that appropriate provision for parking is required in line with adopted parking standards and includes requirements for electrical vehicle charging facilities for development proposals to meet.</p> <p>Policy HC19 'Green Infrastructure' sets out wider green infrastructure principles to achieve multi-functional green infrastructure. Green infrastructure can serve to mitigate the effects of climate change through carbon sequestration in soils and vegetation and the shading/cooling effects of trees and vegetation. The provision of green infrastructure in proximity to new development may also encourage residents to enjoy the local environment and reduce the need to travel for exercise, dog walking etc.</p>

¹ AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Accessed on 27/07/22].

SA Objective 1. Climate Change Mitigation	
	<p>Policy EC1 'Sustainable Economic Growth' sets out the broad requirements in relation to economic development. Part of this policy will be to promote active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network. These measures would contribute to climate change mitigation.</p> <p>Policies EC8 'Retail' and EC9 'Protecting Community Services and Facilities,' seek to maintain the vitality of village centres in existing settlements and in doing so may reduce the need for residents to travel by car to access facilities.</p> <p>Policy EC12 'Sustainable Transport' sets out the Council's approach to sustainable transport through a wide range of measures including strengthening bus and rail services and their connections, encouraging walking and cycling, the Park and Ride initiative at Cross Green and improving availability of electric vehicle charging points. Through these measures, this policy would be expected to increase opportunities for residents to make sustainable transport choices.</p> <p>Policy NB1 relates to protecting, enhancing and expanding natural assets. Vegetation provides several ecosystem services, including carbon storage as well as cooling/shading effects.</p> <p>Policy NB5 will specifically address renewable and low carbon energy generation, including the policy provisions relating to solar, wind and biomass energy schemes. The promotion of renewable or low carbon technologies within the Local Plan would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels and reduce South Staffordshire's contribution towards the causes of climate change.</p> <p>Policy NB6 'Sustainable Construction' sets out energy and water efficiency in new developments including the requirement for all major residential development to achieve a 63% reduction in carbon emissions in comparison to the baseline rates, as set out within Building Regulations Approved Document Part L 2013 and all major commercial development to achieve BREEAM Excellent or Outstanding.</p>
Commentary: Will the policies mitigate the identified adverse effects?	<p>As set out in the CCAM report, better standards for new buildings, combined with grid decarbonisation and switching to Ultra-Low Emission Vehicles, could decrease total emissions by over 50% compared with 2017 levels in South Staffordshire. Although these policies would be likely to reduce the GHG emissions associated with development to some extent, the policies would not be expected to fully mitigate the increased carbon emissions expected as a result of the large scale of development proposed across the Plan area during this plan period.</p>

Table G.3.2: Mitigating LPR Policy for SA Objective 2 - Climate Change Adaptation

2. Climate Change Adaptation	
Identified adverse impacts	Risk of fluvial or surface water flooding.
Potential mitigating influence of LPR policies	<p>Policy NB7 ‘Managing flood risk, sustainable drainage systems & water quality’ seeks to manage fluvial and surface water flood risk, through the requirement for site-specific Flood Risk Assessments and surface water drainage strategies for all developments. Site-specific flood risk assessments, such as the sequential and exception tests, should be in accordance with national requirements and take account of the latest climate change allowances.</p> <p>Policy HC19 ‘Green Infrastructure’; Policy EC1 ‘Sustainable Economic Growth’; and Policy NB1 ‘Protecting, Enhancing and Expanding Natural Assets’ seek to protect and create green infrastructure in development proposals and could lead to various benefits including reduced water runoff rates, and therefore mitigate fluvial and surface water flooding to some extent.</p> <p>Policy HC9 ‘Gypsy, Traveller and Travelling Showpeople’ seeks to locate new plots and pitches in locations which avoid areas of high flood risk.</p>
Commentary: Will the policies mitigate the identified adverse effects?	<p>SSDC has also prepared a Strategic Flood Risk Assessment and is consulting with the Environment Agency through the Local Plan’s preparation to ensure the sequential test is properly followed. Furthermore, SSDC will, where possible, avoid putting vulnerable uses within Flood Zones 2 and 3, ensuring any sites allocated containing areas of Flood Zones 2 and 3 give these areas over to water compatible uses (e.g., green infrastructure).</p> <p>The Strategic Flood Risk Assessment process combined with these policies would be expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial or surface water flooding.</p>

Table G.3.3: Mitigating LPR Policy for SA Objective 3 – Biodiversity and Geodiversity

3. Biodiversity and Geodiversity	
Identified adverse impacts	<p>Threats or pressures to Habitats sites</p> <p>Threats or pressures to nationally designated sites (SSSI)</p> <p>Threats or pressures to locally designated biodiversity sites and priority habitats</p>
Potential mitigating influence of LPR policies	<p>Threats or pressures to Habitats sites</p> <p>South Staffordshire District lies partially within the 15km Zone of Influence for Cannock Chase SAC, established by the SAC Partnership. There are three other Habitats sites within, or in proximity, to the district, including Motte Meadows SAC, Fens Pools SAC and Cannock Canal Extension SAC. Motte Meadows is also designated as a National Nature Reserve (NNR).</p> <p>Policy NB3 ‘Cannock Chase SAC’ will support the recommendations of the SAC Partnership which has developed a strategy to mitigate the effects of development on Cannock Chase SAC. SSDC will produce a separate guidance note or SPD detailing mitigation requirements. The policy will also link to the need to address potential air quality threats to other SACs.</p> <p>An HRA is being prepared which will set out the Zones of Influence (Zol) associated with these SACs and identify any likely significant effects as a consequence of the emerging Local Plan. Potential effects on SACs can relate to increases in recreational pressure, urbanisation effects, changes to air quality and changes to hydrology, amongst others. The Zol for effects on a SAC can be extensive, for example, as a result of changes to air quality as a consequence of commuting patterns. The Zol and nature of any effects and the mitigation of those effects are evaluated in the HRA.</p> <p>Threats or pressures to nationally designated sites (SSSI).</p> <p>A large proportion of reasonable alternative sites were identified as lying within Impact Risk Zones for SSSIs where consultation with Natural England would be required.</p> <p>Policy NB1 ‘Protecting, enhancing and expanding natural assets’ supports proposals “<i>which protect and enhance the quality of the natural environment</i>”, including internationally, nationally and locally designated sites.</p> <p>Threats or pressures to locally designated biodiversity sites and priority habitats</p> <p>Policy NB1 also protects habitats and priority species (including ancient woodland, ancient and veteran trees and historic parkland) in accordance with the provisions of the relevant statutory and national policy.</p> <p>Policy NB2 ‘Biodiversity’ will require development proposals to consider biodiversity as part of any proposal and supports the inclusion of features such as green walls, roofs, bat and bird boxes. All new development will be required to deliver a 10% biodiversity net gain, measured in accordance with Defra’s biodiversity metric.</p> <p>Policy HC9 ‘Gypsy, Traveller and Travelling Showpeople’ will seek to ensure that Gypsy and Traveller proposals demonstrate a minimum 10% biodiversity net gain in accordance with Policy NB2.</p> <p>Sites 062, 138, 310a, 368, 460, E43 and E56 coincide with SBIs and there are potential minor negative effects as a consequence of the development of these sites. It is possible that such</p>

3. Biodiversity and Geodiversity	
	<p>negative effects may be mitigated in any detailed proposals for the site. This would be informed by a suitable ecological appraisal or assessment.</p> <p>Employment site E56 coincides with the South Staffordshire Railway Walk LNR and this site is assessed as having potential major negative effect on the LNR. It is possible that such negative effects may be mitigated in any detailed proposals for the site. This would be informed by a suitable ecological appraisal or assessment.</p> <p>Sites 062, 138, 310a, 368, 460, E43 and E56 coincide with SBIs and there are potential minor negative effects as a consequence of the development of these sites. It is possible that such negative effects may be mitigated in any detailed proposals for the site. This would be informed by a suitable ecological appraisal or assessment.</p>
<p>Commentary: Will the policies mitigate the identified adverse effects?</p>	<p>Policy NB3 supports the recommendations of the Cannock Chase SAC Partnership which has developed a strategy to mitigate the effects of development on Cannock Chase SAC.</p> <p>Policies NB1, NB2 and HC9 would be expected to mitigate potential adverse impacts on SSSIs, ancient woodlands, LNRs, SBIs and priority habitats and deliver a net gain in biodiversity for all development sites.</p> <p>However, at the time of undertaking this assessment there is some uncertainty regarding the potential effects of the proposed housing allocations on Habitats sites. The Publication Draft HRA² concluded that adverse effects on integrity from recreation and water issues could be ruled out, alone or in combination. However, adverse effects on integrity relating to air quality could not be ruled out at this stage and ongoing traffic data collection is required in order to complete the HRA. Subject to the findings of the emerging HRA and mitigation agreements with Natural England, it is expected that the policies would minimise adverse effects on Habitats sites.</p>

² Footprint Ecology (2022) Habitats Regulations Assessment of the South Staffordshire Local Plan Review 2018-2038 (Publication Plan, Regulation 19) – Publication Draft, 10th October 2022

Table G.3.4: Mitigating LPR Policy for SA Objective 4 – Landscape and Townscape

4. Landscape and Townscape	
Identified adverse impacts	<p>Effects on West Midlands Green Belt</p> <p>Effects on the setting to Cannock Chase AONB</p> <p>Threaten or result in the loss of rural and locally distinctive landscape character.</p> <p>Effects on Country Parks.</p> <p>Change in views from Public Rights of Way/for local residents.</p> <p>Increase risk of coalescence and/or urban sprawl.</p>
Potential mitigating influence of LPR policies	<p>Effects on West Midlands Green Belt</p> <p>SSDC's housing target and preferred spatial distributions for growth are informed by the findings of the Greater Birmingham Strategic Growth Study and other evidence base documents, such as the cross boundary Green Belt Study³.</p> <p>The Green Belt Study assesses the likely harm to the Green Belt as a result of development within the assessed land parcels on a seven point scale. In this SA, those land parcels with a Green Belt harm rating of 'very high', 'high' or 'moderate-high' have been assessed as having a potential major negative effect. 'Low-moderate' or 'moderate' harm has been assessed as having minor negative effect, whereas 'low' or 'very low' harm, or areas outside of the study, are assessed as having a negligible effect.</p> <p>The development of these sites is likely to require the removal of much, or all, of the land within the site from the Green Belt, with a resultant 'harm' to the purposes of the Green Belt, as set out in the Green Belt Study. While a range of mitigation measures are set out in the Study (summarised below) to reduce levels of harm, the negative effects of the loss of the Green Belt are unlikely to be fully mitigated by these measures. Therefore, this SA considers it likely there would be residual negative effects in relation to Green Belt harm as consequence of the release of these sites for development.</p> <p>Policy DS1 sets out the policy protection in relation to the West Midlands Green Belt and notes that a separate Green Belt SPD will be prepared which will set out the specific types of development that may be considered acceptable within the Green Belt and seeks to protect the character of the landscape.</p> <p>Examples of potential mitigation measures are set out in Chapter 8 of the Green Belt Study. These are summarised under a number of themes in Table 8.1 of the Study, and include,</p> <ul style="list-style-type: none"> • Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance; • Strengthen boundary at weak points – e.g. where 'breached' by roads; • Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt; • Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge; • Enhance visual openness within the Green Belt; • Preserve/enhance landscape elements which contribute to the setting of historic settlements and views which provide an appreciation of historic setting and special character;

³ LUC (2019) South Staffordshire Green Belt Study: Stage 1 and 2 Report. Available at: <https://www.sstaffs.gov.uk/doc/181123/name/South%20Staffs%20GB%20Stage%201%20and%202%20Report%20FINAL%20v1%20-%20web%20copy.pdf/> [Date Accessed: 27/07/22]

4. Landscape and Townscape

- Enhance access within the Green Belt;
- Improve management practices to enhance countryside character;
- Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings;
- Maintain/create separation between existing washed-over settlement and new inset settlement;
- Design road infrastructure to limit perception of increased urbanisation associated with new development; and
- Use sustainable drainage features to define/enhance separation between settlement and countryside.

Effects on the setting to Cannock Chase AONB

Policy NB4 'Landscape Character' seeks to ensure that development proposals would not result in adverse impacts on landscape character and sets out measures to protect and enhance Cannock Chase AONB and its setting, in accordance with national policy and any additional guidance.

Threaten or result in the loss of rural and locally distinctive landscape character.

The Landscape Sensitivity Study⁴ considered the landscape and visual aspects of the land parcels using ten criteria which were considered most likely to be affected by development. Overall landscape sensitivity was assessed on a five-point scale.

In this SA, sites located in land parcels assessed as 'high' and 'moderate-high' landscape sensitivity are considered to have potentially major negative effects on this objective. Sites in land parcels assessed as 'moderate' and 'low-moderate' are assessed as having minor negative effects on this objective. Sites in land parcels assessed as 'low' landscape sensitivity, or areas outside of the study, are assessed as having a negligible effect on this objective.

Policy NB4 'Landscape Character' will seek to protect and enhance landscapes. The policy seeks to maintain and, where possible, improve the rural character and distinctiveness of the South Staffordshire landscape and includes the protection and retention of all trees, woodland and hedgerows to help protect the local landscape.

Policy HC10 'Design Requirements' will set out the requirements to ensure high quality design, including the requirement for proposed developments to respond positively to landform and respect existing landscape and settlement character.

The nature of the effects of development on the landscape is highly dependent on local site circumstances and the nature of the development proposals. At this stage of the SA process, the development of sites in landscapes which are considered to be of higher sensitivity to development have the potential to result in major negative effects on those landscapes.

Effects on Country Parks.

Country Parks are public green spaces often located at the edge of urban areas and are for public enjoyment and recreation in a semi-rural setting. While Country Parks are not specifically referred to in the policies for protection purposes, it is likely that the requirements of Policy NB4 'Landscape Character' would serve to take into account the character of and views from publicly accessible recreational spaces, such as Cannock Chase Country Park and Baggeridge Country Park. Additionally, Policy HC19 'Green Infrastructure' seeks to protect, maintain and

⁴ LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at: <https://www.sstaffs.gov.uk/planning-files/Spatial-Housing-Strategy/SHSID-Landscape-Study-2019.pdf> [Date Accessed: 02/09/22]

4. Landscape and Townscape	
	<p>enhance greenspaces within the Plan area and strengthen green linkages to major areas of open space, including Country Parks.</p> <p>Change in views from Public Rights of Way/for local residents.</p> <p>As described above, Policy NB4 could serve to ensure new development does not have a detrimental effect on medium and long-distance views.</p> <p>Increase risk of coalescence and/or urban sprawl.</p> <p>Policies DS1 'Green Belt' and DS3 'Open Countryside' seek to protect the openness of the countryside and only release land for development when necessary and justified as part of a Local Plan Review.</p> <p>Policy HC2 'Housing Density' seeks to achieve 35 dwellings per hectare in developments adjoining Tier 1 settlements and urban extensions in order to achieve an efficient use of land. This would reduce overall land requirements to deliver housing needs.</p> <p>Policy HC6 'Rural Exception Sites' provides the requirements whereby small housing sites can be delivered in sites lying adjacent to Tier 1-4 settlements.</p> <p>Policy EC1 'Sustainable Economic Growth' states that preference should be given to sustainable previously developed land.</p>
<p>Commentary: Will the policies mitigate the identified adverse effects?</p>	<p>Policy NB4 would be likely to mitigate significant adverse impacts on the setting and special qualities associated with development located within, or in close proximity to, this AONB.</p> <p>Policies NB4, EC4 and HC10 have the potential to mitigate some potential adverse effects on landscape character and visual amenity identified in this assessment, through sensitive masterplanning and design.</p> <p>It is expected that Policies NB4 and HC19 would mitigate potential adverse impacts from development proposals located in close proximity to a Country Park.</p> <p>Policy NB4 could mitigate significant adverse effects on views. However, the delivery of the required housing need on greenfield sites adjacent to existing settlements and Public Rights of Way (PRoW) would be likely to result in minor adverse effects on views from these receptors.</p> <p>Policies DS1, HC2, HC6 and EC1 would be expected to minimise some adverse impacts on landscape character, particularly in relation to protection of the special qualities of Cannock Chase AONB and proportionate protection of visual amenity and views. However, they would not be expected to fully mitigate changes to landscape character, particularly on greenfield sites, or, mitigate the risk of coalescence and urbanisation of the countryside. There is the potential for Policy HC10 'Design requirements' and Policy HC19 'Green infrastructure' to increase the quality of green infrastructure in developments.</p>

Table G.3.5: Mitigating LPR Policy for SA Objective 5 – Pollution and Waste

5. Pollution and Waste	
Identified adverse impact	<p>Increase in, and exposure to, air pollution (from main road, railway line or AQMA)</p> <p>Risk of contamination of groundwater Source Protection Zones and watercourses</p> <p>Increase in household waste</p>
Potential mitigating influence of LPR policies	<p>Increase in, and exposure to, air pollution (from main road, railway line or AQMA).</p> <p>Policy HC11 ‘Protecting Amenity’ seeks to protect residential amenity, including in relation to noise and other sources of pollution.</p> <p>Policy HC13 ‘Parking Provision’ also introduces the requirement for electric vehicle charging points and supports electric public transport where appropriate. This would serve to encourage the use of electric vehicles and reduce noise and air pollution to some extent.</p> <p>Policy HC19 ‘Green Infrastructure’ would serve to increase the quality of green infrastructure in developments and may serve to filter air pollution to some extent.</p> <p>Policy EC1 ‘Sustainable economic growth’ seeks to promote the provision of active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network.</p> <p>Risk of contamination of groundwater Source Protection Zones and watercourses.</p> <p>Policy NB7 ‘Managing flood risk, sustainable drainage systems & water quality’ requires major development proposals to deliver sustainable drainage systems and that new development proposals located within Flood Zones 2 and 3 provide a site-specific flood risk assessment and surface water drainage strategies. The policy states that development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water or indirectly through the treatments of wastewater.</p> <p>Policy HC19 ‘Green Infrastructure’ seeks to increase green infrastructure provision in developments which may help to control water runoff quality to some extent, through natural filtration.</p> <p>Increase in household waste.</p> <p>Waste management is jointly coordinated by the Staffordshire Joint Waste Management Board (JWMB) which incorporates Staffordshire County Council, Stoke-on-Trent City Council and the eight districts and boroughs within Staffordshire, including SSDC. SSDC has responsibility for the provision of collection and recycling services for households as part of the management of waste in the county. It is likely that development of 9,089 new dwellings will increase household waste in the district. At this stage, the capacity of each site has not been determined and the likely quantities of waste generated have therefore not be calculated.</p> <p>The role of the Local Plan in waste management can be to set guidance or requirements for the reduction of construction waste in new development and to ensure design guidance requires new development to accommodate suitable spaces for recycling and waste storage and collection.</p>

5. Pollution and Waste	
Commentary: Will the policies mitigate the identified adverse effects?	<p>Policies HC11, HC13, HC19 and EC1 would be expected to reduce adverse impacts associated with the exposure of site end users to poor air quality within or adjacent to AQMAs and impacts associated with reduced air and noise quality alongside main roads or railway lines. However, these policies would not be expected to fully mitigate the adverse impacts relating to pollution associated with some sites in proximity to existing AQMAs or main roads, such as the M6, where baseline air and/or noise pollution levels may be high.</p> <p>Policies NB7 and HC19 could help to minimise potential adverse impacts on watercourses and groundwater quality through protecting the quality of run-off.</p>

Table G.3.6: Mitigating LPR Policy for SA Objective 6 – Natural Resources

6. Natural Resources	
Identified adverse impact	Loss of greenfield sites, land with an ecological or landscape value and loss of best and most versatile (BMV) soils
Potential mitigating influence of LPR policies	<p>Policy DS3 ‘Open Countryside’ states “<i>All types of development in the Open Countryside which are not explicitly supported by Policy DS3 will be considered on a case-by-case basis. Such proposals will only be permitted where they are not located on best and most versatile agricultural land.</i>”</p> <p>Policy HC2 ‘Housing Density’ may help to reduce the overall land-take to deliver housing needs across the Plan area and may serve to reduce negative effects on soil loss and loss of Best and Most Versatile (BMV) agricultural land, although this effect is uncertain as it would be dependent on the locations for development.</p> <p>Policy EC1 ‘Sustainable Economic Growth’ gives preference to the “<i>use of sustainable previously developed land for employment development</i>” and could potentially prevent the loss of some local soils.</p>
Commentary: Will the policies mitigate the identified adverse effects?	The majority of the reasonable alternative sites assessed in this report are located on Grades 2 or 3 ALC land, which is likely to comprise some of the district’s BMV land. The policies would not be expected to mitigate adverse impacts on soil resources.

Table G.3.7: Mitigating LPR Policy for SA Objective 7 – Housing

7. Housing	
Identified adverse impact	No adverse impacts anticipated.

Table G.3.8: Mitigating LPR Policy for SA Objective 8 – Health and Wellbeing

8. Health and Wellbeing	
Identified adverse impacts	<p>Limited access to healthcare/leisure facilities and services</p> <p>Exposure to air/noise pollution (from AQMA/main road)</p> <p>Limited access to, and the net loss of, public greenspace</p> <p>Limited access to the pedestrian network</p>
Potential mitigating influence of LPR policies	<p>Limited access to healthcare/leisure facilities and services</p> <p>Policy HC14 ‘Health Infrastructure’ seeks to protect existing healthcare infrastructure and states, “<i>proposals for major residential developments or specialist elderly accommodation must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Clinical Commissioning Group (CCG). Where it is determined that the development results in an unacceptable impact on these facilities and that the development will result in an unacceptable impact on these existing local facilities, then a proportionate financial contribution will be sought agreed through engagement with the CCG</i>”.</p> <p>Policy EC12 ‘Sustainable Transport’ supports the improvement of transport and accessibility across the Plan area. This policy would be expected to improve residents’ access to services and facilities, including healthcare.</p> <p>Exposure to air/noise pollution (from AQMA/main road)</p> <p>Policy HC11 ‘Protecting Amenity’ seeks to protect residential amenity in relation to noise and other sources of pollution.</p> <p>Policy HC13 ‘Parking Provision’ also introduces the requirement for electric vehicle charging points and supports infrastructure for electrical public transport. This would serve to encourage the use of electric vehicles and reduce noise and air pollution to some extent.</p> <p>Policy HC19 ‘Green Infrastructure’ would serve to increase the quality of green infrastructure in developments and may serve to filter air pollution to some extent.</p> <p>Policy EC1 ‘Sustainable Economic Growth’ seeks to promote the provision of active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network.</p> <p>Limited access to, and the net loss of, public greenspace</p> <p>Policy HC17 ‘Open Space’ states that existing open spaces will be protected and will require 0.006 hectares of multi-functional, centrally located open space per dwelling, with the threshold for on-site provision being 33 dwellings or above.</p> <p>Policy HC18 ‘Sports Facilities and Playing Pitches’ states existing sports facilities and playing pitches will be protected and that the provision required from major developments will be determined through the use of the latest Playing Pitch Calculator and Sports Facilities Calculator. An Open Space, Sport and Recreation SPD is proposed.</p> <p>Policy HC19 ‘Green Infrastructure’ will set out the need for development proposals provide green infrastructure to meet open space, biodiversity, active travel, climate mitigation/adaptation and sustainable drainage in multi-functional open space. A Green Infrastructure SPD is proposed.</p>

8. Health and Wellbeing	
	<p>Policy HC12 ‘Space About Dwellings and Internal Space’ states that a “<i>reasonable area of communal open space</i>” must be provided for flats and specialist housing, which may help to increase accessibility to open spaces for recreation and reflection for residents of these accommodation types.</p> <p>Limited access to the pedestrian network</p> <p>Policy EC12 ‘Sustainable transport’ will commit the District/County Council to preparing Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking and cycling improvements within the district and will ensure development is designed to promote high quality walking and cycling routes, both within sites and linking to nearby services and facilities.</p> <p>Policy HC10 ‘Design Requirements’ seeks to ensure development proposals provide a clear and permeable hierarchy of streets, routes and spaces which may serve to encourage travel in the local area by bicycle or by foot.</p> <p>Policy HC19 ‘Green Infrastructure’ seeks to ensure new development provides multifunctional green infrastructure to meet active travel needs, amongst other functions.</p> <p>Policy EC1 ‘Sustainable Economic Growth’ seeks to promote the provision of active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network.</p>
<p>Commentary: Will the policies mitigate the identified adverse effects?</p>	<p>Policies HC14 and EC12 could potentially help to prevent the loss of existing healthcare facilities and improve sustainable access to facilities for some residents, however, the policies would not be expected to fully mitigate the restricted access to healthcare services, in relation to access to NHS hospitals and GP services, for many of the reasonable alternative sites.</p> <p>Policies HC11, HC13, HC19 and EC1 would be expected to reduce adverse impacts associated with the exposure of site end users to poor air quality within or adjacent to AQMAs and impacts associated with reduced air and noise quality alongside main roads or railway lines. However, these policies would not be expected to fully mitigate the adverse impacts relating to pollution associated with some sites in proximity to existing AQMAs or main roads, such as the M6, where baseline air and/or noise pollution levels may be high.</p> <p>Policies HC17, HC18 and HC19 would be expected to ensure new developments provide access to open space, playing pitches and green infrastructure, to some extent, although there is some uncertainty in the total quantity of open space and green infrastructure to be provided at this stage and, therefore, there is some uncertainty in the assessment at this stage.</p> <p>Policies EC1, EC12 and HC19 would be expected to mitigate adverse impacts associated with restricted access to the pedestrian network and help to encourage the uptake of these sustainable transport options in order to access community facilities and centres, to some extent. Development locations in settlements with access to existing public transport infrastructure have the potential for future residents to take fewer journeys by private car. For example, Bilbrook, Penkridge and sites in Cheslyn Hay and Great Wyrley which have access to railway stations. However, in this rural district, with existing high car usage, it is likely many journeys would not be undertaken by walking and cycling.</p>

Table G.3.9: Mitigating LPR Policy for SA Objective 9 – Cultural Heritage

9. Cultural Heritage	
Identified adverse impact	Alteration of character or setting of a heritage asset
Potential mitigating influence of LPR policies	<p>Policy NB8 ‘Protection and Enhancement of the Historic Environment and Heritage Assets’ will promote the conservation and enhancement of the historic environment through the safeguarding of heritage assets and their setting through various criteria, in line with the NPPF and seeking opportunities to better reveal the significance of heritage assets.</p> <p>Policy NB9 ‘Canal Network’ supports development canal-side proposals which meet various criteria including that proposals must conserve and enhance the heritage value of canals and enhance the recreation and tourism value of the canal network.</p> <p>Policy NB4 ‘Landscape Character’ seeks to protect and enhance the intrinsic rural character and local distinctiveness of South Staffordshire, through ensuring that development proposals take into consideration the surrounding environment, views and sensitivities. This includes having regard to heritage assets and especially for any development within Historic Landscape Areas where there may be a greater concentration of designated heritage assets.</p> <p>Policy HC10 ‘Design Requirements’ would help to ensure that development proposals take into account local character and distinctiveness including historic assets. The policy would also ensure that the design of new development reflects the requirements of any Conservation Area Management Plans that are relevant to the site in question.</p> <p>Policy EC5 ‘Tourism’ supports development proposals for tourist accommodation and facilities where they would not adversely affect the character of any nearby heritage assets and their settings.</p>
Commentary: Will the policies mitigate the identified adverse effects?	<p>These policies would be expected to mitigate potentially significant adverse impacts on the local historic environment which may occur as a consequence of the development of the sites, including impacts on Listed Buildings, Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. Potential impacts on underground archaeology are uncertain as the significance of such features may not be known at this time. The requirement for a proportionate assessment should also include the proposals for any required mitigation.</p>

Table G.3.10: Mitigating LPR Policy for SA Objective 10 – Transport and Accessibility

10. Transport	
Identified adverse impacts	<p>Limited access to public transport</p> <p>Limited access to local services and facilities</p> <p>Limited access to the pedestrian or cycle network</p> <p>Limited access to the road network</p>
Potential mitigating influence of LPR policies	<p>Limited access to public transport</p> <p>Policy EC12 ‘Sustainable Transport’ will ensure that the Council proactively work with partners to “<i>promote sustainable transport measures and deliver high quality transport infrastructure and links across the District</i>” including active transport measures. Various other Plan policies include public transport provisions such as DS5, EC8 and EC9.</p> <p>Limited access to local services and facilities</p> <p>Policy EC8 ‘Retail’ will seek to support the vitality of village centres and limit residential development within village centres if it results in the loss of existing facilities.</p> <p>Policy EC9 ‘Protecting Community Services and Facilities’ seeks to protect and enhance essential communities and facilities, including small local shops and pubs.</p> <p>Policy HC14 ‘Health Infrastructure’ seeks to protect existing healthcare infrastructure.</p> <p>Limited access to the pedestrian or cycle network</p> <p>Policy EC12 ‘Sustainable Transport’ commits to preparing a Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking and cycling improvements in the district and seeks to ensure new development is designed to promote high quality walking and cycling routes, both within sites and linking to nearby services and facilities.</p> <p>Policy HC10 ‘Design Requirements’ requires new development to various accessibility and transport related criteria for proposals to meet in order to be supported, including providing “<i>access to local services and facilities via sustainable modes of transport</i>”. The policy will also require new development to accommodate cycle storage and “<i>give safe and convenient ease of movement to all users prioritising pedestrians and cycle users</i>”.</p> <p>Limited access to the road network</p> <p>A small number of reasonable alternative sites were identified as having limited access to the existing road network.</p>
Commentary: Will the policies mitigate the identified adverse effects?	<p>Policy EC12 would be expected to improve the access to sustainable transport options. The nature and locations of these improvements is uncertain at this stage of the planning process.</p> <p>Policies EC8, EC9 and HC14 would be expected to maintain existing local services and facilities as far as possible within the Local Plan process, however, these policies would not be expected to fully mitigate the restricted access to local facilities, in some locations.</p> <p>Policies EC12 and HC10 would be expected to mitigate adverse impacts associated with restricted access to the pedestrian and cycle networks and help to encourage the uptake of these sustainable transport options in order to access community facilities.</p>

10. Transport	
	There are no policies to address limited access to the road network specifically, however, it is anticipated that access matters would be clarified in the plan-making process and without suitable vehicular access SSDC would consider the site to undeliverable.

Table G.3.11: Mitigating LPR Policy for SA Objective 11 – Education

11. Education	
Identified adverse impact	Limited access to primary and secondary education facilities
Potential mitigating influence of LPR policies	Policy HC15 ‘Education’ will seek to protect existing education infrastructure and states that new education infrastructure required as a consequence of the delivery of the housing need would be calculated in line with the Staffordshire Education Infrastructure Contributions Policy. Policy EC12 ‘Sustainable transport’ seeks to promote high quality walking and cycling routes to nearby facilities. This policy could potentially help to improve access to existing schools from sites.
Commentary: Will the policies mitigate the identified adverse effects?	These policies may ensure sufficient capacity of school places and some improvements to routes to schools. At this stage of the planning process, it is uncertain whether the policies would provide sustainable access to schools, for example, through the provision of sustainable access to secondary schools by public transport. Potential negative impacts on access to primary and secondary schools are therefore not considered to be mitigated by these policies at this stage.

Table G.3.12: Mitigating LPR Policy for SA Objective 12 – Economy and Employment

12. Economy	
Identified adverse impacts	<p>Loss of employment floorspace</p> <p>Limited access to employment opportunities by public transport</p>
Potential mitigating influence of LPR policies	<p>Loss of employment floorspace</p> <p>A small number of reasonable alternative sites were identified as having existing employment uses which may be lost as a consequence of the allocation of the site.</p> <p>Policy EC1 ‘Sustainable economic growth’ will seek to support the delivery of the strategic employment areas including the West Midlands Interchange, support opportunities for employment development in Tier 1 and Tier 2 villages and promote diversification of the rural economy.</p> <p>Policy EC2 ‘Retention of employment sites’ seeks to protect existing designated employment areas.</p> <p>Policy EC4 ‘Rural Economy’ supports rural diversification subject to certain measures.</p> <p>Policies EC8 ‘Retail’ and EC9 ‘Protecting community services and facilities’ will seek to protect the vibrancy of village centres by ensuring any new residential development does not result in the loss of essential services or facilities.</p> <p>Limited access to employment opportunities by public transport</p> <p>Policies EC1, EC2, EC4, EC8 and EC9 seek to protect existing employment areas and provide opportunities for small scale employment development in more rural areas. These policies seek to encourage a greater number of local residents to seek local employment opportunities.</p> <p>Policy EC12 ‘Sustainable transport’ seeks to support a range of measures to encourage more sustainable modes of transport, including “opportunities to improve bus and rail services and connections including making provision from increased demand from new development within the District”.</p>
Commentary: Will the policies mitigate the identified adverse effects?	<p>Policies EC1, EC2, EC4, EC8 and EC9 would be expected to mitigate the potential adverse impacts associated with the loss of existing employment uses associated with the reasonable alternative sites.</p> <p>While policies EC1, EC2, EC4, EC8, EC9 and EC12 are likely to improve opportunities for local employment and improve access to sustainable transport for commuting purposes, it is unlikely these policies would be able to fully mitigate the identified impact of limited access to employment by public transport.</p>

G.4 Post mitigation site assessments

G.4.1 Overview

G.4.1.1 The impact matrices for all reasonable alternative site assessments, post-mitigation are presented in **Table G.4.1**. These impacts have been identified following consideration of the likely mitigation effects of the LPR strategic and DM policies as discussed in **Table G.3.1**.

Table G.4.1: Impact matrix of all reasonable alternative site assessments post-mitigation

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Bednall												
023	+/-	+	0	--	0	-	+	-	0	-	-	--
024	+/-	+	0	--	0	-	+	-	0	-	-	--
026	+/-	+	0	--	0	+	+	-	0	-	-	--
Bilbrook and Codsall												
210	+/-	+	0	--	-	-	+	-	0	-	++	+
211	+/-	0	0	-	0	-	+	-	0	-	-	-
213	+/-	+	0	0	0	+	+	-	0	++	++	+
221	+/-	0	0	--	0	-	+	-	0	-	++	+
222	+/-	+	0	--	0	-	+	-	0	-	-	-
224	+/-	+	0	--	-	-	+	-	0	-	-	+
SAD 228	+/-	+	0	0	-	+	+	-	0	++	++	+
236	+/-	0	0	--	-	-	+	-	0	-	--	-
419a/b	+/-	+	0	-	0	-	+	-	0	-	--	-
447	+/-	+	0	--	0	-	+	-	0	-	-	+
503	+/-	0	0	--	-	-	+	-	0	-	++	+
507	+/-	+	0	--	0	-	+	-	0	-	-	-
510	+/-	+	0	--	-	-	+	-	0	-	++	+
512	+/-	0	0	--	-	-	+	-	0	-	--	-
515	+/-	+	0	--	0	-	+	-	0	-	--	-
519	+/-	0	0	--	-	-	+	-	0	-	-	-
630a	+/-	+	0	--	0	-	+	-	0	-	--	-
630b	+/-	0	0	--	-	-	+	-	0	-	--	-
666	+/-	0	0	--	-	-	+	-	0	-	-	-
703	+/-	+	0	--	0	-	+	-	0	-	-	-
735	+/-	+	0	--	-	-	+	-	0	-	++	-
740	+/-	+	0	-	-	-	+	-	0	++	++	+

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Bishops Wood												
096	+/-	+	0	--	0	-	+	-	0	-	-	-
097	+/-	+	0	--	0	-	+	-	0	-	-	-
099	+/-	+	0	--	0	-	+	-	0	-	-	-
Bloxwich												
207	+/-	+	0	-	-	+	+	-	0	+	++	-
492a/b/c	+/-	+	0	--	-	-	+	-	0	-	-	-
Bobbington												
319	+/-	+	0	-	0	-	+	-	0	-	-	--
320	+/-	+	0	--	0	-	+	-	0	-	-	--
321	+/-	+	0	--	0	-	+	-	0	-	-	--
410	+/-	+	0	--	0	-	+	-	0	-	-	--
Brewood												
057	+/-	+	0	0	0	+	+	-	0	-	-	-
062	+/-	+	0	--	0	-	+	-	0	-	-	-
067	+/-	+	0	--	0	-	+	-	0	-	--	-
074	+/-	+	0	--	0	-	+	-	0	-	-	-
075/075a	+/-	+	0	--	0	-	+	-	0	-	-	-
076	+/-	+	0	--	0	-	+	-	0	-	-	-
076a	+/-	+	0	--	0	-	+	-	0	-	-	-
078	+/-	+	0	--	0	-	+	-	0	-	-	-
079	+/-	+	0	--	0	-	+	-	0	-	-	-
376	+/-	+	0	--	0	-	+	-	0	-	-	-
611	+/-	+	0	--	0	-	+	-	0	-	-	-
616	+/-	+	0	--	0	-	+	-	0	-	-	-
617	+/-	0	0	--	0	-	+	-	0	-	--	-
658	+/-	+	0	--	0	-	+	-	0	-	-	-
Cannock												
202	+/-	+	0	--	-	-	+	-	0	-	-	-
203	+/-	+	0	--	-	-	+	-	0	-	--	-
474	+/-	+	0	--	-	-	+	-	0	-	-	-
529	+/-	+	0	--	-	-	+	-	0	-	-	-
624	+/-	+	0	--	-	-	+	-	0	-	--	-
659	+/-	+	0	--	0	-	+	-	0	-	++	-
720	+/-	0	0	-	-	+	+	-	0	-	--	-
Cheslyn Hay and Great Wyrley												
116	+/-	+	0	--	0	-	+	-	0	-	-	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
119a	+/-	+	0	-	0	-	+	-	0	-	++	+
119b	+/-	+	0	-	-	-	+	-	0	-	++	-
120	+/-	+	0	-	-	-	+	-	0	-	-	+
131	+/-	+	0	--	-	-	+	-	0	-	-	-
134	+/-	+	0	-	-	-	+	-	0	-	-	-
136	+/-	+	0	-	-	-	+	-	0	++	-	+
SAD 136	+/-	+	0	0	-	-	+	-	0	++	++	+
136a	+/-	+	0	-	0	-	+	-	0	-	-	-
137	+/-	+	0	--	0	-	+	-	0	-	-	-
138	+/-	0	0	-	-	-	+	-	0	++	++	-
SAD 139	+/-	+	0	0	-	-	+	-	0	-	++	-
SAD 141	+/-	+	0	0	-	-	+	-	0	++	++	+
440	+/-	+	0	-	0	-	+	-	0	-	++	-
489	+/-	+	0	-	-	-	+	-	0	-	++	-
491	+/-	+	0	0	-	+	+	-	0	++	-	+
523	+/-	+	0	-	0	-	+	-	0	-	++	+
525	+/-	0	0	--	0	-	+	-	0	-	-	-
526	+/-	+	0	--	-	-	+	-	0	-	--	-
536a	+/-	+	0	--	-	-	+	-	0	-	-	-
536b	+/-	+	0	--	-	-	+	-	0	-	-	-
638	+/-	+	0	0	-	+	+	-	0	++	-	-
696	+/-	+	0	--	-	-	+	-	0	-	--	-
704	+/-	+	0	0	-	+	+	-	0	-	++	-
730	+/-	+	0	-	-	+	+	-	0	-	++	-
741	+/-	+	0	-	-	-	+	-	0	++	++	+
Coven												
082	+/-	+	0	0	-	-	+	-	0	-	-	-
082a	+/-	+	0	-	-	-	+	-	0	-	-	+
084a	+/-	+	0	--	0	-	+	-	0	-	--	-
085	+/-	+	0	-	-	-	+	-	0	-	-	-
087	+/-	+	0	-	-	-	+	-	0	-	-	-
615	+/-	0	0	-	0	-	+	-	0	-	--	-
618	+/-	+	0	--	-	-	+	-	0	-	-	+
739	+/-	+	0	0	-	+	+	-	0	-	-	+
Dunston												
029	+/-	0	0	-	-	-	+	-	0	-	-	-
029a	+/-	+	0	-	-	-	+	-	0	-	-	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
487	+/-	0	0	-	-	-	+	-	0	-	-	-
588	+/-	0	0	-	-	-	+	-	0	-	-	-
Essington												
150	+/-	+	0	--	-	-	+	-	0	-	--	+
151/662	+/-	+	0	--	-	-	+	-	0	-	--	-
154	+/-	+	0	--	-	-	+	-	0	-	--	+
157	+/-	+	0	0	0	-	+	-	0	-	-	+
160	+/-	+	0	--	-	-	+	-	0	-	--	+
163	+/-	+	0	--	-	-	+	-	0	+	--	-
163a	+/-	+	0	--	-	-	+	-	0	-	--	-
163b	+/-	+	0	--	-	-	+	-	0	-	-	-
164	+/-	+	0	--	-	-	+	-	0	-	--	+
164a	+/-	+	0	--	-	-	+	-	0	-	-	+
165	+/-	+	0	--	-	-	+	-	0	-	--	+
166	+/-	+	0	--	-	-	+	-	0	-	--	+
392	+/-	0	0	--	-	-	+	-	0	-	++	+
393	+/-	+	0	-	-	-	+	-	0	-	-	+
471	+/-	+	0	--	0	-	+	-	0	-	-	-
486a/b	+/-	+	0	--	-	-	+	-	0	-	--	+
486c	+/-	+	0	--	-	-	+	-	0	-	-	+
520	+/-	+	0	--	-	-	+	-	0	-	++	-
679	+/-	+	0	--	-	-	+	-	0	-	-	+
Featherstone												
102	+/-	+	0	--	-	-	+	-	0	-	--	+
SAD 168	+/-	+	0	0	0	+	+	-	0	-	-	-
169	+/-	+	0	--	0	-	+	-	0	-	-	+
170	+/-	+	0	-	-	-	+	-	0	-	-	-
172	+/-	+	0	--	-	-	+	-	0	-	--	-
204	+/-	+	0	--	-	-	+	-	0	-	--	+
206	+/-	+	0	--	-	-	+	-	0	-	--	+
396	+/-	+	0	--	0	-	+	-	0	-	--	-
397	+/-	+	0	-	0	-	+	-	0	-	-	-
527	+/-	+	0	--	-	-	+	-	0	-	--	+
537/537a	+/-	0	0	--	-	-	+	-	0	-	-	+
646a/b	+/-	0	0	--	-	-	+	-	0	-	-	+
742	+/-	+	0	-	-	-	+	-	-	-	-	+
Huntington												

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
016	+/-	+	0	0	-	-	+	-	0	-	-	-
017	+/-	+	0	--	0	-	+	-	0	-	--	-
022	+/-	+	0	--	0	-	+	-	0	-	--	-
591	+/-	+	0	--	0	-	+	-	0	-	-	-
592	+/-	+	0	--	-	-	+	-	0	-	--	-
732	+/-	+	0	--	0	-	+	-	0	-	-	-
Kinver												
272	+/-	+	0	--	0	-	+	-	0	-	-	-
273	+/-	+	0	--	0	-	+	-	0	-	-	-
274	+/-	+	0	-	0	-	+	-	0	-	-	-
SAD 274	+/-	+	0	-	0	-	+	-	0	-	-	-
409	+/-	+	0	--	0	-	+	-	0	-	-	-
546	+/-	+	0	--	0	-	+	-	0	-	-	-
549	+/-	+	0	--	0	-	+	-	0	-	-	-
576	+/-	+	0	--	0	-	+	-	0	-	-	-
Pattingham												
249	+/-	+	0	--	0	-	+	-	0	-	-	-
250	+/-	+	0	--	0	-	+	-	0	-	-	-
251	+/-	+	0	-	0	-	+	-	0	-	-	-
252	+/-	+	0	--	0	-	+	-	0	-	-	-
253	+/-	+	0	--	0	-	+	-	0	-	-	-
255	+/-	+	0	-	0	-	+	-	0	-	-	-
257	+/-	+	0	--	0	-	+	-	0	-	-	-
400	+/-	+	0	--	0	-	+	-	0	-	-	-
401	+/-	+	0	--	0	-	+	-	0	-	-	-
421	+/-	+	0	--	0	-	+	-	0	-	-	-
Penkridge												
005	+/-	+	0	-	-	-	+	-	0	-	++	-
006	+/-	+	0	-	0	-	+	-	0	-	-	-
010	+/-	0	0	--	-	-	+	-	0	-	--	-
420	+/-	0	0	-	-	-	+	-	0	++	++	+
430a	+/-	+	0	--	-	-	+	-	0	-	--	-
430b	+/-	+	0	--	-	-	+	-	0	-	--	-
584	+/-	+	0	--	-	-	+	-	0	-	--	-
585	+/-	+	0	--	-	-	+	-	0	-	-	+
585a	+/-	0	0	--	-	-	+	-	0	-	-	+
665	+/-	0	0	--	-	-	+	-	0	-	-	+

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
711	+/-	0	0	--	-	-	+	-	0	++	-	+
Penn and Lower Penn												
350c	+/-	+	0	--	0	-	+	-	0	-	-	-
350d	+/-	+	0	--	-	-	+	-	0	-	--	-
494a	+/-	+	0	--	-	-	+	-	0	-	-	-
494b	+/-	+	0	--	-	-	+	-	0	-	-	-
559	+/-	+	0	--	-	-	+	-	0	-	--	-
561	+/-	+	0	--	-	-	+	-	0	-	-	-
573	+/-	+	0	--	-	-	+	-	0	-	--	-
579	+/-	0	0	--	-	-	+	-	0	-	-	-
582	+/-	+	0	--	-	-	+	-	0	-	++	-
710	+/-	+	0	--	-	-	+	-	0	-	-	-
Perton												
238	+/-	+	0	--	-	-	+	-	0	-	--	-
239	+/-	+	0	-	0	-	+	-	0	-	--	-
241	+/-	+	0	--	-	-	+	-	0	-	-	-
243	+/-	+	0	--	-	-	+	-	0	-	-	-
245	+/-	+	0	-	-	+	+	-	0	-	--	-
246a	+/-	+	0	--	0	-	+	-	0	-	--	-
260	+/-	+	0	--	-	-	+	-	0	-	--	-
402	+/-	+	0	-	-	-	+	-	0	-	-	-
407	+/-	+	0	--	0	-	+	-	0	-	--	-
454	+/-	+	0	--	0	-	+	-	0	-	-	-
504	+/-	+	0	--	-	-	+	-	0	-	-	-
505	+/-	+	0	-	-	-	+	-	0	-	-	-
506	+/-	+	0	--	0	-	+	-	0	-	-	-
705	+/-	+	0	--	0	-	+	-	0	-	--	-
Sedgley												
339	+/-	+	0	--	-	-	+	-	0	-	++	-
548	+/-	+	0	--	-	-	+	-	0	-	-	-
560	+/-	+	0	--	-	-	+	-	0	-	++	-
566	+/-	+	0	--	-	-	+	-	0	-	-	-
567	+/-	+	0	--	-	-	+	-	0	-	-	-
Seisdon												
358	+/-	+	0	--	0	-	+	-	0	-	--	-
359	+/-	+	0	--	0	-	+	-	0	-	--	-
671	+/-	+	0	--	0	-	+	-	0	-	--	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
702	+/-	+	0	--	0	-	+	-	0	-	--	-
Shareshill												
181	+/-	+	0	--	0	-	+	-	0	-	-	-
183	+/-	+	0	--	0	-	+	-	0	-	-	-
184	+/-	+	0	-	0	-	+	-	0	-	-	-
185	+/-	+	0	-	0	-	+	-	0	-	-	-
Stafford												
036a	+/-	0	0	--	-	-	+	-	0	-	--	-
036c	+/-	+	0	--	-	-	+	-	0	-	++	-
Swindon												
312a	+/-	+	0	--	0	-	+	-	0	-	-	-
313	+/-	+	0	--	0	-	+	-	0	-	-	-
SAD 313	+/-	+	0	0	0	-	+	-	0	-	-	-
314	+/-	+	0	--	0	-	+	-	0	-	-	-
315	+/-	+	0	--	0	-	+	-	0	-	-	-
412	+/-	0	0	-	0	-	+	-	0	-	-	-
437	+/-	0	0	--	0	-	+	-	0	-	-	-
682	+/-	+	0	--	0	-	+	-	0	-	-	-
717	+/-	+	0	--	0	-	+	-	0	-	-	-
718	+/-	+	0	--	0	-	+	-	0	-	-	-
Trysull												
327	+/-	+	0	--	0	-	+	-	0	-	-	--
328	+/-	+	0	--	0	-	+	-	0	-	-	--
329	+/-	+	0	--	0	-	+	-	0	-	-	--
544	+/-	+	0	--	0	-	+	-	0	-	-	--
558	+/-	+	0	--	0	-	+	-	0	-	-	--
Wall Heath												
368	+/-	0	0	--	-	-	+	-	0	-	--	-
370	+/-	0	0	--	-	-	+	-	0	-	--	-
577	+/-	+	0	--	-	-	+	-	0	-	--	-
684	+/-	+	0	--	-	-	+	-	0	-	--	-
Wheaton Aston												
090	+/-	0	0	--	0	-	+	-	0	-	-	-
091	+/-	0	0	--	0	-	+	-	0	-	-	-
092	+/-	+	0	-	0	-	+	-	0	-	-	-
094	+/-	+	0	--	0	-	+	-	0	-	-	-
377/093	+/-	+	0	-	0	-	+	-	0	-	-	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
378	+/-	+	0	--	0	-	+	-	0	-	-	-
378a	+/-	+	0	--	0	-	+	-	0	-	-	-
379	+/-	+	0	-	0	-	+	-	0	-	-	-
SAD 379	+/-	+	0	-	0	-	+	-	0	-	-	-
382	+/-	+	0	--	0	-	+	-	0	-	-	-
426a	+/-	+	0	-	0	-	+	-	0	-	-	-
426b	+/-	0	0	--	0	-	+	-	0	-	-	-
608	+/-	+	0	--	0	-	+	-	0	-	-	-
610	+/-	+	0	--	0	-	+	-	0	-	-	-
614	+/-	+	0	-	0	-	+	-	0	-	-	-
619	+/-	+	0	--	0	-	+	-	0	-	-	-
Wollaston and Wordsley												
364	+/-	+	0	--	-	-	+	-	0	-	++	-
365	+/-	+	0	--	-	-	+	-	0	-	-	-
654	+/-	+	0	--	-	-	+	-	0	-	--	-
655	+/-	+	0	--	-	-	+	-	0	-	--	-
673	+/-	+	0	--	-	-	+	-	0	-	++	-
Wombourne												
280	+/-	0	0	0	0	-	+	-	0	-	++	-
283	+/-	+	0	--	0	-	+	-	0	-	-	-
284	+/-	0	0	--	-	-	+	-	0	-	++	-
285	+/-	+	0	-	0	-	+	-	0	-	-	-
286	+/-	+	0	-	0	-	+	-	0	-	++	-
298	+/-	+	0	-	0	-	+	-	0	-	-	-
305	+/-	+	0	0	0	-	+	-	0	-	-	-
306	+/-	+	0	--	-	-	+	-	0	-	++	-
309	+/-	+	0	--	0	-	+	-	0	-	--	-
310a	+/-	+	0	--	0	+	+	-	0	-	-	-
310b	+/-	0	0	-	0	+	+	-	0	-	-	-
335a	+/-	+	0	-	0	-	+	-	0	-	--	-
335b	+/-	+	0	-	0	-	+	-	0	-	--	-
416	+/-	+	0	-	0	-	+	-	0	-	-	-
416a	+/-	+	0	--	0	-	+	-	0	-	-	-
417	+/-	+	0	-	0	-	+	-	0	-	-	-
438	+/-	0	0	-	0	-	+	-	0	-	++	-
458	+/-	0	0	-	0	-	+	-	0	-	-	-
459	+/-	+	0	-	0	-	+	-	0	-	++	-

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
460	+/-	0	0	--	0	+	+	-	0	-	-	-
463a	+/-	+	0	--	0	-	+	-	0	-	++	-
463b	+/-	+	0	--	-	-	+	-	0	-	++	-
463c	+/-	+	0	--	-	-	+	-	0	-	++	-
463d	+/-	+	0	--	-	-	+	-	0	-	++	-
477	+/-	+	0	-	0	-	+	-	0	-	++	-
479a	+/-	+	0	-	0	-	+	-	0	-	--	-
554	+/-	+	0	-	0	-	+	-	0	-	-	-
562/415	+/-	+	0	-	0	-	+	-	0	-	++	-
626	+/-	+	0	--	0	-	+	-	0	-	-	-
627	+/-	+	0	--	0	-	+	-	0	-	-	-
628	+/-	+	0	--	0	-	+	-	0	-	-	-
629	+/-	+	0	--	0	-	+	-	0	-	-	-
701	+/-	+	0	--	-	-	+	-	0	-	++	-
707	+/-	+	0	--	0	-	+	-	0	-	--	-
708	+/-	+	0	--	0	-	+	-	0	-	-	-
738	+/-	+	0	-	0	-	+	-	-	-	-	-
Employment Sites												
E04a	+/-	+	0	-	-	-	0	-	0	-	0	++
E04b	+/-	+	0	-	-	-	0	-	0	-	0	++
E05	+/-	+	0	-	-	-	0	-	0	-	0	++
E14	+/-	+	0	0	-	-	0	-	0	-	0	++
E15a	+/-	+	0	--	-	+	0	-	0	-	0	++
E18	+/-	0	0	-	-	-	0	-	0	-	0	++
E20a	+/-	+	0	-	-	-	0	-	0	-	0	++
E20b	+/-	+	0	-	-	-	0	-	0	-	0	++
E24	+/-	0	0	-	-	-	0	-	0	-	0	++
E30	+/-	0	0	-	-	-	0	-	0	-	0	++
E31	+/-	+	0	--	0	-	0	-	0	-	0	++
E32	+/-	+	0	--	0	-	0	-	0	-	0	++
E33	+/-	+	0	--	-	-	0	-	0	-	0	++
E37a/b	+/-	0	0	--	-	-	0	-	0	-	0	++
E38	+/-	+	0	--	-	-	0	-	0	-	0	++
E39	+/-	+	0	-	-	-	0	-	0	-	0	++
E41	+/-	+	0	--	-	+	0	-	0	-	0	++
E42	+/-	0	0	--	-	-	0	-	0	-	0	++
E43	+/-	0	0	--	-	-	0	-	0	-	0	++

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
E44	+/-	+	0	-	-	-	0	-	0	-	0	++
E45	+/-	0	0	--	-	-	0	-	0	-	0	++
E46	+/-	0	0	--	-	-	0	-	0	-	0	++
E47	+/-	+	0	--	-	-	0	-	0	-	0	++
E48	+/-	+	0	--	-	-	0	-	0	-	0	++
E49	+/-	+	0	--	-	-	0	-	0	-	0	++
E50	+/-	+	0	-	-	-	0	-	0	-	0	++
E51a	+/-	+	0	--	-	-	0	-	0	-	0	++
E51b	+/-	+	0	--	0	-	0	-	0	-	0	++
E52	+/-	+	0	--	-	-	0	-	0	-	0	++
E53	+/-	0	0	--	-	-	0	-	0	-	0	++
E54	+/-	+	0	--	-	-	0	-	0	-	0	++
E55	+/-	0	0	--	0	+	0	-	0	-	0	++
E56	+/-	+	0	--	-	-	0	-	0	-	0	++
E57	+/-	+	0	-	-	-	0	-	0	-	0	++
E58a	+/-	+	0	-	-	-	0	-	0	-	0	++
E58b	+/-	+	0	-	-	-	0	-	0	-	0	++
E59	+/-	+	0	--	0	-	0	-	0	-	0	++
E60a	+/-	+	0	--	-	-	0	-	0	-	0	++
E60b	+/-	+	0	--	-	-	0	-	0	-	0	++
E61a	+/-	0	0	--	0	-	0	-	0	-	0	++
E61b	+/-	0	0	--	-	-	0	-	0	-	0	++
Gypsy and Traveller Sites												
GT01	+/-	+	0	--	-	+	+/-	-	0	+	--	--
GT02	+/-	+	0	--	0	+	+/-	-	0	-	--	--
GT03	+/-	+	0	-	0	+	+/-	-	0	-	--	--
GT04	+/-	0	0	--	0	-	+/-	-	0	-	--	+
GT05	+/-	+	0	--	0	+	+/-	-	0	-	--	+
GT06	+/-	+	0	--	0	+	+/-	-	0	-	--	+
GT07	+/-	+	0	--	0	+	+/-	-	0	-	--	--
GT08	+/-	+	0	--	-	+	+/-	-	0	-	--	+
GT09	+/-	+	0	0	0	+	+/-	-	0	-	--	+
GT10	+/-	+	0	0	0	+	+/-	-	0	-	--	+
GT11	+/-	+	0	0	0	+	+/-	-	0	-	--	+
GT12	+/-	0	0	--	-	-	+/-	-	0	-	--	--
GT13	+/-	+	0	--	0	+	+/-	-	0	-	++	--
GT14	+/-	+	0	--	-	-	+/-	-	0	-	--	+

Site Reference	SA Objective											
	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
GT15	+/-	+	0	0	-	+	+/-	-	0	-	-	-
GT16	+/-	+	0	0	-	+	+/-	-	0	-	-	-
GT17	+/-	+	0	-	0	-	+/-	-	0	-	--	--
GT18	+/-	+	0	-	0	+	+/-	-	0	-	++	--
GT19	+/-	+	0	--	-	+	+/-	-	0	-	--	+
GT20	+/-	+	0	-	-	-	+/-	-	0	-	--	+
GT23	+/-	+	0	--	0	+	+/-	-	0	-	--	+
GT24	+/-	+	0	-	0	-	+/-	-	0	-	-	-
GT27	+/-	+	0	-	0	-	+/-	-	0	-	--	+
GT30	+/-	0	0	--	-	+	+/-	-	0	-	--	--
GT32	+/-	0	0	-	-	+	+/-	-	0	-	++	--
GT33	+/-	+	0	--	0	+	+/-	-	0	-	--	--
GT34	+/-	+	0	--	-	+	+/-	-	0	-	--	-
GT35	+/-	+	0	-	0	-	+/-	-	0	-	-	+
GT36	+/-	+	0	--	0	-	+/-	-	0	-	--	-
TSP01	+/-	+	0	-	-	+	+/-	-	0	-	-	+
SCC1	+/-	+	0	-	0	-	+/-	-	0	-	--	--
SCC2	+/-	0	0	-	-	-	+/-	-	0	-	--	-
SCC3	+/-	0	0	--	-	-	+/-	-	0	-	--	+
SCC4	+/-	0	0	--	0	-	+/-	-	0	-	--	-
SCC5	+/-	0	0	--	-	-	+/-	-	0	-	--	-
SCC6	+/-	0	0	--	-	-	+/-	-	0	-	-	-
SCC7	+/-	0	0	-	0	-	+/-	-	0	-	-	--
SCC8	+/-	0	0	--	-	-	+/-	-	0	-	-	--
SCC9	+/-	+	0	--	-	-	+/-	-	0	-	++	-
SCC10	+/-	+	0	-	0	-	+/-	-	0	-	-	--

Appendix H: Reasons for Selection and Rejection of Reasonable Alternative Sites

H.1 Selected Residential Sites	H1
H.2 Rejected Residential Sites	H14
H.3 Selected Employment Sites	H81
H.4 Rejected Employment Sites.....	H82
H.5 Selected Gypsy and Traveller Sites	H89
H.6 Rejected Gypsy and Traveller Sites.....	H90

H.1 Selected Residential Sites

H.1.1.1 **Table H.1.1** lists the preferred residential-led sites set out in the Publication Version of the South Staffordshire LPR, within Policies SA1-SA5. The outline reasons for selecting each of the sites, as set out in the table below, have been determined by SSDC.

Table H.1.1: Outline reasons for selecting residential sites

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
Penkridge	005	Land off Cherrybrook Drive	<p>Key positives and negatives</p> <ul style="list-style-type: none"> · In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 · Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 006, 420, 584 and 010.</p>
Penkridge	006	Land off Boscomoor Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lies in the Green Belt (low-moderate harm) unlike other site options around the village • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options. Whilst the Council's initial preference was to limit allocations in Penkridge to non-Green Belt land, the site is considered to perform as well as, if not better than, many other proposed Green Belt allocations elsewhere in the District. It could therefore support the Council's preferred spatial strategy if delivered alongside Sites 420, 584 and 005.</p>
Penkridge	010	land at Lower Drayton Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike other site options around the village, the site is not within the Green Belt • In a higher sensitivity landscape compared to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against education in the Sustainability Appraisal, however there is potential for Sites 584 and 010 to jointly deliver on-site education infrastructure to mitigate this issue • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 420, 584, 006 and 005.
Penkridge	420	land North of Penkridge off A449 (East)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike other site options around the village, the site is not within the Green Belt • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 420, 584, 006 and 005.</p>
Penkridge	584	land north of Penkridge off the A449	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike other site options around the village, the site is not within the Green Belt • Includes land in a higher sensitivity landscape compared to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against education in the Sustainability Appraisal, however there is potential for Sites 584 and 010 to jointly deliver on-site education infrastructure to mitigate this issue • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 420, 010 and 005.</p>
Codsall/Bilbrook	SAD Site 228	Former Adult Training Centre off Histons Hill	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Green Belt site options around Bilbrook/Codsall, the land is a development boundary site allocated by 2018 Site Allocations Document • Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal • Opportunity to redevelop brownfield land • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 213, 519, 224, SAD Site 228 and 419a&b</p>
Codsall/Bilbrook	213	Bilbrook House, Carter Avenue	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Green Belt site options around Bilbrook/Codsall, the land is a development boundary site • Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal • Opportunity to redevelop brownfield land

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<ul style="list-style-type: none"> Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 519, 224, SAD Site 228 and 419a&b</p>
Codsall/Bilbrook	224	Land adjacent 44 Station Rd	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Located in very close proximity to Codsall station, with landowner indicating willingness to deliver additional station parking <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 519, 213, SAD Site 228 and 419a&b</p>
Codsall/Bilbrook	419a	land at Keepers Lane and Nine Acres Farm, Codsall	<p>Key positives and negatives</p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Due to site size (when considered with site 419b), the site has capacity to deliver required first school to serve the villages Major negative impacts predicted against education in the Sustainability Appraisal <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 519, 224, SAD Site 228 and 213</p>
Codsall/Bilbrook	419b	land off Wergs Hall Road, Codsall	<p>Key positives and negatives</p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Due to site size, has capacity to deliver required first school to serve the villages Major negative impacts predicted against education in the Sustainability Appraisal <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 519, 224, SAD Site 228 and 213</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
Codsall/Bilbrook	519	Land east of Bilbrook	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Part of site is an existing safeguarded land allocation made in the Site Allocations Document 2018 • Remainder of site is of similar Green Belt harm to the majority of land around Bilbrook/Codsall (site is 'high') • Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate') • Due to site size, has capacity to deliver required first school to serve the villages • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site provides scope for unique design benefits including a through road linking Lane Green Road to Pendeford Mill Lane (as required by the Site Allocations Document 2018) and close links to existing active travel links to strategic employment site (i54) and services in the Black Country <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 213, 224, SAD Site 228 and 419a&b</p>
Cheslyn Hay/Great Wyrley	SAD 136	Land at Landywood Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document • Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal • Majority of the site in an area of high habitat distinctiveness <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	SAD 139	Pool View, Churchbridge	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document • Major positive impacts predicted against education in the Sustainability Appraisal • Area of high habitat distinctiveness <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	SAD 141	154a Walsall Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<ul style="list-style-type: none"> Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal Opportunity to redevelop brownfield land <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	119a	Land adjoining Saredon Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major positive impacts predicted against education in the Sustainability Appraisal Site is within a mineral safeguarding area for brick clay <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	136	Land off Upper Landywood Lane (north)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major positive impacts predicted against transport and accessibility in the Sustainability Appraisal Majority of the site is in an area of high habitat distinctiveness <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	523	Land east of Wolverhampton Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major positive impacts predicted against education in the Sustainability Appraisal Site is within a mineral safeguarding area for brick clay <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 536a, 704, 730, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	536a	Land off Holly Lane Part 1 (east of rail line)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Northern part of site is similar Green Belt harm to the majority of land around the village (site is 'high'), but land to south is very high harm Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<p>Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> • Highways authority advise against allocation of full site due to surrounding road network • Site could provide land adjacent to neighbouring school with need for increased parking capacity <p>Conclusion Having regard to all site assessment factors set out in the proforma, the northern part of the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, 730, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	638	Loades PLC	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Site is within the development boundary • Major positive impacts predicted against transport and accessibility criteria in Sustainability Appraisal • Site currently allocated as employment use but is currently vacant with site promoter undertaking a well-advanced marketing exercise that could indicate this issue is mitigable • Site is previously developed land <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 704, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	704	Land off Norton Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm to the majority of land around the village (site is 'low') • Major positive impacts predicted against education in the Sustainability Appraisal • Site is previously developed land <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 730, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	730	Fishers Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm to the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major positive impacts predicted against education in the Sustainability Appraisal • Site is previously developed land <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 523, 119a, 136, 638, 704, SAD Site 141, SAD Site 136 and SAD Site 139.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
Wombourne	284	land off Gilbert Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Located in closest area of the village to Wombourne village centre <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	285	Land off Poolhouse Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	286	land adj 62 Sytch Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Part previously developed land <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	416	land off Orton Lane (rear Strathmore Crescent)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	459	land off Poolhouse Road (2)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 • Major positive impacts predicted against the education criteria in Sustainability Appraisal

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	463b	Land between Billy Buns Lane and Smallbrook Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Located in closest area of the village to Wombourne village centre <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	463c	Land between Billy Buns Lane and Smallbrook Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Located in closest area of the village to Wombourne village centre <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	463d	Land off Smallbrook Lane and Gilbert Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Located in closest area of the village to Wombourne village centre

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	562/415	land off Pool House Road/Clap Gate Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 • Major positive impacts predicted against the education criteria in Sustainability Appraisal <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 285, 459, 562/415, 416, 463b, 463c, 463d, and 284.</p>
Brewood	079	land south Kiddemore Green Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Site 617.</p>
Brewood	617	Land off Four Ashes Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Part of the site closest to the village is in non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 • The Green Belt area of the site is in similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • The Green Belt area of the site is partially in an area of similar landscape sensitivity to the majority of land around the village ('high'), with the remainder being in an area of lesser sensitivity ('moderate-high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the safeguarded part of the site only is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Site 079.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
Kinver	SAD 274	land south of White Hill	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 274 and 576.</p>
Kinver	274	land south of White Hill	<p>Key positives and negatives</p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 576 and SAD Site 274.</p>
Kinver	576	land off Hyde Lane (west)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 274 and SAD Site 274.</p>
Perton	239	land west Wrottesley Park Road (south)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 Major negative impacts predicted against education in the Sustainability Appraisal <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Huntington	016	Pear Tree Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Coven	082	Land between A449 Stafford	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Part of the site adjacent to the village is in non-Green Belt safeguarded land allocated as safeguarded land in Site

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
		Rd and School Lane, Coven	<p>Allocations Document 2018</p> <ul style="list-style-type: none"> • The Green Belt area of the site is in lower Green Belt harm than the majority of land around the village (site is 'moderate') • The Green Belt area of the site is in an area of similar landscape sensitivity to the majority of land around the village ('moderate') <p>Conclusion Having regard to all site assessment factors set out in the proforma, the safeguarded part of the site only is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if allocated.</p>
Featherstone	SAD 168	Land at Brinsford Lodge, Featherstone	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document • Brownfield land <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver</p>
Featherstone	397	Land adj to Brinsford Lodge, Brookhouse Lane, Featherstone	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside SAD Site 168.</p>
Wheaton Aston	SAD 379	Land east of Ivetsey Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Open Countryside site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Site 426a.</p>
Wheaton Aston	426a	Bridge Farm 54 Long Street	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Open Countryside site options around the village, the land is within the existing village development boundary <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside SAD Site 379.</p>
Pattingham	251 (safeguarded land)	Hall End Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
Swindon	SAD 313	Land off Himley Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Green Belt site options around the village, the land is a development boundary site allocated by 2018 Site Allocations Document <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Site 313.</p>
Swindon	313 (safeguarded land)	Land off Himley Lane (Site 1)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018 <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside SAD Site 313.</p>
Swindon	313 (Green Belt site)	Land off Himley Lane (Site 1),	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Area of site nearest village is of lesser Green Belt harm than the majority of land around the village ('moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and allocation of part of the site could deliver the Council's preferred spatial strategy if delivered alongside SAD Site 313.</p>
Northern Edge of Black Country	486c	land off Linthouse Lane, Wednesfield	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site presents an opportunity for a mixed-use urban extension with on-site local facilities <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Site 646 a&b.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
Northern Edge of Black Country	646 a&b	Land to the West of ROF Featherstone	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Part of site is higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site presents an opportunity for a mixed-use employment-led development with on-site local facilities • Opportunity for safeguarded land for potential future rail-based park and ride site <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Site 486c.</p>
Western Edge of Black Country	582	Land off Langley Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Majority of site area is of lesser Green Belt harm ('moderate-high') than the majority of other land in this broad location • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>
South of Stafford	036c	Land at Weeping Cross	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • HESA Stage 2 indicates that development should be limited to the northern low-lying part of the site <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, part of the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.</p>

H.2 Rejected Residential Sites

H.2.1.1 **Table H.2.1** lists all reasonable alternative sites that have been considered as part of the SA process for residential-led use but are not preferred sites. The table sets out the reasons why these sites were not taken forward, as decided by SSDC.

Table H.2.1: Reasons for rejecting reasonable alternative residential sites

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Penkridge	430a	Land off Lyne Hill Lane/A449	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lies in the Green Belt (moderate-high harm) unlike other site options around the village Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the education criteria in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Highways authority has raised initial concerns regarding site's access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 005, 006, 420, 584 and 010.</p>
Penkridge	430b	Land off Lyne Hill Lane/A449	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lies in the Green Belt (moderate-high harm) unlike other site options around the village Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Highways authority has raised initial concerns regarding site's access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 005, 006, 420, 584 and 010.</p>
Penkridge	711	Hatherton House, Pinfold Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lies in the Green Belt (high harm) unlike other site options around the village

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major positive impacts predicted against the transport and accessibility criteria • Highways authority has raised initial concerns regarding site's connectivity and impact on junctions in surrounding area <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 005, 006, 420, 584 and 010.</p>
Codsall/Bilbrook	210	Land off Lane Green Avenue/Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	211	Land north of Manor House Park	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate') • Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate') • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	221	Land at Dam Mill	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook • Highways authority has raised initial concerns regarding site's access <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	222	land north of Sandy Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Potentially large enough to accommodate required first school, but no confirmation from site promoter that land is available to deliver this on the site, which is also smaller than other larger land parcels with potential to accommodate this around the villages <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	447	land at Oaken Lodge, Oaken Lanes	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Located in within 400m of Codsall Station, but is not as closely located to the station as other site option (Site 224) • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	507	Land at Hollybush Lane East 1	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around Bilbrook/Codsall (site is 'high') • In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Located in within 600m of Codsall Station, but is not as closely located to the station as other site options (e.g. Site 224) • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated • Highways authority has raised initial concerns regarding site's access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	515	Land off Heath House Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Major negative impacts predicted against education in the Sustainability Appraisal • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	630 a & b	Land at Moatbrook Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • In a higher sensitivity landscape than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major negative impacts predicted against education in the Sustainability Appraisal • Potentially large enough to accommodate required first school, but no confirmation from site promoter on this and

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>site is smaller than other larger land parcels with potential to accommodate this around the villages</p> <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	703	Land north of Gunstone Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate' and 'moderate/high') • In a higher sensitivity landscape than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook • Highways authority has raised initial concerns regarding site's access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	735	Land west of Keepers Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around Bilbrook/Codsall (site is 'high') • In a higher sensitivity landscape than the majority of land around Bilbrook/Codsall (site is 'moderate/high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Codsall/Bilbrook	740	The Grange public house	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Unlike Green Belt site options around Bilbrook/Codsall, the land is a development boundary site • Major positive impacts predicted against education and transport and accessibility in the Sustainability Appraisal • Opportunity to redevelop brownfield land

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook • Site does not currently appear to be available for development <p>Conclusion Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 213, 519, 224, SAD Site 228 and 419a&b.</p>
Cheslyn Hay/Great Wyrley	116	Land South of Wolverhampton Rd - Campions Wood Quarry	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Lesser landscape sensitivity than the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site is in active use as a quarry • Site is within a mineral safeguarding area for brick clay <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	119b	Land adjoining Saredon Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') • Lesser landscape sensitivity than the majority of land around the village (site is 'low') • Major positive impacts predicted against education in the Sustainability Appraisal • Site is within a mineral safeguarding area for brick clay • Highways authority raise initial concerns with impact on surrounding junctions <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	120	Land adj. Wood Green	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') • Lesser landscape sensitivity than the majority of land around the village (site is 'low') • Highways authority raise initial concerns with access and lack of pedestrian connectivity <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.
Cheslyn Hay/Great Wyrley	131	land at Blacklees Farm, Warstone Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Contains significant areas of tree planting that may be lost if redeveloped • Would require delivery of quarry to the north (Site 116) • Site is within a mineral safeguarding area for brick clay • Highways authority raise initial concerns with impact on surrounding junctions <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	134	Home Farm, Walsall Road/Jacobs Hall Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Loss of active employment uses from the site • Site is previously developed land <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	136a	Land off Upper Landywood Lane (North)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Area of high habitat distinctiveness • Highways authority raise initial concerns with impact on surrounding junctions <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Cheslyn Hay/Great Wyrley	137	Land off Upper Landywood Lane (South)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with impact on surrounding junctions <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	138	Leacroft Lane/Roman View	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against transport and accessibility criteria in Sustainability Appraisal • Major positive impacts predicted against education criteria in Sustainability Appraisal • Site layout significantly constrained by Flood Zones 2/3 and Local Wildlife Site – may affect ability to deliver a site with a satisfactory layout and capacity to accommodate affordable housing <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	440	land east of Love Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major positive impacts predicted against education criteria in Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	489	Claypit, Quarry and land at Hawkins drive (Green Belt area)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'low-moderate') • Lower landscape sensitivity than the majority of land around the village (site is 'low') • Major positive impacts predicted against education criteria in Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access • Development would result in loss of active minerals use

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Site is within a mineral safeguarding area for brick clay <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	489	Claypit, Quarry and land at Hawkins drive (development boundary area)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Site is within the development boundary Major positive impacts predicted against education criteria in Sustainability Appraisal Highways authority raise initial concerns with achieving suitable access Development would result in loss of active minerals use Site is within a mineral safeguarding area for brick clay <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	491	land at Landywood Enterprise Park, off Holly Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Site is within the development boundary Major positive impacts predicted against transport and accessibility criteria in Sustainability Appraisal Highways authority raise initial concerns with achieving suitable access Loss of active employment uses from the site Site is previously developed land <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	525	Land north of Jones Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land around the village (site is 'high') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Substantial area of high habitat distinctiveness between site and village Highways authority raise initial concerns with impact on surrounding junctions and landownership constraints <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.
Cheslyn Hay/Great Wyrley	526	Land south of Jones Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Area of high habitat distinctiveness may be affected by site access • Highways authority raise initial concerns with impact on surrounding junctions and landownership constraints <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	536b	Land off Holly Lane Part 2 (west of rail line)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Northern part of site is similar Green Belt harm to the majority of land around the village (site is 'high'), but land to south is very high harm • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority advise against allocation of full site due to surrounding road network • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	696	Land East of A34	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land around the village (site is 'very high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Highways authority raise initial concerns with impact on surrounding junctions at this scale Development would coalesce Newtown and Great Wyrley <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730, 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Cheslyn Hay/Great Wyrley	741	Meadowbank Grange/Station Rd	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Site is within the development boundary Major positive impacts predicted against transport and accessibility criteria in Sustainability Appraisal Major positive impacts predicted against education criteria in Sustainability Appraisal Highways authority raise initial concerns due to loss of car parking use Site is previously developed land <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 523, 119a, 136, 638, 704, 730 536a, SAD Site 141, SAD Site 136 and SAD Site 139.</p>
Wombourne	280	land at The Bratch, Bratch Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Site is within the development boundary Major positive impacts predicted against education in the Sustainability Appraisal Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	283	land off Bridgnorth Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Majority of the site is on lesser Green Belt harm ('moderate') than the majority of land around the village, whilst a small part of the site's eastern extent being 'moderate-high' harm Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Wombourne	298	land off Bratch Lane/Trysull Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	305	land at Bridgnorth Road/Heathlands	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Within development boundary • Site shape appears unable to accommodate residential layout • Development would affect area of TPOs <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	306	land adj Redcliffe Drive (Park Mount)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving suitable access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	309	Land off Bridgnorth Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access and cumulative impacts on nearby junctions • Major negative impacts predicted against the education criteria in Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</p> <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	310a	Smestow Bridge Works, Bridgnorth Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm ('low-moderate') than the majority of land around the village • Most of the site is of similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving suitable access • Site is previously developed land • Would result in loss of existing occupied employment use, although this is a lower quality use and may be relocated <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	310b	Smestow Bridge Works, Bridgnorth Road, Parcel 2	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm ('low-moderate') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access • Site is previously developed land • Would result in loss of existing occupied employment use <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	416a	land off Orton Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	417	land adj Hartford House Pool House Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm ('very low') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access • Site is previously developed land <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	438	land off Bratch Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('low-moderate') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	458	land off Poolhouse Road (former landfill site)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm ('moderate') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Concerns from highways authority regarding pedestrian connectivity and isolation from village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	460	land at Bridgnorth Road (Tata)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Site is within the development boundary • Site is previously developed land • Significant areas of the site are within Flood Zone 2/3 and a Site of Biological Importance • Site is in an existing occupied employment use which would be lost if developed

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	463a	Land off Billy Buns Lane (N)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm ('very high') than the majority of land around the village • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be allocated. • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Located in closest area of the village to Wombourne village centre <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	477	Land off Woodford Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('moderate') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Highways authority raise initial concerns with achieving suitable access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	554	Land off Trysull Road - Bratch Common	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm ('moderate') than the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with achieving suitable access and cumulative impacts on nearby junctions <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Wombourne	626	land off Bridgnorth Road/Wombourne Road - Parcel A	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	627	land off Bridgnorth Road/Wombourne Road - Parcel B	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	628	land off Bridgnorth Road/Wombourne Road - Parcel C	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	629	land off Bridgnorth Road/Wombourne Road - Parcel D	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</p> <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	701	Land at Longdon	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Higher landscape sensitivity to the majority of land around the village (site is 'moderate-high') • Major positive impacts predicted against the education criteria in Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	708	Land west of Strathmore Crescent	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm ('moderate-high') to the majority of land around the village • Higher landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.</p>
Wombourne	738	Wagon and Horses public house	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • The site is within the development boundary, unlike other Green Belt site options around the village • The site's development would result in the loss of an existing essential community facility <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			compared to other site options that it should be allocated instead of, or in addition to, Sites 285, 459, 562/415, 416, 463b, 463c, 463d and 284.
Brewood	057	Garage and parking area Coneybere Gardens	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Development boundary site • Unlikely to be able to deliver net residential growth at an appropriate density <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	062	Land adjacent to The Woodlands, Coven Rd	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	067	land off Coven Road, Brewood	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	074	Site 1 land rear Oak Cottage, Kiddemore Green Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>in Duty to Co-operate correspondence.</p> <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	075 & 075a	Site 2 land adj 56 Kiddemore Green Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	076	Site 3 land off Dirty Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving site access <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	076a	Land off Dirty Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving site access <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Brewood	078	land at Port Lane and west of Coven Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	376	land at Fallowfields Barn, Barn Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Lesser landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	611	Land off Port Lane - Coven Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	616	land at Melwood, Tinkers Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Brewood	658	Land at Oakwood	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') Lesser landscape sensitivity than the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Highways authority raise initial concerns with site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 079 and 617.</p>
Kinver	272	Land East of Dunsley Drive	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 274, 576 and SAD Site 274.</p>
Kinver	273	North of White Hill	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Highways authority raise initial concerns with access and lack of footway <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			compared to other site options that it should be allocated instead of, or in addition to, Sites 274, 576 and SAD Site 274.
Kinver	409	land adj Edge View Home, Comber Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land around the village (site is 'moderate') • Higher landscape sensitivity than the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access road and lack of footway • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated • Site access may affect TPOs/trees in Conservation Area <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 274, 576 and SAD Site 274.</p>
Kinver	546	Land at Church Hill	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Higher landscape sensitivity than the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site access may affect TPOs/trees in Conservation Area <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 274, 576 and SAD Site 274.</p>
Kinver	549	Land north of Dunsley Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Eastern part of the site is of greater Green Belt harm ('high') than the majority of land around the village, whilst western portion of site is an area of lesser Green Belt harm ('moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with footway connectivity to site <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			- Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 274, 576 and SAD Site 274.
Perton	238	Land at former Perton Court Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with impact on surrounding junctions • Could result in coalescence of Wolverhampton urban area and Perton <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.</p>
Perton	241	land off Dippons Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.</p>
Perton	246a	Bradshaws Estate, Holyhead Rd	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land around the village (site is 'very high') • Higher landscape sensitivity than the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be allocated. • Highways authority raise initial concerns with impact on surrounding junctions <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.
Perton	402	land rear of Winceby Road	<ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Highways authority raise initial concerns that suitable site access cannot be achieved and also regarding impact on surrounding junctions <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.</p>
Perton	407	land west of Wrottesley Park Road (north)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.</p>
Perton	454	Land off Dippons Lane/Rear Idonia Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.</p>
Perton	505	Land rear Dunster Grove	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land around the village (site is 'low' and 'low-moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Highways authority raise initial concerns with site access • Could result in coalescence of Wolverhampton urban area and Perton

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.</p>
Perton	506	Land off Westcroft Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.</p>
Perton	705	Perton Golf Course	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with site access and impact on surrounding junctions <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 239.</p>
Huntington	017	Land off Almond Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Major negative impacts predicted against landscape criteria in the Sustainability Appraisal due to proximity to Cannock Chase AONB <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 016.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Huntington	022	Land off Hawthorne Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Major negative impacts predicted against landscape criteria in the Sustainability Appraisal due to the site's proximity to Cannock Chase AONB <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 016.</p>
Huntington	591	Land at Oaklands Farm (north of Limepit Lane)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • The Cannock Chase AONB Partnership have objected to development which erodes the separation between Huntington and Cannock <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 016.</p>
Huntington	592	Land at Oaklands Farm (south of Limepit Lane)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • The Cannock Chase AONB Partnership have objected to development which erodes the separation between Huntington and Cannock <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 016.</p>
Huntington	732	Land north of Cocksparrow Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Lower landscape sensitivity than the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> Initial highways concerns raised regarding access <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 016.</p>
Essington	150	Land adjoining High Hill Rd, Essington	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm to the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Essington	151/662	Land between M6 & Essington and adj. Bursnips Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Highways authority raise initial concerns with impact on surrounding junctions and pedestrian connectivity <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Essington	154	South Side of High Hill, Essington	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> • May result in loss of existing public open space (allotments) <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Essington	157	Hill Street, Essington	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Development boundary site • Previously developed land • May not be deliverable due to site availability and loss of car parking <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Essington	164 / 164a	Land at Bursnips Road/Sneyd Lane	<p>The landownership information on these plots has substantially changed since the 2021 SHELAA, to the extent these are no longer reasonable alternatives and have been replaced by Sites 163 and 163a.</p>
Essington	471	Land at Bognop Road, Essington	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with impact on surrounding junctions and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Coven	082a	Land between A449 Stafford Rd and School Lane, Coven	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> • The site is in lower Green Belt harm than the majority of land around the village (site is 'moderate') • The site is in an area of similar landscape sensitivity to the majority of land around the village ('moderate') <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, the safeguarded land at Site 082.</p>
Coven	084a	Land off Birchcroft, Coven	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against education in the Sustainability Appraisal Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, the safeguarded land at Site 082.</p>
Coven	085	Land at Grange Farm, Coven	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Highways authority raise initial concerns with site access <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, the safeguarded land at Site 082.</p>
Coven	087	Land at Stadacona, Stafford, Coven	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land around the village (site is 'low-moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Highways authority raise initial concerns with site access, as this could only be achieved via the A449 <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, the safeguarded land at Site 082.</p>
Coven	615	Land west of School Lane, Coven	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land around the village (site is 'moderate') Similar landscape sensitivity to the majority of land around the village (site is 'moderate') Major negative impacts predicted against education in the Sustainability Appraisal Highways authority raise initial concerns with site access and pedestrian connectivity <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, the safeguarded land at Site 082.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Coven	618	Land west A449	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with site access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, the safeguarded land at Site 082.</p>
Coven	739	Croft Garage	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Development boundary site • Site is occupied by other commercial uses and is not available for residential development <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, the safeguarded land at Site 082.</p>
Featherstone	169	Featherstone Hall Farm, New Road, Featherstone	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with highways capacity in surrounding area <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, SAD Site 168 and Site 397.</p>
Featherstone	170	Land east of Brookhouse Lane, Featherstone	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate') • Highways authority raise initial concerns with highways capacity in surrounding area <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, SAD Site 168 and Site 397.
Featherstone	172	Land at Cannock Road, Featherstone	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated • Highways authority raise initial concerns with highways capacity in surrounding area • Area of poor pedestrian connectivity between site and wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, SAD Site 168 and Site 397.</p>
Featherstone	396	Land off New Road/East Road, Featherstone	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with highways capacity in surrounding area <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, SAD Site 168 and Site 397.</p>
Featherstone	527	Land north of New Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with highways capacity in surrounding area

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, SAD Site 168 and Site 397.</p>
Featherstone	742	Red White and Blue public house	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Development boundary site • Site is occupied by an essential community facility and is not available for residential development <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, SAD Site 168 and Site 397.</p>
Shareshill	181	Land at the rear of Tanglewood, Elms Lane Shareshill	<ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with highways capacity in surrounding area • Site does not appear to have pedestrian access into wider settlement <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Shareshill	183	Land off Swan Lane, Shareshill	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with highways capacity in surrounding area • Site does not appear to have pedestrian access into wider settlement <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Shareshill	184	Land east of Manor Drive, Shareshill	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land in this broad location (site is 'moderate') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Highways authority raise initial concerns with highways capacity in surrounding area, surrounding junctions and

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			pedestrian connectivity Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.
Shareshill	185	Land off Manor Drive (south), Shareshill	Key positives and negatives <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land in this broad location (site is 'moderate') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Highways authority raise initial concerns with highways capacity in surrounding area, surrounding junctions and pedestrian connectivity Conclusion - Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.
Wheaton Aston	090	The Paddock, Hawthorn Drive	Key positives and negatives <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Unlike other land around the village, part of the site is within the Green Belt • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.
Wheaton Aston	091	Land at Brooklands	Key positives and negatives <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Unlike other land around the village, part of the site is within the Green Belt • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.
Wheaton Aston	092	Back Lane/Mill Lane	Key positives and negatives <ul style="list-style-type: none"> • Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate'). • Highways authority raise initial concerns with access

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Wheaton Aston	094	land off Primrose Close	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Does not appear to have existing pedestrian access into the wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Wheaton Aston	377/093	land adj Brook House Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate'). • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Wheaton Aston	378	Land off Broadholes Lane/Badgers End	<p>Split into Site 378a and 378b as these are in separate land ownerships and there is no agreement to promote these two parcels jointly. Site 378b is 'unsuitable' in SHELAA so not a reasonable alternative.</p>
Wheaton Aston	378a	land off Broadholes Lane/Badgers End	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Does not appear to have existing pedestrian access into the wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Wheaton Aston	379	land off Back Lane/Ivetsey Close	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate'). • No existing footway access into the village without joint delivery alongside SAD Site 379 • Would not deliver a small site (<1ha) if delivered alongside SAD Site 379 <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.
Wheaton Aston	382	land rear Meadowcroft Gardens/Hawthorne Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • No willing landowner – suggested by third party • No pedestrian access into wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Wheaton Aston	426b	Bridge Farm 54 Long Street	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high'). • No existing footway access into the village without joint delivery alongside Site 426a • Would not deliver a small site (<1ha) if delivered alongside Site 426a <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Wheaton Aston	608	Land adj Fenton House Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high'). <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Wheaton Aston	610	Land off Marston Rd - Fenton House Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Adjacent to a key local facility (primary school) <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Wheaton Aston	614	land off Back Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate'). • Highways authority raise initial concerns with access <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.
Wheaton Aston	619	Land off Fenton House Lane 2	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high'). <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 426a and SAD Site 379.</p>
Pattingham	249	land adjacent Meadowside, off High Street	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Higher landscape sensitivity than the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251.</p>
Pattingham	250	land off Patshull Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Higher landscape sensitivity than the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251.</p>
Pattingham	251 (Green Belt)	Hall End Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Majority of the site is of lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251 (safeguarded land).
Pattingham	252	Land off Clive Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Small part of the site nearest village is of lesser Green Belt harm ('moderate') than the majority of land around the village, remainder is of similar harm ('moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving suitable access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251.</p>
Pattingham	253	Land off Westbeech Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Small part of the site nearest village is of lesser Green Belt harm ('moderate') than the majority of land around the village, remainder is of similar harm ('moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with achieving suitable access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251.</p>
Pattingham	255	Land off Moor Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'moderate') <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 251.</p>
Pattingham	257	land at Highgate Farm, Wolverhampton Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Higher landscape sensitivity than the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> • Highways authority raise initial concerns with lack of pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251.</p>
Pattingham	400	Land off Westbeech Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Higher landscape sensitivity than the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Lack of pedestrian connections to wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251.</p>
Pattingham	401	Land adj Beech House Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity than the majority of land around the village (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with suitability of site access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251.</p>
Pattingham	421	land between Rudge Road and Marlbrook Lane, Pattingham	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity than the majority of land around the village (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with suitability of site access and pedestrian connectivity • Area of high habitat distinctiveness

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 251.</p>
Swindon	312a	land off Church Road/St John's Close, Swindon	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Unlikely to deliver affordable housing <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313.</p>
Swindon	314	Land off Wombourne Road (Site 2)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313.</p>
Swindon	315	Land off Himley Lane (Site 3)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Majority of the site is higher Green Belt harm ('very high') than majority of other land around the village, with some limited areas adjacent the development boundary of similar Green belt harm to the majority of other land ('high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313.</p>
Swindon	412	land off High Street/Brooklands, Swindon	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Not currently available • Flood zone may constrain layout/access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313.</p>
Swindon	437	land off Church Rd/rear Baldwin Way	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land around the village (site is 'moderate-high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with pedestrian connectivity to wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313.</p>
Swindon	682	Reynolds Close, Swindon	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313.</p>
Swindon	717	Land west of Church Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with site access <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313.
Swindon	718	Land west of Church Road 2	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land around the village (site is 'high') • Similar landscape sensitivity to the majority of land around the village (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with pedestrian connectivity into wider settlement <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 313.</p>
Bednall	023	Land West of Church Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site does not appear to have footway access to facilities in wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Bednall	024	Land at Bednall Hall Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access and pedestrian connectivity • Site does not appear to have footway access to facilities in wider village <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.
Bednall	026	Lower Bednall Farm-Site B	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access • Site does not appear to have footway access to facilities in wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Dunston	029a	School Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Dunston	487	Land rear The Cottage	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Dunston	588	Dunston Dairy Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Bishops Wood	096	Land off Offoxey Road and Ivetsey Bank Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site has a well advanced planning application for a rural exception site (19/00952/FUL) <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant a general housing allocation, although the allocation of a rural exception site may be considered given the well-advanced planning application for this form of development.</p>
Bishops Wood	097	Land south of Bishops Wood	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site does not appear to have footway access to facilities in wider village <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Bishops Wood	099	Land off Ivetsey Bank Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with lack of pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Bobbington	319	Land west of Six Ashes Rd	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal <p>Conclusion Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Bobbington	320	Land rear of 19 Six Ashes Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with site access • Site does not appear to have footway access into wider village <p>Conclusion Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Bobbington	321	Land adj. Bannockburn, Six Ashes Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Bobbington	410	Land adj Corbett Primary School, Six Ashes Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Trysull	327	Land adj the Vicarage school	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'low-moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against transport and accessibility criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Trysull	328	Land to rear Manor House, Seisdon Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'low-moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Trysull	329	Land rear of "The Plough" Public House, School Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'low-moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Trysull	544	Land adj the Manor House 2	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Trysull	588	Land off Crockington Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against employment criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access and pedestrian connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Seisdon	358	Land between Post Office Road & Fox Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Seisdon	359	Land adj Home Farm, Crockington Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> • Highways authority raise initial concerns with access <p>Conclusion Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Seisdon	671	Land West of Fox Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Seisdon	702	Land off Fox Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with access <p>Conclusion Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Himley	335a	The Limes, Plantation Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Site is within the development boundary, unlike other site options around the village • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Highways authority raise initial concerns with access <p>Conclusion Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Himley	335b	The Limes, Plantation Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Highways authority raise initial concerns with access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Himley	479a	Land off Brignorth Road (East)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Highways authority raise initial concerns with junction capacity and connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Himley	707	Land at Himley	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with junction capacity and connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma and the relative sustainability of Tier 4 settlements, the site is not considered to perform so well as to warrant allocation.</p>
Northern Edge of Black Country	102	land at Garrick Works, Garrick Farm, Stafford Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways Authority indicate initial concerns over access

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	160	Upper Sneyd Road/Brownshore Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major negative impacts predicted against education in the Sustainability Appraisal • Site does not present an opportunity for a mixed use urban extension <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	163	Land off Sneyd Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major negative impacts predicted against education in the Sustainability Appraisal • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	163a	Land off Sneyd Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major negative impacts predicted against education in the Sustainability Appraisal • Site does not present an opportunity for a mixed-use urban extension

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	163b	Land off Sneyd Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	165	Bursnips Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major negative impacts predicted against education in the Sustainability Appraisal • Would result in loss of cemetery use • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	166	Land at Holly Bank House, Bursnips Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated • Site is partially brownfield land

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	204	land adjacent 46 Cannock Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways Authority indicate access may be unsuitable • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	206	land adj 116 Cannock Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways Authority indicate access may be unsuitable • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	207	land at Broad Lane Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm to the majority of land in this broad location (site is 'moderate') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major positive impacts predicted against education in the Sustainability Appraisal • Highways Authority indicate access may be unsuitable • Site does not present an opportunity for a mixed-use urban extension

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	392	land at Westcroft Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Lesser landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways Authority indicate access may be unsuitable • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	393	land rear 3-65 Upper Sneyd Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land in this broad location (site is 'low') • Similar landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') • Highways Authority indicate access may be unsuitable • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	486 a&b	Land north of Blackhalve Lane, Wednesfield	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways Authority indicate access may be unsuitable • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Northern Edge of Black Country	492 a, b & c	Land at Yieldfields Farm north of Bloxwich	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Part of site is in higher landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site presents an opportunity for a mixed-use urban extension with on-site local facilities • May require allocation of significant additional land in neighbouring local authority (Walsall) to be delivered <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	520	Oakley Farm, Blackhalve Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site does not present an opportunity for a mixed-use urban extension • May require allocation of additional land in neighbouring local authority (Wolverhampton) to be delivered <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	537 & 537a	North Wolverhampton (Moseley)/ Land East of Bushbury	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Part of the site is in area of greater Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate' and 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be allocated. • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated • Site presents an opportunity for a mixed-use urban extension with on-site local facilities <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Northern Edge of Black Country	666	Upper Pendeford Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site does not present an opportunity for a mixed-use urban extension <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Northern Edge of Black Country	679	Kitchen Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Site layout, topography and vegetation may constrain potential to accommodate growth • Site does not present an opportunity for a mixed-use urban extension <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 646 a&b and 486c.</p>
Western Edge of Black Country	236	Land adjacent Wergs Hall Road and Keepers Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with surrounding junction capacity and connectivity issues <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	243	land at Yew Tree Lane/Wrottesley Road West	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Site is separated from the adjacent highway by dense mature trees that are subject to tree preservation orders <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	245	Wightwick Hall Special School, Tinacre Hill, Wightwick	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lesser Green Belt harm than the majority of land in this broad location (site is 'low') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against education criteria in the Sustainability Appraisal Site is largely brownfield land <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	260	land off Bridgnorth Road, Wightwick	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Site is separated from the adjacent highway by dense tree belt which is subject to tree preservation orders <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	339	Meadow Brook Stables, Gospel End Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Higher Green Belt harm than the majority of land in this broad location (site is 'very high') Higher landscape sensitivity to the majority of land in this broad location (site is 'moderate-high') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be allocated. Major positive impacts predicted against education in the Sustainability Appraisal <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.
Western Edge of Black Country	350c	Land East of Radford Land (b)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with impacts on junctions in surrounding area <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	350d	Land west of Radford Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education criteria in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with impacts on junctions in surrounding area <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	364	land at New Wood, off Bridgnorth Road (Site 1)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'high') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be allocated. • Highways authority raise initial concerns that access may not be achievable <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Western Edge of Black Country	365	land north of Bridgnorth Rd (adj the Hawthorns)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	368	Land off Enville Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns that access may not be achievable <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	370	Land off Enville Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	494a	land at Springhill Lane parcel A	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> Highways authority raise initial concerns regarding site access and junctions in surrounding area <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	494b	land at Springhill Lane parcel B	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land in this broad location (site is 'high') Majority of the site is in similar landscape sensitivity to the majority of land in this broad location ('moderate' sensitivity), with the remainder being 'low-moderate' sensitivity Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Highways authority raise initial concerns regarding site access and junctions in surrounding area <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	503	Land North Codsall Palmers Cross	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Similar Green Belt harm to the majority of land in this broad location (site is 'high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm. Major positive impacts predicted against education in the Sustainability Appraisal Site would result in the coalescence of Wolverhampton urban area and Bilbrook/Codsall <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	504	Land off Yew Tree Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.
Western Edge of Black Country	510	Land West of Codsall Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major positive impacts predicted against education in the Sustainability Appraisal <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	512	Wergs Golf Club Keepers Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Major positive impacts predicted against education in the Sustainability Appraisal • Highways authority raise initial concerns regarding site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	548	land at Pennwood Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. • Highways authority raise initial concerns regarding site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
Western Edge of Black Country	559	Land east of Stourbridge Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. • Highways authority raise initial concerns regarding site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	560	Land north of Sandyfields Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	561	Land off Foxlands Avenue	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. • Highways authority raise initial concerns regarding site access <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	566	Land west of the Straits Part 2	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.
Western Edge of Black Country	567	Green Hill Farm, Sandyfields	Key positives and negatives <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.
Western Edge of Black Country	573	Land west Stourbridge Road	Key positives and negatives <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. • Highways authority raise initial concerns regarding site access Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.
Western Edge of Black Country	577	Land at Hinksford Lane, Mile Flat Road	Key positives and negatives <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated Conclusion

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.
Western Edge of Black Country	579	East Holding 107 Westcroft Farm	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns regarding site connectivity <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	654	Lawnswood Parcel B	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. • Historic Environment Site Assessment indicates the potential for significant effects that may not be mitigated <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	655	Lawnswood Parcel C	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. • Highways authority raise initial concerns regarding impact on surrounding junctions <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	673	Land at Wollaston Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lower Green Belt harm than the majority of land in this broad location (site is 'moderate-high')

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<ul style="list-style-type: none"> • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major positive impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	684	Land off Swindon Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Western Edge of Black Country	710	Land rear of Pennwood Lane	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'moderate-high') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal and of both very high Green Belt harm and moderate/high landscape sensitivity, which Duty to Co-operate correspondence from the Association of Black Country Authorities' suggests should not be considered for allocation. • Highways authority raise initial concerns regarding site access and connectivity <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.</p>
Cannock Edge	202	Land east of Wolverhampton Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • The majority of the site is on an area of higher Green Belt harm ('very high') than the majority of land in this broad location, with the remainder being of 'high' harm • Lower landscape sensitivity than the majority of land in this broad location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> • Within a brick clay mineral safeguarding area <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	203	Land West of Woodhaven	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high harm') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Within a brick clay mineral safeguarding area <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	474	land at Longford House, A5 Cannock Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Higher Green Belt harm than the majority of land in this broad location (site is 'very high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	529	Land at Middle Hill Part 2	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Initial concerns raised by Highways Authority due to remoteness from services and facilities • Within a brick clay mineral safeguarding area

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	624	Land north of Chase Gate Public House, Wolverhampton Road	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Lesser Green Belt harm than the majority of land in this broad location (site is 'moderate-high') • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Initial concerns raised regarding site access by Highways Authority <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	659	Land near Shoal Hill Tavern	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of land in this broad location (site is 'high') • Higher landscape sensitivity than the majority of land in this broad location (site is 'high') • Major positive impacts predicted against education criteria in the Sustainability Appraisal • Major negative impacts predicted against landscape criteria in the Sustainability Appraisal <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
Cannock Edge	720	Roman Way Hotel, Watling Street	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • The majority of the site is on an area of lower Green Belt harm ('low-moderate') than the majority of land in this broad location • Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate') • Major negative impacts predicted against the education criteria in the Sustainability Appraisal • Site is previously developed land <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
South of Stafford	036a	Land South of Stafford	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar landscape sensitivity to the majority of land in this broad location (site is 'high') • Major negative impacts predicted against education in the Sustainability Appraisal • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
			<p>consider such areas for development would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</p> <ul style="list-style-type: none"> • Highways authority raise initial concerns regarding capacity of highway network in surrounding area <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 036c.</p>
New Settlement	585	Land off Gailey Island	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is 'high harm') • Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with impact on surrounding highways network and connectivity • The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
New Settlement	585a	Land off Gailey Island (parcel 2)	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is 'high harm') • Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with impact on surrounding highways network and connectivity • The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education <p>Conclusion Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>

Settlement	Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
New Settlement	665	Deanery Estate	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is 'high harm') • Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is 'low-moderate') • Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence. • Highways authority raise initial concerns with impact on surrounding highways network and connectivity • The site does not have a demonstrable footway access into the adjacent larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>
New Settlement	029	Land - Dunston Estate	<p>Key positives and negatives</p> <ul style="list-style-type: none"> • On non-Green Belt land, unlike the majority of new settlement options in the A449/West Coast Mainline corridor • Of average landscape sensitivity compared to the majority of land in the A449/West Coast Mainline corridor location (site is 'moderate') • Highways authority raise initial concerns with site severance due to the lack of agreed access over the West Coast Mainline and potential difficulties of establishing the required multiple site accesses within the parcel • The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education <p>Conclusion</p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>

H.3 Selected Employment Sites

H.3.1.1 **Table H.3.1** lists the preferred employment-led sites set out in the Publication Version of the South Staffordshire LPR, within Policy SA7. The outline reasons for selecting each of the sites, as set out in the table below, have been determined by SSDC.

Table H.3.1: *Outline reasons for selecting employment sites*

Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
E14	Land at Vernon Park	The site performs well and has a clear advantage of being a logical extension to an existing non-strategic employment site and is not in the Green Belt or Open Countryside. The site was already factored into the supply/demand balance in the EDNA 2022 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for allocation
E18	ROF Featherstone	The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site also benefits from an outline consent (20/01131/OUT). The site was already factored into the supply/demand balance in the EDNA 2022 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation
E20	Land at Hilton Cross	The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site also benefits from a previous outline consent (95/00829/OUT) The site was already factored into the supply/demand balance in the EDNA 2022 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation
E24	I54	The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site also benefits from a previous outline consent (05/01311/OUT). The site was already factored into the supply/demand balance in the EDNA 2022 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation
E33	West Midlands Interchange	The principle of the development is already established through the DCO process and the site scores significantly better than other site options through the EDNA2 and this assessment. Major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District, however the principle of substantial development has already been established in this location. The site can clearly make a significant contribution towards any unmet needs of the wider FEMA and could do so in a more sustainable manner than alternative site options (due to the proposed rail link). Given that the principle of B8 development is established, it is considered that the exceptional circumstances the site from the Green Belt exist and therefore the site is proposed for allocation.
E44	I54 western extension (north)	The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site was already factored into the supply/demand balance in the EDNA 2022 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation

H.4 Rejected Employment Sites

H.4.1.1 **Table H.4.1** lists all reasonable alternative sites that have been considered as part of the SA process for employment-led use but are not preferred sites. The table sets out the reasons why these sites were not taken forward, as decided by SSDC.

Table H.4.1: Reasons for rejecting reasonable alternative employment sites

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
E04	Land around Dunston Business Village	The site performs relatively well and has a clear advantage of being a logical extension to an existing non-strategic employment site and is not in the Green Belt. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E15a	Hobnock Road, Essington. (exc. 5.2ha already within supply due to a certificate of lawful use for B2 industrial use).	The site performs relatively well compared to most other site options, and has a clear advantage of being of low landscape sensitivity (in part due to previous quarrying use) with part of the site acceptable in principle for B2 use due to Certificate of Lawfulness consent. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. The site's location in a brick clay mineral safeguarding area is also a constraint. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E30	Land south of J13, M6.	The site performs relatively well and has a clear advantage for distribution/logistics of being close to the M6 (J13) and is not in the Green Belt. However, Staffordshire County Council highways team have expressed some initial concerns relating to site access and the significant highways works that would likely be required. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E31	Land east of Paradise Lane, Slade Heath	The site performs relatively well and has the advantage of being very well contained and close to other commercial activity. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E32	Land east of Four Ashes (proposed extension).	The site performs relatively well and has the advantage of potentially forming an extension to an existing strategic employment site. However, there are some initial concerns about the site's deliverability, particularly relating to rights of access through the adjacent VEOLIA facility. The site is also predicted to cause major negative effects in the Sustainability Appraisal, due to being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E37	Land between ROF Featherstone and A449.	The site performs relatively well and has the advantage of potentially forming an extension to ROF Strategic Employment Site. However, the site is being promoted for residential led mixed use development and is proposed for a housing allocation through the Local Plan. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E38	Land south of Moseley Road.	The site performs relatively well and has the advantage of being located close to Hilton Cross Strategic Employment Site. However, major negative effects are predicted in the Sustainability Appraisal due to the site being in one of the more harmful Green Belt areas within the District and some initial concerns have been expressed by Staffordshire County Council highways team regarding its potential impact on the A460. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E41	Land north of Bognop Road.	The site performs relatively well and has the advantage of being a former quarry so from a landscape sensitivity perspective development the impact of developing the site would be limited. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District, and there are concerns about the remediation costs of developing the former quarry, as well as initial highway concerns. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
E42	Former Severn Trent works, Wedges Mills.	The site was considered unsuitable in the EDNA2 and has a considerable number of significant constraints including concerns around flooding, highly distinctive habitat areas within the site, viability, access, and the fact it is in a brick clay mineral safeguarding area. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E43	Land at J11 M6, Hilton Park.	The site performs relatively well and has a clear advantage for distribution/logistics of being close to the M6 (J11). However, major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. The County highways team have also expressed concerns about the impact of loading traffic back onto the A460, something the M54/M6 link road is designed to alleviate. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E45	Land north of i54 / M54.	The site performs relatively well and has a clear advantage of being very close to the existing i54 site. However, major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E46	Aspley Farm, south of Four Ashes.	The site performs poorly and was deemed unsuitable as part of the EDNA2 assessment due to being unattractive to the market due to significant access constraints. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E47	Land at Middlehill Farm (Site A).	The site performs relatively poorly and was deemed 'other' quality in the EDNA2 and has initial concerns from County highways on the cumulative effect of the development on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E48	Land at Middlehill Farm (Site B).	The site performs relatively poorly and was deemed 'other' quality in the EDNA2, has initial concerns from County highways on its cumulative effect on the highway network, and is in an area of brick clay safeguarding. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E49	Land at Middlehill Farm (Site C).	The site performs relatively poorly with a number of key constraints including its location within a brick clay safeguarding area and initial concerns from County highways on its cumulative effect on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E50	Land at M6 Toll, Cheslyn Hay	The site performs relatively poorly with a number of key constraints including its location within a brick clay safeguarding area and initial significant concerns from County highways relating to the lack of a suitable access. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E51a	Extension to Bericote, Four Ashes (Site A).	The site performs relatively well and has a clear advantage of being a logical extension to an existing employment site, however it is entirely wooded and is an area of high habitat distinctiveness. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Despite this, its Green Belt function could potentially be weakened in the future by the presence of surrounding employment land as WMI is developed. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E51b	Extension to Bericote, Four Ashes (Site B).	The site performs relatively well and has a clear advantage of being a logical extension to an existing employment site. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		<p>areas within the District. Despite this, its Green Belt function could potentially be weakened in the future by the presence of surrounding employment land as WMI is developed.</p> <p>Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.</p>
E52	Land at Laney Green.	<p>The site performs relatively poorly and was deemed 'other' quality in the EDNA2, is sloped in topography, has initial concerns from County highways on the cumulative effect of the development on the highway network, and includes an area of mineral safeguarding for brick clay. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.</p>
E53	Upper Pendeford Farm.	<p>The site performs relatively well however the sites topography and highway concerns are considered key constraints. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.</p>
E54	Land east of Wolverhampton Road.	<p>The site performs relatively poorly and was deemed 'other' quality in the EDNA2, is sloped in topography, has initial concerns from County highways on the cumulative effect of the development on the highway network, and includes an area of mineral safeguarding for brick clay. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.</p>
E55	Bridgnorth Road sewage works.	<p>The site was identified as unsuitable in the EDNA2 and performs poorly due to the considerable number of significant constraints including concerns around viability and site access. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of</p>

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E56	Land at Wall Heath.	The site performs relatively poorly with a number of key constraints including its potential impact on mature tree belt along the railway walk that cuts through the site, and its cumulative effect on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E57	Land at Mount Pleasant, Dunston.	The site performs relatively well and has a clear advantage of being close to Junction 13 of the M6 as well as an existing employment area, and the site is not in the Green Belt. However there are initial highways concerns relating to the potential site access. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E58	Land at Gailey Lea Farm	Site performs relatively well from a market perspective, having a clear advantage for distribution/logistics of being close to the M6 (J12) and the West Midland Interchange proposal. However, some initial concerns have been expressed by Staffordshire County Council highways team regarding cumulative impacts on the surrounding network and sustainable travel access. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E59	Land north of Cocksparrow Lane	Site performs relatively poorly with a number of constraints identified including its proximity to a local wildlife site and an irregular shape. Some initial concerns have been expressed by Staffordshire County Council highways team with concerns that suitable access may not be achieved through the industrial estate to the south. Major negative effects are also predicted in the Sustainability Appraisal due to the site being in one of the more harmful Green Belt areas within the District. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.
E60	Land north of the A5, Gailey	Site performs relatively well from a market perspective, having a clear advantage for distribution/logistics of being close to the M6 (J12) and the West Midland Interchange proposal. However, some initial concerns have been expressed by Staffordshire

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
		<p>County Council highways team regarding if a suitable access is achievable and impact on the surrounding network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.</p>
E61	Pendeford Hall Lane	<p>Site performs relatively poorly with a number of constraints including flood zone 2/3 running through the site. Some initial concerns have been expressed by Staffordshire County Council highways team with concerns around lack of bus, pedestrian and cycle connectivity and impact on surrounding junctions. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.</p> <p>Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.</p>

H.5 Selected Gypsy and Traveller Sites

H.5.1.1 **Table H.5.1** lists the preferred sites for Gypsy and Traveller pitches set out in the Publication Version of the South Staffordshire LPR, within Policy SA6. The outline reasons for selecting each of the sites, as set out in the table below, have been determined by SSDC.

Table H.5.1: Outline reasons for selecting Gypsy and Traveller sites

Site Ref.	Site Address	Outline Reasons for Selection (provided by Council)
GT01	New Acre Stables	Site assessed as suitable to meet the occupants 5 year requirement of 4 pitches through the Pitch Deliverability Study 2021.
GT05	Granary Cottage, Slade Heath	Site assessed as suitable to meet the occupants 5 year requirement of 1 pitches identified through the Pitch Deliverability Study 2021
GT06	The Spinney, Slade Heath	Site assessed as suitable to meet the occupants 5 year requirement of 2 pitches through the Pitch Deliverability Study 2021.
GT07	The Bungalow, Rockbank, Coven	Site assessed as suitable to contribute 3 additional pitches against the occupants 5 year requirement of 5 pitches, as confirmed through the Pitch Deliverability Study 2021
GT08	Brinsford Bridge, Stafford Road, Coven Heath	Site assessed as suitable to meet the occupants 5 year requirement of 7 pitches through the Pitch Deliverability Study 2021.
GT14	Brickyard Cottage, Bursnips Road, Essington	Site assessed as suitable to meet the occupants 5 year requirement of 2 pitches identified through the Pitch Deliverability Study 2021.
GT17	The Stables, Old Landwyood Lane	Site assessed as suitable to meet the occupants 5 year requirement of 3 pitches through the Pitch Deliverability Study 2021.
GT18	Park Lodge, Poolhouse Road, Wombourne	Site assessed as suitable to meet the occupants 5 year requirement of 1 pitches through the Pitch Deliverability Study 2021.
GT23	Glenside, Dark Lane, Slade Heath	Site assessed as suitable to meet the occupants 5 year requirement of 1 pitch identified through the Pitch Deliverability Study 2021.
GT32	Kingswood Colliery, Watling Street, Great Wyrley, WS11 3JY	Site assessed as suitable to meet the occupants 5 year requirement of 8 pitches through the Pitch Deliverability Study 2021.
GT33	Fair Haven, Shaw Hall Lane, Coven Heath	Site assessed as suitable to meet the occupants 5 year requirement of 4 pitches through the Pitch Deliverability Study 2021.
GT34	Anvil Park, Essington	Site assessed as suitable to meet the occupants 5 year requirement of 1 pitch identified through the Pitch Deliverability Study 2021.

H.6 Rejected Gypsy and Traveller Sites

H.6.1.1 **Table H.6.1** lists all reasonable alternative sites that have been considered as part of the SA process for Gypsy and Traveller use but are not preferred sites. The table sets out the reasons why these sites were not taken forward, as decided by SSDC.

Table H.6.1: *Reasons for rejecting reasonable alternative Gypsy and Traveller sites*

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
GT02	High House Poplar Lane, Hatherton	County Highways concerns over extending site
GT03	New Stables, Poplar Lane, Hatherton	Detracts from the character and appearance of the landscape setting further heightened by its close proximity to Cannock Chase AONB and the linking footways and bridlepaths
GT04	Pool House Barn, Slade Heath	Site is within Flood Zones 2 and 3
GT09	Oak Tree Caravan Park	Additional pitches likely to dominate nearest settlement (Brinsford)
GT10	St James Caravan Park, Featherstone	Additional pitches likely to dominate nearest settlement (Brinsford)
GT11	Fishponds Caravan Park, Featherstone	Additional pitches likely to dominate nearest settlement (Brinsford)
GT12	Malthouse Lane, Calf Heath	Unable to access essential services (water, electricity) and in Flood Zone 2 & 3
GT13	Hospital Lane, Cheslyn Hay	Encroachment into the Green Belt through a site extension and loss of mineral safeguarding area for brick clay
GT15	Walsall Road, Newtown	Site is already at full capacity
GT16	Clee Park, Newtown	Site is already at full capacity
GT19	1a Stafford Road, Coven Heath	No current need
GT20	Land at Ball Lane	No current need.
GT24	59a Long Lane, Newtown, WS6 6AT	Issues with encroachment into Green Belt along Long Lane, site extension would cause encroachment, risk of dominating Newtown settlement due to its cumulative impact with other nearby gypsy and traveller sites
GT27	Land off New Road adj Fishponds	Scoped out of Pitch Deliverability Study due to uncertain availability of land.
GT30	Rose Meadow, Prestwood	Site is within Flood Zones 2 and 3 and has significant highway concerns
GT35	Site to rear of 122 Streets Lane, Great Wyrley	Encroachment into the Green Belt and impact on its openness that landscaping would not obscure or minimise.

Site Ref.	Site Address	Outline Reasons for Rejection (provided by Council)
GT36	Squirrels Rest, Poplar Lane, Hatherton	Site is currently unauthorised and will result in encroachment into the Green Belt and will detract from the character and appearance of the landscape setting further heightened by its close proximity to Cannock Chase AONB and the linking footways and bridlepaths
TSP01	Dobsons Yard (Intensification of existing site)	Future need can be met for 3 plots
SSC1	Land east of Levedale Road	Landowner unwilling to make land available for a public gypsy and traveller site
SSC2	Land west of Levedale	Landowner unwilling to make land available for a public gypsy and traveller site
SSC3	Land at Water Eaton Lane	Landowner unwilling to make land available for a public gypsy and traveller site
SSC4	Land North of Pinfold Lane / Whiston Road	Landowner unwilling to make land available for a public gypsy and traveller site
SSC5	Land at Rodbaston	Landowner unwilling to make land available for a public gypsy and traveller site
SSC6	Land south of Langley Road	Landowner unwilling to make land available for a public gypsy and traveller site
SSC7	Land north of Springhill Lane	Landowner unwilling to make land available for a public gypsy and traveller site
SSC8	Land off Dirtyfoot Lane	Landowner unwilling to make land available for a public gypsy and traveller site
SSC9	Land north of Springhill Lane	Landowner unwilling to make land available for a public gypsy and traveller site
SS10	Land between Springhill Lane and Dirtyfoot Lane	Landowner unwilling to make land available for a public gypsy and traveller site

Appendix I: Policy Assessments

Appendix I: Policy Assessments

I.1	Introduction	11
I.1.1	Overview.....	11
I.1.2	Overview of policy assessments	12
I.2	Development Strategy Policies.....	14
I.2.1	Policy DS1: Green Belt.....	14
I.2.2	Policy DS2: Green Belt Compensatory Improvements.....	17
I.2.3	Policy DS3: Open Countryside	18
I.2.4	Policy DS4: Development Needs.....	111
I.2.5	Policy DS5: The Spatial Strategy to 2039	113
I.2.6	Policy DS6: Longer Term Growth Aspirations for a New Settlement.....	120
I.3	Site Allocation Policies	124
I.3.1	Policy MA1: Master Planning Strategic Sites	124
I.3.2	Policy SA1: Strategic development location: Land East of Bilbrook	127
I.3.3	Policy SA2: Strategic development location: Land at Cross Green.....	131
I.3.4	Policy SA3: Strategic development location: Land north of Linthouse Lane	136
I.3.5	Policy SA4: Strategic development location: Land North of Penkridge.....	141
I.3.6	Policy SA5: Housing Allocations.....	146
I.3.7	Policy SA6: Gypsy and Traveller Allocations.....	152
I.3.8	Policy SA7: Employment Allocations.....	159
I.4	Delivering the right homes.....	165
I.4.1	HC1: Housing Mix	165
I.4.2	HC2: Housing Density	166
I.4.3	HC3: Affordable Housing	167
I.4.4	HC4: Homes for Older People and Others with Special Housing Requirements.....	168
I.4.5	HC5: Specialist Housing Schemes	169
I.4.6	HC6: Rural Exception Sites.....	170
I.4.7	HC7: First Homes Exception Sites.....	171
I.4.8	HC8: Self-Build and Custom Housebuilding	173
I.4.9	HC9: Gypsy, Traveller and Travelling Showpeople.....	174
I.5	Design and space standards	176
I.5.1	HC10: Design requirements.....	176
I.5.2	HC11: Protecting amenity	178
I.5.3	HC12: Space about dwellings and internal space	179
I.5.4	HC13: Parking Provision.....	180
I.6	Promoting successful and sustainable communities.....	182
I.6.1	HC14: Health Infrastructure	182
I.6.2	HC15: Education.....	183
I.6.3	HC16: South Staffordshire College (Rodbaston)	184
I.6.4	HC17: Open Space	184

I.6.5	HC18: Sports Facilities and Playing Pitches.....	I86
I.6.6	HC19: Green Infrastructure.....	I86
I.7	Building a strong local economy	I88
I.7.1	EC1: Sustainable economic growth.....	I88
I.7.2	EC2: Retention of employment sites.....	I90
I.7.3	EC3: Employment and Skills	I91
I.7.4	EC4: Rural Economy.....	I91
I.7.5	EC5: Tourism.....	I93
I.7.6	EC6: Rural workers dwellings.....	I95
I.7.7	EC7: Equine related development	I96
I.8	Community services, facilities and infrastructure	I97
I.8.1	EC8: Retail	I97
I.8.2	EC9: Protecting community services and facilities.....	I99
I.8.3	EC10: Wolverhampton Halfpenny Green Business Airport	I100
I.8.4	EC11: Infrastructure	I101
I.8.5	EC12: Sustainable transport	I102
I.8.6	EC13: Broadband	I103
I.9	Protecting and enhancing the natural environment	I105
I.9.1	NB1: Protecting, enhancing and expanding natural assets	I105
I.9.2	NB2: Biodiversity.....	I107
I.9.3	NB3: Cannock Chase SAC.....	I108
I.9.4	NB4: Landscape Character.....	I109
I.10	Climate Change and sustainable development.....	I110
I.10.1	NB5: Renewable and low carbon energy generation	I110
I.10.2	NB6: Sustainable Construction	I111
I.10.3	NB7: Managing flood risk, sustainable drainage systems & water quality	I113
I.11	Enhancing the Historic Environment.....	I116
I.11.1	NB8: Protection and Enhancement of the Historic Environment and Heritage Assets.....	I116
I.11.2	NB9: Canal network.....	I117

I.1 Introduction

I.1.1 Overview

- I.1.1.1 This appendix provides an assessment of 54 policies proposed by South Staffordshire District Council for the Local Plan Review (LPR).
- I.1.1.2 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix B**) and are in accordance with the methodology as set out in the SA Main Report.
- I.1.1.3 For ease of reference the scoring system is summarised in **Table I.1.1**.

Table I.1.1: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or a negligible effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

- I.1.1.4 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- I.1.1.5 The sustainability performance of each policy is assessed in isolation from other policies in the LPR. Where negative effects are identified, there is the potential for other policies to mitigate these impacts. The main Regulation 19 SA report considers the residual impacts of the plan and the overall mitigating effects of the LPR policies.
- I.1.1.6 The policies assessed within this appendix were based on the most up to date policy wording at the time of assessment, provided by SSDC between July and September 2022. The policy text used in the SA is presented in a box alongside each of the assessment narratives within this document. It should be noted that there may be minor wording changes to the policies compared to that within the Publication Version of the LPR.

I.1.2 Overview of policy assessments

I.1.2.1 The impact matrices for all policy assessments are presented in **Table I.1.2**. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

Table I.1.2: Summary of policy assessments

Policy Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & employment
Development Strategy Policies												
DS1	0	0	-	-	+	-	+	+	0	+	+	+
DS2	0	0	0	0	0	0	0	+	0	+	0	0
DS3	0	0	0	+	0	+	+	+	0	0	+	+
DS4	-	+/-	+/-	--	--	--	++	-	+/-	+/-	+/-	++
DS5	--	-	-	-	-	--	++	-	-	-	-	++
DS6	+	+/-	-	-	+/-	+/-	+	+	+/-	+	++	+
Site Allocation Policies												
MA1	+	+	+	+	+	+	+	+	+	+	+	0
SA1	-	0	+/-	--	-	-	++	-	0	-	++	+
SA2	+/-	0	+/-	--	-	-	++	-	0	-	-	+
SA3	-	+	+/-	--	-	-	++	-	0	+	++	+
SA4	-	0	+/-	--	-	-	++	-	0	+	++	+
SA5	+/-	0	-	--	-	-	++	-	-	-	-	-
SA6	0	--	-	--	-	-	+	-	-	-	-	--
SA7	-	--	-	-	-	-	0	-	-	-	0	++
Delivering the Right Homes												
HC1	0	0	0	0	0	+/-	+	+	0	0	0	0
HC2	+/-	0	0	0	0	+/-	+	0	0	0	0	0
HC3	0	0	0	0	0	0	+	+	0	0	0	0
HC4	0	0	0	0	0	0	+	+	0	0	0	0
HC5	0	0	0	0	0	0	+	+	0	0	0	0
HC6	0	0	0	0	0	+/-	+	0	0	0	0	0
HC7	0	0	0	0	0	+/-	+	+	0	0	0	0
HC8	0	0	0	0	0	0	+	0	0	0	0	0
HC9	0	+	0	0	+	0	+	+	0	0	0	0
Design and Space Standards												
HC10	+	0	0	+	0	0	+	+	0	+	0	0
HC11	0	0	0	0	+	0	0	+	0	0	0	0
HC12	0	0	0	0	0	0	0	+	0	0	0	0
HC13	+	0	0	0	+	0	0	0	0	+	0	0
Promoting Successful and Sustainable Communities												
HC14	0	0	0	0	0	0	0	+	0	0	0	0

Policy Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & employment
HC15	0	0	0	0	0	0	0	0	0	0	+	0
HC16	0	0	0	0	0	0	0	0	0	0	+	0
HC17	0	0	0	0	0	0	0	+	0	0	0	0
HC18	0	0	0	0	0	0	0	+	0	0	0	0
HC19	+	+	+	+	+	0	0	+	0	0	0	0
Building a Strong Local Economy												
EC1	+	+	+/-	+/-	+/-	+	0	+	+/-	+	0	++
EC2	0	0	0	0	0	0	0	0	0	0	0	++
EC3	+	0	0	0	0	0	0	0	0	+	0	+
EC4	0	0	+	+	0	+	0	0	0	0	0	+
EC5	0	0	0	+	0	0	0	+	0	+	0	+
EC6	0	0	0	+	0	0	+	0	0	0	0	+
EC7	0	0	0	0	0	0	0	+	0	0	0	+
Community Services, Facilities and Infrastructure												
EC8	+	0	0	0	0	0	0	0	0	+	0	+
EC9	+	0	0	0	0	0	0	+	0	+	0	+
EC10	0	0	0	0	0	0	0	0	0	0	0	+
EC11	0	0	+	0	0	0	0	+	0	+	+	0
EC12	+	0	0	0	+	0	0	+	0	++	+	+
EC13	+	0	0	0	0	0	0	0	0	+	+	+
Protecting and Enhancing the Natural Environment												
NB1	+	+	++	+	+	+	0	+	0	0	0	0
NB2	+	0	+	0	0	0	0	0	0	0	0	0
NB3	0	0	+	0	+	0	0	+	0	0	0	0
NB4	0	0	+	++	0	0	0	0	+	0	0	0
Climate Change and Sustainable Development												
NB5	+	0	-	-	+/-	+/-	0	0	0	0	0	0
NB6	++	0	0	0	0	+	0	0	0	0	0	0
NB7	0	++	0	0	+	0	0	0	0	0	0	0
Enhancing the Historic Environment												
NB8	0	0	0	+	0	0	0	0	++	0	0	+
NB9	+	0	+	+	+	0	0	0	+	0	0	0

I.2 Development Strategy Policies

I.2.1 Policy DS1: Green Belt

Policy DS1: Green Belt

Within the West Midlands Green Belt, as defined on the policies map, opportunities to enhance the beneficial use of the Green Belt will be supported. This may include opportunities to provide access, for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land.

Development within the Green Belt must retain its character and openness. Inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and other harm, is clearly outweighed by other considerations.

The construction of new buildings within the Green Belt should be regarded as inappropriate, unless it is for one of the exceptions listed within the National Planning Policy Framework. A separate Green Belt Supplementary Planning Document (SPD) will be prepared for further guidance.

Limited affordable housing for local community needs in the Green Belt will be supported on small rural exceptions sites where the development complies with Policy HC6.

The Green Belt boundary will be altered through the Local Plan Review to accommodate development allocations set out in Policies SA1, SA2, SA3, SA5 and SA7. The boundaries of the reviewed Green Belt sites are identified in Appendices B-E of this document.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS1	0	0	-	-	+	-	+	+	0	+	+	+

I.2.1.1 The principal objectives of Green Belt designation are to maintain openness and to restrict urban sprawl. The measures in place to protect the Green Belt are set out in the NPPF. Green Belt designation is not a reflection of the environmental quality or value of the land.

I.2.1.2 The NPPF sets out the five purposes of the Green Belt:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict or other urban land.

- I.2.1.3 In South Staffordshire District 80% of land lies within the West Midlands Green Belt. In line with the provisions in the NPPF, a Green Belt review was carried out in 2019¹, recognising the likelihood that land would need to be released from the Green Belt and Open Countryside in some locations to meet future development needs. Green Belt is only released through the Local Plan Review (LPR) process where is considered necessary and justified.
- I.2.1.4 Where Green Belt release is considered necessary, the LPR should seek compensatory improvements to the environmental quality and accessibility within the remaining Green Belt, including improving access to the countryside and ecological and biodiversity enhancement, in line with the NPPF.
- I.2.1.5 Policy DS1 sets out protection for land in the revised Green Belt. By undertaking a Green Belt review and planning the release of Green Belt land only to facilitate planned growth, the policy has the potential to facilitate more sustainable communities, by locating new development in closer proximity to services, facilities and public transport. Transport by private car is identified as one of the key behaviours resulting in greater carbon emissions in the district². Reducing the need to travel and facilitating the use of public transport would potentially reduce carbon emissions in comparison to having unplanned growth or greater levels of dispersed development within the Green Belt. There is some uncertainty in this assessment as it relies on changes in behaviour in relation to travel patterns. The policy would also restrict further development in Green Belt designated areas, which would serve to protect soils and vegetation, which act as carbon stores. Overall, this policy would be likely to have a negligible effect on climate change mitigation (SA Objective 1).
- I.2.1.6 By focusing planned development within larger settlements and restricting the type and extent of other new development within the Green Belt, the policy would protect associated soils, vegetation, watercourses and flood zones on land protected by Green Belt designation. These features have roles in natural water management, carbon sequestration and may provide ecological habitats. One of the purposes of Green Belt designation is to encourage urban regeneration by encouraging the reuse of derelict and other urban land. There is potential for the policy to put pressure on the development of land in locations outside the Green Belt but within Flood Zones 2 and 3; however, this effect could be mitigated through the provisions of national and local planning policies and guidance. The policy is likely to have both minor positive and minor negative effects in relation to climate change adaptation, resulting in an overall negligible impact (SA Objective 2).
- I.2.1.7 The policy would protect existing soils and vegetation in Green Belt designated areas, which could provide habitats for various species. The policy will also require the release of some areas of Green Belt to deliver the proposals set out in Policies SA1 to SA7. The policy supports proposals for beneficial uses of the Green Belt, including the enhancement of biodiversity, however, the nature and location of such proposals are uncertain at this stage. Following the precautionary principle, the policy has the potential to have minor negative impacts for biodiversity (SA Objective 3) at this stage.

¹ LUC (2019) 'South Staffordshire Green Belt Study', Available at <https://www.sstaffs.gov.uk/planning/spatial-housing-strategy-infrastructure-delivery.cfm> [Accessed on 11/08/22]

² AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Accessed on 11/08/22].

- I.2.1.8 The policy will require the release of some areas of Green Belt to deliver the proposals set out in Policies SA1 to SA7 and will protect the character of the revised Green Belt land. The policy also supports “*opportunities to enhance the beneficial use of the Green Belt.... This may include opportunities to provide access, for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land*”. The nature and location of such proposals are not set out in this policy. Following the precautionary principle, a minor negative effect on landscape and townscape character cannot be ruled out at this stage (SA Objective 4).
- I.2.1.9 The Green Belt policy is likely to substantially restrict development in designated areas and therefore limit the potential effects of development on air and water quality. By planning for future residential development in more sustainable locations, residents would potentially have greater access to services and facilities and potentially greater access to public transport. There is the potential for minor positive effect on SA Objective 5 (Pollution and Waste).
- I.2.1.10 The policy sets out the need to revise Green Belt boundaries to deliver some of the predicted housing need. This is likely to result in the loss of previously undeveloped land and associated soils. There are extensive areas of ‘best and most versatile’ (BMV) agricultural land in South Staffordshire and it is likely that the development required to meet housing needs would result in the loss of some of this resource. By limiting development in the revised Green Belt, the policy would be likely to protect BMV agricultural land elsewhere, however, there is potential for a minor negative effect on natural resources (SA Objective 6) as a result of the loss of soils associated with delivering the required development.
- I.2.1.11 Policy DS1 sets out the need to revise the Green Belt to deliver predicted housing need and supports limited infilling within settlements in the Green Belt and affordable housing schemes for local community needs on rural exception sites. This would have a minor positive effect on housing provision (SA Objective 7).
- I.2.1.12 The policy supports proposals for the beneficial uses of the Green Belt, including for outdoor sport and recreation and for enhanced access to the Green Belt. The nature of any such proposals is uncertain at this stage, however, there is the potential for enhanced access to recreational facilities and open space, and a minor beneficial effect on health and wellbeing (SA Objective 8) and potentially Objective 12 (Economy and Employment), depending on the nature of any future facilities.
- I.2.1.13 By restricting the quantity and types of development within the Green Belt, the policy would be likely to preserve existing settings to historic assets on Green Belt designated land. The policy also sets out the need to release Green Belt land in order to deliver housing allocations. One of the purposes of the Green Belt is to “*preserve the setting and special character of historic towns*”. However, the Green Belt Study³ states “*this applies to very few places within the country and very few settlements in practice. In most towns, there is already more recent development between the historic core and the countryside*”. The summary table, provided on page 40 of the study, shows that all assessed land parcels were found to have a ‘weak/no

³ LUC (2019) ‘South Staffordshire Green Belt Study’, Available at <https://www.sstaffs.gov.uk/planning/spatial-housing-strategy-infrastructure-delivery.cfm> [Accessed on 11/08/22]

contribution' to this purpose. Overall, Policy DS1 would be likely to have a negligible effect in relation to cultural heritage (SA Objective 9).

I.2.1.14 This policy, and separate Green Belt SPD, may direct planned future residential development to more sustainable locations where residents would have greater access to services and facilities and potentially greater access to public transport. As set out in the NPPF, there is also potential for Green Belt designation to result in pressure for greater levels of development outside the Green Belt and potentially away from existing settlements. This effect can be mitigated by planning for and allocating development sites in more sustainable locations. SSDC's preferred approach to housing allocations is set out in Policies SA1 to SA7. There is potential for a minor positive effect in relation to transport and accessibility (SA Objective 10).

I.2.1.15 In relation to potential effects on access to education, by undertaking a planned review of the Green Belt and planning future residential development in more sustainable locations, new residents are likely to have better access to existing schools, which are often associated with existing settlements. Overall, the policy is likely to have a minor positive effect on access to education (Objective 11). Should any new school development be required, in addition to those locations for primary/first schools identified in this LPR, Green Belt designation may serve to restrict potential locations for that development.

I.2.2 Policy DS2: Green Belt Compensatory Improvements

Policy DS2: Green Belt Compensatory Improvements

Planning permission will not be granted for development of sites removed from the Green Belt through the Local Plan unless and until appropriate additional compensatory improvements to environmental quality and accessibility of remaining Green Belt are incorporated into a Section 106 agreement. As a starting point any compensatory improvements should be in addition to other local plan policy standards.

Where compensatory improvements have been identified in the Local Plan on remaining Green Belt land adjacent to an allocated site, such improvements must be secured through planning applications for these developments. Where areas of land for compensatory improvements have not been identified adjacent to a site through the Local Plan, applicants must demonstrate proportionate compensatory improvements to remaining Green Belt land in accordance with the following hierarchy:

- a) Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;
- b) Compensatory improvements to remaining Green Belt land within the wider locality accommodating the development;
- c) Compensatory improvements to remaining Green Belt land in an area identified through the Council's latest Nature Recovery Network mapping or Open Space Strategy.

In the event that it is robustly demonstrated that none of the above options can be satisfied (e.g. as land is demonstrably not available) then the Council will accept a commuted sum that it will use to undertake compensatory improvements.

Development should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS2	0	0	0	0	0	0	0	+	0	+	0	0

I.2.2.1 The principal objectives of Green Belt designation are to maintain openness and to restrict urban sprawl. Green Belt is not a reflection of the environmental quality or value of the land. The NPPF sets out the five purposes of the Green Belt as follows:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict or other urban land.

I.2.2.2 Policy DS2 outlines the requirement for “*compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site, the wider locality accommodating the development and Nature Recovery Networks and Open Space Strategy*”. This policy may have a minor positive effect on existing Green Belt land and provide opportunities to deliver or contribute towards the emerging Nature Recovery Networks and Open Space Strategies in South Staffordshire. These measures could potentially lead to minor positive impacts on accessibility to the countryside and opportunities for recreation (SA Objective 10 and 8).

I.2.2.3 There may also be potential for longer-term positive effects on biodiversity (SA Objective 3) if the delivery of Nature Recovery Networks incorporating measurable net gains in biodiversity is successful.

I.2.3 Policy DS3: Open Countryside

Policy DS3: Open Countryside

The District’s Open Countryside is defined as the area in the District which is both beyond the West Midlands Green Belt and outside of individual settlement’s development boundaries, as indicated on the Policies Map.

The Open Countryside contains many sensitive areas, including its landscapes and areas of ecological, historic, archaeological, agricultural and recreational value. The District Council will protect the intrinsic character and beauty of the Open Countryside whilst supporting development proposals which:

- Assist in delivering diverse and sustainable farming enterprises;
- Deliver/assist in delivering other countryside-based enterprises and activities, including those which promote the recreation and enjoyment of the countryside, such as forestry, horticulture, fishing and equestrian activities;
- Provide for the sensitive use of renewable energy resources (in conjunction with Policy NB6); or

Policy DS3: Open Countryside

- d) Enable the re-use of an existing building, providing that the proposed use of any building (taking into account the size of any extensions, rebuilding or required alterations), would not harm the intrinsic character and beauty of the Open Countryside.

The policy provisions set out above indicate the types of development which will, in principle, be supported within the Open Countryside. In addition to the requirements set out in this policy, any proposed scheme must also be consistent with any relevant policies set out elsewhere within the Local Plan in order to be supported.

All types of development in the Open Countryside which are not explicitly supported by Policy DS3 will be considered on a case-by-case basis. Such proposals will only be permitted where they are not located on best and most versatile agricultural land and are fully consistent with any other relevant policies set out elsewhere in the Local Plan. These include, but are not limited to, policies which relate to the District's:

- overall development strategy
- design standards
- landscape character and assets
- historic assets
- ecological assets and biodiversity
- recreational assets
- housing mix requirements (where applicable)
- sustainable travel requirements

The Open Countryside boundary will be altered through the Local Plan Review to accommodate the relevant development allocations set out in Policies SA4 and SA5. The boundaries of the reviewed Open Countryside sites are identified in Appendices B and C of this document.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS3	0	0	0	+	0	+	+	+	0	0	+	+

I.2.3.1 Policy DS3 seeks to sensitively plan for development while protecting valuable features of the Open Countryside, including landscape character, biodiversity, heritage, agricultural soils and recreational value. Land designated as Open Countryside would lie to the north of the district, outside the Green Belt and outside the settlement boundaries which will be redefined to accommodate the planned development as part of the LPR.

I.2.3.2 By allocating land to facilitate planned growth, and protecting areas of land outside these defined areas, the policy has the potential to facilitate more sustainable communities, by locating new development in closer proximity to services, facilities and public transport. Transport by private car is identified as one of the key behaviours resulting in greater carbon emissions in the South Staffordshire District⁴. Reducing the need to travel and facilitating

⁴ AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Accessed on 11/08/22].

- the use of public transport would potentially reduce carbon emissions in comparison to having unplanned growth or greater levels of development in the Open Countryside. There is some uncertainty in this assessment as it relies on changes in behaviour in relation to transport and travel. The policy would also restrict further development in areas of Open Countryside, which would serve to protect soils and vegetation, which act as carbon stores. Overall, this policy could have a negligible to slight beneficial effect on climate change mitigation (SA Objective 1).
- I.2.3.3 By restricting the type and extent of new development in the Open Countryside, the policy would result in the protection of soils, vegetation, watercourses and flood zones on land protected by the policy. These features have roles in natural water management. The policy would be likely to have a negligible effect in relation to climate change adaptation (SA Objective 2).
- I.2.3.4 The policy would protect existing soils and vegetation in the Open Countryside, which could provide habitats for various species. The circumstances in which development may be considered acceptable are set out in the policy. There is the potential for this development to have minor negative effects on some habitats and species. However, Policy DS3 also states that development will only be permitted when fully consistent with other Local Plan policies including ecological assets and biodiversity. Overall, the policy is likely to have a negligible impact on biodiversity (SA Objective 3) at this stage.
- I.2.3.5 The policy aims to “*protect the intrinsic character and beauty of the Open Countryside*”, whilst supporting development proposals as outlined within the policy text, and outlines that proposals must be fully consistent with other relevant policies within the Plan, such as those regarding the protection of landscape character and assets. The policy would be expected to largely protect the existing character of the landscape in these areas. There is likely to be a minor positive effect on the landscape (SA Objective 4).
- I.2.3.6 This policy may direct future residential development to more sustainable locations where residents would have greater access to services and facilities and potentially greater access to public transport, however, there is some uncertainty in the assessment of the nature of any behavioural change in relation to transport and travel and the associated effects on air quality and transport. There is the potential for negligible to minor beneficial effects in relation to pollution (SA Objective 5) and transport (SA Objective 10).
- I.2.3.7 The policy seeks to direct development in the Open Countryside away from locations on BMV agricultural land, which is likely to protect such soils. The policy would have a minor beneficial effect on BMV agricultural land and natural resources (SA Objective 6).
- I.2.3.8 The policy seeks to protect the Open Countryside and supports applications for recreational facilities, provided the application meets other Local Plan policy requirements. Access to the open countryside and outdoor recreation are widely accepted as being beneficial to both mental and physical health. The policy could have a minor beneficial effect on health and wellbeing (SA Objective 8).
- I.2.3.9 By restricting the quantity and types of development in the Open Countryside, the policy would be likely to protect existing settings to historic assets. The policy would be likely to have a negligible effect in relation to cultural heritage (SA Objective 9).

- I.2.3.10 Policy DS3 supports limited new residential development including limited infilling within settlement boundaries, new or extended dwellings directly related to agriculture or forestry and affordable housing schemes for local community needs on rural exception sites. This would have a minor positive effect on housing provision (SA Objective 7).
- I.2.3.11 The policy seeks to limit the quantity and types of development in the Open Countryside and may serve to encourage housing development in more sustainable locations in proximity to existing schools. There is likely to be a minor positive effect on access to education (SA Objective 11).
- I.2.3.12 The policy supports some elements of rural enterprise such as, new dwellings directly related to agriculture or forestry, facilities for outdoor sport or recreation, nature conservation, cemeteries as well as some aspects of change of use. There is the potential for the policy to have a minor beneficial effect on the economy and employment (SA Objective 12).

I.2.4 Policy DS4: Development Needs

Policy DS4: Development Needs

During the plan period up to 2039, the Council will promote the delivery of a minimum of:

- a) 9,089 homes over the period 2018-2039 to meet the districts housing target whilst providing approximately 13% additional homes to ensure plan flexibility. This housing target includes the district's own housing requirement of 5089 homes, plus a 4000-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area.
- b) 99ha of employment land over the period 2020-2039 to ensure that South Staffordshire's identified need for employment land of 63.6ha is met, as well as making available a contribution of 36.6ha⁵ to the unmet employment land needs of the Black Country authorities. 18.8ha of West Midlands Interchange will contribute towards South Staffordshire's employment land supply and an additional minimum of 67ha towards the unmet employment land needs of the Black Country authorities, which may increase depending on the employment land position of other local authorities in the site's market area. The remaining land supply on West Midlands Interchange will be considered with related authorities through the Duty to Co-operate.
- c) 37 new Gypsy and Traveller pitches. This is the number of pitch options that have been assessed as deliverable against a larger need of 121 pitches, primarily to meet the future needs of existing families within the district. The Council has explored numerous options to meet this unmet need, including through ongoing Duty to Co-operate engagement with neighbouring authorities and promoters of residential site allocations, as well as assessing the suitability of publicly owned land. The Council will continue to work with Duty to Cooperate bodies to explore options for new or expanded public sites to meet this unmet need and will respond positively to windfall proposals that accord with Policy HC9.

Policies DS5, SA1, SA2, SA3, SA4, SA5, SA6 and SA7 set out how the above development needs will be delivered in a sustainable way that enhances the vitality of communities across South Staffordshire, supports economic growth, and which conserves and enhances the district's environmental assets. Delivery of new development will be monitored in line with the monitoring framework and the development needs set out above will be kept under review to inform whether a review of the Local Plan is required.

⁵ Of which 1.2ha is surplus ancillary office floorspace on strategic sites

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS4	-	+/-	+/-	--	--	--	++	-	+/-	+/-	+/-	++

- I.2.4.1 Strategic Policy DS4 sets out the overall development needs for South Staffordshire within the plan period 2018-2039 to meet the identified needs for housing, employment land and Gypsy and Traveller pitches, relating to the LPR allocations as set out within Policies SA1-7 (see **Chapter I.3**).
- I.2.4.2 It should be noted that each site allocated within the LPR has been assessed as part of the reasonable alternative site assessments in the SA process, either in Appendix B of the Regulation 18 (III) SA Report⁶, or **Appendix F** of this report. The assessment of sites (and Policies SA1-7) has identified a range of sustainability impacts in regard to SA Objectives 2, 3, 9, 10 and 11, and therefore, for the purposes of this policy assessment the overall impact is uncertain.
- I.2.4.3 The development of 9,089 dwellings would be expected to meet the identified local need and contribute towards the wider HMA needs, and the proposed development of 37 Gypsy and Traveller pitches would contribute towards meeting identified needs. Overall, this policy would be expected to have a major positive impact on housing provision (SA Objective 7). As the policy aims to meet the identified need for employment floorspace, this policy would also be expected to have a major positive impact on economy and employment (SA Objective 12).
- I.2.4.4 The large scale of development proposed under this policy would be expected to result in the loss of previously undeveloped land. This would, in turn, result in the loss of ecologically, and potentially agriculturally, important soils. Therefore, a major negative impact on natural resources would be anticipated (SA Objective 6).
- I.2.4.5 Based on an average of 2.3 people per dwelling in South Staffordshire⁷, the delivery of 9,089 dwellings could result in approximately 20,905 new residents. This increase in residents would be expected to increase pressures on existing infrastructure across the Plan area, including the road networks and local facilities and services. An increase in traffic and the number of vehicles on local roads would be expected to increase local air pollution. This, in

⁶ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 30/08/22]

⁷ Based on 2021 Census population data (110,500) and 2021 dwelling stock information (48,064).

ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> and DLUHC & MHCLG (2022) Live tables on dwelling stock. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date Accessed: 26/08/22]

turn, would be likely to have a minor negative impact on the health and wellbeing of local residents (SA Objective 8).

- I.2.4.6 In 2020, South Staffordshire's carbon emissions totalled approximately 858,771 tonnes CO₂, whilst residents of the district had an average annual carbon footprint of 7.6 tonnes CO₂ per person⁸. Although there is a general trend of reduced carbon emissions over time, which would be likely to continue over the Plan period to 2039, the introduction of up to 20,905 new residents could be expected to significantly increase the local area's contribution towards the causes of climate change in the short-medium term.
- I.2.4.7 It is also acknowledged that many of the allocations as set out in Policies SA1-7 and referred to in Policy DS4 are directed towards higher tier settlements and urban edges where it is likely that more sustainable communities can be created, owing to the existing provision of services, jobs and public transport infrastructure within these towns and settlements. Taking into consideration the large scale of growth, alongside the trend data and spatial strategy which seeks to promote more sustainable communities, a minor negative impact on climate change mitigation would be likely to result overall (SA Objective 1).
- I.2.4.8 In 2020-2021, South Staffordshire's total collected household waste totalled 47,388 tonnes⁹, which represents an increase compared to the 2018-2019 dataset which identified 43,662 tonnes. The average waste production per person per year in England was 399kg in 2020. Assuming new residents would generate 399kg waste per capita, the introduction of 20,905 new residents could be expected to increase the total household waste generation by 8,341 tonnes, or 17% compared to 2020-21 levels. This could result in a major negative impact on waste (SA Objective 5).

I.2.5 Policy DS5: The Spatial Strategy to 2039

Policy DS5: The Spatial Strategy to 2039

During the plan period to 2039, the Council will deliver a minimum of 5,089 dwellings plus a contribution of 4,000 dwellings towards meeting the Greater Birmingham Housing Market Area shortfall.

The principal aim will be to meet needs in a manner which builds on the district's existing infrastructure and environmental capacity, whilst recognising opportunities to deliver local infrastructure opportunities identified within the district. Throughout the district, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy set out below. The Council will work with partners to deliver the infrastructure, facilities and services required to support this growth.

An integral part of the Strategy will be to ensure that growth is distributed to the district's most sustainable locations, avoiding a disproportionate level of growth in the district's less sustainable settlements whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances set out in the settlement hierarchy below. It will also seek to maintain and enhance the natural and historic environment and the local distinctiveness of the district and retain and reinforce the current settlement pattern.

⁸ DBEIS (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020> [Date Accessed: 26/08/22]

⁹ DEFRA (2022) Local authority collected waste generation from January 2010 to March 2021. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date Accessed: 26/08/22]

Policy DS5: The Spatial Strategy to 2039

Tier 1 settlements

The district's Tier 1 settlements are Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley. These settlements hold a wider range of services and facilities and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan. These Tier 1 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent with other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC6, in a manner which reflects their role and function.

Tier 2 settlements

The district's Tier 2 settlements are Wombourne, Brewood, Kinver, Perton and Huntington. These settlements hold a wider range of services and facilities than other smaller settlements in the district's rural area. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan.

These Tier 2 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC6, in a manner which reflects their role and function.

Tier 3 settlements

The district's Tier 3 settlements are Essington, Coven, Featherstone, Sharesill, Wheaton Aston, Pattingham and Swindon. These settlements hold a smaller range of services and facilities than Tier 1 and 2 settlements and as such are given a lesser level of growth. Limited growth in these smaller rural settlements will be delivered through appropriate allocations made in the Local Plan.

The district's Tier 3 settlements will continue to support limited windfall housing and employment growth to assist in meeting local needs, where it is consistent with other Local Plan policies. Employment development will be small in scale and aim to maintain the vitality and viability of these communities. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC6, in a manner which reflects their role and function.

Tier 4 settlements

The district's Tier 4 settlements are Bednall, Bishops Wood, Bobbington, Dunston, Himley, Seisdon and Trysull. These settlements will continue to support very limited windfall housing growth to assist in safeguarding the limited services and facilities in each village and to address local housing needs. Limited windfall housing growth will be supported only where it is consistent with other Local Plan policies.

Tier 5 settlements

The district's Tier 5 settlements are set out in the Rural Services and Facilities Audit 2021. These settlements are not intended to experience further housing or employment growth, owing to their poorer public transport links and lack of services and facilities relative to other settlements within the district. New development in these locations will be limited to the conversion and re-use of redundant rural buildings to appropriate uses, in accordance with other development plan policies. On a case-by-case basis, the very limited redevelopment of previously developed land for housing may also be supported within these settlements where this would not increase unsustainable transport movements from the settlement in question and would not conflict with other Local Plan policies.

The district's wider rural area

In the rural area outside of the district's existing settlements, the objective of the Spatial Strategy is to protect the attractive rural character of the countryside. To deliver this, new development will be restricted to particular types of development to support biodiversity, carbon sequestration, renewable and low carbon technologies, tourism, sport and recreation and the local rural economy and rural diversification, where this is consistent with other Local Plan policies. Other than the forms of residential development identified as being acceptable in rural

Policy DS5: The Spatial Strategy to 2039

areas in the National Planning Policy Framework, isolated housing growth away from the district's rural settlements will not be supported.

Growth adjacent to the neighbouring towns and cities in the Black Country

Housing growth will be primarily located at the allocations made adjacent to the Black Country through this Local Plan, in order to facilitate sustainable growth of their towns and cities and to assist in meeting wider unmet housing needs from the housing market area. These are:

- Land at Cross Green
- Land north of Linthouse Lane
- Land at Langley Road

As part of delivering these sites, the Council will work cross-boundary with infrastructure bodies and statutory partners to ensure these sites are supported by any necessary infrastructure. In addition, the Council will continue to work with partners to seek opportunities to deliver a rail-based park and ride on land safeguarded for this use through the Land at Cross Green development.

Growth adjacent to the town of Stafford

Housing growth will be primarily located at the strategic allocation made adjacent to Stafford through this Local Plan, in order to facilitate sustainable growth at a non-Green Belt location. This is:

- Land at Weeping Cross, west of the A34

The district's freestanding strategic employment sites

Outside of the district's rural settlements, support will continue to be given for employment and economic development at the district's five existing freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes). Existing and proposed employment sites throughout the district will be safeguarded for their respective uses, in accordance with other Local Plan policies.

Gypsy, Travellers and Travelling Showpeople sites

The district will seek to meet existing Gypsy, Travellers and Travelling Showpeople needs as far as possible, pursuing a strategy of meeting evidenced needs where they arise throughout the district. To deliver this strategy, allocations in the Local Plan will be used to allow for the sustainable intensification, extension and regularisation of suitable existing sites, in a manner consistent with other development plan policies and local evidence on pitch deliverability. Windfall proposals for additional pitches will be considered on a case-by-case basis against the criteria in Policy HC8 and other relevant Local Plan policies.

Delivering the Strategy

The Spatial Strategy will be delivered through allocations made in this Local Plan and associated planning policies, ensuring development is sustainable, enhances the environment and provides any necessary mitigating or compensatory measures to address harmful implications. In all cases development should not conflict with the policies of the development plan.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS5	--	-	-	-	-	--	++	-	-	-	-	++

- I.2.5.1 Strategic Policy DS5 sets out the proposed distribution of housing, employment and Gypsy, Traveller and Travelling Showpeople pitches/plots development across the Plan area. A settlement hierarchy has been identified based on available services and facilities. In addition, development would also be directed towards the towns and cities of the Black Country and, to a lesser extent, towards Stafford in order contribute to the identified unmet housing need in these neighbouring authorities.
- I.2.5.2 The Spatial Strategy has been identified and refined by SSDC over a number of years. The Spatial Housing Strategy and Infrastructure Delivery (SHSID) was consulted on in October 2019. This report described how proposed housing could be distributed between different settlements and other broad locations within the district, informed by strategic evidence on the sustainability and sensitivity of these different locations. A preferred infrastructure-led spatial housing strategy was identified, called Option G, which has been refined following consultation.
- I.2.5.3 The Spatial Strategy seeks to direct development in the first instance towards the three Tier 1 settlements (Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley) as well as on land adjacent to the Black Country and Stafford. Tier 2 and Tier 3 settlements would accommodate lower levels of housing allocations, with very low levels of housing development expected to be delivered in Tier 4 settlements and in the wider rural area and Tier 5 settlements.
- I.2.5.4 The construction, occupation and operation of 9,089 dwellings would be expected to exacerbate air pollution, including greenhouse gas (GHG) emissions and particulate matter (PM). The Climate Change Adaptation and Mitigation report¹⁰ states that new development in Staffordshire, as a whole, could increase emissions by approximately 5%. In 2020, the estimated carbon emissions per person per year in South Staffordshire was 7.6 tonnes¹¹. Given an average of 2.3 residents per dwelling¹², the residents occupying the 9,089 dwellings could result in an increase of approximately 158,876 tonnes CO₂/year. This would be expected to have a major negative effect in relation to climate change mitigation. By directing a greater amount of development towards Tier 1 and Tier 2 settlements and the urban edge of existing larger towns outside the district, this policy would be likely to facilitate more sustainable communities, by locating residents in closer proximity to services, facilities and public transport, including railway stations. The use of the private cars and associated fossil fuel consumption is identified as one of the district's largest contributors to carbon emissions¹³. By seeking to reduce the need to travel and by locating development in

¹⁰ AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Accessed on 11/08/22].

¹¹ DBEIS (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020> [Date Accessed: 26/08/22]

¹² Based on 2021 Census population data (110,500) and 2021 dwelling stock information (48,064).

ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> and DLUHC & MHCLG (2022) Live tables on dwelling stock. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date Accessed: 26/08/22]

¹³ AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Accessed on 11/08/22]

settlements with existing public transport links, this policy could potentially lead to a lower level of carbon emissions than would otherwise be the case. However, development of this scale is likely to result in a major negative effect on the climate change mitigation (SA Objective 1).

- I.2.5.5 By primarily directing development to existing urban areas, there may be more opportunities for the use of previously developed land. However, the development of this quantum of housing is likely to lead to the loss of previously undeveloped land to some extent and could potentially result in the exacerbation of flood risk from rivers and surface water. The proposed allocations will be considered as part of the Strategic Flood Risk Assessment (SFRA)¹⁴ and potentially site-specific Flood Risk Assessments for planning applications for sites that are not considered in the SFRA. SSDC has confirmed that, for allocated sites, development would be located in Flood Zone 1 only, and appropriate uses, as set out in Table 3 of the PPG¹⁵, would be expected to be located in Flood Zones 2 and 3. For example, 'water-compatible development' can be located in Flood Zone 3 and can include amenity open space, nature conservation and outdoor sports uses. Surface water management solutions would be likely to be required for all larger sites and this is likely to manage surface water runoff rates, in line with the requirements of the Environment Agency. However, at this stage of the planning process, and following the precautionary principle, this overall policy for the delivery of 9,089 homes has the potential to have a minor negative impact on flooding (SA Objective 2). The mitigating effects of the proposed policies on the identified impacts of the development of sites is considered in **Appendix G** of this report.
- I.2.5.6 There are four Habitats sites within or in proximity to the district, designated as Special Areas of Conservation (SACs): Cannock Chase, Cannock Extension Canal, Motte Meadows and Fens Pools. Development locations towards the north east of the district in areas to the south of Stafford, in proximity to Penkridge and in Cheslyn Hay and Great Wyrley would lie within the identified 15km Zone of Influence (Zoi) for Cannock Chase SAC. Sites located in proximity to Motte Meadows, Fens Pools and Cannock Extension Canal SACs may also lie within the Zoi of these SACs. The Zois for these SACs are unknown at the time of assessment; likely significant effects on these SACs and other Habitats sites within the influence of the LPR will be assessed within the emerging HRA to accompany this stage of the planning process. In relation to other potential impacts on biodiversity, the delivery of the Spatial Strategy on greenfield land as well as previously developed land could potentially lead to negative impacts on the local Green Infrastructure network and the loss of natural habitats and ecologically important soils. A potential minor negative impact on biodiversity would be anticipated at this stage (SA Objective 3).
- I.2.5.7 Directing a large proportion of allocations towards existing settlements would be likely to limit impacts on the character of the wider landscape and provides the opportunity for new buildings to be designed to be in-keeping with existing townscape character. Development of these areas would be likely to result in the loss of areas of greenfield land and result in

¹⁴ JBA Consulting (2019) 'Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment'. Available at <https://www.sstaffs.gov.uk/doc/181158/name/2018s1642%20-%20Southern%20Staffordshire%20SFRA%20Final%20Report%20v20.pdf/> Accessed on 11/08/22]

¹⁵ Flood Risk and Coastal Change PPG (2014) Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf [Accessed on 11/08/22]

- negative effects on landscape character. Development in locations to the north east of the district towards Cannock Chase AONB, such as in proximity to Dunston and Penkridge, have the potential to have a negative effect on the setting to the AONB. Building design and any mitigating landscape measures are unknown at this stage of the plan-making process, and therefore, a minor negative impact on the landscape cannot be ruled out (SA Objective 4).
- I.2.5.8 An increase in population in existing settlements would be expected to result in an increased number of vehicles and associated emissions. Air pollution in higher density urban areas is more likely to result in adverse impacts on human health than air pollution in lower density areas. This is because of higher pollution emissions in more populated streets, in combination with more dense built form stagnating the air flow. SSDC has three small Air Quality Management Areas (AQMA) within the district and lies adjacent to the AQMA identified covering the whole of the Black Country. The Spatial Strategy seeks to direct development towards settlements with existing services and with access to public transport, and particularly access to rail services and in this regard would serve to reduce the level of likely effects in relation to vehicular emissions. Despite this, overall, a minor negative impact on pollution would be expected (SA Objective 5).
- I.2.5.9 By directing development towards existing settlements, there is greater scope for development on brownfield sites, which would be likely to help limit the permanent and irreversible loss of agriculturally and ecologically valuable soils. Allocations in proximity to Cheslyn Hay and Great Wyrley are likely to have a lower level of effect on BMV soils due to the poorer quality of the agricultural land in this part of the district. However, the proposed new allocations on greenfield locations such as in proximity to Bilbrook and Codsall, Penkridge, Wombourne and Kinver, amongst others, would be likely to result in a significant loss of BMV soils. There is a level of uncertainty in this assessment as Provisional Agricultural Land Classification (ALC) does not distinguish between Grades 3a and 3b and therefore does not distinguish between land classed as BMV and land which would fall below this quality. Overall, a major negative impact on natural resources as a result of the loss of BMV soils could not be ruled out at this stage (SA Objective 6).
- I.2.5.10 Policy DS5 aims to meet the identified housing and employment needs by 2039, delivering a minimum of 5,089 dwellings in addition to a contribution of 4,000 dwellings towards meeting the Greater Birmingham Housing Market Area shortfall, and contribute towards meeting the Gypsy and Traveller needs. As a result, Policy DS5 would be expected to have a major positive impact on housing and employment (SA Objectives 7 and 12).
- I.2.5.11 By directing development towards Tier 1 and Tier 2 settlements, this policy would be likely to locate new residents in areas with access to existing GP surgeries. Residents of South Staffordshire rely on hospital services in neighbouring Authorities, including Stafford, Wolverhampton and Walsall. Settlements in proximity to the district boundaries in these locations are likely to have better access to hospital services, although the majority of settlements lie outside the 5km target distance used in this assessment. The Tier 1 settlements and Wombourne, in Tier 2, have leisure centres located within the settlement, providing access to related services. Penkridge, Cheslyn Hay and Great Wyrley lie within 200m of main roads or motorways. While no AQMA have been identified in these settlements, it is possible some new residents would be located within areas with higher levels of vehicular emissions. There is a level of uncertainty in this assessment as the detailed locations for the development are not set out in this policy. It is likely that some development

- locations would lie outside the target distances for GP services and hospital services and therefore, overall, this policy would be expected to have a minor negative impact on human health (SA Objective 8).
- I.2.5.12 The impacts of development on heritage assets and their settings are largely dependent on the distribution of development in relation to the location of SSDC's heritage assets and depend, in part, on the design and specific location of development which may allow for mitigation and/or enhancement. Providing growth in line with the identified settlement hierarchy would result in the larger settlements in the district accommodating the highest level of growth. The Tier 1 settlements of Penkridge and Codsall and Bilbrook and the Tier 2 settlements of Wombourne, Brewood and Kinver have a number of heritage assets associated with the settlements, including Listed Buildings and Conservation Areas. The proposed distribution of development under this policy could potentially result in a minor negative impact on cultural heritage (SA Objective 9).
- I.2.5.13 This policy seeks to locate development in more sustainable locations with access to existing services, including public transport options. The Tier 1 settlements benefit from having railway stations in central locations, as well as having local GP surgeries, primary and secondary schools and leisure centres within the settlements. Many Tier 2 settlements have GP surgeries as well as primary and secondary schools. Access to local services and public transport options would help to reduce reliance on personal car usage. However, in a largely rural district with high levels of car ownership and usage, there is likely to be additional car users on roads due to the levels of development put forward in the strategy. The impact on local congestion as a result of the proposed development within this policy is likely to be greater in existing settlements, with larger numbers of new residents using the same roads and access points. Overall, this policy could potentially have a negative impact on transport and accessibility (SA Objective 10).
- I.2.5.14 By directing the majority of development towards existing Tier 1 and Tier 2 settlements as well as at the fringe of the Black Country conurbation, it would be expected that a large proportion of new residents would be situated in close proximity to educational facilities. In addition, there would be expected to be a good range of sustainable transport modes to assist travelling to these facilities. However, it is anticipated that some development locations would not be located within the target distances to schools and, overall, a minor negative impact on education would be expected (SA Objective 11).
- I.2.5.15 Policy DS5 seeks to support the district's five existing strategic employment sites comprising: the West Midlands Interchange; i54 South Staffordshire; Hilton Cross; ROF Featherstone/Brinsford; and Four Ashes. Existing and small-scale proposed employment sites throughout the district would be safeguarded.
- I.2.5.16 As stated in the Local Plan, a large proportion of South Staffordshire's population travel to work outside the district. The Black Country and other authorities' economies are an important source of employment for residents in the district. More recently, South Staffordshire has aspired to provide more local jobs, to reduce levels of out-commuting and

provide employment for residents of neighbouring areas. The EDNA (2022)¹⁶ identified a total objectively assessed gross employment land need of 63.6ha for the period 2020 to 2040.

- I.2.5.17 Public transport access to employment opportunities has been considered for each village settlement, using Hansen scores developed by Staffordshire County Council. The most recent Hansen scores for the county are shown in the Rural Services and Facilities Audit 2019¹⁷. Hansen scores measure the number of destinations that can be accessed within a 60-minute journey time, factoring in the disbenefits of travel in terms of journey time, origin point population and the total number of jobs available at the destination. A higher Hansen score will show a greater level of access to employment opportunities by public transport for residents within a certain settlement. Hansen scores of 'good' or 'reasonable' are found in the settlements of Penkridge, Bilbrook, Codsall, Cheslyn Hay, Great Wyrley, Coven, Brinsford, Featherstone, Essington, parts of Huntington and parts of Perton.
- I.2.5.18 Policy DS5 seeks to safeguard sufficient employment land to meet the needs of the district and contribute to the unmet need in neighbouring authorities. The Tier 1 settlements identified in the Spatial Strategy have been identified as having 'reasonable' or 'good' access to employment opportunities by public transport. The Spatial Strategy is likely to have a positive impact on local economy (SA Objective 12).

I.2.6 Policy DS6: Longer Term Growth Aspirations for a New Settlement

Policy DS6: Longer Term Growth Aspirations for a New Settlement

It is a key longer term aspiration of the Council to explore potential options within the district for a sustainable independent new settlement which has the capacity to accommodate the future housing and economic needs of the district. It is not anticipated that a new settlement will contribute to housing growth during the current plan period. Instead, it will form a key option that the Council will want to consider alongside alternatives in future plan-making, meaning it is important that work to identify any potential options begins now.

To provide a focus for future new settlement site proposals, the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford has been identified as a potential area of search for such proposals. This is shown indicatively in Appendix F of this document. The exact location of such a settlement and alternative growth options should be considered through the plan-making process as part of a subsequent review of the Local Plan. Key to this will be evidence supporting any future proposal's sustainability, infrastructure requirements, viability considerations, delivery mechanisms and future stewardship arrangements.

It is anticipated any new settlement would be of a scale that is self-sustaining and enables a genuine mix of vibrant mixed communities that support a range of local employment types and premises, education, retail opportunities, recreational and community facilities with a wide range of housing to meet the needs of the community.

¹⁶ DLP Planning Ltd (2022) Economic Development Needs Assessment 2020-2040 for and on behalf of South Staffordshire District Council, June 2022. Available at: <https://www.sstaffs.gov.uk/doc/183444/name/0616KWST5049PSSSDC%20EDNA%202020-2040%20Final.pdf/> [Accessed on 14/09/22]

¹⁷ Staffordshire County Council (2018) 'Rural Services and Facilities Audit' Available at <https://www.sstaffs.gov.uk/doc/179887/name/Rural%20Services%20%26%20Facilities%20Audit%20Final%202018.pdf/> [Accessed on 11/08/22]

Policy DS6: Longer Term Growth Aspirations for a New Settlement

The Council anticipates that in sustainably delivering this growth, any new settlement proposals will need to deliver the following objectives:

- **Beautifully Designed:** Create a place with a local identity, with well-connected and distinctive neighbourhoods and an attractive and functioning centre and public realm, delivering a design code and masterplan for the development with a strong local vision that emerges from collaborative community engagement at the earliest stages.
- **Mixed Communities:** Offer a range of high quality and distinctive housing types for both market and affordable housing, designed to meet the needs of all members of the community at all stages of life.
- **Sustainable Size and Location:** Be of a scale and size that provides a range of local employment types and premises, education, retail opportunities, recreational and community facilities to meet the day-to-day needs of new residents within the settlement. Where this is not realistically achievable, put in place measures to ensure the delivery of direct and convenient sustainable transport to higher order services and employment in nearby towns and cities (including the Black Country urban area).
- **Transport:** Reduce car dependency whilst allowing residents to meet their day-to-day needs via other means, designing a community that is easy to navigate with direct and high quality walking, cycling, rail and bus infrastructure.
- **Green Infrastructure and Health:** Be designed to provide the choices and chances for all to live a healthy life, including generous, accessible, and good quality green and blue infrastructure that improves health and wellbeing alongside wider opportunities for recreation, sport, biodiversity and enhancements to natural capital.
- **Future-proofed:** Support radical reductions in greenhouse gas emissions through the community's design, whilst also allowing for changing demographics, future growth, and the impacts of climate change including flooding risk and water availability. Ensure the delivery of durable landscapes and building design planned for generations to come, including anticipation of the opportunities presented by technological changes such as driverless cars and renewable energy measures.
- **Infrastructure-led:** Ensure the required infrastructure is delivered at the appropriate stage, with consideration given to phasing, delivery mechanisms, future maintenance and stewardship from the outset.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS6	+	+/-	-	-	+/-	+/-	+	+	+/-	+	++	+

- I.2.6.1 The aspiration to deliver a new settlement in an unspecified location, in the longer term, beyond the period of the current LPR, has inherent levels of uncertainty in the assessment of likely significant effects relating to all SA Objectives.
- I.2.6.2 The broad aspirations in Policy DS6 seek to create a sustainable community with a range of employment, community, education and retail services provided within the settlement to meet the day-to-day needs of residents and where this is not achievable, provide sustainable transport connections to higher order services. The policy seeks to reduce car dependency by creating high quality and convenient walking, cycling and public transport choices. The policy also seeks to embrace technological change including renewable energy measures.
- I.2.6.3 By locating residents in proximity to services to meet their day-to-day needs, seeking to reduce the need to travel by car and potentially providing on-site renewable energy

- generation, Policy DS6 may achieve a substantial reduction in carbon emissions and may achieve net zero carbon emission. While there are no details in relation to the location or deliverability of these aspirations at this stage, the policy has the potential to achieve a minor positive effect on the climate change objective (SA Objective 1).
- I.2.6.4 As the location for the settlement is uncertain at this stage there would be an uncertain effect on floodplains and surface water management (SA Objective 2). However, the policy seeks to adapt to future flood risk, recognising the importance of this element in the selection of an appropriate location and masterplanning of the development.
- I.2.6.5 There are four Habitats Sites within or in proximity to the district, designated as SACs: Cannock Chase, Cannock Extension Canal, Motte Meadows and Fens Pools. A broad area has been identified for the new settlement between Wolverhampton and Stafford. Northern parts of this corridor lie within the 15km ZOI of Cannock Chase SAC, where there is potential for the development to have a negative effect on the SAC. While there are few SSSIs located broadly in proximity to the corridor identified as a potential location for the settlement, the SSSI Impact Risk Zones (IRZs) extend across much of this area and there is potential for negative effects on the associated SSSIs. Potential effects on NNRs, LNRs, SBIs and priority habitats are uncertain at this stage. Overall, there is potential for a minor negative effect on biodiversity and geodiversity (SA Objective 3), although there are high levels of uncertainty in this assessment.
- I.2.6.6 The potential effects on landscape are uncertain at this stage. It is not known if the new settlement would be accommodated on a brownfield or greenfield location. The sensitivity of the landscape to the types of development is uncertain. The broad location for the new settlement lies within 10km of Cannock Chase AONB and there is potential for the new settlement to affect the setting of the AONB. Minor negative landscape effects may be expected, although there is considerable uncertainty in the assessment of SA Objective 4.
- I.2.6.7 An increase in population associated with the new settlement would be expected to result in an increased number of vehicle movements and associated emissions. The policy seeks to create a sustainable community with access to local services and public transport, which could serve to reduce the level of private car use and reduce the likely effects in relation to vehicular emissions. The number and type of vehicles likely to be using the existing and proposed road network is uncertain at this stage. The potential impact on pollution is uncertain (SA Objective 5).
- I.2.6.8 As the location for the new settlement is unknown, there would be uncertain effects on agriculturally and ecologically important soils and an uncertain effect on natural resources (SA Objective 6).
- I.2.6.9 Policy DS6 relates to delivering development beyond the current period of the plan. Housing and employment needs in this future period are uncertain at this stage. There is likely to be a positive but uncertain effect on housing and employment (SA Objectives 7 and 12).
- I.2.6.10 Due to the uncertainties in the location and timeframe for delivering for the new settlement, it is uncertain at this stage whether the new settlement would locate new residents in proximity to sources of higher levels of pollution, such as AQMAs, motorways or main roads. The policy seeks to create healthy communities by locating a range of services within the settlement, including leisure and community facilities as well as access to green and blue

- infrastructure. Accessibility to such services has the potential to have a positive effect on people's health and wellbeing. There is a high level of uncertainty in this assessment as the policy sets out broad aspirations at this stage. Overall, this policy would be expected to have an uncertain minor positive impact on human health (SA Objective 8).
- I.2.6.11 The impacts of development on heritage assets and their settings are largely dependent on the distribution of development in relation to the location of SSDC's heritage assets and depend, in part, on the design and specific location of development which may allow for mitigation and/or enhancement. As these aspects are uncertain at this stage, there would be an uncertain effect on cultural heritage (SA Objective 9).
- I.2.6.12 This policy seeks to create a sustainable community with good access to local services and good public transport options. While there is considerable uncertainty at this stage, the policy has the potential to have a positive effect on transport and accessibility (SA Objective 10).
- I.2.6.13 The policy seeks to create a self-sustaining community and provide access to education, while there is uncertainty regarding the deliverability of schools in at this stage, there is the potential for the policy to have a major positive impact on access to education (SA Objective 11).

I.3 Site Allocation Policies

I.3.1 Policy MA1: Master Planning Strategic Sites

Policy MA1 – Master Planning Strategic Sites

The Council considers high quality design to be a key component of achieving sustainable development and we will support new development where it is well designed, located and responsive to local context.

A comprehensive and deliverable site-wide Strategic Master Plan (SMP) for each of the strategic sites set out in Policies SA1 – SA4 will be prepared by the landowners/promoters, in conjunction with and to be approved by the Council. The scope and contents of the site-wide Master Plans will be confirmed by the Council in pre-application discussions and will be based upon and informed by community and stakeholder engagement and the relevant site-specific vision, objectives and concept plan as set out in Policies SA1 – SA4, to ensure that development for the whole site is delivered in a comprehensive and co-ordinated manner and is of sufficient quality. The site-wide Master Plans will be a material consideration in the determination of future planning applications related to the relevant site(s) and adherence to it/them will be secured through relevant planning conditions and/or legal agreement. The SMP will include the following:

- a) **Vision and Objectives** based on the content of the relevant strategic site policy as set out below, with any further iteration/update following further consultation and technical evidence
- b) **Baseline Evidence** setting out the key constraints and opportunities in relation to the site and reference to relevant supporting technical documentation.
- c) **Land Use Framework** addressing the key broad extent, type and mix of development uses across the site (including any public open space)¹
- d) **Movement Framework and Access Strategy** including:
 - a clear route hierarchy of primary and secondary streets, pedestrian and cycle routes which plug into existing and proposed networks and key destinations within and beyond the site boundary
 - potential bus circulation routes and bus stops (including service diversion where appropriate and infrastructure considerations for electric bus provision)
- e) **Green Infrastructure Framework** including:
 - A clear hierarchy of public open space throughout the site, including indicative roles and functions of different spaces (e.g. play, biodiversity/natural capital, SuDS, recreation)
 - Indicative ecological mitigation and opportunities for delivering biodiversity net gain on the site
 - Opportunities to integrate SuDS within the site's green infrastructure
 - Areas for allotments/community gardens/forest schools etc. (informed by engagement with local community/Parish Council)
 - Utilisation and retention of existing landscape features and key views into and out of the site to create a distinctive and visually sensitive character to the development that links into the green infrastructure network beyond the site's boundaries
- f) **Urban Design Framework** creating a cohesive urban structure for the site including:
 - Character areas
 - Gateways, landmarks, key views and nodes
 - Community hubs
 - Important frontages
 - Sensitive areas
- g) **Comprehensive Spatial Framework Plan** drawing together the above frameworks to demonstrate the overall placemaking strategy for the site
- h) **Development Phasing and Delivery Strategy** collating information regarding the phasing and delivery of the following items:
 - On and offsite highways mitigation
 - Public transport provision
 - Active travel links
 - On and offsite education provision

Policy MA1 – Master Planning Strategic Sites

- Open space, biodiversity / habitat mitigation and enhancement and other green infrastructure (e.g. playing fields/allotments)
- Flood risk mitigation, drainage and SuDS infrastructure
- Sports and recreation facilities
- Community facilities
- Utilities
- Affordable housing provision
- Planning strategy setting out the expectations for future planning applications

- i) **A strategy for site wide Design Coding:** setting out the approach to formulating provably popular site wide and area (as appropriate) design coding, in keeping with the requirements of the National Model Design Code and accompanying National Model Design Guidance.
- j) **Community and key stakeholder consultation/engagement strategy and outcomes for the site** setting out who has been engaged, in what way and how this has informed the SMP
- k) **A site-specific infrastructure delivery schedule** setting out broad timing and triggers for the delivery of critical infrastructure to deliver comprehensive and co-ordinated placemaking

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
MA1	+	+	+	+	+	+	+	+	+	+	+	0

- I.3.1.1 Policy MA1 sets out key requirements for future Strategic Master Plans (SMPs) which will be prepared by the site promoters or landowners, to support the delivery of the four strategic site allocations within the South Staffordshire LPR (as set out in Policies SA1–4). These SMPs should build upon the indicative concept plan, vision and key objectives that have been prepared for each site.
- I.3.1.2 The policy states that the SMP should provide a “*Movement Framework and Access Strategy*” to include public transport routes, pedestrian routes and cycle paths which would improve sustainable travel choices, enable local journeys to be made via active travel and may help to reduce reliance on private car use. These provisions may help to reduce GHG emissions. Furthermore, through ensuring comprehensive SMPs are produced, the developments would have opportunities to provide coordinated development and co-locating homes and facilities, resulting in more sustainable communities with less need to travel. A minor positive impact on transport and accessibility (SA Objective 10), air pollution (SA Objective 5) and climate change mitigation (SA Objective 1) could be achieved.
- I.3.1.3 Policy MA1 requires the provision of “*flood risk mitigation, drainage and SuDS infrastructure*”, and encourages opportunities to be sought to integrate SuDS within the multi-functional green infrastructure networks within the developments. These measures would be likely to help mitigate surface water flooding and drainage issues. Furthermore, the proposed Green Infrastructure Framework would be likely to ensure a range of natural and semi-natural green

- spaces are provided, with likely benefits in terms of habitat provision and ecological corridors to enable movement of species through the development. These measures would be expected to result in a minor positive impact on climate change adaptation (SA Objective 2) and potentially on natural resources (SA Objective 6) by conserving and enhancing ecosystem service functions of green and blue infrastructure.
- I.3.1.4 The policy requires *“indicative ecological mitigation and opportunities for delivering biodiversity net gain on the site”* and encourages developers to consider biodiversity and natural capital provision within open spaces, which would be likely to help conserve and enhance the biodiversity value of the sites. As part of the multi-functional green infrastructure provisions, Policy MA1 encourages the creation of allotments and community gardens alongside new developments, which may help to provide additional habitats and wildlife corridors alongside the built developments, in addition to benefits for mental and physical wellbeing of residents. A minor positive impact would be expected in relation to biodiversity (SA Objective 3) and human health and wellbeing (SA Objective 8).
- I.3.1.5 Additionally, the provision of sports and recreational facilities and active travel links, within well-designed and attractive developments, would be likely to encourage new residents to lead more active lifestyles, with further benefits to SA Objective 8.
- I.3.1.6 The policy states that SMPs should ensure the *“utilisation and retention of existing landscape features and key views into and out of the site to create a distinctive and visually sensitive character to the development”* with connections to the wider multi-functional green infrastructure network beyond the site boundaries. Therefore, the policy could help to ensure that developments are carefully planned and designed to integrate with the surrounding landscape. These measures could potentially result in a minor positive effect on the local landscape and townscape character and help to create a sense of place and identity for the new communities (SA Objective 4).
- I.3.1.7 Furthermore, through seeking to protect key views, alongside the requirements to create a *“cohesive urban structure including ... gateways, landmarks ... [and] important frontages”* the policy may indirectly result in a minor positive impact on cultural heritage assets and historic landscapes (SA Objective 9).
- I.3.1.8 The policy seeks to deliver high quality and comprehensive developments, in line with the findings of baseline evidence and informed through community and stakeholder engagement, and as such, would be expected to help to identify and meet needs of the local population. The policy also aims ensure provision of affordable housing. A minor positive impact on housing provision could therefore be achieved (SA Objective 7).
- I.3.1.9 Through ensuring *“on and offsite education provision”*, the policy would be expected to result in a minor positive impact on the provision of schools to serve the new development (SA Objective 11). The policy could improve sustainability through seeking to prioritise on site provision, where feasible.
- I.3.1.10 The policy would not be expected to directly affect the economy or employment (SA Objective 12).

I.3.2 Policy SA1: Strategic development location: Land East of Bilbrook

Policy SA1 – Strategic development location: Land East of Bilbrook

A strategic site for major housing growth is identified at Land East of Bilbrook, in the location shown in Appendix B of this document. The key spatial principles for delivering this level of housing growth at Land East of Bilbrook are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this local plan and an approved site wide Strategic Master Plan as required under Policy MA1, consistent with the Concept Plan, vision and objectives for the site contained within this document and requirements set out within the Infrastructure Delivery Plan. The site-specific requirements should include:

- a) A minimum of 848 new homes;
- b) Affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan;
- c) A Community Hub focused around a central area of communal green space, well connected to the site wide green infrastructure network, to contain:
 - i. Small local convenience retail to serve the day to day needs of the neighbourhood
 - ii. Flexible community space
 - iii. A new First School (1.3ha)
- d) Vehicular accesses onto Pendeford Mill Lane, Lane Green Road and Barnhurst Lane and appropriate public transport provision to support sustainable travel from the scheme;
- e) High quality active travel links through and beyond the site, including to the recreational green space to the north, local shops and rail station in Bilbrook and the Sustrans network to the east;
- f) A network of green and blue infrastructure consistent with the indicative layout on the Concept Plan, providing for high quality Sustainable Drainage Systems, open space, play, biodiversity net gain and active travel, including a large central green space at the heart of the development and additional compensatory Green Belt improvements on the land identified as off -site green infrastructure to the south of the site in accordance with Policy DS2;
- g) Enhancement of and provision of additional playing pitches and associated facilities in the existing recreational open space to the north of Pendeford Mill Lane, including improved active travel links from the new neighbourhood;
- h) Any necessary historic environment mitigation identified in the Council's Historic Environment Site Assessment Stage 2 (2022), including setting back development from the site's eastern edge and reinforcing planting within that boundary; and
- i) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision.

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA1	-	0	+/-	--	-	-	++	-	0	-	++	+

- I.3.2.1 This strategic development location has been assessed in Appendix B of the Regulation 18 (III) SA Report¹⁸. Land East of Bilbrook is Site 519 of Appendix B in the Bilbrook and Codsall cluster and is approximately 41ha.
- I.3.2.2 The construction, occupation and operation of residential development would be expected to exacerbate air pollution, including GHG emissions. However, Land East of Bilbrook is located with good access to a range of existing services including schools, GP surgeries, Codsall Leisure Centre and the railway station at Codsall. There is an existing Budgens and Coop within the settlement as well as a range of other local services including a bank. Policy SA1 requires a new First School and local convenience retail facilities as part of the future proposals for the site. By allocating this site in proximity to existing and proposed services and facilities, this policy would be likely to facilitate more sustainable communities, by reducing the need to travel and providing more sustainable travel choices. This policy could lead to a lower level of GHG emissions than a similar quantity of development in a less sustainable location; however, the development of a minimum of 848 dwellings would be expected to result in an increase in traffic in the local area and associated GHG emissions, to some extent. The policy is likely to have a minor negative effect on the climate change objective overall, although there is some uncertainty in the assessment (SA Objective 1).
- I.3.2.3 Policy SA1 proposes the development of a site of which a small proportion lies within Flood Zones 2 and 3, to the south of the site, and which also lies adjacent to the Shropshire Union Canal. The site coincides with areas determined to be at low, medium and high risk of surface water flooding. The site boundary sets out a site suggestion and SSDC confirm the developed area will lie outside Flood Zones 2 and 3, with ‘water compatible uses’, such as amenity open space, being located in areas of higher flood risk. It is likely that the future development of the site would require consideration of surface water management measures, as required by national planning policy and in accordance with other LPR policies, which should serve to mitigate effects on surface water runoff. Overall, there is likely to be a negligible effect on flood risk and surface water flood risk (SA Objective 2).
- I.3.2.4 The assessment of Site 519 (within the Regulation 18 (III) SA) found there was unlikely to be any significant effects on biodiversity and geodiversity, in terms of effects on designated sites and priority habitats. There is uncertainty in this assessment at this stage as no detailed ecological or protected species surveys have been carried out. The development of 41ha of greenfield agricultural land has the potential to result in the loss of grassland, hedgerows and trees, which may form habitats and corridors for various species. It is possible any adverse effects on biodiversity could be mitigated through appropriate measures. Policy SA1 seeks to ensure delivery of “a network of green and blue infrastructure” including high quality on-site open space and biodiversity net gain as well as off-site compensatory improvements to the Green Belt to the south of the site. There is the potential for minor positive effects on biodiversity (SA Objective 3). At the time of assessment, the potential negative effects on Habitats sites are uncertain until the HRA process is completed. Therefore, an overall assessment of uncertain has been recorded in the matrix above for biodiversity (SA Objective 3).

¹⁸ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 30/08/22]

- I.3.2.5 The Landscape Sensitivity Study and Green Belt Study have assessed the land parcels in which the site lies. The site lies within an area assessed as being of ‘moderate’ landscape sensitivity. The Green Belt Study assessed the loss of land parcels in the site to have the potential to cause a ‘high’ level of harm to the purposes of the Green Belt.
- I.3.2.6 The site relating to Policy SA1 lies within the RCA ‘Staffordshire Plain’ and the LCT ‘Ancient Clay Farmlands’. The characteristic landscape features of this LCT include “*mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern*”. The development of this site would be potentially discordant with the key characteristics of the LCT. The site assessment (within the Regulation 18 (III) SA) identifies the potential for views from the public rights of way (PRoW) network and local residents’ homes to be affected by the development of the site. The site lies between Bilbrook and the existing urban edge of Wolverhampton. Development of the site would serve to reduce the perceived gap between the settlements and there would be a risk of future coalescence of the settlements.
- I.3.2.7 Overall, a major negative impact on the landscape objective is possible as a consequence of the ‘high’ level of harm to the purposes of the Green Belt as a result of the development of the site (SA Objective 4).
- I.3.2.8 A proportion of this site is located within 200m of the Wolverhampton AQMA. The proposed development of this site may locate some residents in areas of existing poor air quality. A railway line passes through the centre of Bilbrook and Codsall, linking Wolverhampton to Shrewsbury, adjacent to the proposed site. Development could potentially expose residents to higher levels of noise pollution and vibrations associated with this railway line. The proposed development could potentially increase the risk of groundwater contamination within an SPZ. The site lies adjacent to the Shropshire Union Canal and a proportion of the site is located within 200m of the River Penk. The proposed development could potentially increase the risk of contamination of these watercourses. Overall, a minor negative effect on pollution and waste would be likely (SA Objective 5).
- I.3.2.9 The site lies on Grade 2 ALC land, which represents some of South Staffordshire’s BMV agricultural land. The proposed development at this site would be likely to result in the loss of previously undeveloped land and the permanent and irreversible loss of soils. A minor negative impact on natural resources would be expected (SA Objective 6).
- I.3.2.10 Policy SA1 indicates the site could deliver a minimum of 848 dwellings, including affordable housing and specialist elderly housing, providing a substantial contribution to the identified housing needs and therefore a major positive effect on housing need is expected (SA Objective 7).
- I.3.2.11 The closest NHS hospital with an A&E department is New Cross Hospital, located to the south east in Wolverhampton. The proposed development could potentially restrict the access of residents to essential health services provided by hospitals. The closest GP surgery is Bilbrook Medical Centre. The site lies partially within and partially outside the target distance of 800m to GP services. Codsall Leisure Centre is located within the target distance of 1.5km from the site, with a minor positive effect for future residents. A proportion of the site is located within 200m of the Wolverhampton AQMA. The proposed development could

- potentially expose residents to poor air quality associated with this AQMA, and therefore, have a negative impact on health. The site benefits from good access to the pedestrian and cycling network providing opportunities for active travel and recreation, including access to the towpath on the Shropshire Union Canal, which also forms part of the National Cycle Network. Policy SA1 also requires the proposals to provide high quality green infrastructure, recreational provisions and public open space “*including a large central green space at the heart of the development*”, which would be expected to provide benefits to health and wellbeing.
- I.3.2.12 Overall, there are expected to be both minor positive and minor negative effects on health and wellbeing (SA Objective 8). Using the precautionary principle, a minor negative effect has been shown in the summary table above.
- I.3.2.13 Site 519 is located approximately 250m from the ‘Shropshire Union Canal Aqueduct’, a Grade II Listed Building, carrying the canal over River Penk. The site is located within an area of medium historic value in the Historic Environmental Character Assessment¹⁹. The impacts of development on heritage assets and their settings are largely dependent on the distribution of development in relation to the location of the heritage assets and the design of the development which may allow for mitigation and/or enhancement. Policy SA1 seeks to ensure the development is set back from the eastern edge and includes reinforced planting to screen the site, in line with the findings of the latest Historic Environment Site Assessment Stage 2. Subject to achieving suitable mitigation, a negligible impact could be expected on cultural heritage (SA Objective 9).
- I.3.2.14 The site has good access to Bilbrook Railway Station, being located approximately 600m from the site boundary. Train services to Wolverhampton and Shrewsbury are available from this station, with onward services to Birmingham. The site has good access to the footpath and PRoW network, including the towpath along the Shropshire Union Canal, and is well connected to the existing road network. There are a range of services available in the settlements of Bilbrook and Codsall, including a convenience store located within 300m of the site. The site is located partially outside the target distance to a bus stop providing regular services. Overall, the site is assessed as having good access to a range of local services and sustainable transport choices. However, the District Integrated Transport Strategy for South Staffordshire²⁰ states that there are long peak hour delays at junctions in Bilbrook, Codsall and Perton and there are car parking issues at local stations. Taking into account sustainable provisions within Policy SA1 including active travel links and public transport, there are a range of potential positive and negative effects on transport and access. Using the precautionary principle, a minor negative effect on transport and accessibility is recorded in the summary table above (SA Objective 10).
- I.3.2.15 Bilbrook and Codsall are served by several existing primary schools, including St Nicholas C of E First School, Lane Green First School, St Christopher’s Catholic Primary School, Birches First School and Palmers Cross Primary School. Site 519 lies partially outside the target

¹⁹ South Stafford Council (2011) ‘Historic Environmental Character Assessment: South Stafford’ Available at <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Historic-Environment-Assessments.aspx#southstaffs-hea> [Accessed on 11/08/22]

²⁰ Staffordshire County Council (2017) ‘District Integrated Transport Strategy’ Available at <https://www.staffordshire.gov.uk/Transport/transportplanning/districtintegratedtransportstrategies.aspx> [Accessed on 11/08/22]

distance of 800m from a primary school; however, the policy seeks to provide a new on-site first school. Bilbrook and Codsall are served by Codsall Community High School and Aldersley High School. New residents would have good access to primary and secondary education, and therefore, a major positive impact would be expected on education (SA Objective 11).

- I.3.2.16 The site lies in proximity to a number of existing employment sites, including Balliol Business Park and GE Aviation. i54 lies approximately 1.1km to the east of the site and is accessible by walking and cycling routes. The Hansen score calculation did not assess the site, although the site lies in proximity to areas identified as having ‘good’ or ‘reasonable’ access to employment opportunities by public transport. Development of the site would offer a small range of employment opportunities at the proposed school and retail services. Overall, there is the potential for a minor positive effect on employment (SA Objective 12).

I.3.3 Policy SA2: Strategic development location: Land at Cross Green

Policy SA2 – Strategic development location: Land at Cross Green

A strategic site for major housing growth is identified at Land at Cross Green, in the location shown in Appendix B of this document. The key spatial principles for delivering this level of housing growth at Land at Cross Green are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this local plan and an approved site wide Strategic Master Plan, as required under policy MA1, consistent with the Concept Plan, vision and objectives for the site contained within this document and the requirements of the Infrastructure Delivery Plan. The site-specific requirements should include:

- a) A minimum of 1,200 homes
- b) Affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan;
- c) A community hub/village centre, focused around a central area of communal greenspace. in close proximity to the new parkway station and well-connected to the site-wide green infrastructure network, to contain:
 - i. Convenience retail provision to meet the needs of the new village and the nearby communities of Coven Heath, Coven and Cross Green
 - ii. Other commercial floorspace to support day to day needs of the village and nearby communities
 - iii. A local employment hub/space
 - iv. Flexible community space.
- d) A transport/movement strategy which includes access onto the A449, Brinsford Lane, New Road/Old Stafford Road and to the ROF Featherstone employment site to the east and appropriate public transport provision to support sustainable travel from the scheme;
- e) High quality active travel links through and beyond the site, including to the cycleway running along the A449, the nearby canal towpath network, the ROF strategic employment site and throughout the site to connect all neighbourhoods to the new community facilities at its centre;
- f) Safeguarded land which could feasibly deliver a future rail-based park and ride, comprising of a 2 platform station and 500 car parking spaces, in the broad location shown on the Concept Plan
- g) A network of green and blue infrastructure consistent with the indicative layout on the Concept Plan, providing for high quality Sustainable Drainage Systems, open space, sport, biodiversity net gain and active travel, including an integrated and connected green network running through the development, a central communal green space and additional compensatory Green Belt improvements at the heart of the site in accordance with Policy DS2;
- h) The provision of full size sports pitches to national standard along with associated facilities to meet identified need. This should be explored further as part of the site wide masterplan process, including the potential to implement any alternative suitable strategy to meet identified needs.

Policy SA2 – Strategic development location: Land at Cross Green

- i) A new Primary/First School (1.6ha);
- j) Any necessary historic environment mitigation identified in the Council's Historic Environment Site Assessment Stage 2 (2022), including preserving and potentially enhancing existing tree and hedge boundaries along Dark Lane and undertaking geophysical surveys of the northern and eastern part of the site prior to submission of a planning application; and
- k) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision.

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA2	+/-	0	+/-	--	-	-	++	-	0	-	-	+

I.3.3.1 This strategic development location has been assessed in Appendix B of the Regulation 18 (III) SA Report²¹. Land at Cross Green is Site 646a&b of Appendix B in the Featherstone cluster and is approximately 65ha.

I.3.3.2 The construction, occupation and operation of residential development would be expected to exacerbate air pollution, including GHG emissions. Policy SA2 proposes a new community with access to a range of community and employment facilities, including a new primary or first school and on-site retail. There are existing convenience stores in the local area, approximately 1km away, in Coven and Featherstone, as well as additional services in Wolverhampton to the south. The site lies near to existing employment sites at i54 and ROF Featherstone. There are bus stops on the A449 providing services between Wolverhampton and Stafford. The Hansen score for westerly parts of the site is 'reasonable', in that residents in proximity to these locations would have a 'reasonable' level of access to employment using public transport. The Shropshire and Worcestershire Canal has a towpath providing an off-road walking route in a north-south direction, intersecting with the north westerly edge of the site. Policy SA2 safeguards land to assist in the delivery of a new rail-based park and ride facility, which would seek to reduce the use of private vehicles by new and existing residents to access services and employment and offer a more sustainable transport option.

I.3.3.3 While some new residents would have the opportunity to use on-site services and make more sustainable travel choices, it is also likely that new residents would make many journeys using private vehicles. There is a level of uncertainty in this assessment in relation to the timing of the delivery of the rail-based park and ride and in relation to whether individuals

²¹ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 30/08/22]

- choose to travel by more sustainable modes of transport. At this stage, the effect that this policy could have on climate change is uncertain (SA Objective 1).
- I.3.3.4 Policy SA2 proposes the development of a site of which a proportion lies within Flood Zones 2 and 3, in the centre of the site, and which also lies adjacent to the Staffordshire and Worcestershire Canal to the west. The site coincides with areas determined to be at low, medium and high risk of surface water flooding. The site boundary sets out a site suggestion and SSDC has confirmed the developed area would lie outside Flood Zones 2 and 3, with 'water compatible uses', such as amenity open space, being located in areas of higher flood risk. The policy states that "*high quality Sustainable Drainage Systems*" will be provided, as required by national planning policy and in accordance with other LPR policies, which could serve to mitigate effects on surface water runoff. Overall, the policy is likely to have a negligible effect on flood risk (SA Objective 2).
- I.3.3.5 Land at Cross Green lies between 8km and 15km from Cannock Chase SAC. Cannock Chase SAC has a 15km Zol; development proposals in this zone have the potential to result in a negative effect on the integrity of the SAC through increased visitor numbers and vehicular emissions, unless mitigation is in place. The SAC Partnership have agreed a suite of measures with Natural England that allow for planned development within 15km of the SAC to proceed without harm to the SAC. Financial contributions from developments are expected from the 0-8 km Zone only. 'Four Ashes Pit' SSSI is located approximately 2.1km north of Site 646a/b. The site is located within an IRZ which states that "*any residential developments with a total net gain in residential units*" should be consulted on. Therefore, the proposed development at this site could potentially have a minor negative impact on the features for which this SSSI has been designated. The development of a 65ha greenfield site has the potential to result in the loss of grassland, hedgerows and trees, which may form habitats for various species. It is possible any adverse effects on biodiversity could be mitigated through appropriate measures. Policy SA2 seeks to ensure high quality on-site open space and green infrastructure provisions and biodiversity net gain, as well as off-site compensatory improvements to the Green Belt. At the time of assessment, the potential negative effects on Habitats sites are uncertain until the HRA process is completed. Therefore, an overall assessment of uncertain has been recorded in the matrix above for biodiversity (SA Objective 3).
- I.3.3.6 The Landscape Sensitivity Study and Green Belt Study have assessed the land parcels in which the site lies. The site lies within an area assessed as being of 'moderate' landscape sensitivity. The Green Belt Study assessed the loss of land parcels in the site to have the potential to cause a 'high' or 'very high' level of harm to the purposes of the Green Belt.
- I.3.3.7 The site is located within the RCA 'Cannock Chase and Cankwood' and the LCT 'Settled Heathlands'. The characteristic landscape features of this LCT are "*mixed arable and pasture farming; flat to gently rolling landform; hedged fields; regular and irregular hedgerows; oak and birch hedgerow trees; straight and winding roads; wooded stream valleys; bracken; [and] broadleaved woodlands*". The development of the site could potentially be discordant with the key characteristics of this LCT. Therefore, there is a potential minor negative impact on the local landscape character. The site assessment (within the Regulation 18 (III) SA) identifies the potential for views from PRow and local residents' homes to be affected by the development of the site. Site 646a&b comprises an area of previously undeveloped land, situated between Coven Heath and Cross Green. Development of the site could potentially

- increase the risk of coalescence between these settlements and therefore have a minor negative impact on the local landscape.
- I.3.3.8 Overall, a major negative impact on the landscape objective is possible as a consequence of the potential level of harm to the purposes of the Green Belt (SA Objective 4).
- I.3.3.9 A small proportion of this site is located within 200m of the Wolverhampton AQMA. The M54 lies to the south of the site and the A449 lies to the west. While the levels of air quality in proximity to the M54 and A449 are uncertain, the proposed development of this site may locate some residents in areas of existing poor air quality. The West Coast Mainline railway line forms the eastern boundary to the site, linking Stafford, Wolverhampton and Birmingham. Development of the site could potentially expose residents to higher levels of noise pollution and vibration associated with this railway line. The proposed development could potentially increase the risk of groundwater contamination within an SPZ. The site lies adjacent to the Staffordshire and Warwickshire Canal and a minor watercourse lies within the site. The proposed development could potentially increase the risk of contamination of these watercourses. Overall, a minor negative effect on pollution and waste would be likely (SA Objective 5).
- I.3.3.10 The site lies on Grade 2 and 3 ALC land, which is potentially some of South Staffordshire's BMV agricultural land. The proposed development at this site would be likely to result in the loss of previously undeveloped land and the permanent and irreversible loss of soils. There is a level of uncertainty in this assessment as Provisional ALC does not distinguish between Grades 3a and 3b and therefore does not distinguish between land classed as BMV and land which would fall below this quality. A minor negative impact on natural resources would be expected (SA Objective 6).
- I.3.3.11 Policy SA2 indicates the site could deliver a minimum of 1,200 dwellings, including affordable housing and specialist elderly housing, and therefore development would make a substantial contribution to identified housing needs. A major positive effect on housing need is expected (SA Objective 7).
- I.3.3.12 The closest NHS hospital with an A&E department is New Cross Hospital, located to the south in Wolverhampton. Southern parts of the site fall within the 5km target distance for access to hospital services. The proposed development could potentially restrict the access of some residents to essential health services provided by hospitals. The closest GP surgery is Bushbury Surgery approximately 850m to the south of the site, outside the target distance of 800m. Codsall Leisure Centre is located approximately 4.5km to the west of the site and Cheslyn Hay Leisure Centre is located approximately 5.5km to the east of the site. These facilities are located beyond the target distance.
- I.3.3.13 A small proportion of this site to the south is located within 200m of the Wolverhampton AQMA. The M54 lies to the south of the site and the A449 lies to the west. While the levels of air pollution in proximity to the M54 and A449 are uncertain, the proposed development of this site may locate some residents in areas of existing poor air quality. The West Coast Mainline railway forms the eastern boundary to the site. Development of the site could potentially expose residents to higher levels of noise pollution and vibrations associated with this railway line.

- I.3.3.14 The site has access to the existing pedestrian network, including access to the towpath on the Staffordshire and Warwickshire Canal. Policy SA2 also requires the proposals to provide high quality green infrastructure, active travel links, sports pitches and public open space, which would be expected to provide benefits to health and wellbeing and promote active lifestyles.
- I.3.3.15 Overall, there are expected to be both minor positive and minor negative effects on health and wellbeing (SA Objective 8). Using the precautionary principle, a minor negative effect has been shown in the summary table above.
- I.3.3.16 The site is located approximately 50m from the Grade II Listed ‘Staffordshire and Worcestershire Canal Number 71 (Cross Green Bridge)’. There is a small area of ridge and furrow identified in the site on the Historic Environmental Record. The Historic Environmental Character Assessment²² did not assess this site. The impacts of development on heritage assets, such as listed buildings and their settings, are largely dependent on the distribution of development in relation to the location of the heritage assets and the design of the development which may allow for mitigation and/or enhancement. Policy SA2 seeks to ensure the development preserves and enhances the hedgerow boundaries to provide screening, in line with the findings of the latest Historic Environment Site Assessment Stage 2. Subject to achieving suitable mitigation, a negligible impact could be expected on cultural heritage (SA Objective 9).
- I.3.3.17 The closest railway station is Bilbrook Railway Station, located approximately 4.3km to the south west of the site, outside of the identified target distance, which could potentially have a negative impact on new residents’ access to rail services. The site lies adjacent to the A449 and associated bus stops for the service from Stafford to Wolverhampton. While the bus services allow for commuting into Wolverhampton at peak times, the frequency of services is limited. The site has access to the existing pedestrian network, including access to the towpath on the Staffordshire and Warwickshire Canal, and is well connected to the existing road network. The District Integrated Transport Strategy for South Staffordshire²³ does not bring out any specific road transport issues in relation to this area, although the strategy states that the M54 creates a barrier to pedestrian and cycling movement and increased permeability is a funding priority.
- I.3.3.18 There are a range of potential positive and negative effects on transport and access at this stage. There is also a level of uncertainty in the travel choices future residents make, and the timing of delivery of the rail-based park and ride. Overall, the potential effects on transport and access are likely to lead to a minor negative effect on transport and access (SA Objective 10), with potential for positive effects in the longer term if the proposed transport improvements are implemented effectively.
- I.3.3.19 There are existing first or primary schools at Coven and Featherstone. These schools lie outside the target for future residents of the site. Policy SA2 seeks to provide a new on-site

²² South Stafford Council (2011) ‘Historic Environmental Character Assessment: South Stafford’ Available at <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Historic-Environment-Assessments.aspx#southstaffs-hea> [Accessed on 27/05/21]

²³ Staffordshire County Council (2017) ‘District Integrated Transport Strategy’ Available at <https://www.staffordshire.gov.uk/Transport/transportplanning/districtintegratedtransportstrategies.aspx> [Accessed on 11/08/22]

primary or first school. Although the exact location of the school is unknown, most residents are likely to be located within 800m. The nearest secondary school is Ormiston New Academy, located approximately 2km to the south of the site or Moreton School located approximately 2.5km south of the site, both in Wolverhampton. New residents of the site would not be located within the target distance for secondary education. Overall, a minor negative effect on education is likely due to the distance between the site and secondary schools (SA Objective 11).

- I.3.3.20 The site lies in proximity to several existing employment sites, including i54 approximately 500m to the west of the site, ROF Featherstone approximately 150m east of the site and a smaller employment site at Paradise Lane, lying adjacent to the site. The Hansen score calculation assesses southern parts of the site as having ‘reasonable’ access to employment opportunities by public transport. Development of the site would offer a small range of employment opportunities at the proposed school and retail services, and the proposed “*local employment hub/space*”. Overall, there is the potential for a minor positive effect on employment (SA Objective 12).

I.3.4 Policy SA3: Strategic development location: Land north of Linthouse Lane

Policy SA3 – Strategic development location: Land north of Linthouse Lane

A strategic site for major housing growth is identified at Land north of Linthouse Lane in the location shown in Appendix B of this document. The key spatial principles for delivering this level of housing growth on the site are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this local plan and an approved site wide Strategic Master Plan, as required under policy MA1, consistent with the Concept Plan, vision and objectives for the site contained within this document and the requirements of the Infrastructure Delivery Plan. The site-specific requirements should include:

- a) A minimum of 1,200 homes by the end of the plan period²⁴, including affordable housing and specialist elderly housing (e.g. sheltered or extra care) of at least 80 units in accordance with other policies within the local plan;
- b) A Community Hub focussed around a central communal green space, well connected to the site wide green infrastructure network to contain:
 - i. A new primary school (2.1ha)
 - ii. Local convenience retail to serve the neighbourhood
 - iii. Other commercial floorspace to serve the day to day needs of the neighbourhood
 - iv. Flexible community space
- c) A Community Park along with associated local facilities that could include changing facilities, toilets, café etc. These would be located adjacent to or within the Community Park and thus provided separately to the Community Hub.
- d) The provision of full-size sports pitches to national standard along with associated facilities as set out at c. above, to meet identified need.
- e) A transport/movement strategy which includes consideration of access onto Linthouse Lane, Blackhalve Lane and Kitchen Lane and appropriate public transport provision to support sustainable travel from the scheme; and
- f) High quality active travel links through and beyond the site, integrating the existing public rights of way running through the site and providing links to Ashmore Park and facilities to the west of the site;
- g) An integrated and connected network of green and blue infrastructure consistent with the indicative layout on the Concept Plan, providing for high quality Sustainable Drainage Systems, open space, sport,

²⁴ Site estimated to deliver 1976 homes in total with continued delivery beyond the plan period

Policy SA3 – Strategic development location: Land north of Linthouse Lane

- biodiversity net gain and active travel, including a large central greenspace and significant additional compensatory Green Belt improvements to the north-east of the site in accordance with Policy DS2;
- h) Any necessary historic environment mitigation identified in the Council's Historic Environment Site Assessment Stage 2 (2022), including integrating the former Prestwood into the design of any proposed development and avoiding any direct impacts upon these non-designated remains; and
 - i) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision.

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA3	-	+	+/-	--	-	-	++	-	0	+	++	+

I.3.4.1 This strategic development location has been assessed in Appendix B of the Regulation 18 (III) SA Report²⁵. Land north of Linthouse Lane (also called Land off Blackhalve Lane) is Site 486c of Appendix B in the Essington cluster and is approximately 94.21ha.

I.3.4.2 The construction, occupation and operation of residential development would be expected to exacerbate air pollution, including GHG emissions. Policy SA3 proposes a new primary school and on-site local convenience retail. There are existing retail stores and GP surgeries in the local area, approximately 1km to the south west in Wolverhampton as well as local convenience stores to the south east in Ashmore. The Hansen score for some southerly parts of the site indicates that residents in these locations would have 'reasonable' access to employment using public transport. While some new residents would have the opportunity to use on-site services and make more sustainable travel choices, it is likely that some residents would also make many journeys using private vehicles to access services and employment. The development of a minimum of 1,200 dwellings would be expected to result in an increase in traffic in the local area and associated GHG emissions, to some extent. The policy is likely to have a minor negative effect on the climate change objective overall (SA Objective 1), although there is some uncertainty in the assessment.

I.3.4.3 Policy SA3 proposes the development of a site of which lies within Flood Zone 1, where there is less than a 1 in 1000 annual risk of flooding. However, the site coincides with areas determined to be at low, medium and high risk of surface water flooding. The policy requires integrated green and blue infrastructure including "*high quality Sustainable Drainage Systems*", as required by national planning policy and in accordance with other LPR policies, which could serve to mitigate effects on surface water runoff. As the site is within Flood

²⁵ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 30/08/22]

- Zone 1, the lowest flood risk, there would be a minor positive effect in relation to avoiding flood risk for future residents (SA Objective 2).
- I.3.4.4 Land north of Linthouse Lane lies between 8km and 15km from Cannock Chase SAC. Cannock Chase SAC has a 15km Zol; development proposals in this zone have the potential to have a negative effect on the integrity of the SAC through increased visitor numbers and vehicular emissions, unless mitigation is in place. The SAC Partnership have agreed a suite of measures with Natural England that allow for planned development within 15km of the SAC to proceed without harm to the SAC. Financial contributions from developments are expected from the 0-8km Zone only. The site lies more than 6km from the nearest SSSI called 'Stowe Pool and Walk Mill Clay Pit'. However, the site is located within an IRZ which states that "*any residential developments with a total net gain in residential units*" should be consulted on with Natural England. Therefore, the proposed development at this site could potentially have a minor negative impact on the features for which local SSSIs have been designated. The development of a 94ha greenfield site has the potential to result in the loss of grassland, hedgerows and trees, which may form habitats for various species. It is possible any adverse effects on biodiversity could be mitigated through appropriate measures. Policy SA3 seeks to provide high quality on-site open space and green infrastructure and biodiversity net gain, as well as off-site compensatory improvements to the Green Belt. At the time of assessment, the potential negative effects on Habitats sites are uncertain until the HRA process is completed. Therefore, an overall assessment of uncertain has been recorded in the matrix above for biodiversity (SA Objective 3).
- I.3.4.5 The Landscape Sensitivity Study and Green Belt Study have assessed the land parcels in which the site lies. The site lies within an area assessed as being of 'low-moderate' landscape sensitivity. The Green Belt Study assessed the loss of land parcels in the site to have the potential to cause a 'high' level of harm to the purposes of the Green Belt.
- I.3.4.6 The site is located within the RCA 'Cannock Chase and Cankwood' and the LCT 'Settled Plateau Farmland Slopes'. The characteristic landscape features of this LCT are "*hamlets and villages; irregular fields; narrow winding lanes and hedge banks; hedgerow oaks; irregular pattern of mixed hedges; parklands with estate woodlands; red brick farm buildings; rolling landform; [and] mixed arable and pasture farming*". The development of the site is likely to be discordant with the key characteristics of this LCT, with potential for an adverse impact on the local landscape character. The site assessment (within the Regulation 18 (III) SA) identifies the potential for views from PRoW and local residents' homes to be affected by the development of the site. Site 486c comprises an area of previously undeveloped land between the Wolverhampton suburbs of Wood Hayes and Ashmore. Development of the site could potentially increase the risk of coalescence between these communities.
- I.3.4.7 Overall, a major negative impact on the landscape objective is possible at this stage as a consequence of the potential level of harm to the purposes of the Green Belt (SA Objective 4).
- I.3.4.8 There are no main or minor watercourses within the site, reducing the potential for impacts on water quality. However, the southern boundary of this site lies adjacent to the Wolverhampton AQMA. The proposed development would be likely to locate some residents in areas of existing poor air quality. The development of at least 1,200 dwellings would also be expected to generate further pollution. Overall, a minor negative effect on pollution and waste would be likely (SA Objective 5).

- I.3.4.9 The site lies on Grade 3 ALC land, which is potentially considered to be some of South Staffordshire's BMV agricultural land. The proposed development at this site would be likely to result in the loss of previously undeveloped land and the permanent and irreversible loss of soils. There is a level of uncertainty in this assessment as Provisional ALC does not distinguish between Grades 3a and 3b and therefore does not distinguish between land classed as BMV and land which would fall below this quality. Nevertheless, a minor negative impact on natural resources would be expected (SA Objective 6).
- I.3.4.10 Policy SA3 indicates that the site could deliver a minimum of 1,200 dwellings in the plan period, including affordable housing and specialist elderly housing, which would make a substantial contribution to identified housing needs. Therefore, a major positive effect on housing need is expected (SA Objective 7).
- I.3.4.11 The closest NHS hospital with an A&E department is New Cross Hospital, located to the south in Wolverhampton. SA3 is located within the target distance to this hospital. The proposed development would be expected to have a minor positive impact in relation to residents' access to this essential health facility. The closest GP surgery is Ashmore Park Health Centre approximately 550m to the east of the site. Additional GP surgeries are located in Wood Hayes. The site is partially located outside the target distance of 800m to GP services. Cheslyn Hay Leisure Centre is located approximately 5km to the north east of the site, which is beyond the target distance for such facilities.
- I.3.4.12 The site lies adjacent to the Wolverhampton AQMA. While the levels of air quality in proximity to the site are uncertain, the proposed development may locate some residents in areas of existing poor air quality.
- I.3.4.13 The site has access to the surrounding PRow network, and Policy SA3 also requires the proposals to provide high quality green infrastructure and public open space, active travel links and sports pitches, which would be expected to provide benefits to health and wellbeing.
- I.3.4.14 Overall, there are expected to be both minor positive and minor negative effects on health and wellbeing (SA Objective 8). Using the precautionary principle, a minor negative effect has been shown in the summary table above.
- I.3.4.15 In relation to potential effects on historic assets, there are no designated heritage assets or conservation areas in proximity to the site such that there would be likely to be effects on the setting of these assets. There is an area within the site identified on the Historic Environmental Record as 'Moated Site, East of Prestwood Farm, Essington'. The Historic Environmental Character Assessment²⁶ did not assess this site. The impacts of development on heritage assets are largely dependent on the distribution of development in relation to the location of the heritage assets and depend, in part, on the design of the development which may allow for mitigation and/or enhancement. Policy SA3 seeks to ensure the development avoids direct impacts on historic remains and "*integrates the former Prestwood into the design*", in line with the findings of the latest Historic Environment Site Assessment

²⁶ South Stafford Council (2011) 'Historic Environmental Character Assessment: South Stafford' Available at <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Historic-Environment-Assessments.aspx#southstaffs-hea> [Accessed on 27/05/21]

Stage 2. Subject to achieving suitable mitigation, a negligible impact could be expected on cultural heritage (SA Objective 9).

- I.3.4.16 The closest railway station is Bloxwich North, located approximately 5.3km to the east of the site. The proposed development site lies outside the target distance to railway stations and would be likely to restrict new residents' access to rail services. Bus services are available from Guest Avenue which provides a number of services into Wolverhampton on the 65 and 71 routes, and from Linthouse Lane which provides services into Bilston and Walsall on the 57 and 69 routes. There are less frequent bus services available from Blackhalve Lane. Parts of the site lie outside the target distance to regular bus services. The site has access to the pedestrian network and is connected to the existing road network. The District Integrated Transport Strategy for South Staffordshire²⁷ does not bring out any specific road transport issues in relation to this area, although traffic congestion on the A460 is described as an issue. Policy SA3 requires preparation of a transport/movement strategy including public transport enhancements and seeks to deliver "*high quality active travel links through and beyond the site*". Although there is a level of uncertainty in the travel choices future residents will make, overall, a minor positive effect on transport and accessibility could be achieved (SA Objective 10).
- I.3.4.17 There are existing primary schools within Wolverhampton to the south of the site including Long Knowle Primary School, Wood End Primary School, St Thomas' C of E Primary School, Moat House Primary School and Corpus Christi Catholic Primary School. Southern parts of the site lie within the target distance to these schools. Policy SA3 also seeks to provide a new on-site primary school. Depending on the location of the school, most residents are likely to be located within 800m of primary education facilities. The nearest secondary school is Wednesfield High School, located approximately 980m to the south of the site or Moreton School located approximately 1.4km west of the site, both in Wolverhampton. Parts of the site are located within the target distance to these schools. Some new residents of the site would not be located within the target distance for secondary education. However, the policy also seeks to provide sustainable transport and active travel routes which could provide enhanced sustainable access to secondary schools, for example through safe walking and cycling routes. Overall, a major positive effect on education is likely due to the distance between parts of the site and secondary schools (SA Objective 11).
- I.3.4.18 The site approximately 1.7km from the existing employment areas at the M54/A460 junction and approximately 2.9km from ROF Featherstone. The Hansen score calculation assesses southern parts of the site as having 'reasonable' access to employment opportunities by public transport. Development of the site would offer a small range of employment opportunities at the proposed school and retail services. Overall, there is the potential for a minor positive effect on employment (SA Objective 12).

²⁷ Staffordshire County Council (2017) 'District Integrated Transport Strategy' Available at <https://www.staffordshire.gov.uk/Transport/transportplanning/District-integrated-transport-strategies/districtintegratedtransportstrategies.aspx> [Accessed on 27/05/21]

I.3.5 Policy SA4: Strategic development location: Land North of Penkridge

Policy SA4 – Strategic development location: Land North of Penkridge

A strategic site for major housing growth is identified at Land north of Penkridge in the location shown in Appendix B of this document. The key spatial principles for the delivering this level of housing growth at Land North of Penkridge are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this local plan and an approved site wide Strategic Master Plan, as required under policy MA1, consistent with the Concept Plan, vision and objectives for the site contained within this document and the requirements of the Infrastructure Delivery Plan. The site-specific requirements should include:

- a) A minimum of 1,129 homes, including affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan;
- b) A Community Hub focussed around community uses/provision with a strong relationship with primary movement through and within the site, well connected to the site wide green infrastructure network to contain:
 - i. A new first school (1.5ha)
 - ii. Local convenience retail to serve the new neighbourhood
 - iii. Other commercial floorspace to serve the day to day needs of the neighbourhood
 - iv. Flexible community space
- c) A Community Park on the eastern side of the development.
- d) A transport strategy which includes consideration of accesses onto the A449, a gateway feature to the village on the site's northern edge and appropriate public transport provision to support sustainable travel from the scheme;
- e) The provision of full-size sports pitches to national standard along with associated facilities to meet identified need.
- f) High quality active travel links through and beyond the site, including a north-south cycle link through the development and into the existing village centre and rail facilities to the south;
- g) An integrated and connected network of green and blue infrastructure consistent with the indicative layout on the Concept Plan, providing for high quality Sustainable Drainage Systems, open space, sport, biodiversity net gain and active travel, including a large central green space at the heart of the development and additional compensatory Green Belt improvements at a riverside linear community park on the land identified to the east of the site in accordance with Policy DS2;
- h) Any necessary historic environment mitigation identified in the Council's Historic Environment Site Assessment Stage 2 (2022), including retention of tree and hedgerow boundaries bordering the site; and,
- i) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure and health provision.

Development proposals should be consistent with other Local Plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA4	-	0	+/-	--	-	-	++	-	0	+	++	+

- I.3.5.1 This strategic development location has been assessed in Appendix B of the Regulation 18 (III) SA Report²⁸. Land North of Penkridge comprises Sites 010, 420 and 584 in the Penkridge cluster. The total area of the three sites is approximately 83ha.
- I.3.5.2 The construction, occupation and operation of residential development would be expected to exacerbate air pollution, including GHG emissions. Penkridge has a range of existing services including primary and secondary schools, a GP surgery, Penkridge Leisure Centre and the railway station at Penkridge. There are local food stores in the village as well as a range of other local services including a Post Office. Policy SA4 requires a new first school, local convenience retail facilities and commercial floorspace as part of the future proposals for the site. By allocating these sites in proximity to existing and proposed services and facilities, this policy would be likely to facilitate more sustainable communities, by reducing the need to travel and providing more sustainable travel choices. There is a level of uncertainty in this assessment as the choice of whether to travel and the use of more sustainable modes of transport relies on behavioural change of individuals. Overall, the development of a minimum of 1,129 dwellings would be expected to result in an increase in traffic in the local area and associated GHG emissions, to some extent. The policy is likely to have a minor negative effect on the climate change objective overall (SA Objective 1), although there is some uncertainty in the assessment.
- I.3.5.3 Policy SA4 proposes the development of a site of which a proportion lies within Flood Zones 2 and 3, to the south east of the site. The site also coincides with areas determined to be at low, medium and high risk of surface water flooding. The site boundary sets out a site suggestion and SSDC has confirmed that developed area would lie outside Flood Zones 2 and 3, with ‘water compatible uses’, such as amenity open space, being located in areas of higher flood risk. Policy SA4 requires an “*integrated and connected network of green and blue infrastructure ... providing for high quality Sustainable Drainage Systems*”, in accordance with national planning policy and other LPR policies, which should serve to mitigate effects on surface water runoff. Overall, the policy is likely to have a negligible effect on flood risk (SA Objective 2).
- I.3.5.4 The site proposed within Policy SA4 lies less than 8km from Cannock Chase SAC. Cannock Chase SAC has a 15km Zol; development proposals in this zone have the potential to have a negative effect on the integrity of the SAC through increased visitor numbers and vehicular emissions, unless mitigation is in place. The SAC Partnership have agreed a suite of measures with Natural England that allow for planned development within 15 km of the SAC to proceed without harm to the SAC. Financial contributions from developments are expected from the 0-8km Zone.
- I.3.5.5 Cannock Chase SAC is also designated as a SSSI. SA4 appears to lie within the IRZs for this SSSI and for ‘Belvide Reservoir’ SSSI. The IRZ information states that “*any residential developments with a total net gain in residential units*” should be consulted on with Natural England. Therefore, the proposed development at this site could potentially have a negative impact on the features for which these SSSIs have been designated.

²⁸ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 30/08/22]

- I.3.5.6 The development of 83ha of greenfield agricultural land has the potential to result in the loss of grassland, hedgerows, trees and riparian areas, which may form habitats for various species. It is possible any adverse effects on biodiversity could be mitigated through appropriate measures. Policy SA4 seeks high quality on-site open space and green infrastructure as well as a new community park. There is the potential for this policy to result in biodiversity net gain, although this uncertain at this stage.
- I.3.5.7 At the time of assessment, the potential negative effects on Habitats sites are uncertain until the HRA process is completed. Therefore, an overall assessment of uncertain has been recorded in the matrix above for biodiversity (SA Objective 3).
- I.3.5.8 The site lies approximately 3.2km west of Cannock Chase AONB. There is the potential for the development of 83ha to be visible from the AONB and such development may be considered to affect the AONB's setting. Policy SA4 seeks to integrate the development into the landscape and provide a range of green infrastructure, which may help to reduce potential for adverse impacts on the setting of the AONB.
- I.3.5.9 The Landscape Sensitivity Study has assessed the land parcels in which the site lies. Details of the methodology for this study is provided in the Main Report. The site lies within an area assessed as being of 'moderate' and 'moderate-high' landscape sensitivity. The site does not lie within the Green Belt.
- I.3.5.10 The site relating to Policy SA4 lies within the RCA 'Staffordshire Plain' and the LCT 'Ancient Clay Farmlands'. The characteristic landscape features of this LCT include "*mature hedgerow oaks and strong hedgerow patterns ... small broadleaved and conifer woodlands; well treed stream and canal corridors ... numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; [and] dispersed settlement pattern*". The development of this site would be potentially discordant with the key characteristics of this LCT. The site assessments (within the Regulation 18 (III) SA) identify the potential for views from PRow and local residents' homes to be affected by the development of the sites.
- I.3.5.11 Overall, a major negative impact on the character of the landscape is possible at this stage due to the effects of the development on a landscape assessed as being of 'moderate-high' sensitivity to change (SA Objective 4).
- I.3.5.12 A small proportion of the site is located within 200m of 'AQMA No.1 (Woodbank)'. The A449 passes through the site and the M6 lies to the east, with the eastern edge of the site lying within 200m of the M6. The proposed development could locate some new residents in areas of existing poor air quality. The West Coast Mainline forms the western boundary to SA4. The proposed development could expose residents to higher levels of noise pollution and vibrations associated with the railway line. The River Penk lies adjacent to the south eastern boundary of SA4, and the proposed development could potentially increase the risk of contamination of this watercourse. Overall, a minor negative effect on pollution and waste would be likely (SA Objective 5).
- I.3.5.13 The majority of SA4 lies on Grade 2 and 3 ALC land, which could potentially represent some of South Staffordshire's BMV agricultural land. A small area of SA4, adjacent to the River Penk, lies on Grade 4 land. The proposed development would be likely to result in the loss

- of previously undeveloped land and the permanent and irreversible loss of soils. A minor negative impact on natural resources would be expected (SA Objective 6).
- I.3.5.14 Policy SA4 indicates that the site could deliver a minimum of 1,129 dwellings, including affordable housing and specialist elderly housing, which would make a substantial contribution to identified housing needs and therefore a major positive effect on housing need is expected (SA Objective 7).
- I.3.5.15 The closest NHS hospital with an A&E department is County Hospital, Stafford, located approximately 8km to the north of SA4. The proposed development could restrict the access of residents to essential health services provided by hospitals. The closest GP surgery is Penkridge Medical Practice, located approximately 700m from the closest parts of the site. The site lies partially within and partially outside the target distance of 800m to GP services. Penkridge Leisure Centre is located approximately 1.2km from the site, partially within the target distance of 1.5km. As described above, the proposed development could locate some new residents in areas of existing poor air quality associated with the AQMA and main roads, with adverse implications for human health. The West Coast Mainline forms the western boundary to SA4. The proposed development could potentially expose residents to higher levels of noise pollution and vibrations associated with the railway line.
- I.3.5.16 The site benefits from some access to the pedestrian network, including access to the towpath on the Staffordshire and Worcestershire Canal via an underpass to the M6. Policy SA4 also requires the proposals to provide high quality green infrastructure, open space and a new community park, active travel links and sports pitches, which would be expected to provide benefits to health and wellbeing and encourage active lifestyles.
- I.3.5.17 Overall, there are expected to be both minor positive and minor negative effects on health and wellbeing (SA Objective 8). Using the precautionary principle, a minor negative effect has been shown in the summary table above.
- I.3.5.18 SA4 is located approximately 200m from the Grade II Listed Buildings ‘Garden Cottage, Mill End Cottage and The Cottage’ and approximately 250m from ‘Lower Drayton Cottages’ and ‘Lower Drayton Bridge’. The proposed development could have a minor negative impact on the setting of these Listed Buildings. SA4 coincides with several archaeological features identified on the Historic Environmental Record including ‘Stone, Stafford and Penkridge Turnpike Road’, ‘Silver Mount Findspot, Penkridge’ ‘Coin Findspot, Penkridge’, ‘Water Meadow, Lower Drayton’, ‘Drayton Cross’ and ‘Pilgrim’s Ampulla, Penkridge’. The Historic Environmental Character Assessment²⁹ identified the site as being an area of medium historic value. The impacts of development on heritage assets and their settings are largely dependent on the distribution of development in relation to the location of the heritage assets and depend, in part, on the design of the development which may allow for mitigation and/or enhancement. Policy SA4 seeks to ensure the development preserves and enhances the trees and hedgerows to provide screening, in line with the findings of the latest Historic Environment Site Assessment Stage 2. Subject to achieving suitable mitigation, a negligible impact could be expected on cultural heritage (SA Objective 9).

²⁹ South Stafford Council (2011) ‘Historic Environmental Character Assessment: South Stafford’ Available at <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Historic-Environment-Assessments.aspx#southstaffs-hea> [Accessed on 11/08/22]

-
- I.3.5.19 Penkridge Railway Station is located approximately 880m from the site boundary, within the target distance of 2km for rail services. Train services are available to Birmingham and Stafford, as well as other stations on the West Coast Mainline. There are bus stops available on the A449 which passes through the site, providing services to Stafford and Wolverhampton with occasional services to other destinations. There are additional existing bus stops at Chase View and Goods Station Lane. Parts of the site would be expected to have good access to existing bus services.
- I.3.5.20 The site has access to the footpath and PRoW network and connects to the towpath along the Staffordshire and Worcestershire Canal. The site is well connected to the existing road network. There are a range of services available in Penkridge, including food stores and the leisure centre. Policy SA4 also sets out the requirement for a transport strategy to ensure public transport enhancements and *“high quality active travel links through and beyond the site, including a north-south cycle link through the development and into the existing village centre and rail facilities to the south”*. Overall, the site is assessed as having good access to a range of local services and sustainable transport choices. There is a level of uncertainty in the travel choices of future residents and effectiveness of the proposed transport strategy; however, overall, a minor positive impact could be achieved (SA Objective 10).
- I.3.5.21 Penkridge is served by three existing first schools and one middle school, while Wolgarston High School provides secondary education for the area. Policy SA4 proposes a new first school on the site. New residents would have good access to first school education and parts of the site would have good access to middle and secondary school education. The policy seeks the creation of high quality active travel links through and beyond the site, and enhanced public transport provision, which could improve sustainable access to schools. A major positive impact would be expected on education (SA Objective 11).
- I.3.5.22 There are some existing employment sites in the local area, including Dunston Business Park, which lies approximately 850m to the north of the site. The Hansen score calculation assessed central parts of the site as having ‘reasonable’ access to employment opportunities by public transport. Development of the site would offer a small range of employment opportunities at the proposed school, retail services and commercial floorspace to meet day to day needs. Overall, there is the potential for a minor positive effect on employment (SA Objective 12).

I.3.6 Policy SA5: Housing Allocations

Policy SA5 – Housing Allocations

Alongside the strategic development locations identified in Policies SA1, SA2, SA3 and SA4, the following housing allocations will be delivered to meet the district's housing target up to 2039. The site boundaries are set out in the relevant site proforma in Appendix C.

Village/ Town	Site Ref No.	Use	Site location	Minimum Capacity (dwellings)	Proforma Page Number
Tier 1 Settlements					
Bilbrook	213	Residential	Bilbrook House	13	
Codsall	419a&b	Residential	Land at Keepers Lane and Wergs Hall Rd	317	104
Codsall	224	Residential and station parking	Land adjacent to 44 Station Road	85	102
Codsall	228	Residential	Former Adult Training Centre off Histons Hill	29	103
Cheslyn Hay	523	Residential	Land east of Wolverhampton Road	49	110
Cheslyn Hay	119a	Residential	Land adjoining Saredon Road	60	113
Great Wyrley	141	Residential	154a Walsall Road	31	106
Great Wyrley	136	Residential, country park and allotments	Land at Landywood Lane	155	107
Great Wyrley	139	Residential	Pool View, Church Bridge	46	108
Great Wyrley	638	Residential	Loades PLC	29	112
Great Wyrley	704	Residential	Land off Norton Lane	31	109
Great Wyrley	536a	Residential (including specialist housing and school parking)	Land off Holly Lane	84	111
Great Wyrley	730	Residential	Fishers Farm	10	
Penkridge	005	Residential	Land at Cherry Brook	88	115
Penkridge	006	Residential	Land at Boscomoor Lane	80	
Tier 2 Settlements					
Brewood	617	Residential	Four Ashes Road	63	118
Brewood	079	Residential (including specialist housing)	Land south of Kiddemore Green Road	43	117
Huntington	016	Residential	Land at Pear Tree Farm	39	120
Kinver	274	Residential	Land south of White Hill	120	123
Kinver	576	Residential	Land off Hyde Road (west)	44	124
Perton	239	Residential	Land west of Wrottesley Park Road (south)	150	127
Wombourne	416/ 416a	Residential	Land off Orton Lane	79	129
Wombourne	285, 562/415, 459	Residential	Pool House Road	218	130-132
Wombourne	463 & 284	Residential	Land off Billy Bunns Lane and Gilbert Lane	223	133
Wombourne	286	Residential	Land adjacent 63 Sytch Lane	16	134
Tier 3 Settlements					
Coven	082	Residential	Land between A449 Stafford Rd & School Lane	48	136
Featherstone	397	Residential	Land adjacent to Brinsford Lodge, Brookhouse Lane	35	139
Pattingham	251	Residential	Hall End Farm	17	141
Swindon	313	Residential	Land off Himley Lane	22	144

Policy SA5 – Housing Allocations

Wheaton Aston	379	Residential	Land off Ivetsey Road	18	147
Wheaton Aston	426a	Residential	Bridge Farm: 54 Long Street	15	148
Other Sites Adjacent Neighbouring Towns and Cities					
South of Stafford	036c	Residential	Land at Weeping Cross (adjoining Stafford Borough)	81	149
West of Wolverhampton	582	Residential	North of Langley Road (adjoining City of Wolverhampton boundary)	390	150

All site allocations will be delivered in accordance with the individual site planning requirements set out in Appendix C and any other mitigation which is deemed necessary, through the development management process. Proposals should be consistent with other Development Management policies in the Local Plan.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA5	+/-	0	-	--	-	-	++	-	-	-	-	-

- I.3.6.1 Each site proposed as a reasonable alternative has been separately assessed in Appendix B of the Regulation 18 (III) SA Report³⁰, or **Appendix F** of this report. Each site has a range of positive and negative effects on the SA Objectives.
- I.3.6.2 Strategic Policy SA5 sets out the proposed distribution of housing across the plan area, in addition to the sites identified in Policies SA1 to SA4. The distribution of allocations reflects the settlement hierarchy, which is based on available services and facilities as well as environmental constraints. In addition, development would also be directed towards the towns and cities of the Black Country and, to a lesser extent, towards Stafford in order to contribute to the identified unmet housing need in these neighbouring authorities.
- I.3.6.3 The Spatial Strategy seeks to direct development in the first instance towards the three Tier 1 settlements: Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley, as well as on land adjacent to the Black Country and Stafford. Tier 2 settlements comprise Wombourne, Brewood, Kinver, Perton and Huntington and Tier 3 settlements comprise Essington, Coven, Featherstone, Snareshill, Wheaton Aston, Pattingham and Swindon. Tier 2 and Tier 3 settlements would accommodate lower levels of housing allocations.
- I.3.6.4 The construction, occupation and operation of development would be expected to exacerbate air pollution, including GHG emissions and PM. However, by directing development towards Tier 1, Tier 2 and, to a lesser extent, Tier 3 settlements as well as towards the urban edge of existing larger towns outside the district, this policy would be

³⁰ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 30/08/22]

likely to facilitate more sustainable communities, by locating residents in closer proximity to services, facilities and public transport, including railway stations. The use of the private cars and associated fossil fuel consumption is identified as one of the district's larger contributors to GHG emissions. By seeking to reduce the need to travel and by locating development in settlements with existing public transport links, this policy could lead to a lower level of carbon emissions than would otherwise be the case. There is a level of uncertainty in this assessment as the choice of more sustainable modes of transport relies on behavioural change of individuals, which is uncertain at this stage. Policies SA1 to SA4 propose strategic housing allocations, while Policy SA5 proposes the remaining housing allocations across the settlement hierarchy, with some allocations proposed in smaller settlements with fewer services and where new residents may be expected to have more reliance on private car usage, with associated GHG emissions. The potential impact of this policy on climate change mitigation is uncertain (SA Objective 1).

- I.3.6.5 The South Staffordshire plan area is crossed by numerous watercourses and associated floodplains, including the River Penk and the River Stour. The Shropshire Union Canal and Staffordshire and Worcestershire Canal also pass through the district. Development of previously undeveloped land could potentially result in the exacerbation of flood risk. Three sites identified in this policy include land which lies in Flood Zones 2 and 3 and therefore of higher flood risk. Site-specific Flood Risk Assessments may lead to floodplain avoidance and surface water management solutions will be required for all larger sites, in line with the requirements of the Environment Agency. It is likely fluvial and surface water flood risk impacts can be mitigated, as set out in National Planning Policy and required by the Environment Agency (and reflected in other LPR policies). It is likely the overall effect on SA Objective 2 would be negligible.
- I.3.6.6 There are four Habitats sites within or in proximity to the district, designated as SACs: Cannock Chase, Motte Meadows, Fens Pools and Cannock Extension Canal. Development locations towards the north east of the district in areas to the south of Stafford, in proximity to Penkridge, Cheslyn Hay, Great Wyrley, Brewood, Huntington, Featherstone, would lie within the identified 15km ZOI for Cannock Chase SAC. The ZOIs for the three other Habitats sites are unknown at the time of assessment; likely significant effects on these SACs and other Habitats sites within the influence of the LPR will be assessed within the emerging HRA to accompany this stage of the planning process.
- I.3.6.7 Cannock Chase SAC has a 15km ZOI; development proposals in this zone, resulting in a net increase of more than one dwelling have the potential to have a negative effect on the integrity of the SAC through increased visitor numbers and vehicular emissions, unless mitigation is in place. The SAC Partnership have agreed a suite of measures with Natural England that allow for planned development within 15km of the SAC to proceed without harm to the SAC. Financial contributions from developments are expected from the 0-8km Zone. Planned mitigation is therefore in place for those sites located in this zone.
- I.3.6.8 The delivery of residential development on greenfield land could potentially lead to negative impacts on the local green infrastructure network and the loss of natural habitats and ecologically important soils. A potential minor negative impact on biodiversity would be anticipated at this stage (SA Objective 3).
- I.3.6.9 Directing a large proportion of allocations towards existing settlements would serve to limit the likely effects on the character of the wider landscape and provides the opportunity for

- new buildings to be designed to be in-keeping with the existing townscape character. However, development of these sites would be likely to result in the loss of areas of greenfield land would be likely to result in a minor negative effect on the landscape.
- I.3.6.10 The Landscape Sensitivity Study and Green Belt Study have assessed the land parcels in which these sites lie. Six of the 33 sites identified in Policy SA5 lie in areas assessed as being of 'moderate-high' or 'high' landscape sensitivity. In relation to the Green Belt, 20 of the allocations do not lie within the existing Green Belt. Five of the sites lie in areas where the removal of those land parcels has the potential to cause a 'moderate-high', 'high' or 'very high' level of harm to the purposes of the Green Belt.
- I.3.6.11 Development in locations to the north east of the district towards Cannock Chase AONB, such as in proximity to Huntington and Stafford, have the potential to have a negative effect on the setting to the AONB. Building design and any mitigating landscape measures are uncertain at this stage of the plan-making process.
- I.3.6.12 Overall, there is the potential for a major negative effect on landscape, as a consequence of the release of land which would be likely to harm the purposes of the Green Belt in those locations (SA Objective 4).
- I.3.6.13 An increase in population in existing settlements would be expected to result in an increased number of vehicles and associated emissions. Air pollution in higher density urban areas is more likely to result in adverse impacts on human health than air pollution in lower density areas because of higher pollution emissions in more populated streets, in-combination with more dense built form stagnating the air flow. The overall strategy for the distribution of residential allocations seeks to direct development towards settlements with existing services and with access to public transport, and particularly access to rail services and in this regard would serve to reduce the level of likely effects in relation to vehicular emissions.
- I.3.6.14 SSDC benefits from having only three small AQMAs. However, the district lies adjacent to the AQMAs covering the whole of the City of Wolverhampton, Dudley Metropolitan Borough Council and Walsall Metropolitan Borough Council. A small number of sites in Great Wyrley and west of Wolverhampton would be located in proximity to existing AQMAs. The district is crossed by a number of motorways, trunk roads and main roads, including the M6, A5, A449 and A34. Sites located in proximity to these routes may expose residents to higher levels of vehicular-related emissions. There are numerous groundwater Source Protection Zones and watercourses across the district. Sites located in proximity to these features may lead to a greater risk of pollution escape into watercourses or groundwater. Overall, a minor negative impact on pollution would be expected (SA Objective 5).
- I.3.6.15 By directing development towards existing settlements, there is greater scope for development on brownfield sites, which would be likely to help limit the permanent and irreversible loss of agriculturally and ecologically valuable soils, such as in locations in Cheslyn Hay and Featherstone. Allocations on greenfield land in proximity to Cheslyn Hay and Great Wyrley are likely to have a lower level of effect on BMV soils due to the quality of the agricultural land in much of this part of the district. However, the proposed allocations in locations in proximity to Bilbrook and Codsall, Penkridge, Wombourne and Kinver, amongst others, would be likely to result in a significant loss of soil of BMV soils due to the higher Grades of soils in proximity to these settlements. There is a level of uncertainty in this assessment as Provisional ALC does not distinguish between Grades 3a and 3b and therefore

- does not distinguish between land classed as BMV and land which would fall below this quality. Overall, a minor negative impact on natural resources would be likely (SA Objective 6).
- I.3.6.16 Policy SA5 seeks to make a substantial contribution to meeting the identified housing needs to the year 2039. As a result, Policy SA5 would be expected to have a major positive impact on housing (SA Objective 7).
- I.3.6.17 By directing development towards Tier 1 and Tier 2 settlements, this policy would be likely to locate many new residents in areas with some access to existing GP surgeries. Pattingham, Huntington, Coven and Swindon do not have GP surgeries within the settlement and new residents would need to travel to neighbouring settlements to access health services. Residents of South Staffordshire rely on hospital services in neighbouring Authorities, including Stafford, Wolverhampton and Walsall. Settlements in proximity to the district boundaries in these locations are likely to have better access to hospital services, including the proposed sites near Stafford and Featherstone. The majority of settlements lie outside the 5km target distance used in this assessment. The Tier 1 settlements, and Wombourne in Tier 2, have leisure centres located within the settlement, providing access to these services. Penkridge, Cheslyn Hay and Great Wyrley lie within 200m of main roads or motorways. While no AQMAs have been identified in these settlements, it is possible some new residents would be located within areas with higher levels of vehicular emissions. Overall, this policy would be expected to have a range of positive and negative effects on human health (SA Objective 8). Using the precautionary principle, a minor negative effect has been shown in the summary table above.
- I.3.6.18 The impacts of development on heritage assets and their settings are largely dependent on the distribution of development in relation to the location of SSDC's heritage assets and depend, in part, on the design and specific location of development which may allow for mitigation and/or enhancement. Some of the sites identified above located in Brewood, Pattingham, Wheaton Aston and Great Wyrley are located in proximity to Grade II Listed Buildings. Some of the identified sites in Codsall, Brewood, Kinver, Pattingham and Wombourne lie in proximity to the Conservation Areas associated with these settlements. Site 576 in Kinver has the potential to have a negative effect on the Enville Registered Park and Garden. The effects of proposed development of these sites on the significance of these heritage assets is uncertain at this stage. Specialist heritage advice would be required to establish the nature and extent of any such effects. There is the potential for a minor negative effect on cultural heritage assets (SA Objective 9).
- I.3.6.19 This policy seeks to locate development in more sustainable locations with access to existing services, including public transport options. The Tier 1 settlements benefit from having railway stations in central locations, as well as having local GP surgeries, primary and secondary schools and leisure centres within the settlements. Many Tier 2 settlements have GP surgeries as well as primary and secondary schools. Access to local services and public transport options would help to reduce the reliance on personal car usage. However, in a largely rural district with high levels of car ownership and high car usage, there is likely to be additional car users on roads as a result of the development put forward in the policy. The impact on local congestion as a result of the proposed development within this policy is likely to be greater in existing settlements, with larger numbers of new residents using the same

roads and access points. Overall, this policy could potentially have a negative impact on transport and accessibility (SA Objective 10).

- I.3.6.20 By directing the majority of development towards existing Tier 1 and Tier 2 settlements as well as at the fringe of the conurbation comprising the Black Country, it would be expected that a large proportion of new residents would be situated in close proximity to educational facilities. Some sites in Bilbrook, Codsall, Brewood, Great Wyrley, Kinver, Perton, Wheaton Aston and Wombourne lie outside the target distances for primary education. Some sites in Billbrook, Brewood, Huntington, Perton, Swindon, Wheaton Aston, Great Wyrley, Coven and Featherstone lie outside of the target distances for secondary education. Overall, using the precautionary principle, there is likely to be a minor negative effect in relation to locating residents within the target distance to schools (SA Objective 11).
- I.3.6.21 As stated in the Local Plan, a large proportion of South Staffordshire's population travel to work outside the district. The Black Country and other authorities' economies are an important source of employment for residents in the district. More recently, South Staffordshire has aspired to provide more local jobs, to reduce levels of out commuting and provide employment for residents of neighbouring areas. Public transport access to employment opportunities has been considered for each village settlement, using Hansen scores developed by Staffordshire County Council. A higher Hansen score will show a greater level of access to employment opportunities by public transport for residents within a certain settlement. Hansen scores of 'good' or 'reasonable' are found in parts of the settlements of Penkridge, Bilbrook, Codsall, Cheslyn Hay, Great Wyrley, Coven, Brinsford, Featherstone, Essington, Huntington and Perton. Sites at Wombourne, Kinver, Pattingham, Stafford, Swindon and Wheaton Aston are identified as having less than 'reasonable' access to employment by public transport and it is more likely new residents would travel by car to access employment opportunities outside the local area. In this largely rural district, the majority of the sites proposed in Policy SA5 lie in areas with less than 'reasonable' level of access to employment by public transport. Overall, Policy SA5 is likely to have a minor negative impact on access to the local economy (SA Objective 12).

I.3.7 Policy SA6: Gypsy and Traveller Allocations

Policy SA6 – Gypsy and Traveller Allocations

Gypsy and Traveller pitches are allocated at the locations set out in the table below to meet identified family needs.

The new pitch allocations must be located within the red line boundary of the site as shown in Appendix D.

Site	Site ref no.	Total no. pitch allocations	Proforma page number
New Acre Stables, Penkridge	GT01	4	160
Granary Cottage, Slade Heath	GT05	1	155
The Spinney, Slade Heath	GT06	2	157
The Bungalow, Coven	GT07	3	156
Brinsford Bridge, Coven Heath	GT08	7	153
Brickyard Cottage, Essington	GT14	2	152
The Stables, Upper Landywood	GT17	3	158
Park Lodge, Wombourne	GT18	1	161
Glenside, Slade Heath	GT23	1	154
Kingswood Colliery, Great Wyrley	GT32	8	162
Fair Haven, Cross Green	GT33	4	159
Anvil Park, Essington	GT34	1	151

All sites are existing established sites or direct extension to these and are often in remote rural locations and washed over by the West Midlands Green Belt. As an exception to the planning policies relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the Local Plan will be acceptable in principle where planning applications are submitted for the specified number of additional pitches allocated in the Local Plan.

Planning applications on these sites will need to be in accordance with the criteria in Policy HC8, any site-specific planning requirements set out in Appendix D, and any other mitigation which is deemed necessary through the development management process. Proposals should be consistent with other Development Management policies in the Local Plan.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA6	0	--	-	--	-	-	+	-	-	-	-	--

I.3.7.1 Accommodation needs for Gypsies and Travellers have been assessed in the Gypsy and Traveller Accommodation Assessment (2021)³¹ and considered further in the Pitch Deliverability Study (2021)³². These assessments found that there is the need to deliver 72 pitches to meet the needs of Gypsies and Travellers over the five-year period from 2021 to

³¹ Opinion Research Services (2021) South Staffordshire Council Gypsy and Traveller Accommodation Assessment. Final Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/183443/name/GTAAFinalReport2022.pdf/> [Date accessed: 04/10/22]

³² Opinion Research Services (2021) South Staffordshire Council Pitch Deliverability Assessment. Available at: <https://www.sstaffs.gov.uk/doc/182805/name/South%20Staffordshire%20Pitch%20Deliverability%20Assessment%20Final%20Report.pdf/> [Date accessed: 04/10/22]

2025. Beyond this period, it is proposed that future need will be met through the Development Management process, using Policy HC9 as the criteria-based policy against which future applications would be considered.

I.3.7.2 As set out in the table accompanying Policy SA6, 37 pitches for Gypsies and Travellers have been identified across 12 sites. All proposed pitches would be delivered on existing sites or as extensions to existing sites.

I.3.7.3 Each site proposed as a reasonable alternative has been separately assessed in Appendix B of the Regulation 18 (III) SA Report³³, or **Appendix F** of this report. Each site has a range of positive and negative effects on the SA Objectives.

Climate Change Mitigation

I.3.7.4 Due to the small-scale nature of the development within this policy, it is assumed that development proposals would have a negligible impact on the district's contributions to climate change (SA Objective 1).

Climate Change Adaptation

I.3.7.5 All of the preferred sites are located wholly within Flood Zone 1. A minor positive impact would be expected at these sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding (SA Objective 2).

I.3.7.6 A proportion of Site GT08 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations. A proportion of site GT14 coincides with areas determined to be at low and medium risk of surface water flooding, the proposed development at this site would be expected to have a minor negative impact on surface water flood risk, as development would be likely to locate site end users in areas at some risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations to some degree. The other ten sites where pitches may be delivered are in locations which are not identified as being within areas of surface water flood risk and a negligible impact on surface water flood risk would be anticipated. At this stage of the planning process a major negative impact is recorded in the matrix for this SA Objective, following the principle of recording the worse-case assessment for each criterion of an objective (SA Objective 2).

Biodiversity and Geodiversity

I.3.7.7 Sites GT01, GT05, GT06, GT07, GT08, GT14, GT17, GT23, GT32, GT33 and GT34 are located within 15km of Cannock Chase SAC. There is the potential for a minor negative impact as a result of the proposed development at these eleven sites, due to the increased risk of development-related threats and pressures on this Habitats site.

³³ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 30/08/22]

- I.3.7.8 At the time of writing the potential impact of development on other Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.
- I.3.7.9 Sites GT01, GT05, GT06, GT07, GT08, GT14, GT17, GT23, GT32, GT33 and GT34 are located within an IRZ which states that “*any residential developments outside of existing settlements/urban areas with a total net gain in residential units*” should be consulted on with Natural England. At this stage of the planning process, the proposed development at these sites could potentially have minor negative impacts on the features for which these SSSIs have been designated. Consultation with Natural England would clarify whether the type of small-scale development proposed at these sites would be likely to have adverse impacts on SSSIs.
- I.3.7.10 Site GT14 is located approximately 20m from ‘Essington Wood’ ancient woodland, and Site GT34 is located approximately 250m from this ancient woodland. The proposed development at these two sites could potentially have a minor negative impact on this ancient woodland, due to an increased risk of disturbance.
- I.3.7.11 Site GT17 is located approximately 100m from ‘Wyrley and Essington Canal’ LNR. Site GT32 is located adjacent to ‘Bridgetown Subsidence Pools, Cannock’ SBI. The proposed development at these sites could potentially result in a minor negative impact on these designations, due to an increased risk of development-related threats and pressures.
- I.3.7.12 At this stage of the planning process, there is the potential for the development of these sites to have minor negative impacts on biodiversity (SA Objective 3).

Landscape and Townscape

- I.3.7.13 All sites lie within the West Midlands Green Belt. The release of Green Belt land at Sites GT08 and GT33 is considered by the Green Belt Study to result in ‘very high’ levels of harm to the purposes of the Green Belt. Development of Sites GT05, GT06, GT07, GT14, GT23 and GT34 could cause ‘high’ levels of harm. Additionally, development of Site GT01 could cause ‘moderate-high’ levels of harm to the purposes of the Green Belt. Therefore, development of these sites is assessed as having a potentially major negative impact. The proposals at Sites GT05, GT23 and GT34 are to provide one additional pitch to an existing site. While these sites lie in areas assessed as making a substantial contribution to the purposes of the Green Belt, the development proposed is small in scale and mitigation measures may be more successful in limiting the effects of the development on the openness of the Green Belt and/or reducing urbanising influences on the character of the Green Belt. Development of Sites GT18 and GT32 are considered to result in ‘moderate’ and ‘low-moderate’ harm to the Green Belt purposes. Therefore, development of these sites is assessed as having a minor negative impact. Site GT17 was not assessed by the Green Belt study. Development of this site is assessed as having a negligible impact.
- I.3.7.14 Sites GT01 and GT07 are considered by the Landscape Sensitivity Study to be within areas of ‘moderate-high’ landscape sensitivity. Development of these sites has been assessed as having a potentially major negative impact. Sites GT05, GT06 and GT23 are assessed as being within an area of ‘moderate’ landscape sensitivity. Additionally, Sites GT08, GT18 and GT33 are assessed as being within an area of ‘low-moderate’ landscape sensitivity. Therefore, development of these sites has been assessed as having a potentially minor

negative impact. Sites GT14 and GT34 are assessed as being within an area of 'low' landscape sensitivity and Sites GT17 and GT32 were not assessed by the Landscape Sensitivity Study. Development of these sites is assessed as having a negligible impact.

- I.3.7.15 All proposed pitches are located on or adjacent to existing sites for Gypsies and Travellers. The additional pitches proposed would be likely to have a negligible impact on the characteristics identified in the published landscape character assessment.
- I.3.7.16 Sites GT14 and GT17 are located in the open countryside surrounding settlements. The proposed development at these sites would be likely to contribute towards urbanisation of the surrounding countryside, and could potentially alter the views experienced by exiting local residents. Therefore, a minor negative impact on the local landscape would be expected.
- I.3.7.17 Overall, this policy is assessed as having a potentially major negative impact on the landscape objective (SA Objective 4) primarily as a result of potential impacts on the purposes of the Green Belt and areas of high landscape sensitivity.

Pollution and Waste

- I.3.7.18 Site GT32 is located adjacent to an AQMA. Sites GT01, GT08, GT14, GT32 and GT34 are located wholly or partially within 200m of main roads, including the A449 and A462. Site GT01 is also located adjacent to the railway line linking Wolverhampton to Stafford. The proposed development at these sites could potentially expose some site end users to higher levels of transport associated air and noise pollution.
- I.3.7.19 Sites GT01, GT05, GT06, GT07, GT08, GT18, GT23 and GT33 coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.
- I.3.7.20 Sites GT05, GT06, GT07, GT08, GT23, GT32 and GT33 are located within 200m of a watercourse, including the Staffordshire and Worcestershire Canal, River Penk or Saredon Brook. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.
- I.3.7.21 Overall, the policy has the potential to have a minor negative impact on the pollution and waste objective (SA Objective 5).

Housing

- I.3.7.22 The latest evidence base studies identified the current five year need to be 72 pitches for Gypsies and Traveller households that met the national planning definition of a Traveller in the Planning Policy for Traveller Sites (PPTS)³⁴. The assessment finds that 37 pitches can be delivered through the expansion or intensification of existing sites. According to the Pitch Deliverability Assessment (2021), there is an unmet need for additional pitches at two sites,

³⁴ Department for Communities and Local Government (2015) Planning Policy for Traveller Sites (PPTS) Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf [Accessed on 11/08/22]

Clee Park (five pitches) and The Bungalow (two pitches). The proposed policy meets the identified need for pitches at the majority of sites and therefore a minor positive impact is anticipated in relation to the housing objective (SA Objective 6). There is the potential for the unmet need for pitches to lead to adverse impacts on community cohesion and possibly health, should existing accommodation become overcrowded.

Natural Resources

- I.3.7.23 Sites GT01, GT05, GT06, GT07, GT08, GT18, GT23, GT32, GT33 and GT34 comprise previously developed land. The proposed development at these sites would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected. Sites GT14 and GT17 partially comprise previously undeveloped land, and Site GT14 coincides with ALC Grade 3 land which could potentially include BMV land. The proposed development at these sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils. Overall, the policy has the potential for a minor negative impact on natural resources (SA Objective 7).

Health and Wellbeing

- I.3.7.24 All sites are located outside the target distance to a hospital and the proposed development at these sites could potentially restrict the access of site end users to these essential health facilities. Due to the rural nature of the district and the location of hospitals in neighbouring authorities, this impact is expected at many locations.
- I.3.7.25 Site GT18 is located within the target distance to Dale Medical Practice, in Wombourne. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to GP surgeries. All other sites are located outside the target distance to the nearest GP surgeries. The proposed development at these sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- I.3.7.26 Site GT18 is located within the target distance to Wombourne Leisure Centre. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to these facilities. All other sites are located wholly or partially outside the target distance to the nearest leisure facilities, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected.
- I.3.7.27 Site GT32 is located adjacent to an AQMA, and Sites GT01, GT08, GT14. GT32 and GT34 are located wholly or partially within 200m of a main road. The proposed development at these sites could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users. Sites GT05, GT06, GT07, GT17, GT18, GT23 and GT33 are located over 200m from a main road. The proposed development at these sites would be expected to have a minor positive impact on health, as site end users would be located away from traffic related air and noise pollution.
- I.3.7.28 All sites have good access to the PRoW and/or cycle networks. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents. All sites are located within 600m of a public greenspace, other than GT32. Therefore, a minor positive impact would be expected at the

majority of sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

- I.3.7.29 Overall, the policy is assessed as having a range of positive and negative impacts on health and wellbeing. The policy has the potential for minor negative impacts on health and wellbeing, as a result of site users being outside the target distance to health services and some site users being in proximity to sources of pollution. A minor negative impact is anticipated at this stage (SA Objective 8).

Cultural Heritage

- I.3.7.30 Site GT05 is located approximately 20m from the Grade II Listed Building ‘Staffordshire and Worcestershire Canal Number 71 (Cross Green Bridge)’. Site GT23 is located approximately 200m from this Listed Building. Site GT14 is located approximately 190m from ‘Chapel Farmhouse’. The proposed development at these three sites could potentially have a minor negative impact on the setting of these Listed Buildings.
- I.3.7.31 Site GT07 coincides with several heritage/archaeological features, including ‘Brewood Deer Park’ and ‘Old Coal Shafts, East of Wyrley Cannock Colliery (No. 8)’. Sites GT01, GT05, GT06, GT08, GT14, GT17, GT23 and GT32 are located adjacent to various heritage features. The proposed development at these sites could have a potential adverse impact on the interpretation of the significance of these historic assets and/or their settings. Sites GT17 and GT18 are located within an area of high historic value. Sites GT01 and GT32 are located within an area of medium historic value. The proposed development at these sites could potentially have a minor negative impact on the local historic character.
- I.3.7.32 Overall, the policy has the potential for a minor negative impact on the significance of heritage assets and/or their settings (SA Objective 9).

Transport and Access

- I.3.7.33 Sites GT01, GT05, GT06, GT08, GT23 and GT33 are located within the target distance to bus stops providing regular services. The proposed development at these sites would be likely to have a minor positive impact on site end users’ access to bus services. The other six sites are located wholly or partially outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these sites could potentially have a minor negative impact on site end users’ access to bus services.
- I.3.7.34 Site GT01 is located within the target distance to Penkridge Railway Station. Sites GT17 and GT32 are located within the target distance to Landywood Railway Station. The proposed development at these sites would be expected to have a minor positive impact on site end users’ access to rail services. The other nine sites are located outside the target distance to the nearest railway stations. Therefore, the proposed development at these sites would be likely to have a minor negative impact on site end users’ access to rail services.
- I.3.7.35 Sites GT06, GT08, GT14, GT32 and GT34 are well connected to the existing footpath network. The proposed development at these sites would be expected to have a minor positive impact on site end users’ opportunities to travel by foot. Sites GT01, GT05, GT07, GT17, GT18, GT23 and GT33 currently have poor access to the surrounding footpath network.

The proposed development at these sites could potentially have a minor negative impact on local accessibility.

- I.3.7.36 All sites are well connected to the existing road network. The policy would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.
- I.3.7.37 Sites GT01 and GT32 are located within the target distance to a local food store, therefore, the proposed development at these sites would be expected to have a minor positive impact. All other sites proposed in this policy are located outside the target distance to a convenience store. The proposed development at these sites could potentially have a minor negative impact on the access of site end users to local services.
- I.3.7.38 Overall, the policy is assessed as having a range of positive and negative impacts on transport and accessibility. The policy has the potential for minor negative impacts on transport and accessibility as a result of some site users being outside the target distance to public transport and local convenience stores as well as having limited access to the site on a footway. A minor negative impact is anticipated at this stage (SA Objective 10).

Education

- I.3.7.39 Site GT18 is located within the target distance to St Bernadettes Catholic School. Site GT32 is located within the target distance to St Thomas More Catholic Primary School. The proposed development at these sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected. All other sites are located wholly or partially outside the target distance to schools providing education for all primary ages, and therefore, the proposed development at these sites would be expected to have a minor negative impact on the access of new residents to primary education.
- I.3.7.40 Site GT18 is located within the target distance to Ounsdale High School. Site GT32 is located within the target distance to Great Wyrley High School. The proposed development at these sites would be expected to situate new residents in locations with good access to secondary education, and therefore, a minor positive impact would be expected. All other sites are located wholly or partially outside the target distance to the nearest secondary schools, and therefore, the proposed development at these sites would be expected to have a minor negative impact on the access of new residents to secondary education.
- I.3.7.41 Overall, the policy has the potential for a minor negative impact on access to education as the majority of sites lie outside the target distance for sustainable access to schools (SA Objective 11).

Economy and Employment

- I.3.7.42 Of the twelve sites selected in Policy SA6, five sites are located in areas with 'reasonable' sustainable access to employment opportunities (Sites GT05, GT06, GT08, GT14 and GT23) and therefore, the proposed development at these sites would be expected to have a minor positive impact on site end users' access to employment. Site GT34 is located in an area with 'poor' or 'unreasonable' sustainable access to employment opportunities, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to employment. All other sites are located in areas outside of the

Rural Services and Facilities Audit. The proposed development at these sites could potentially restrict the access of site end users to employment opportunities, and therefore, a major negative impact would be expected. There is the potential for a major negative impact on access to employment at this stage due to the poor sustainable access to employment in these site locations (SA Objective 12).

I.3.8 Policy SA7: Employment Allocations

Policy SA7 – Employment Allocations

The following sites will be allocated to ensure that the district's employment land target identified in Policy DS4 is met.

Site Reference	Site Name	Area (Ha)	Employment Type (Use Class ¹)
E14	Vernon Park	2.8	E(g); B2; B8
E15	Hobnock Road	5.2	B8
E18	ROF Featherstone	36	E(g); B2; B8
E20	Hilton Cross	4.8	E(g); B2; B8
E24	I54	4.8	B1/B2
E44	I54 western extension (north)	16.7	B1/B2
E33	West Midlands Interchange (WMI).	297	B8

¹ As defined by the Town and Country Planning (Use Classes) Order 1987 (as amended).

West Midlands Interchange (E33)

The WMI employment site allocation (E33) is for a Strategic Rail Freight Interchange (SRFI) and will be progressed in-line with the [Development Consent Order](#) (DCO) that granted permission on 4 May 2020.

In order to meet the employment land development needs of the district, the land benefiting from the approved DCO at WMI will be removed from the Green Belt. This excludes the land specified for Green Infrastructure provision in the DCO adjacent the Canal Conservation Area and the country park to the south of Vicarage Road which will remain as Green Belt to provide compensatory improvements for the land removed for development. This is indicated on the Policies Map in Appendix X and will see 232.5ha of land removed from the Green Belt.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
SA7	-	++	-	-	-	-	0	-	-	-	0	++

I.3.8.1 Each site proposed as a reasonable alternative for employment use has been separately assessed in Appendix B of the Regulation 18 (III) SA Report³⁵, or **Appendix F** of this report. Each site has a range of positive and negative effects on the SA Objectives.

³⁵ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan – Regulation 18 (III) SA Report, August 2021. Available at: <https://www.sstaffs.gov.uk/doc/182657/name/Sustainability%20Appraisal%20PO%202021.pdf/> [Date Accessed: 30/08/22]

I.3.8.2 The West Midlands Rail Freight Interchange (the largest employment allocation within Policy SA7) has been granted development consent through a Development Control Order (DCO). The application for a DCO was accompanied by an Environmental Statement. The Non-Technical Summary (NTS)³⁶ outlines the likely significant environmental effects of the proposals.

I.3.8.3 The proposals do not include residential development and therefore there would be a negligible effect on housing (SA Objective 7). The policy would also be expected to result in a negligible impact on provision of and access to education (SA Objective 11).

Climate Change Mitigation

I.3.8.4 In general the construction, occupation and operation of employment development allocated through Policy SA7 could exacerbate air pollution, including GHG emissions and PM.

I.3.8.5 In relation to the largest allocation, the WMI Site E33, the development seeks to support moving goods traffic from road transport to rail to help reduce carbon emissions and provide economic benefits. The project website³⁷ states that rail freight produces 70% less carbon dioxide, up to 15 times lower nitrogen oxide emissions and nearly 90% lower particulate emissions than road freight, as well as de-congestion benefits. There is the potential for a minor positive effect on the emission of GHGs at this site.

I.3.8.6 Mixed positive and negative effects are likely, resulting in potential for a minor negative impact on climate change mitigation overall (SA Objective 1).

Climate Change Adaptation

I.3.8.7 Sites E18 and E24 coincide with areas of Flood Zone 2 and 3. The proposed development at these two sites could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a major negative impact would be expected. The other six allocations are located wholly within Flood Zone 1, in an area of lowest flood risk.

I.3.8.8 Sites E15a, E18, E33 and E44 coincide with areas of land determined to be at low, medium and high risk of surface water flooding. The proposed development at these sites could be expected to have a major negative impact on surface water flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

I.3.8.9 The proposed development at WMI Site E33 includes mitigation measures developed through the EIA process, including a drainage strategy for the operations stage, comprising a network of swales and balancing ponds which will control the flow of water from the site and provide several stages of treatment to address diffuse pollution. Following the implementation of mitigation, no significant adverse effects were identified with regard to the water environment. It is likely there would be a negligible effect at this site.

³⁶ Ramboll (July 2018) West Midlands Rail Freight Interchange Order 201X Environmental Statement - Non-technical summary (NTS) Regulation 5(2)(a) Available at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000451-Doc%206.3%20-%20Non-Technical%20Summary.pdf> [Accessed on 11/08/22]

³⁷ Available at: <https://www.westmidlandsinterchange.co.uk/> [Accessed on 11/08/22]

- I.3.8.10 Overall, at this stage of the planning process a major negative impact is recorded in the matrix for SA Objective 2, following the principle of recording the worse-case assessment for each criterion of an objective.

Biodiversity and Geodiversity

- I.3.8.11 All employment allocations are located within 15km from Cannock Chase SAC.
- I.3.8.12 For the WMI Site E33, the proposed West Midlands Interchange Development Consent Order (DCO) was accompanied by a Habitats Regulations Assessment (HRA)³⁸ which concluded that there were no Likely Significant Effects on Cannock Chase SAC or other Habitats sites as a result of the proposed development.
- I.3.8.13 Site E33 is located within a SSSI IRZ which states that “*Large non residential developments outside existing settlements/urban areas where net additional gross internal floorspace is > 1,000m² or footprint exceeds 0.2ha*” should be consulted on with Natural England.
- I.3.8.14 Sites E14, E15a, E20a, E20b and E44 are located in close proximity to ancient woodlands, with potential to increase risk of disturbance. Site E33 is adjacent to ‘Gailey Reservoirs’ SBI. Sites E15a, E18 and E33 coincide with deciduous woodland priority habitat. The proposed development at these locations could result increased development related threats and pressures on these biodiversity designations and result in the loss/degradation of priority habitats
- I.3.8.15 The Environmental Statement in relation to the WMI Site E33 found significant residual effects are likely in relation to biodiversity. This is balanced in part through the provision of significant new and enhanced habitat including the proposed community parks and off-site farmland bird mitigation land, to be maintained in the long term, which would provide benefits to a range of wildlife, and which would be managed for the duration of the operational phase. The habitats created would address local and national biodiversity action plan targets.
- I.3.8.16 Despite potential for new and enhanced habitat at Site E33, overall, a minor negative effect on biodiversity is likely as a result of the employment allocations collectively (SA Objective 3).

Landscape and Townscape

- I.3.8.17 Sites E15a and E33 are located in areas which could cause ‘high’ harm to the purposes of the Green Belt, according to the Green Belt Study, with potential to cause a significant adverse effect on this receptor.
- I.3.8.18 Sites E33 and E18 are located in areas which are of ‘low-moderate’ sensitivity according to the Landscape Sensitivity Study, with potential to result in a minor adverse effect on the landscape. The remaining sites are either of ‘low’ sensitivity or are outside of the study area, where negligible effects on landscape sensitivity would be likely.

³⁸ Ramboll (2018) ‘HRA – No Significant Effects Report’ Available at <http://www.westmidlandsinterchange.co.uk/wp-content/uploads/2018/09/Doc-5.3-HRA-No-Significant-Effects-Report.pdf> [Accessed on 09/06/21]

- I.3.8.19 The majority of the allocations have potential to be discordant with the existing landscape surroundings, contribute towards urbanisation of the countryside, and may adversely affect views experienced by users of the PRow network.
- I.3.8.20 Site E33 is located approximately 3km from Cannock Chase AONB. Residual landscape and visual effects were identified taking into account the embedded mitigation measures, including minor adverse effects on the landscape character of Cannock Chase AONB; significant adverse permanent effects were identified on visual receptors during operation, relating to certain properties with views of the proposed development. It is anticipated that these effects will reduce during the completed development phase as the proposed landscaping matures.
- I.3.8.21 Overall, a minor negative effect on landscape would be likely (SA Objective 4).

Pollution and Waste

- I.3.8.22 Sites E18 and E24 are located partially within 200m of AQMAs, and all sites except E24 are located within 200m of main roads. The proposed development at these sites could potentially expose some site end users to higher levels of transport associated air and noise pollution.
- I.3.8.23 Sites E18, E24, E33 and E44 coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.
- I.3.8.24 Sites E24, E18 and E33 are located within 200m of watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.
- I.3.8.25 In relation to the WMI Site E33, an increase in road traffic was predicted to have a significant adverse impact on air quality in relation to one group receptor (3-4 residential properties located adjacent to the east of the M6), however, this is due to the high baseline concentrations present. Negligible to slight residual effects were identified in relation to operational traffic on other human receptors adjacent to the road network. Noise generated by increased traffic on the local road network and by plant, rolling stock, vehicles and machinery in use, once operational, is likely to give rise to moderate adverse effects at a number of receptors around the site. Noise insulation would be offered for residential properties where there are significant effects. No significant effects are anticipated from vibration.
- I.3.8.26 Overall, there is likely to be a minor negative effect on pollution and waste (SA Objective 5).

Natural Resources

- I.3.8.27 In relation to agricultural land and loss of soils, all sites other than E15a comprise (either wholly or partially) previously undeveloped land which contains ALC Grades 2 or 3.
- I.3.8.28 The WMI Site E33 comprises 17.2% Grade 2, 41% Subgrade 3a, 12.9% Subgrade 3b and 28.9% non-agricultural land. While the proposals at Site E33 for green infrastructure and new country parks would retain some soils, the assessment found significant residual effects as a result of the permanent loss of BMV agricultural land.

- I.3.8.29 Overall, a minor negative effect on natural resources as a result of the allocations within Policy SA7 would be likely (SA Objective 6).

Health and Wellbeing

- I.3.8.30 Due to the nature of the employment allocations, many of the sites are located in areas that are close to main roads where air quality is likely to be relatively poor, and are further away from local centres providing healthcare facilities. Further development in these locations may result in worsening of air quality, with potential to increase exposure of humans to poor air quality with implications for human health.
- I.3.8.31 As described under the pollution and waste objective effects on human health were largely negligible to slight regarding the WMI Site E33. The proposals for this site include the creation of a new country park, offering increased opportunities for access to open space and recreation. Minor adverse effects were identified in relation to amenity during operation at local level.
- I.3.8.32 A range of minor positive and negative effects on health and wellbeing are likely, and in line with the precautionary principle, a minor negative impact is identified overall (SA Objective 8).

Cultural Heritage

- I.3.8.33 Sites E15a and E33 are located in close proximity to Grade II Listed Buildings, with potential to result in adverse impacts on their settings. Site E33 is also located in close proximity to several SMs including 'Roman Forrt W of Eaton House' SM. The majority of employment sites are coincident with or adjacent to archaeological features, which may be sensitive to development.
- I.3.8.34 Site E33 in particular could affect a range of features including: Neolithic and Bronze Age ring ditches; potential Romano-British remains; potential buried remains associated with the Anglo-Saxon and Medieval settlement at Gailey; features associated with Anglo-Saxon agricultural practices; potential buried remains associated with the route of the Staffordshire and Worcestershire Canal and Grand Junction Railway; and other as-yet unidentified, potential buried archaeological remains. Preservation by record through excavation of features, supplemented by public outreach works was considered to be appropriate mitigation. Residual effects were assessed as between insignificant and minor to moderate adverse, depending on the nature of any features. In relation to above-ground cultural heritage receptors, no significant effects were identified relating to Straight Mile Farm and the settings of all off-site designated features and features related to the wider historic landscape. A minor adverse effect was identified relating to the demolition of locally listed Heath Farm. Minor direct and indirect effects on the Staffordshire and Worcestershire Canal were identified. Overall, no significant residual effects were identified in relation to above ground cultural heritage for Site E33.
- I.3.8.35 There is uncertainty in the potential effects on cultural heritage due to archaeological features which may be encountered on site at the allocations within Policy SA7. There is a potential minor negative effect in relation to cultural heritage (SA Objective 9).

Transport and Access

- I.3.8.36 In the SA assessments, Sites E14, E20a and E20b were assessed as having a minor positive impact due to their location with respect to existing bus stops. All employment sites are located outside of the target distance to railway stations. All sites, with the exception of E18, are well connected to the existing footpath networks, and all sites are well connected to the highway network. As such, mixed effects could be expected in relation to transport and accessibility, according to the baseline assessments with potential reliance on private car use for employees at many locations.
- I.3.8.37 In relation to the WMI Site E33, the site is located at a strategic location in the national highway network, close to Junction 12 of the M6, close to the M54 and linked directly by the A5 and A449. The site is well served by cycle lanes which would facilitate cycle access from nearby train stations at Cannock and Penkridge, and population centres at Cannock, Penkridge, and Wolverhampton. The proposals include provision of a shuttle bus service between large population areas and the site, provision of new and extended public bus services, and new infrastructure to address existing issues with crossings, footways and cycleways, as well as improvements to the canal towpath. The Transport and Access chapter of the Environmental Statement found a range of effects between negligible to minor/moderate adverse, with beneficial effects for the A449 and Station Road. The scheme proposes a new Strategic Rail Freight Interchange, the purpose of which is to move goods transport from the road network to the rail network, leading to overall reductions in heavy goods vehicle movements and reduction in GHG emissions in comparison to road transport.
- I.3.8.38 Overall, a mixture of positive and negative effects on traffic and transport is likely, with a minor negative impact recorded overall in line with the precautionary principle (SA Objective 10).

Economy and Employment

- I.3.8.39 In relation to employment opportunities, all allocated sites within this policy would seek to increase employment floorspace within South Staffordshire including E(g), B1, B2 and B8 use classes providing a range of jobs for new and future residents.
- I.3.8.40 In relation to the WMI Site E33, long term minor beneficial effects were identified in relation to construction and demolition employment. Long term major beneficial effects were identified in relation to operational employment and wider economic effects of operation which would apply at local and district levels. Long term minor beneficial effects were identified in relation to operational employment at West Midlands Interchange Travel to Work Area (TTWA) level and wider economic effects of operation at National level.
- I.3.8.41 Overall, there is likely to be a major positive impact on the economy and employment (SA Objective 12).

I.4 Delivering the right homes

I.4.1 HC1: Housing Mix

HC1: Housing Mix

The Council will support development that creates mixed, sustainable and inclusive communities, and contributes to the objectives of the adopted Housing and Homelessness Strategy.

All new housing developments should provide a mixture of property sizes, types and tenures in order to meet the needs of different groups in the community. Proposals must contribute to better balancing the district's housing market, particularly by increasing the supply of 2 and 3 bedroom homes in all areas, especially on the open market.

On major development housing sites (excluding sites exclusively provided for self-build or custom housebuilding), the market housing must include a minimum of 75% of properties with 3 bedrooms or less, with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the Council's latest Housing Market Assessment.

All major development must also contribute to meeting the needs of the district's ageing population in accordance with Policy HC4.

The provision of affordable housing will be required in accordance with Policy HC3. Affordable housing should provide a range of property sizes, with the specific mix to be determined on a site-by-site basis and reflective of need identified in the Council's latest Housing Market Assessment, the Council's housing waiting list, parish need surveys and information from local Registered Providers.

The housing mix of all major development sites will be secured via appropriate means e.g. condition or Section 106 agreement for outline applications, to provide a clear indication of the Council's expectations at an early stage.

Sites of less than 10 dwellings should provide a mixture of property sizes and reflect the need identified in the Council's latest Housing Market Assessment, where consistent with other local plan policies.

Any development that fails to make efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes compared with local housing need will be refused, in accordance with the requirements of this policy and Policy HC2.

Strategic site allocations will be required to provide the specific housing mix outlined in Policies SA1, SA2, SA3 and SA4.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC1	0	0	0	0	0	+/-	+	+	0	0	0	0

- I.4.1.1 An appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met. In particular, this may include an increased number of smaller homes which would be likely to help provide appropriate accommodation for the elderly, first-time buyers and young families.

- I.4.1.2 DM Policy HC1 seeks to ensure that residential developments provide a mixture of property sizes, types and tenures and focuses on ensuring proposals prioritise an efficient use of land. This would likely have a minor positive impact on local housing provision (SA Objective 7) and may serve to reduce the loss of soils, however, this is uncertain as the policy does not specify locations (SA Objective 6). By providing affordable housing, this policy would be expected to meet the varying needs of residents, and as such, have a minor positive impact on health and wellbeing (SA Objective 8).

I.4.2 HC2: Housing Density

HC2: Housing Density

Housing developments, including rural exception sites, will achieve a minimum net density of 35 dwellings per net developable hectare in developments within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the District or in urban extensions to neighbouring towns and cities. Where it would help to support the delivery of local services and facilities, sites will be encouraged to exceed this minimum density standard where this could be done in a manner consistent with other development plan policies, particularly those relevant to the character of the surrounding area.

The net density on a site may go below the minimum density standard set above if to do otherwise would result in significant adverse impacts to the surrounding area's historic environment, settlement pattern or landscape character.

All housing developments should make efficient use of land, whilst ensuring they still meet the requirements of other local plan policies. In areas not covered by the minimum density standards set out above, the appropriate density of a scheme will be determined on a case-by-case basis. In doing so it will have regard to the location of the site relative to services and facilities and other development plan policies, such as those addressing local design, character and housing mix requirements. Housing applications will be refused where they fail to demonstrate how they have optimised a site's density in accordance with these principles.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC2	+/-	0	0	0	0	+/-	+	0	0	0	0	0

- I.4.2.1 DM Policy HC2 seeks to ensure an efficient use of land in appropriate locations by increasing density of development in certain locations.

- I.4.2.2 An efficient use of land would be likely to help the Council provide more housing across the Plan area, in particular through the increase of housing densities in appropriate areas. As such, a minor positive impact on housing could be expected (SA Objective 7). The policy may help to reduce the overall land-take to deliver housing needs across the Plan area and may serve to reduce negative effects on soil loss and loss of 'best and most versatile' (BMV) agricultural land, although this effect is uncertain as it would be dependent on the location of development (SA Objective 6). By using land efficiently, there is the opportunity for new communities to be located in closer proximity to existing facilities and services and in proximity to sustainable transport choices, possibly reducing reliance on private car usage

and reducing greenhouse gas (GHG) emissions, although this effect is uncertain (SA Objective 1).

- I.4.2.3 The sustainability performance of the policy could be improved by relating housing density requirements for new developments to existing townscape and landscape character and relating the policy to respect the significance of heritage assets, or cross referring to such policies elsewhere in the Plan.

I.4.3 HC3: Affordable Housing

HC3: Affordable Housing

All proposals for major housing development will be required to provide 30% affordable housing. This includes any development which provides self-contained units for day to day private domestic use, regardless of use class and whether care is provided to residents.

The affordable housing should then be broken down by tenure as follows:

- 25% First Homes
- 50% Social Rent
- 25% Shared Ownership

The Council will consider what local eligibility criteria should be implemented for the delivery of First Homes and detail these in the Affordable Housing SPD. The mix of property sizes and types of affordable housing will be determined in accordance with Policies HC1 and HC4.

The Council will apply a Vacant Building Credit and reduce the affordable housing requirement as required, in accordance with national policy and the Affordable Housing SPD.

Applications may be refused where a single site has been subdivided into smaller parcels in order to circumvent the affordable housing threshold. Where permission has been granted for a scheme and a subsequent application is made which clearly forms part of a single development, then the full affordable housing requirement will be required for the total number of dwellings proposed across all relevant applications.

The Council requires new development to contribute towards mixed and sustainable communities, therefore affordable housing should be provided on site and fully integrated with market housing. This should be achieved by suitably pepper potting the affordable housing across the site, ensuring it is materially indistinguishable from market housing in both siting and design and otherwise provided in accordance with the Affordable Housing SPD.

Affordable housing will be secured in perpetuity and monitored via an appropriate legal means e.g. Section 106 agreement, subject to Right to Buy/Acquire, staircasing and mortgagee in possession provisions. Delivery must be phased with the market housing on site in accordance with triggers specified in the Section 106 agreement.

Shared ownership housing will be subject to staircasing restrictions in Designated Protected Areas in accordance with the relevant legislation, in order to safeguard new provision.

Offsite and/or financial contributions in lieu of onsite provision of affordable housing will only be acceptable in exceptional circumstances. In such cases, the applicant will be required to provide clear justification for not providing affordable homes on site, and demonstrate how an offsite contribution will contribute to mixed and sustainable communities.

Planning applications that comply with up to date policies in this plan will be assumed to be viable. Consideration will not be given to reducing the affordable housing contribution on the grounds of viability unless the applicant can first demonstrate to the satisfaction of the Council that particular circumstances justify a viability assessment at application stage, as per the PPG.

Further guidance on the requirements of implementing this policy will be provided in the adopted Affordable Housing SPD.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC3	0	0	0	0	0	0	+	+	0	0	0	0

I.4.3.1 DM Policy HC3 seeks to ensure that the South Staffordshire Local Plan delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents.

I.4.3.2 This policy sets out the requirements for affordable housing in South Staffordshire, to ensure that suitable residential development is provided to meet the social and economic needs of the population. Therefore, this policy would be expected to have a minor positive impact on meeting housing needs and health and wellbeing (SA Objectives 7 and 8).

I.4.4 HC4: Homes for Older People and Others with Special Housing Requirements

HC4: Homes for Older People and Others with Special Housing Requirements

The Council will continue to work with Registered Providers, developers and other stakeholders to secure homes which meet the needs of older people and other groups with specialist requirements.

All major housing developments will be required to demonstrate how the proposal clearly contributes to meeting the needs of older and disabled people. The Council will expect housing, as part of the wider mix on the site, to be provided in the following forms in order to provide a range of general and specialist housing options and meet the objectives of the adopted Housing and Homelessness Strategy:

- Bungalows
- Other age restricted single storey accommodation such as flats and maisonettes
- Sheltered/retirement living
- Extra care/housing with care and other supported living

Homes suitable for older and disabled people should be provided within both the market and affordable sectors, with the specific mix further guided by the Housing Market Assessment, local housing need surveys and the Housing Register.

All major developments will also be required to ensure 30% of both the market and affordable housing meets the higher access standards Part M4(2) Category 2: Accessible and adaptable dwellings of Building Regulations. Additional weight will be given to the provision of properties also accessible for wheelchair users.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC4	0	0	0	0	0	0	+	+	0	0	0	0

- I.4.4.1 Over the Plan period, it is likely that there will be an increase in the need for homes for the elderly and those in need of specialist care. It is expected that people over the age of 60 will require different types of housing of various sizes and tenures, and those over 80 will have particular needs for specialist forms of housing, including some homes with care provision and access for those with reduced mobility. DM Policy HC4 aims to provide suitable accommodation for older residents within South Staffordshire and therefore would likely have a minor positive impact on housing (SA Objective 7) within the Plan area.
- I.4.4.2 By providing appropriate homes for residents across the Plan area, this policy would be expected to result in benefits to the health and wellbeing of these residents. In addition, this policy would be likely to help support a more inclusive and vibrant community, and therefore, a minor positive impact on health and wellbeing would be expected (SA Objective 8).

I.4.5 HC5: Specialist Housing Schemes

HC5: Specialist Housing Schemes

The Council will enable and strongly support proposals for the provision of specialist housing of all tenures, particularly those that will contribute to meeting the needs of the district's ageing population, subject to the proposed development meeting all of the following criteria:

- Suitable in size and scale in relation to the existing settlement
- Well integrated with the settlement (in terms of siting and design) in order to promote and encourage interaction with existing communities
- Situated in a sustainable location within safe walking distance of key services, facilities and public transport links
- Suitable provision is made of attractive landscaping and high quality outdoor recreational spaces
- Suitable and safe parking provision for residents, staff, visitors and emergency services

Specialist housing may be in the form of age-restricted accommodation, retirement, sheltered, extra-care, housing with care, nursing/residential homes or other forms of supported living.

The loss of specialist accommodation will not be supported unless required to increase the overall quantity of specialist homes in the local area, or improve quality where existing provision is no longer fit for purpose (e.g. through redevelopment or relocation).

The Council will work with Staffordshire County Council and registered providers in order to identify specific opportunities and sites for specialist housing.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC5	0	0	0	0	0	0	+	+	0	0	0	0

- I.4.5.1 DM Policy HC5 aims to provide suitable accommodation for those with specialist needs within South Staffordshire including some homes with care provision and access for those with reduced mobility. The policy includes resisting proposals which may result in the loss of specialist accommodation; therefore, this policy would be likely to have a minor positive impact on housing and specialist accommodation provision (SA Objective 7).
- I.4.5.2 By providing specialist and supported homes for residents across the Plan area, this policy would be expected to result in benefits to the health and wellbeing of these residents. In addition, this policy would be likely to help support a more inclusive and vibrant community, and therefore, a minor positive impact on health and wellbeing would be expected (SA Objective 8).

I.4.6 HC6: Rural Exception Sites

HC6: Rural Exception Sites

As an exception to planning policies relating to the location of housing development in the district, small rural exception sites of 100% affordable housing to meet the identified needs of local people will be supported where all of the following criteria are met:

- The site lies immediately adjacent to the development boundary of the settlement
- An affordable housing need has been identified in the parish through a robust housing need survey, which considers all tenures of affordable housing identified in the NPPF definition, for the type, tenure and scale of development proposed. In parishes with more than one settlement, the survey should include data or be supplemented with additional information to demonstrate the housing need specifically in the settlement in which the development is proposed.
- The proposed development is proportionate in size and scale in relation to the existing settlement, having regard to its role in the settlement hierarchy
- The initial and subsequent occupancy is controlled through planning conditions and/or legal agreements to ensure the accommodation remains affordable and for local people in housing need in perpetuity.
- The proposed development respects the scale, character and local distinctiveness of its surroundings.

The Council will work proactively with Registered Providers and community organisations to identify opportunities for rural exception sites to deliver affordable housing over and above the housing supply set out in this plan. The Council will require Parish Councils to be engaged in the process and a Rural Housing Enabler commissioned to consult with local communities and provide an independent assessment of local need. Any housing need survey and supporting information submitted to evidence local housing need should be no more than 3 years old, at the point of application submission, to be considered an up-to-date, robust assessment.

In exceptional circumstances in areas outside the Green Belt, a maximum of 10% market housing may be permitted at the Council's discretion, where it can be robustly demonstrated to be essential to the viability of the scheme. In such cases, the market housing must be fully integrated with, and of a consistent standard and design as, the affordable homes in accordance with the adopted Affordable Housing SPD.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC6	0	0	0	0	0	+/-	+	0	0	0	0	0

- I.4.6.1 Rural exception sites are small sites used for affordable housing in perpetuity where sites would not typically be used for housing³⁹. Paragraph 78 of the NPPF⁴⁰ states that *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this”*.
- I.4.6.2 DM Policy HC6 would be expected to help meet the housing requirements and increase the provision of affordable housing across the Plan area. Therefore, a minor positive impact on housing would be expected (SA Objective 7).
- I.4.6.3 Rural exception sites could potentially be located on previously undeveloped land in the open countryside. As such, development proposals could potentially result in the loss of soil, and therefore, have a minor negative impact on natural resources (SA Objective 6). However, this effect is uncertain as the policy does not specify locations.

I.4.7 HC7: First Homes Exception Sites

HC7: First Homes Exception Sites

As an exception to planning policies relating to the location of housing development in the district, small exception sites of primarily First Homes to meet the needs of local people will be supported where all of the following criteria are met:

- a) An evidenced need for First Homes exists within the district which is not already being met within the local authority area
- b) The site lies outside the Green Belt and is immediately adjacent to the development boundary of the settlement
- c) The proposed development is of a proportionate size and scale in relation to the existing village, taking into account the size of the settlement having regard to its role in the settlement hierarchy
- d) No more than 10% of the site is provided as market housing and the applicant has sufficiently demonstrated this is required for the viability of the development where grant funding is unavailable and/or there are abnormal site costs
- e) The need for other affordable tenures has been considered and limited provision has been made on the site accordingly to reflect the significant need in the district
- f) The initial and subsequent occupancy of properties is controlled through planning conditions and/or legal agreements to ensure the accommodation remains affordable and for local people in housing need in perpetuity
- g) The proposed development respects the scale, character and local distinctiveness of its surroundings, and complies with any other local design policies and guidance

The Council will consider what local eligibility criteria should be implemented for the delivery of First Homes and detail these in the Affordable Housing SPD.

³⁹ MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed on 11/08/22]

⁴⁰ Ibid

HC7: First Homes Exception Sites

In cases where a mixture of tenures are provided, all properties must be fully integrated and of a consistent standard and design, in accordance with the adopted Affordable Housing SPD.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC7	0	0	0	0	0	+/-	+	+	0	0	0	0

- I.4.7.1 Policy HC7 supports development of first homes within small unallocated sites adjacent to defined settlement development boundaries, but outside of Green Belt, subject to a range of criteria as set out in the policy.
- I.4.7.2 PPG defines first homes as “a specific kind of discounted market sale housing and should be considered to meet the definition of ‘affordable housing’ for planning purposes”, which are available only to first-time buyers at a discount of at least 30% below market value⁴¹. Policy HC7 seeks to deliver first homes in areas where there is a proven unmet local need.
- I.4.7.3 This policy would be expected to contribute towards meeting the housing requirements and increase the provision of affordable housing across the Plan area, helping first-time buyers to enter the housing market. Therefore, a minor positive impact on housing would be expected (SA Objective 7).
- I.4.7.4 Furthermore, by providing affordable first homes, this policy would be expected to help meet the varying needs of residents and provide opportunities for more inclusive communities. The policy has the potential to have a minor positive impact on health and wellbeing (SA Objective 8).
- I.4.7.5 The policy states that first homes sites will be permitted adjacent to the existing development boundary; as such, sites could potentially be located on previously undeveloped land. Although the policy restricts their size, development proposals under this policy would be likely to result in the loss of soil to some extent, and therefore, have a minor negative impact on natural resources (SA Objective 6). However, this effect is uncertain as the policy does not specify locations.
- I.4.7.6 Policy HC7 seeks to ensure that the development proposal “respects the scale, character and local distinctiveness of its surroundings, and complies with any other local design policies and guidance”. These measures could potentially help to minimise any adverse impacts on accessibility and landscape, resulting in negligible impacts for SA Objectives 4 and 10.

⁴¹ DLUHC & MHCLG (2021) Guidance: First Homes. Available at: <https://www.gov.uk/guidance/first-homes> [Accessed on 11/08/22]

I.4.8 HC8: Self-Build and Custom Housebuilding

HC8: Self-Build and Custom Housebuilding

The Council will support the provision of self-build and custom housebuilding schemes and plots throughout the district, where in conformity with other local plan policies, in order to ensure a wide range of housing options are available to residents and to meet bespoke needs. The Council will work positively with developers, Registered Providers, self and custom build associations and other community groups to bring forward schemes in order to meet demand as evidenced on the self-build register.

Major developments will be required to have regard to the need on the Council's self-build register, and make provision of self and custom build plots to reflect this. The Council may require a design code to be agreed with the applicant and implemented for development of the plots.

Developers will be required to actively market plots at a reasonable price for a minimum of 12 months from the date the relevant planning permission is issued. If after this period, the plot has not been sold, the developer will be permitted to build out the plot as a standard property type, for the same tenure as was first approved. Requirements for marketing and notifying the Council will be secured through a Section 106 agreement.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC8	0	0	0	0	0	0	+	0	0	0	0	0

I.4.8.1 DM Policy HC8 seeks to meet the needs of those wishing to build and customise their own homes. The policy aims to support self-build and custom house building proposals with regard to any other policies and large-scale proposed residential developments in place, in line with the requirements of the NPPF.

I.4.8.2 This policy would ensure that new housing delivered across the Plan area can accommodate the diverse requirements of future and current residents within South Staffordshire, and therefore, will likely have a minor positive impact on housing (SA Objective 7).

I.4.9 HC9: Gypsy, Traveller and Travelling Showpeople

HC9: Gypsy, Traveller and Travelling Showpeople

All applications for Gypsy, Traveller and Travelling showpeople pitches or plots must conform with all the criteria set out below.

- a) Essential services such as power, water, drainage, sewage disposal and refuse/waste disposal must be provided on site.
- b) The site must be well designed and landscaped with clearly demarcated site and pitch boundaries using appropriate boundary treatment and landscaping sympathetic to, and in keeping with, the surrounding area.
- c) Proposals must demonstrate a minimum 10% biodiversity net gain in accordance with Policy NB2
- d) In line with Policy HC10, the amenity of the sites occupiers and neighbouring residential properties should be protected. Sites must be designed to ensure privacy between pitches and between the site and adjacent users, including residential canal side moorings. Proposals for caravans in residential gardens will be refused where they have an adverse impact on the amenity of neighbouring properties.
- e) The site can be safely and adequately accessed by vehicles towing caravans, is well related to the highway network, and provides adequate space within the site to accommodate vehicle parking and turning space to accommodate the occupants of the site.
- f) The proposal, either in itself or cumulatively having regard to existing neighbouring sites, must be of an appropriate scale so as to not put unacceptable strain on infrastructure or dominate the nearest settled communities, to avoid problems of community safety arising from poor social cohesion with existing families.
- g) Pitches should be an appropriate scale for the size and number of caravans to be accommodated, without over-crowding or unnecessary sprawl. A single pitch to accommodate immediate family should only consist of one static caravan and one tourer caravan unless it can be demonstrated that additional caravans are necessary on the pitch to avoid overcrowding
- h) Built development in the countryside outside the development boundaries should be kept to the minimum required, in order to minimise the visual impact on the surrounding area. Where proposals are in the Green Belt, proposals will only be acceptable where they conform to Policy DS1. The proposed allocations of new pitches in the Green Belt set out in Policy SA6 will be acceptable in principle, subject to conformity with Policy SA6 and all criteria in this policy
- i) Any amenity buildings proposed should be of an appropriate scale and reasonably related to the size of the pitch or pitches they serve.
- j) Proposals must not be located in areas at high risk of flooding
- k) Where the proposal is for travelling showperson provision, the site should be large enough for the storage, maintenance and testing of items of mobile equipment, and should not have an unacceptable impact on the amenity of neighbouring residential properties, including canal side residential moorings.
- l) Where the proposal is for a transit site, proposals should avoid locations that are accessed via narrow country lanes and be in locations with good access to the strategic highway network.

Applications for pitches from individuals that do not meet the planning definition set out in Annex 1 of Planning Policy for Traveller Sites will also be considered in line with this criteria-based policy and other relevant policies on a case by case basis.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC9	0	+	0	0	+	0	+	+	0	0	0	0

- I.4.9.1 In accordance with the Planning policy for traveller sites⁴², Gypsies and Travellers are defined as *“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”*.
- I.4.9.2 Travelling Showpeople are defined as *“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”*⁴³.
- I.4.9.3 DM Policy HC9 is expected to result in the sufficient provision of high-quality pitches and plots for the Gypsy, Traveller and Travelling Showpeople communities within South Staffordshire which addresses the likely permanent and transit accommodation needs. Therefore, the policy is expected to have a minor positive impact on housing (SA Objective 7).
- I.4.9.4 The policy sets out criteria which includes aiming to ensure future pitch and plot development would provide access to essential services and that areas of high flood risk will be avoided, potentially having minor positive effects on pollution (SA Objective 5), health and wellbeing (SA Objective 8) and climate change adaptation (SA Objective 2). The policy sets out criteria which aim to ensure future pitch and plot development would not result in adverse impacts on biodiversity, landscape, health or transport.

⁴² MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Accessed on 11/08/22]

⁴³ Ibid

I.5 Design and space standards

I.5.1 HC10: Design requirements

HC10: Design requirements

The Council will require the design of all developments to be of a high quality.

All development proposals must achieve creative and sustainable design from the outset and throughout the lifetime of the development that takes into account local character and distinctiveness and ensures the following:

- a) Design reflects any relevant requirements in the latest South Staffordshire Design Guide SPD, relevant national and local design codes, or Conservation Area Management Plans relevant to the site.
- b) Reflect the positive features that make up the character of the local area, enhancing and complementing the site's surroundings
- c) Incorporate tree lined streets, particularly along primary highway routes through the site.
- d) Positively respond to and respects the existing landform, layout, building orientation, massing and landscaping
- e) Ensure attractive and distinctive development with use of a variety of materials that will remain attractive through the lifetime of the development, and use bespoke house types to avoid a monotonous visual appearance
- f) Well-designed buildings to reflect local vernacular, including historical building typologies where appropriate
- g) Land is used efficiently whilst respecting existing landscape and settlement character
- h) Provide a clear and permeable hierarchy of streets, routes and spaces which incorporate a variety of green infrastructure through the development
- i) Ensuring buildings can be entered, used and exited safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers
- j) Give safe and convenient ease of movement to all users prioritising pedestrians and cycle users
- k) Provide access to local services and facilities via sustainable modes of transport
- l) Provide a range of house sizes, types and tenures in accordance with Policy HC1.
- m) Deliver socially inclusive, tenure-neutral housing for market and affordable properties where no tenure is disadvantaged, including the surrounding landscaping and public realm, in accordance with Policy HC3 and the Affordable Housing SPD
- n) Ensure all public and private spaces are easily identifiable
- o) Ensure that streets and other public spaces are well overlooked, whilst seeking to deliver wider Secure by Design principles, where practicable and consistent with other design objectives
- p) Accommodates car and cycle parking, and bin storage using imaginative solutions that do not detract from the streetscene
- q) Deliver a high quality and well-managed public realm that supports biodiversity, recreation and active travel
- r) Be proactive and adaptive in responding to social and technological conditions particularly in relation to climate change
- s) Minimise adverse impact on natural resources and maximise the restoration and enhancement of biodiversity

Where infilling is proposed, it will only be permitted where it does not result in the unacceptable intensification of the area and is sensitively integrated into its immediate setting, townscape and landscape and wider settlement pattern.

Developments proposed to come forward along other adjacent or closely related sites with similar delivery timescales must prepare a framework plan to show how a comprehensive and integrated layout could be achieved alongside other sites in the area.

Development proposals should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC10	+	0	0	+	0	0	+	+	0	+	0	0

- I.5.1.1 Effective design requirements can help to ensure new developments are integrated effectively into the local landscape, conserving heritage and cultural assets and reinforcing local distinctiveness. Good design can strengthen the sense of place, improve the attractiveness of a location and the quality of life for residents and create a safer place to live and work.
- I.5.1.2 DM Policy HC10 could help to reduce carbon emissions associated with development and promote climate change resilience, due to the proposed use of green infrastructure (GI) which could act as a carbon sink. Therefore, a minor positive impact on climate change would be expected (SA Objective 1).
- I.5.1.3 The policy requires development proposals to *“reflect the positive features that make up the character of the local area, enhancing and complementing the site’s surroundings”*. Policy HC10 also seeks to ensure that development proposals use land *“efficiently whilst respecting existing landscape and settlement character”*. This would be likely to result in a minor positive impact on the local landscape, by helping to ensure that future development does not adversely impact the existing landscape character (SA Objective 4).
- I.5.1.4 The policy outlines that future development must *“deliver socially inclusive, tenure-neutral housing for market and affordable properties where no tenure is disadvantaged, including the surrounding landscaping and public realm”*, which is likely to ensure that residents will have the opportunity to find a home which meets their needs. This would therefore be likely to result in a minor positive impact on housing demands (SA Objective 7).
- I.5.1.5 Under this policy, provisions to *“provide access to local services and facilities”* would be expected to ensure residents have access to local health facilities. As well as this, the policy aims to ensure future developments promote active recreation, and therefore, a minor positive impact on health would be expected (SA Objective 8).
- I.5.1.6 DM Policy HC10 aims for the provision of *“clear... hierarchy of streets, routes and spaces”* to provide *“safe and convenient ease of movement to all users”* and *“provide access to local services and facilities”* as well as providing car parking and cycle storage for future developments. This would include improvements to, or the provision of, access to the pedestrian and cycle networks; therefore, this policy would be likely to have a minor positive impact on transport and accessibility in the Plan area (SA Objective 10).

- I.5.1.7 The detail provided in the accompanying SPDs could help to enhance the sustainability performance of future development. Design guides such as Building for Life 12⁴⁴ could be used to support the development of the SPDs. This is a government endorsed design quality indicator for well-designed developments which can be used by local authorities to help guide design codes within the Plan area.
- I.5.1.8 The sustainability performance of the policy could be strengthened by specifically referring to the protection and enhancement of cultural heritage assets and their settings, or cross referring to such a policy.

I.5.2 HC11: Protecting amenity

HC11: Protecting amenity

All development proposals should take into account the amenity of any nearby residents, particularly with regard to privacy, security, noise and disturbance, pollution (including light pollution), odours and daylight.

Noise sensitive developments such as housing development will not be permitted in the vicinity of established noise generating uses where potential for harmful noise levels is known to exist unless measures to suppress noise sources can be provided through condition or legal agreement.

Development likely to generate harmful noise levels will be directed to appropriate locations away from known noise sensitive locations and noise sensitive habitats unless measures to suppress noise can be provided for the life of the development through legal agreement.

Sensitive developments such as housing will not be permitted in the vicinity of established sources of pollution which may give rise to harm to the amenity of occupants. Proposals involving the re-use of agricultural buildings to residential use should not take place where agricultural use involving the keeping of animals or associated waste is to be retained in nearby buildings.

Development likely to harm amenity will be directed to appropriate locations away from known sensitive locations or the natural environment.

Development must not unacceptably reduce the existing level of amenity space about buildings, particularly dwellings, and not unacceptably affect the amenity of residents or occupants.

Development proposals should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC11	0	0	0	0	+	0	0	+	0	0	0	0

- I.5.2.1 DM Policy HC11 relates to residential privacy, security, noise and disturbance, pollution (including light pollution), odours and daylight. The policy states that “*all development proposals should take into account the amenity of any nearby residents*” and also

⁴⁴ D. Birkbeck and S. Kruczkowski (2015) Building for Life 12. Available at: <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition> [Accessed on 11/08/22]

“development likely to harm amenity will be directed to appropriate locations away from known sensitive locations or the natural environment”. Therefore, this policy is likely to have a minor positive impact on pollution and on the health and wellbeing of local residents within the Plan area (SA Objectives 5 and 8).

I.5.3 HC12: Space about dwellings and internal space

HC12: Space about dwellings and internal space

The design of new housing should improve the overall quality of development in South Staffordshire, to create a place that people find attractive to live and work in. New development should be designed to take account of individual buildings, their inter-relationships and the character of its surroundings.

Consideration should be given to the layout and design of new housing development, so that a satisfactory standard of spacing around dwellings is achieved, considering outlook, privacy, safety, crime prevention and energy conservation.

Through appropriate design and layout, development proposals must ensure all of the following:

- a. Maximised daylight and sunlight to internal accommodation and private amenity areas. As far as is practicable, habitable room windows, especially lounge windows, should not face north.
- b. reasonable privacy for dwellings within the layout and protection of the privacy of existing dwellings
- c. a satisfactory outlook, both within the new development and in relation to the existing development
- d. a reasonable area of outdoor private amenity space to allow such uses as drying, washing, gardening and children's play space and with space for garden storage. A reasonable area of communal open space must be provided for flats and specialist housing.

Internal Space and layout

All new residential developments must meet or exceed the Government's Technical Housing Standards – Nationally Described Space Standard (2015) or subsequent editions.

External Space

All private amenity space should be a minimum of 10 metres in length and the total area of the garden should be a minimum of:

- 45 square metres for dwellings with 2 or less bedrooms;
- 65 square metres for dwellings with 3 and 4 bedrooms;
- 100 square metres for dwellings with 5 or more bedrooms;
- 10 square metres per unit for flats/apartments provided in shared amenity areas.

Flexibility may be applied in relation to the above standard, depending upon the site orientation and the individual merits of the development proposal.

Distances between Dwellings

Dwellings should be designed and sited so as to ensure that all the following are met:

- a. there is a minimum distance of 21 metres between facing principal windows*
- b. there is a minimum distance of 14 metres from a principal window when it faces the wall of another dwelling with no principal window
- c. there is a minimum distance of 10.5 metres from a principal window when the facing wall forms part of a single storey structure

Flexibility may be applied in relation to the above garden length standard, depending upon the site orientation and the individual merits of the development proposal.

Development proposals should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC12	0	0	0	0	0	0	0	+	0	0	0	0

I.5.3.1 The Nationally Described Space Standards⁴⁵ help to ensure that all development satisfies the requirement for internal space. It is understood that, in general, the greater the internal space within a property, the better the standard of living for residents.

I.5.3.2 Residents experiencing an increased amount of living space enables an improved standard of living and therefore a more comfortable and higher quality life. DM Policy HC11 sets out appropriate external space standards for South Staffordshire for new developments and includes standards such as the minimum distance required between dwellings. Residents with more space, and therefore better qualities of life, are likely to be part of a more vibrant and interactive community, and as such, a minor positive impact on the wellbeing of residents would be expected (SA Objective 8).

I.5.4 HC13: Parking Provision

HC13: Parking Provision

The Council will require appropriate provision to be made for parking in development proposals in accordance with adopted parking standards. The Council's recommended parking standards are set out in Appendix XX. These should be considered the starting point for the level of cycle and car parking required to support a scheme, but in considering the final level of provision the Council will have regard to:

- (a) the anticipated demand for parking arising from the use proposed, or other uses to which the development may be put without needing planning permission;
- (b) the scope for encouraging alternative means of travel to the development that would reduce the need for on-site car parking. This will be particularly relevant in areas well-served by public transport;
- (c) the impact on highway safety from potential on-street car parking and the scope for measures to overcome any problems;
- (d) the need to make adequate and convenient parking provision for disabled people;
- (e) requirements for electric vehicle charging facilities as set out in Appendix XX, including infrastructure to support electric public transport where appropriate; and
- (f) the design quality of the scheme and the embodied emissions associated with the scheme's materials and construction.

Any required cycle storage must be safe, weatherproof, convenient and secure to assist in promoting cycle use. In addition to the electric vehicle charging standards, the provision of other emerging vehicular charging technologies (e.g. hydrogen) will also be supported where it can be demonstrated these will support the transition to zero carbon travel.

⁴⁵ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Accessed on 11/08/22]

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC13	+	0	0	0	+	0	0	0	0	+	0	0

- I.5.4.1 DM Policy HC13 aims to introduce electric vehicle charging standards for new residential and commercial development. Electric vehicles are an efficient substitute to petrol- and diesel-powered vehicles, because they have zero direct emissions of some air pollutants including nitrogen oxides and carbon dioxide. Electric vehicles have significantly lower carbon dioxide emissions than conventional petrol and diesel vehicles, even when taking into account the emissions from producing electricity⁴⁶. Electric vehicles are also likely to have significantly lower fuel costs, often saving car owners money in the long-term. By encouraging sustainable transport options and the use of electric vehicles, this policy would be likely to have a minor positive impact on climate change and pollution (SA Objectives 1 and 5).
- I.5.4.2 By providing parking standards for future developments, Policy HC13 supports future residents' accessibility to services and employment across the Plan area. The policy would be expected have a minor positive impact on transport and accessibility within the South Staffordshire area (SA Objective 10).

⁴⁶ Local Government Association (2021) The case for electric vehicles. Available at: <https://www.local.gov.uk/case-electric-vehicles>
 [Accessed on 11/08/22]

I.6 Promoting successful and sustainable communities

I.6.1 HC14: Health Infrastructure

HC14: Health Infrastructure

Proposals for major residential developments or specialist elderly accommodation must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Clinical Commissioning Group (CCG). Where it is demonstrated that existing facilities do not have capacity to accommodate patients from new development and that the development will result in an unacceptable impact on these existing local facilities, then a proportionate financial contribution will be sought and agreed through engagement with the CCG. In the first instance, any infrastructure contributions will be sought for expanding the capacity of existing services in the relevant Primary Care Network and secured through planning obligations.

Existing healthcare infrastructure will be protected unless it can be clearly demonstrated that its loss would not have an adverse impact on healthcare delivery, such as where a GP practice is relocating to new premises serving the same community. New facilities should be well served by public transport infrastructure and good access via legible walking and cycling routes. Where possible, new facilities should be located in local centres. Support will be given for co-location of compatible community services on one site.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC14	0	0	0	0	0	0	0	+	0	0	0	0

I.6.1.1 DM Policy HC14 aims to ensure that the Plan protects existing healthcare infrastructure (including GP surgeries), that major residential developments are assessed against existing healthcare facilities for potential negative impact and that contributions towards healthcare infrastructure are prioritised. Therefore, this policy is likely to have a minor positive impact on healthcare by seeking adequate GP services for all current and future residents (SA Objective 8).

I.6.1.2 Many future residents would be likely to lie outside the target distances from a hospital with an A&E department as all such services are provided from hospitals outside the district; therefore, sustainable access to emergency healthcare may be more limited.

I.6.2 HC15: Education

HC15: Education

Support will be provided for the expansion and/or improvement of educational facilities or the construction of new schools to meet demand generated by children in new development or to deliver necessary improvements and updates to education infrastructure. New education infrastructure will be required from new development in line with the latest Staffordshire Education Infrastructure Contributions Policy, which may include safeguarding of land for future school expansion. Proposals that do not provide contributions towards education infrastructure where it has been determined that these are necessary will be refused.

Existing Infant, Junior, First, Primary, Middle and Secondary school infrastructure will be protected unless a clearly demonstrated that the loss of the facility is supported by a robust business case and will not adversely impact education provision. New facilities should be well served by public transport infrastructure with good access via legible walking and cycling routes. Where feasible the Council will aim to co-locate new facilities with local centres and will support the co-location of compatible community facilities with school provision.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC15	0	0	0	0	0	0	0	0	0	0	+	0

- I.6.2.1 DM Policy HC15 seeks to protect existing education infrastructure from the pressures of an increasing population. Additionally, the policy requires new education infrastructure from new development to be in line with the latest Staffordshire Education Infrastructure Contributions Policy (SEICP)⁴⁷ which “*provides the basis for calculating likely educational infrastructure contributions*” regarding new development. This policy therefore is likely to have a minor positive impact on education within the Plan area.

⁴⁷ Staffordshire County Council (2022) Staffordshire Education Infrastructure Contributions Policy (SEICP). Available at: <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Information-for-developers/Planning-policy.aspx> [Accessed on 11/08/22]

I.6.3 HC16: South Staffordshire College (Rodbaston)

HC16: South Staffordshire College (Rodbaston)

Within the Special Policy Area defined on the Policies Map, proposals for new development associated with the use of South Staffordshire College (Rodbaston) as an education and training establishment will be supported.

Proposals should show:

- that the development proposed is for education and training uses directly related to the activities of the College and can include business start-up activities to support people into work in areas of employment related to College Curriculum subjects;
- that the development is of a scale and massing appropriate to its location;
- that the design and external appearance of the development is of a high standard and uses high quality materials which relate well to the development's setting;
- where appropriate, re-use existing buildings for uses which support the existing uses at South Staffordshire College;
- the provision of satisfactory access and vehicle parking;
- the incorporation of a satisfactory landscaping scheme, which complements and enhances the development and the local environment;
- that the development is located outside Flood Zones 2 and 3;
- that the development will not lead to the loss of sports facilities or, if it does, then compensatory provision/investment in sports facilities can be found in a suitable location elsewhere within the college estate. Any replacement sports provision must be equivalent if not better than that being replaced in terms of quality, quantity and accessibility

Development proposals should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC16	0	0	0	0	0	0	0	0	0	0	+	0

- I.6.3.1 DM Policy HC16 sets out SSDC's approach with regard to the modernisation and long-term vision of South Staffordshire College, which is likely to improve educational services for residents undertaking further and higher courses. Therefore, the policy is likely to have a minor positive impact on education within the Plan area (SA Objective 11).

I.6.4 HC17: Open Space

HC17: Open Space

Existing open space should not be built on unless the conditions set out in paragraph 99 of the NPPF 2021 (or subsequent revisions) are met. This protection extends to all land performing an open space function, including, but is not limited to, all open space identified in the latest Open Space Audit.

The Council will require 0.006 hectares of multi-functional publicly accessible open space per dwelling as standard. Development which would generate a need for 0.2ha of open space or more (i.e sites of 33 dwellings or above) should provide this as on-site open space. Smaller areas of incidental green infrastructure without a clear recreational purpose (e.g. landscape buffers, highways verges) and areas without public access will not count towards meeting the quantitative on-site open space standard. Development requiring on-site open space should also include equipped high quality play provision as a default unless an alternative play provision strategy is agreed with the Council.

HC17: Open Space

On-site open space must be designed and located within development so as to maximise its recreational use and multifunctionality whilst benefiting from natural surveillance. In doing so it should have regard to the wider roles that open space can play in supporting health and wellbeing, sustainable food production, biodiversity, public art, local heritage and climate change mitigation and adaptation. A landscape-led approach should be used to provide a hierarchy of open spaces throughout any development layouts and designs which fail to adopt this approach to on-site open space design will not be supported. Opportunities to connect into existing green infrastructure networks will also be supported in line with Policy XX. Developers must ensure that appropriate maintenance arrangements are agreed with the Council and monitored post completion for any open space provided, having regard to the scale and function of such spaces.

Sites of between and including 10 and 32 dwellings will be required to provide an offsite financial contribution equivalent to the amount of open space that would otherwise be required on-site. This amount will be calculated having regard to both the costs of providing and maintaining off-site multi-functional open space.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC17	0	0	0	0	0	0	0	+	0	0	0	0

- I.6.4.1 DM Policy HC17 seeks to protect existing open spaces and require new developments to provide or make contributions towards open spaces with a variety of opportunities, including recreation, leisure and play facilities for children. This would be expected to encourage outdoor exercise and provide space for reflection. Therefore, a minor positive impact on mental and physical health would be expected (SA Objective 8).
- I.6.4.2 Open spaces can contribute to creating distinctive character in new developments, contribute to biodiversity and help to control surface water runoff in multi-functional spaces. However, the degree to which this policy could contribute to these objectives is uncertain at this stage and would depend on the content of the future SPD.

I.6.5 HC18: Sports Facilities and Playing Pitches

HC18: Sports Facilities and Playing Pitches

There should be no loss of existing playing pitches or sports facilities unless:

- an assessment has been undertaken with Sport England engagement which has clearly demonstrated that the pitches or facilities are surplus to requirement. Or;
- alternative provision is made of at least equivalent quality and accessibility to local residents served by the existing facility, particularly by active travel methods, prior to any loss taking place.

All new major residential development will make a financial contribution towards sports facilities and playing pitches which will be secured through a S106 agreement and informed by the latest Sport Facilities and Playing Pitch Strategies.

The development or improvement of new playing fields and sports facilities will be supported in accordance with the latest Sport Facilities and Playing Pitch Strategies.

The council will prepare an Open Space, Sport and Recreation Supplementary Planning Document.

Development proposals should be consistent with other local plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC18	0	0	0	0	0	0	0	+	0	0	0	0

I.6.5.1 DM Policy HC18 aims to protect existing sports facilities and playing pitches and would be expected to ensure the local facilities are enhanced, which would likely result in improvements to current and future residents' access to these sports services.

I.6.5.2 By encouraging the retention or provision of these community sports facilities to meet local needs, this policy would be expected to facilitate exercise and recreation for local residents and have a minor positive impact in relation to health and wellbeing (SA Objective 8).

I.6.6 HC19: Green Infrastructure

HC19: Green Infrastructure

The Council will support the protection, maintenance and enhancement of a network of interconnected, multi-functional and accessible green and blue spaces.

All development proposals should seek to maximise on-site green infrastructure. Where suitable opportunities exist, taking into account local circumstances and priorities, development must demonstrate it has sought to strengthen and promote connectivity with the existing green infrastructure network by:

- strengthening green linkages between settlements and the wider countryside and major areas of open space such as country parks;
- providing interlinked multifunctional publicly accessible open space within new development schemes including public open spaces, attractive cycle and walkways, street trees, green roofs and walls, pocket parks, allotments, play areas and new wetland habitats;

HC19: Green Infrastructure

- identifying and strengthening potential linkages with green and blue spaces within adjoining developed areas to promote interconnected urban green infrastructure;
- connecting together and enriching biodiversity and wildlife habitats

Development proposals must make adequate provision for the long term management and maintenance of the green infrastructure network.

Development proposals should be consistent with other local planning policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
HC19	+	+	+	+	+	0	0	+	0	0	0	0

- I.6.6.1 Paragraph 20 of the NPPF⁴⁸ states that “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for ... conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”.
- I.6.6.2 Green Infrastructure (GI) contributes considerably towards high quality natural and built environments. GI is a multi-functional feature and has multiple benefits that include helping to mitigate extreme temperatures and flooding; habitat protection and creation; pollution reduction; and providing open land for recreation and breathing space to benefit residents’ physical and mental health.
- I.6.6.3 DM Policy HC19 aims to provide GI opportunities throughout the Plan area which will result in various benefits including increased uptake of CO₂; reduced water runoff rates and therefore both fluvial and surface water flooding; provide and improve connectivity between habitats; provide opportunities to retain and improve the character and appearance of the local landscape and townscape; filtration of pollutants such as those produced by road transport; and have a positive impact on residents’ physical and mental wellbeing by providing increased access to natural habitats. Therefore, a minor positive impact on climate change mitigation and adaptation (SA Objectives 1 and 2), biodiversity (SA Objective 3), local landscape (SA Objective 4), pollution (SA Objective 5) and residents’ health and wellbeing (SA Objective 8) would be expected.

⁴⁸ MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed on 11/08/22]

I.7 Building a strong local economy

I.7.1 EC1: Sustainable economic growth

EC1: Sustainable economic growth

The Council, working in partnership with businesses, Staffordshire County Council, the Staffordshire and Stoke Local Enterprise Partnership and other key stakeholders, will support measures to sustain and develop the local economy of South Staffordshire and encourage opportunities for inward investment and further economic development of the District. Inward investment that accords with the spatial strategy in potential growth sectors such as advanced manufacturing will be supported, along with business growth that supports decarbonisation and the district's journey to net zero.

Through the existing supply of available employment land and allocations in this plan the Council will ensure there is sufficient supply of employment land to meet the needs of the District over the plan period, as well as contributing towards the employment needs of our wider functional economic market area arising from the Black Country authorities.

Live/work units and proposals that support home working that reduce commuting journeys will be supported, subject to complying with other development plan policies.

Employment proposals should be accessible via sustainable travel modes, including clear and legible walking and cycling routes. Employment proposals will only be supported where the necessary on and off-site infrastructure is provided, including the necessary highways mitigation measures.

Where B8 use logistics/warehousing is proposed, the Council will support proposals to deliver adequate overnight HGV parking to deliver economic growth.

Preference will be given to the use of sustainable previously developed land for employment development having regard to factors such as biodiversity and sustainable transport links.

Economic growth will be primarily focused on the District's five strategic employment sites:

- Four Ashes;
- Hilton Cross, I54 South Staffordshire;
- ROF Featherstone; and
- West Midlands Interchange

There will be strong in-principle support for employment development within the development boundaries of these sites that is in line with their allocation and/or substantive planning permission and that result in significant job creation. Development at the strategic employment sites should be of high quality and facilitate the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network.

There is also support for employment development within existing employment areas - as defined on the policies map - and within the Tier 1 and Tier 2 villages identified within the settlement hierarchy subject to other policy requirements including ensuring proposals do not have an unacceptable impact on local amenity.

Elsewhere in the district diversification of the rural economy will be supported in line with Policy EC4, particularly where proposals would contribute towards climate change mitigation and other environmental benefits where compatible with other planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC1	+	+	+/-	+/-	+/-	+	0	+	+/-	+	0	++

- I.7.1.1 DM Policy EC1 aims to meet the identified requirements for employment land within South Staffordshire over the Plan period. This would be expected to have a major positive impact on the local economy (SA Objective 12). The policy supports the delivery of employment at the existing employment sites as well as the West Midlands Interchange. The latter is classed as a nationally significant infrastructure project and has been granted development consent through a Development Control Order. Development of employment sites in Tier 1 and Tier 2 villages is also supported, subject to other Local Plan policies.
- I.7.1.2 The sustainability assessment of this range of employment sites and projects could identify a range of sustainability impacts in regard to SA Objectives 3, 4, 5 and 9, and therefore, for the purposes of this policy assessment the overall impact on the objectives is uncertain.
- I.7.1.3 The policy states that “*support measures to provide necessary infrastructure*” will be prioritised, which may allow for current and future residents to be able to better access employment opportunities, and therefore, a minor positive impact on accessibility (SA Objective 10) would be expected.
- I.7.1.4 By giving preference to the “*use of previously developed land except where this would result in significant biodiversity loss*”, the policy could potentially help to prevent the loss of local soils and promote the use of existing buildings, resulting in an efficient use of land. Therefore, this policy is likely to have a minor positive impact on natural resources (SA Objective 6) within the Plan area where previously developed land is used.
- I.7.1.5 DM Policy EC1 also aims to “*promote the provision of active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the Green Infrastructure Network*” which could result in various benefits. Active travel to and from a place of employment will promote a healthy lifestyle, and the use of greenspaces is likely to improve the physical and mental health of employees; therefore, a minor positive impact on health (SA Objective 8) can be expected. The use of GI in the employment areas could contribute to pollution reduction and help to mitigate local flooding and therefore is likely to have a minor positive impact on climate change mitigation and adaptation (SA Objectives 1 and 2).

I.7.2 EC2: Retention of employment sites

EC2: Retention of employment sites

Development that would result in the loss of an existing designated employment area (as defined on the policies maps) in whole or part; or a site/premises which is currently, or was last, used for industrial or commercial purposes (classes E(g), B2, B8 or related sui generis) will not be permitted unless it can be demonstrated that:

- a) The retention of the site or premises for use classes E(g), B2 or B8 use has been fully explored without success. Proposed development that would see the loss of sites or premises should be subject to a period of marketing, with detailed evidence of the marketing undertaken submitted with the planning application. The length and extent of the marketing should be proportionate to the sites or premises importance to the local economy and should typically be for a minimum 12 month period on terms that reflect the lawful use and condition of the premises. or
- b) The redevelopment would result in significant economic benefits to the area, for example by facilitating the relocation of a business to a more appropriate site in the District.

Proposals for alternative uses must not prejudice the continued operation and viability of existing or allocated employment areas and any other neighbouring uses.

If an existing employment use in a designated employment area is considered to be unviable and the applicant is seeking a change of use to an alternative employment use class, then a period of marketing must be evidenced with the planning application.

There is a strong presumption that the strategic employment sites at i54 South Staffordshire; Hilton Cross, ROF Featherstone, Four Ashes and West Midlands Interchange are retained for employment use and used for employment purposes that accord with their allocation and/or substantive planning permissions and their strategic planning and economic objectives.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC2	0	0	0	0	0	0	0	0	0	0	0	++

- I.7.2.1 DM Policy EC2 seeks to protect existing employment sites from loss which would serve to protect the identified land needed for employment in the Plan area. The policy would set out those circumstances where redevelopment may be permitted. The policy is therefore likely to have a major positive impact on the local economy and employment (SA Objective 12).

I.7.3 EC3: Employment and Skills

EC3: Employment and Skills

An Employment and Skills Plan (ESP) will be required for developments of 100 or more residential units or 5000sqm of commercial floorspace. The ESP should outline exactly what the development will provide in terms of employment and training opportunities to local residents. This will be secured by a legal agreement or planning condition.

The Plan must clearly outline how the developer will deliver the ESP in cooperation with the local authority. This will include reference to specific and measurable outputs, key delivery partners and details on the timeframe within which each output will be delivered.

Development proposals should be consistent with other local plan policies

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC3	+	0	0	0	0	0	0	0	0	+	0	+

- I.7.3.1 DM Policy EC3 sets out the requirement for large residential and commercial developments to submit an Employment and Skills Plan (ESP) which would encourage engagement of local people within employment and training. This could lead to the addressing of skills gaps and help to bring new talent into local businesses, therefore the policy could consequently have a minor positive impact on the economy and employment within the Plan area (SA Objective 12). The policy seeks to encourage more local employment opportunities and encourage more sustainable commuting patterns, potentially having a minor positive effect on climate change mitigation (SA Objective 1) and transport and accessibility (SA Objective 10).

I.7.4 EC4: Rural Economy

EC4: Rural Economy

1. Rural employment within villages

To support sustainable economic growth in rural areas proposals that create new employment generating uses or support the sustainable growth and expansion of existing businesses within village development boundaries as defined in this plan will be supported in principle where the scale of development would be in-keeping with the tier and scale of the village and be in character and scale with the location.

2. Rural employment outside development boundaries

Rural employment proposals for employment development in locations outside development boundaries will only be supported where all of the following criteria are satisfied:

- 2a) it is small in scale;
- 2b) it comprises the conversion and reuse of rural buildings;
- 2c) the development is not capable of being located within the development boundaries of a village, by reason of the operation of the absence of suitable sites;

EC4: Rural Economy

2e) the development is accessible by a choice of means of transport including walking, cycling and public transport;

2f) the local highway network is capable of accommodating the traffic generated by the proposed development.

3. Conversion and re-use of rural agricultural buildings

The sustainable re-use of rural agricultural buildings will be supported with the preference for re-use for rural employment uses. Proposals for non-employment generating uses will only be supported where it can be demonstrated through marketing at a realistic price for at least 12 months, and on terms reflecting the condition of the premises, that an appropriate employment use is not viable. The loss of employment uses in rural areas will need to confirm to Policy EC2.

Proposals for the conversion and re-use of rural agricultural buildings must meet all of the following criteria:

3a) demonstrate that the building is structurally sound and in a condition capable of conversion without demolition and rebuilding, or substantial reconstruction;

3b) Demonstrate that the building is no longer needed for the overall agricultural activity of the farm holding

3c) is capable of conversion without detrimental alterations affecting its character, appearance, significance, general setting and immediate surroundings.

4. Farm Diversification

Farm diversification such as those that support the engagement of communities with land management, rural crafts and the development of local produce markets will be supported in principle provided that all of the following criteria are met:

a) the development will not cause significant or unacceptable harm to the character and appearance of the landscape and avoids the loss of large areas of higher quality agricultural land;

b) there is no adverse impact upon amenity or the historic environment and proposals contribute positively to the maintenance of biodiversity, climate change and food security;

c) the proposal should make use of existing buildings wherever possible. Where new or replacement buildings are required they should be closely related to the existing group and their siting, form, scale, design and external materials should be in harmony with existing traditional buildings;

d) the proposal forms part of a comprehensive diversification scheme and is operated as a subsidiary to a sustainable farming business or appropriate land-based enterprise and will contribute to making the existing business viable;

e) the approach roads and access to the site have the capacity to cater for the type and levels of traffic likely to be generated by the development;

f) the proposal will benefit the local rural economy; and

g) proposals which generate high levels of traffic or increased public use will only be permitted where they can be easily accessed by public transport, foot and cycle modes

Development proposals should be consistent with other local plan policies

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC4	0	0	+	+	0	+	0	0	0	0	0	+

I.7.4.1 South Staffordshire is a rural district, and this policy will support rural diversification and set out the circumstances where such development will be supported. Overall, DM Policy EC4 would be expected to have a minor positive impact on the local economy (SA Objective 12) by encouraging the provision of rural employment opportunities.

I.7.4.2 Additionally, by primarily restricting development of rural employment to using existing buildings, a minor positive impact on local natural resources (SA Objective 6) could be achieved, as valuable local soils are less likely to be lost through the development. The policy has the potential to protect landscape character and biodiversity and a minor positive impact on these objectives would be expected (SA Objectives 3 and 4).

I.7.5 EC5: Tourism

EC5: Tourism

Proposals for tourist accommodation within development boundaries will be supported subject to compliance with other policies within this plan. Proposals should be proportionate relative to the size of the settlement.

Proposals for small scale or expansion of tourist accommodation and facilities outside of development boundaries, will be permitted provided that all the following criteria are met:

- The demand for the development has been clearly demonstrated;
- Proposals are connected to and associated with existing facilities or located at a site that; relates well to defined settlements in the area and are accessible to adequate public transport, cycling and walking links;
- They would not materially adversely affect the character, appearance and amenity of the surrounding area, any heritage assets and their setting and include appropriate mitigation where necessary to ensure this;
- Appropriate, convenient and safe vehicular access can be gained to/from the public highway and appropriate parking is provided;
- They would not use the best and most versatile agricultural land;
- They will be served by adequate water, sewerage and waste storage and disposal systems; and
- They will include a high-quality landscaping scheme.

In addition, tourist accommodation proposals will be required to include a business plan that will demonstrate the long-term viability of the scheme.

Proposals for large scale standalone tourist accommodation outside of development boundaries will not normally be supported.

The occupation of new tourist accommodation will be restricted via condition or legal agreement to ensure a tourist use solely and not permanent residential occupation.

EC5: Tourism

The change of use from tourist accommodation to residential will not normally be permitted unless it is demonstrated that its continued use as tourist accommodation is no longer viable.

Development proposals should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC5	0	0	0	+	0	0	0	+	0	+	0	+

- I.7.5.1 Policy EC5 would be likely to enhance the tourism potential of South Staffordshire and could help to result in an increase in the number of visitors to the Plan area. Increased tourism would be expected to have benefits in relation to the local economy, providing employment opportunities and improving local infrastructure. This would be likely to have a minor positive impact on the economy (SA Objective 12). An increase in employment opportunities and a strong local economy would also be likely to have a minor positive impact on the wellbeing of local residents (SA Objective 8).
- I.7.5.2 The policy sets out requirements for proposed developments to be connected to existing facilities which are accessible to public transport, cycling and walking networks. Policy EC5 also requires that *“appropriate, convenient and safe vehicular access can be gained to/from the public highway and appropriate parking is provided”*. The policy would be likely to enhance transport and accessibility (SA Objective 10), having a minor positive impact in and around areas developed for tourism in South Staffordshire.
- I.7.5.3 Policy EC5 states that proposals for small scale or expansion of tourist accommodation and facilities outside of development boundaries *“will include a high-quality landscaping scheme”*. As such, this policy could potentially have minor positive impacts on landscape and townscape (SA Objective 4).

I.7.6 EC6: Rural workers dwellings

EC6: Rural workers dwellings

1) Proposals for new rural workers dwellings

New isolated dwellings in the countryside intended for occupation by rural workers will not be permitted unless it can be shown that there is an essential need for a rural worker to live permanently at or near their place of work within the countryside. If a new dwelling is essential to support a new farming activity, whether on a newly-created agricultural unit or an established one, it should be a temporary dwelling for the first three years. New rural workers dwellings will only be supported where all of the following criteria are met:

- There is a clearly established existing functional need;
- The need relates to a full-time worker, or one who is primarily employed in rural employment and does not relate to a part-time requirement;
- The unit and the rural employment activity concerned have been established for at least three years, have been financially sound for at least one of them, are currently financially sound, and have a clear prospect of remaining so;
- The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable for occupation by the workers concerned or by converting existing redundant buildings on site; and
- Other planning requirements, e.g. in relation to access, or the impact on the countryside are satisfied.

An assessment setting out the need for the dwelling should be submitted with any application which will be verified by an independent expert.

2) Removal of Conditions

Where agricultural or forestry dwellings are permitted, appropriate conditions will be used to retain the dwelling for rural worker occupation. Applications to remove these conditions will not be permitted unless:

- the dwelling is no longer needed on that unit for the purposes of agriculture or forestry;
- there is no current demand for dwellings for rural workers in the locality; and
- the dwelling cannot be sold or let at a price which reflects its occupancy condition within a reasonable period.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC6	0	0	0	+	0	0	+	0	0	0	0	+

I.7.6.1 Paragraph 79 of the NPPF⁴⁹ states that “*planning policies and decisions should avoid the development of isolated homes in the countryside unless ... there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside*”. Applicants would need to prove the need for permanent or temporary dwellings and be able to satisfy the criteria set out within the policy.

⁴⁹ MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed on 11/08/22]

- I.7.6.2 DM Policy EC6 relates to housing agricultural workers and equine developments and highlights the requirement for essential need to be demonstrated in relation to rural workers' dwellings in order for them to be permitted in the countryside.
- I.7.6.3 This policy would be anticipated to help ensure that the rural workers in question live near the worked land, are able to live in a location that permits access into their place of work, and thereby support the rural economy at an appropriate level. Additionally, responsible equine development could ensure further local economic support. Therefore, this policy would be expected to have a minor positive impact on housing provision and the economy (SA Objectives 7 and 12). The policy would serve to restrict development outside that required for these purposes, and therefore, could serve to protect landscape character (SA Objective 4).

I.7.7 EC7: Equine related development

EC7: Equine related development

Horse related facilities and equine enterprises in the Green Belt and Open Countryside will be supported provided that:

- new buildings in association with equine development such as stables and field shelters are sited within close proximity to any existing rural buildings or settlement pattern to reduce the impact on the local landscape;
- the scale, design and external materials are of a traditional rural nature which respects and enhances the rural character of the local area;
- the number of stables should be proportionate to the reasonable equestrian leisure needs of the applicant balanced against the need to protect the countryside and character of the landscape whilst according with The British Horse Standards;
- the proposal does not have an adverse impact on the natural environment and the integrity of designated protected sites;
- any associated developments such as maneges are sympathetic to the character of the area;
- the proposal is located close to the bridleway network and is located so as to reduce conflict between road users due to the transportation of horses, deliveries and horses using narrow lanes.

Proposals for larger scale equine enterprises will be considered on whether they will be beneficial to the local rural economy through a business case demonstrating sound financial planning and should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC7	0	0	0	0	0	0	0	+	0	0	0	+

- I.7.7.1 This policy would support the development of equine related development within the Plan area. This policy could potentially have benefits by providing increased opportunities for leisure and recreation, the rural economy and employment. Therefore, this policy could potentially result in a minor positive impact in regard to health and wellbeing (SA Objective 8) and economy and development (SA Objective 12).

I.8 Community services, facilities and infrastructure

I.8.1 EC8: Retail

EC8: Retail

Proposals will maintain and enhance the vitality and viability of South Staffordshire's network of Centres in line with national policy, taking into account any local regeneration strategies where appropriate as well as the requirements of this policy and other settlement specific policies/guidance. This includes proposals being accessible by a choice of means of transport including walking, cycling and public transport.

The council will seek to support and deliver public realm enhancement schemes, parking provision, highways measures and sustainable transport infrastructure as defined in the Infrastructure Delivery Plan.

Proposals should be appropriate in scale and type to the role of centres, respect their (historic) character, environment, and local distinctiveness. Proposed uses will make a demonstrable positive contribution to the overall role and functionality of the centre by maintaining/enhancing the centre's retail, cultural and/or community offer.

Proposals should be of a high-quality design and accord with the design policies of this plan alongside any design SPDs and the NPPF.

Development proposals must accord with all other relevant plan policies.

Designated Centres

The Council will designate, protect, and where possible enhance, a network of centres consisting of Large Village Centres, Village Centres, and Neighbourhood Centres. The Retail Centres Hierarchy, or network of centres for South Staffordshire is set out below. The boundary of each designated centre has been produced within the Local Plan Policies Map. These boundaries will be kept under review.

	Centre	Location
Large Village Centres	Codsall	The Square, Station Road
	Penkridge	Market Street
	Wombourne	High Street
Village Centres	Brewood	Market Place
	Codsall	Birches Bridge
	Coven	Brewood Road
	Cheslyn Hay	High Street
	Great Wyrley	Quinton Court
	Kinver	High Street
	Pattingham	The Square
	Perton	Anders Square
Neighbourhood Centres	Bilbrook	Duck Lane, Bilbrook Road, Lane Green Road
	Cheslyn Hay	Glenthorne Drive
	Essington	Hill Street
	Featherstone	The Avenue
	Great Wyrley	Tower View Road
	Great Wyrley	Walsall Road North
	Great Wyrley	Walsall Road South
	Huntington	Stafford Road
	Kinver	Potters Cross
	Penkridge	Boscomoor Shopping Centre
	Shareshill	Church Road
	Swindon	High Street
	Wheaton Aston	High Street
	Wombourne	Bull Lane
	Wombourne – Blakeley	Common Road, Giggetty Lane

EC8: Retail

	Wombourne	Planks Lane
--	-----------	-------------

There is a presumption in favour of accommodating E class uses and other Main Town Centre uses within the Large Village Centres. Such uses will be supported as complementary offers in Village Centres where their function is to primarily to serve the village and in Neighbourhood Centres where their function is to primarily serve the day-to-day needs of immediate local residents.

A small quantity of retail provision is to be delivered on each of the SUEs as described in policies SA1, SA2, SA3, and SA4 to support the existing Retail Centres Hierarchy. Each of which will be reviewed for inclusion on the Retail Centres Hierarchy as part of the next Local Plan review process.

Other Town Centre Uses

Proposals that reduce the concentration of E-class uses within a centre will not be supported, unless it is demonstrable that it supports wider significant regeneration of the centre and does not impose undue dominance of non-Main Town Centre uses. Consideration will be had to the number, proximity and continuance of other non-E class uses, and the compatibility of the proposal with nearby uses.

Proposals for other uses, including residential, will be assessed on a case-by-case basis, subject to the creation/preservation of a satisfactory residential environment and ensuring the functionality of the centre is not undermined.

Residential uses will not be permitted at ground floor level (except for the provision of access arrangements). Changes to residential use on the first floor or above will be supported as long as they do not compromise the ability of the ground floor unit to operate either as existing or by making future retail accommodation impractical. For example, consideration will be given to loss of storage space, preparation areas and delivery areas.

Proposals for hot food takeaways are expected to:

- not result in significant harm to the amenity of nearby residents or highways safety.
- not result in harmful cumulative impacts due to the location of existing or consented proposed outlets.

Out-of-Centre Proposals

The council will not permit proposals in edge-of, or out-of-centre locations for retail and other Main Town Centre uses unless they satisfy the sequential test and impact assessment. This includes proposals for the expansion of existing uses and applications to vary existing conditions.

A sequential test will be required for new Main Town Centre uses outside of a designated centre in line with national policy and guidance.

#. An impact assessment will be required for all retail uses that exceed the following **net** floorspace thresholds both in, edge-of, and out-of-centre:

Convenience floorspace – 500m².

Comparison floorspace – 300m².

The impact assessment must be prepared in line with national policy and guidance.

Catchment areas for both sequential tests and impact assessments will be considered on a case by case basis to reflect the application/site specific circumstances under consideration.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC8	+	0	0	0	0	0	0	0	0	+	0	+

I.8.1.1 DM Policy EC8 seeks to protect the vitality of existing village centres. The policy sets out the hierarchy of centres within South Staffordshire including Large Village Centres, Village Centres and Neighbourhood Centres.

I.8.1.2 This policy aims to support and strengthen the identified hierarchy of centres which would be expected to provide benefits within the community such as residential access to local services and facilities, in addition to strengthening the local economy by protecting retail opportunities. The policy supports residential development in town centres where it ensures that *“the functionality of the centre is not undermined”*. Therefore, this policy would be expected to have a minor positive impact on the local economy (SA Objective 12) and a minor positive impact on residents’ access to local services (SA Objective 10). The policy seeks to protect existing facilities and services to reduce the need to travel, potentially having a minor positive effect on climate change mitigation (SA Objective 1).

I.8.2 EC9: Protecting community services and facilities

EC9: Protecting community services and facilities

The Council will support the development and retention of local services and community facilities to meet local needs and to promote social wellbeing, interests, interaction, and healthy inclusive communities. Development proposals that would result in the loss of uses, buildings or land for community services and facilities will only be supported where it can be clearly shown that:

- a) Appropriate alternative existing provision will remain of at least equivalent quality and accessibility to local residents served by the existing facility, particularly by active travel methods, and;
- b) The use is no longer viable and is incapable of being made viable or adapted to retain a viable service or facility including as a community run enterprise. A marketing exercise for a minimum of 12 months at a realistic price will be required to demonstrate that the use or premises is unviable. This includes marketing the premises for an alternative community service and facility uses.

Development for the relocation of community services and facilities will only be permitted where alternative provision is made of at least equivalent quality and accessibility to local residents served by the existing facility, particularly by active travel methods, prior to the loss of the existing facility.

Development proposals should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC9	+	0	0	0	0	0	0	+	0	+	0	+

I.8.2.1 DM Policy EC9 sets out to support the provision and enhancement of essential communities and facilities within the Plan area, including small local shops and pubs, and aims to retain existing services.

I.8.2.2 This policy is expected to have a minor positive impact on the local economy and the wellbeing of local residents (SA Objectives 8 and 12), by retaining access to services close to where people live. The policy also seeks to protect existing facilities and services to reduce

the need to travel, potentially having a minor positive effect on climate change mitigation (SA Objective 1).

I.8.3 EC10: Wolverhampton Halfpenny Green Business Airport

EC10: Wolverhampton Halfpenny Green Business Airport

The Council supports the role of Wolverhampton Halfpenny Green Airport as a General Aviation airport.

Development proposals, including the replacement of existing outdated buildings and high quality infill development directly related to the General Aviation role of the airport and situated within the developed area of the site (as defined on the policies map) will be supported. New development unrelated to this role will not be supported.

The Council will support the continued occupation of the site by existing non-aviation businesses that play an important role in ensuring the viability of the airport.

The Council will resist development proposals that would have a detrimental impact on the environment and the amenity of nearby residents including the physical expansion of the site, extensions to runways and the operation of commercial passenger and freight services. Development proposals relating to the existing uses required for safe and efficient operation of the airport will be supported.

Development proposals should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC10	0	0	0	0	0	0	0	0	0	0	0	+

I.8.3.1 DM Policy EC10 supports development proposals for Wolverhampton Halfpenny Green Business Airport, if they remain within the developed area of the site. Wolverhampton Airport services light aircraft and supports business and recreational flying. The policy is likely to have a minor positive impact on the local economy and employment (SA Objective 12) within the Plan area, by maintaining the role of the airport. There are no plans to support further expansion of the airport or to allow jet engine aircraft use. The policy is likely to have a negligible effect on climate change mitigation (SA Objective 1) and other SA Objectives.

I.8.4 EC11: Infrastructure

EC11: Infrastructure

Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms.

The Council will work with infrastructure providers, agencies, organisations and funding bodies to enable, support and co-ordinate the delivery of infrastructure to support the delivery of the growth identified within this Plan.

Developers and landowners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.

New development will be required to deliver or contribute towards the timely provision of essential supporting infrastructure either directly as part of the development, or through an appropriate financial contribution.

The infrastructure requirements for the strategic sites allocated within this Plan will be set out via their corresponding policies, master planning process and IDP.

Development proposals should be consistent with other local plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC11	0	0	+	0	0	0	0	+	0	+	+	0

I.8.4.1 DM Policy EC11 seeks to ensure the Plan provides appropriate and proportionate infrastructure to deliver the proposed development. South Staffordshire's Infrastructure Delivery Plan⁵⁰ defines infrastructure as:

"Infrastructure is a broad term to define all the requirements that are needed to make places function efficiently and effectively. Infrastructure can range from large physical infrastructure such as roads and utilities; social infrastructure like health, educational and cultural programs, projects, networks and facilities; through to Green Infrastructure such as open spaces and allotments".

I.8.4.2 This policy would be likely to help ensure that there are adequate services for all new development in the area and could potentially improve the type and range of services available to current and future residents.

I.8.4.3 The policy will likely have a minor positive impact on biodiversity, residents' health and wellbeing, transport and accessibility to local amenities and on education (SA Objectives 3,

⁵⁰ South Staffordshire Council (2019) Infrastructure Delivery Plan. Available at: <https://www.sstaffs.gov.uk/doc/181109/name/Infrastructure%20Delivery%20Plan%202019.pdf/> [Accessed on 22/07/22]

8, 10 and 11), supporting policies for infrastructure requirements set out within the South Staffordshire Infrastructure Delivery Plan⁵¹.

I.8.5 EC12: Sustainable transport

EC12: Sustainable transport

South Staffordshire District Council will work proactively with partners to promote sustainable transport measures and deliver high quality transport infrastructure and links across the District. This includes opportunities to improve bus and rail services and connections including making provision from increased demand from new development within the District.

The Local authority will work with the County Council to prepare a Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking and cycling improvements throughout the District.

Developers of major developments or where a proposal is likely to have significant transport implications will be required to demonstrate they have maximised opportunities for sustainable travel and will make adequate provision to mitigate the likely impacts through provision of a Transport Assessment and Travel Plan. All other developments will be required to submit a Transport Statement where appropriate.

All new developments will:

- a) be designed to maximise opportunities for walking, cycling and the use of public transport, ensure the safe movement of vehicles and minimise the impact of parked and moving vehicles on residents, business and the environment. Developments should adhere to the standards set out within LTN 120 or subsequent additions.
- b) be required to demonstrate safe access and an acceptable degree of impact on the local highway network.
- c) provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey. Travel routes should link into existing travel networks beyond the development site where possible. The long-term management of the public realm including transport infrastructure must be ensured.
- d) protect existing rights of way, cycling and equestrian routes (including both designated and non-designated routes and, where there is evidence of regular public usage, informal provision). If it is demonstrated that the loss of such as route is unavoidable, the development should provide suitable, more appealing or at least equal replacement routes.
- e) be required to demonstrate they will make adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions.

Development proposals should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC12	+	0	0	0	+	0	0	+	0	++	+	+

⁵¹ ibid

- I.8.5.1 DM Policy EC12 seeks to promote sustainable transport throughout the Plan area through a wide range of measures including strengthening bus and rail services and their connections, encouraging walking and cycling, the park and ride initiative at Cross Green and improving availability of electric vehicle charging points. Through these measures, this policy would be expected to increase opportunities for residents to make sustainable transport choices. This would be expected to result in a major positive impact on transport and accessibility (SA Objective 10).
- I.8.5.2 By supporting the improvement of transport and accessibility across the Plan area, this policy would be expected to improve residents' access to services and facilities, including healthcare, leisure and schools. In addition, this policy aims to *"maximise opportunities for walking, cycling and use of public transport"* and *"encourage short distance trips"* to nearby centres through active travel. Overall, this policy would be likely to have positive impacts on human health and education (SA Objectives 8 and 11).
- I.8.5.3 The transport schemes set out within the policy would be likely to have a positive impact on the economic prosperity of the Plan area and will likely ensure that there will be a variety of sustainable transport choices. The policy seeks to improve sustainable transport and may lead to an improvement in access to employment opportunities, therefore, the policy would be likely to have a minor positive impact on the local economy (SA Objective 12).
- I.8.5.4 By encouraging sustainable transport options and protecting public rights of way, cycling and equestrian routes, this policy would be likely to have a minor positive impact on climate change and pollution (SA Objectives 1 and 5).

I.8.6 EC13: Broadband

EC13: Broadband

New developments in South Staffordshire District must provide gigabit-capable connectivity through the developer installing full fibre connectivity. If this is not achievable, it must be demonstrated as such through a connectivity statement, in which case the next best alternative technology should be applied. As a minimum the developer should be required to provide appropriate ducting within the highway to facilitate a provider delivering a service at a later date.

Support will be given to proposals which involve community groups or organisations seeking to improve broadband infrastructure within their area.

Development proposals should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
EC13	+	0	0	0	0	0	0	0	0	+	+	+

- I.8.6.1 Policy EC13 supports the provision of broadband connectivity and networks as part of new development proposals, in order to meet the needs of current and future populations.
- I.8.6.2 With improvements to broadband and communications in the area under this policy, residents would be likely to have greater access to essential services from home. This would provide increased opportunities for education and working from home, resulting in improved access to a wider range of employment opportunities. Therefore, the policy has potential to result in a minor positive impact on education and the economy within the local community (SA Objectives 11 and 12).
- I.8.6.3 In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on private car use such as for commuting to workplaces, and in turn, reduce local congestion. This could potentially lead to a minor positive impact on climate change, due to reduced emissions associated with less traffic, and transport (SA Objectives 1 and 10).

I.9 Protecting and enhancing the natural environment

I.9.1 NB1: Protecting, enhancing and expanding natural assets

NB1: Protecting, enhancing and expanding natural assets

Support will be given for proposals which protect and enhance the quality of the natural environment. The restoration, enhancement and creation of habitats and linkages will be supported, particularly where these contribute to the Nature Recovery Network and priorities identified in the UK Biodiversity Action Plan and the Staffordshire Biodiversity Action Plan.

When determining planning applications, the council will apply the principles relevant to habitats and species protection as set out in national legislation and policy. Development proposals which are likely to affect any designated site or habitat, species or geological feature must be supported by adequate information to ensure that the impact of the proposal can be fully assessed.

Internationally Designated Sites (SACs, SPAs and Ramsar)

Where a proposed development is likely to have an adverse impact on a European designated site (whether individually or in combination with other plans or proposals) permissions will not be granted unless there is due compliance with the requirements of the Habitats and Species Regulations (2017) (as amended). Where adverse impacts are identified measures must be put in place to avoid or, if this is not possible, mitigate these impacts. Adverse impacts that cannot be avoided or adequately mitigated will not be permitted except where there are imperative reasons of overriding public interest.

Nationally Designated Sites (SSSI and NNR)

Development proposals which directly or indirectly cause harm to sites of national importance (whether individually or in combination with other developments) will not be permitted. The only exception is where satisfactory mitigation or compensation is provided and the benefits of the proposed development clearly outweigh both the likely impacts on the features of the site that make it of national importance and any impacts on the wider national network of sites.

Locally Designated Sites (SBIs, RIGS, LNRs)

Local sites will be safeguarded from development through the use of the mitigation hierarchy with avoidance as the preferred approach. Where impact is unavoidable, developers must provide mitigation or, as a last resort, compensation in the form of replacement habitat in a suitable location to ensure there is a net gain of biodiversity and that the coherence of any local ecological network is maintained.

The loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees will not be acceptable unless there are wholly exceptional reasons and a suitable compensation strategy is agreed. Areas of very high or high habitat distinctiveness identified in the District's Nature Recovery Network Mapping (or subsequent survey work) should be avoided in the first instance.

Valued soils will be protected and enhanced, including the best and most versatile agricultural land, and development should not contribute to unacceptable levels of soil pollution.

Where there is a confirmed presence or reasonable likelihood of protected species or priority species being present on or immediately adjacent to a development site, the developer will be required to undertake an ecological survey prior to determination and will be required to demonstrate that an adequate mitigation plan is provided and where necessary suitable licenses secured to ensure no harm to protected species and no net loss of priority species.

Development proposals should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB1	+	+	++	+	+	+	0	+	0	0	0	0

- I.9.1.1 This policy would be expected to support proposals which enhance designated biodiversity sites, determining those that could have an adverse impact on European or nationally designated sites, in accordance with relevant statutory and national policy.
- I.9.1.2 It is expected that this policy will allow the protection and enhancement of locally designated habitats and areas of high habitat distinctiveness, as well as promote habitat connectivity. Habitat connectivity improves the ability of species to adapt to climate change through movement in response to, potentially, changing environmental conditions. Therefore, it is anticipated that this policy would have a major positive impact on biodiversity within the Plan area (SA Objective 3).
- I.9.1.3 Nationally and locally designated biodiversity assets relevant to South Staffordshire include Motte Meadows SAC, Fenn Pools SAC and Cannock Chase SAC (located adjacent to the district border) in addition to various SSSIs and LWSs. Non-designated biodiversity assets, such as hedgerows, arable field boundaries and mature trees, are common key features of local landscapes within South Staffordshire. By protecting and possibly enhancing biodiversity assets, it would be likely that some key landscape features would also be protected and enhanced. Therefore, this policy would be expected to have a minor positive impact on the local landscape (SA Objective 4).
- I.9.1.4 Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants and the protection of ecologically valuable soil resources from erosion. The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance these essential ecosystem services within the Plan area. DM Policy NB1 could potentially result in a minor positive impact on climate change mitigation and adaptation, pollution and natural resources (SA Objectives 1, 2, 5 and 6).
- I.9.1.5 The protection of local biodiversity assets could also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats is recognised as having benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. This policy would therefore be likely to have a minor positive impact on human health (SA Objective 8).

I.9.2 NB2: Biodiversity

NB2: Biodiversity

All new developments must consider biodiversity as part of any proposal. Opportunities should be taken to achieve positive gain through the form and design of development. Measures may include creating, enhancing and managing wildlife habitats and networks, and natural landscape. The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation. Features including green walls, roofs, bat and bird boxes will be supported on new developments where appropriate.

Previously developed land (brownfield sites) will not be considered to be vacant of biodiversity. The reuse of such sites must be undertaken carefully with regard to existing features of biodiversity interest. Development proposals on such sites will be expected to include measures that maintain and enhance important features and appropriately incorporate them within any development of the site.

Biodiversity net-gain

All new development will provide a minimum of 10% biodiversity net gain as part of the development. Proposals must:

- Deliver the biodiversity net-gain on-site wherever possible, in a manner consistent with national requirements, ensuring that existing habitats on site are maintained and enhanced as a priority. Where it is demonstrated that this cannot be achieved on site, the required level of off-site biodiversity net-gain must be provided. As a last resort, statutory biodiversity credits may be acceptable;
- Be measured against the latest Natural England Biodiversity Metric; and
- Secure the habitat in perpetuity. Where it is demonstrated that this is not possible, the habitat must be secured for at least 30 years. This will be achieved via a S106 agreement or planning conditions.

Where new habitats are created, the Council will seek opportunities for habitat creation that mitigates the effect of climate change on species, enhances links between habitats and facilitates species migration.

Development proposals should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB2	+	0	+	0	0	0	0	0	0	0	0	0

I.9.2.1 DM Policy NB2 seeks to ensure that all new development provides a “*minimum of 10% biodiversity net gain as part of the development*” calculated using the Defra metric and sets out requirements to achieve this.

I.9.2.2 This policy is likely to have a positive impact on local biodiversity as development which could potentially result in the loss of local biodiversity and geodiversity would be prevented where appropriate, and biodiversity net gain will be required for all new developments, with a 10% increase in biodiversity net gain required for all new development. Therefore, a minor positive impact on local biodiversity and geodiversity would be expected (SA Objective 3).

I.9.2.3 The policy sets out that opportunities for the creation of habitat that “*mitigates the effect of climate change on species*” will be sought, which could increase the capture of greenhouse gases within the Plan area and have a minor positive impact on climate change mitigation (SA Objective 1).

I.9.3 NB3: Cannock Chase SAC

NB3: Cannock Chase SAC

Development will only be permitted where it can be demonstrated that the proposal, either directly or in combination with other plans or projects, will not be likely to lead to an adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC).

In addition to any other likely significant effects identified all development that leads to a net increase in dwellings within the Zone of Influence around Cannock Chase SAC has the potential to have an adverse impact upon Cannock Chase SAC and must mitigate for such effects. Mitigation can be secured through developer contributions as outlined in the Guidance to Mitigation Note.

The effective avoidance of and/or mitigation for any identified adverse effects on the Cannock Chase SAC must be demonstrated to the Council as the Competent Authority and Natural England and secured prior to the Council giving approval for development. This policy has jurisdiction over developments within South Staffordshire only; however it will be implemented jointly with neighbouring authorities via the application of complementary policies in partner Local Plans.

Development proposals should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB3	0	0	+	0	+	0	0	+	0	0	0	0

- I.9.3.1 DM Policy NB3 supports development proposals which are “*not likely to lead to an adverse effect upon the integrity of the Cannock Chase SAC*”, where demonstrated.
- I.9.3.2 Cannock Chase SAC is a European site designated for its biodiversity interest. This policy seeks to protect the SAC from the potentially adverse effects of all development, such as increases in recreational disturbance and changes in air quality. Therefore, this policy is likely to have a minor positive impact on the biodiversity of the SAC, by considering these development related threats and pressures and ensuring they are mitigated effectively (SA Objective 3).
- I.9.3.3 The policy includes the “*avoidance of and/or mitigation for any identified adverse impacts effects*” on the SAC which could have a minor positive impact on pollution and health through the potential reduction of air pollutants (SA Objectives 5 and 8).

I.9.4 NB4: Landscape Character

NB4: Landscape Character

The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced. Throughout the District, the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, and not have a detrimental effect on the immediate environment and on any important medium and long-distance views. Proposals must consider the County Council Landscape Character Assessment and Historic Landscape Characterisation in assessing their impacts upon landscape character and should also (where applicable) have regard to the findings of the latest Landscape Sensitivity Study prepared by the Council.

All trees, woodland, and hedgerows should be protected and retained. Where any loss of these assets is demonstrably necessary or would facilitate increased biodiversity appropriate mitigation must be delivered by the applicant and appropriate maintenance arrangements established. New and replacement planting should seek to maximise biodiversity in a manner that complements the habitats within and character of the surrounding area.

Proposals within the Historic Landscape Areas (HLA) defined on the Policies Map should have special regard to the desirability of conserving and enhancing the historic landscape character, important landscape features and the setting of the HLA.

All proposals within the Cannock Chase Area of Outstanding Natural Beauty (AONB) and its setting must conserve and enhance the landscape and scenic beauty of the area. In assessing proposals within the AONB or its setting regard must be had to the Cannock Chase AONB Design Guide 2020 and Cannock Chase AONB Views and Setting Guide 2020, or subsequent updates of these documents. Proposals that contribute to the objectives of the Cannock Chase AONB Management Plan, the Forest of Mercia and other local initiatives that will contribute to enhancing landscape character will be supported.

Development proposals should be consistent with other local planning policies.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB4	0	0	+	++	0	0	0	0	+	0	0	0

I.9.4.1 DM Policy NB4 seeks to ensure that future development proposals would not result in adverse impacts on landscape character and sets out how proposals can integrate with and enhance the surrounding landscape. The policy also sets out the requirement to protect and enhance Cannock Chase AONB and its setting, in accordance with the NPPF and additional guidance including the Cannock Chase AONB Design Guide and the AONB Management Plan. The policy includes the protection and retention of all trees, woodland and hedgerows.

I.9.4.2 As this policy would be likely to protect and enhance local landscape features (potentially including on-site trees and hedgerows) and the overall landscape character of the area, a major positive impact on the landscape (SA Objective 4) and a minor positive impact on biodiversity (SA Objective 3) would be expected. Additionally, the key characteristics of some landscapes within South Staffordshire emphasise built heritage. By protecting and enhancing these key characteristics, this policy would be expected to have a minor positive impact on the historic environment (SA Objective 9).

I.10 Climate Change and sustainable development

I.10.1 NB5: Renewable and low carbon energy generation

NB5: Renewable and low carbon energy generation

The development of renewable or sustainable energy technologies and complementary infrastructure will be supported throughout the District, subject to conformity with other local plan policies. Such technologies include solar, wind, district heating, hydroelectricity, ground source heat and complementary battery storage schemes. In considering the impacts of a scheme the cumulative impact of the proposed development will be considered along with other planned, committed or completed development.

In addition to conformity with other local plan policies, solar energy proposals must also demonstrate that:

- (a) That the use of agricultural land is necessary and no alternative available and suitable previously developed site within the District can accommodate a scheme of similar scale. The area of search considered should have regard to a viable connection (in distance) to the National Grid;
- (b) If (a) is satisfied but the scheme is on Best and Most Versatile Agricultural Land, that there are no alternative sites on lower grade agricultural land that could accommodate the scheme; and
- (c) That the proposal has considered opportunities for continued agricultural use (where feasible) and will maximise biodiversity benefits around arrays.

In the case of wind energy proposals, the whole of the District is designated as an area of search suitable for wind energy development. In addition to conformity with other local plan policies, wind proposals must also demonstrate that:

- (a) The development does not create a potential hazard to the public, including users of highways, footpaths, bridleways or other public rights of way;
- (b) The development does not interfere with telecommunication paths or air traffic services including those associated with the military;
- (c) They do not have an overshadowing or overbearing effect on nearby residents;
- (d) The development avoids or adequately mitigates shadow, flicker, noise and any other adverse impact on amenity; and
- (e) Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed.

Within the District's Green Belt, elements of many renewable energy schemes may comprise inappropriate development and in all such cases schemes must demonstrate very special circumstances in order to be granted permission. Benefits of schemes relevant in considering whether very special circumstances exist may include (but are not limited to) the wider environmental benefits associated with increased production of energy from renewable sources.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB5	+	0	-	-	+/-	+/-	0	0	0	0	0	0

I.10.1.1 DM Policy NB5 seeks to support renewable and low carbon energy generation within South Staffordshire, including solar, biomass schemes and onshore wind.

- I.10.1.2 The promotion of renewable or low carbon technologies within the Local Plan would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce South Staffordshire's contribution towards the causes of climate change. This policy would be likely to have a positive impact on climate change through delivery of renewable and low carbon energy (SA Objective 1). The number of schemes and energy generated from them is uncertain at this stage, however, a minor positive effect is possible.
- I.10.1.3 The development of renewable and low carbon technologies could lead to a reduction in the emission of some pollutants, however, some schemes, such as biomass energy generation, may result in increases in air pollutants. At this stage, the impact this would have on air quality within the Plan area is uncertain (SA Objective 5).
- I.10.1.4 The policy seeks to set out the approach to renewable energy development in the Green Belt, which may be justified in certain circumstances. This could result in a loss of previously undeveloped land, and subsequently result in the loss of natural habitats and ecologically and agriculturally important soils. The nature of the proposals is uncertain at this stage but there may be opportunities to deliver environmental protection/enhancements alongside development. For example, some solar farm development can also accommodate biodiverse grassland or meadows beneath the panels. However, some wind turbine development can lead to adverse effects on some species such as birds and bats due to collisions. Therefore, there is an uncertain effect on natural resources (SA Objectives 6) and potentially adverse effects on biodiversity (SA Objective 3).
- I.10.1.5 The potential design of future renewable energy developments is unknown at this stage of the plan-making process; however, the development of solar farms or wind turbines has the potential to have minor negative impacts on the local landscape (SA Objective 4).

I.10.2 NB6: Sustainable Construction

NB6: Sustainable Construction

Residential development carbon reduction and water efficiency standards

New development of one or more new dwellings must achieve net zero regulated carbon emissions. In achieving this all schemes must demonstrate application of the energy hierarchy through submission of an energy statement showing compliance with all of the following:

(a) A minimum 63% reduction in carbon emissions is achieved for each dwelling by on-site measures compared to the relevant baseline rates set by Building Regulations Part L 2021. In achieving this, each dwelling must demonstrate at least a 10% improvement on the Part L 2021 Target for Fabric Energy Efficiency and must not include fossil fuel-based heating systems or be connected to the gas grid.

(b) Once minimum improvements in fabric efficiency and carbon reduction in (a) are delivered, additional on-site renewable energy generation must be provided, or connections made to on or near site renewable/low-carbon community energy generation and storage networks. Any such measures must be sufficient to achieve at least zero regulated carbon across the scheme and schemes should also look for opportunities to go beyond this standard where feasible. If full compliance is not achieved proposals must demonstrate how such technologies have been provided to the greatest extent feasible.

(c) For major developments, any remaining residual regulated carbon emissions which demonstrably cannot be addressed via on or near site renewable technologies must be offset. Offsetting will only be considered an acceptable alternative to renewable energy generation in meeting net zero carbon requirements if it can be demonstrated that the necessary emission reductions achieved via renewable energy generation are demonstrably unfeasible. Offsetting will be delivered via an in lieu financial contribution to the District Council's

NB6: Sustainable Construction

carbon offsetting fund. Any offsetting sum must reflect 30 years of residual emissions arising from the development. The carbon offset price is the latest central figure from the nationally recognised non-traded valuation of carbon, set through the Treasury Green Book.

All residential schemes' energy statements must also show compliance with a water efficiency standard of 110 litres/person/day. Water reuse and recycling and rainwater harvesting should be incorporated wherever feasible to reduce demand on mains water supply, subject to viability.

Non-residential development carbon reduction standards

New development with a gross internal area of 1,000sqm or more of new non-residential floorspace should demonstrate application of the energy hierarchy through submission of an energy statement which meets all of the following:

- (a) Demonstrates compliance with the latest BREEAM 'Excellent' standard as a minimum, targeting compliance with BREEAM 'Outstanding' wherever possible;
- (b) Whilst achieving compliance with the standards in (a), priority must be given to maximising credits achieved under BREEAM criteria Ene01 in all cases;
- (c) Demonstrates the fullest viable use of onsite renewable energy generation measures to meet operational energy demand from the scheme.

Embodied carbon and closing the performance gap

All major development must also demonstrate in the energy statement how the embodied carbon of the proposed materials to be used in the development has been considered and reduced where possible, including with regard to the type, life cycle and source of materials to be used. Proposals for development of 50 dwellings or more or 5,000sqm or more of new non-residential gross internal floorspace must be accompanied by a nationally recognised Whole Life Carbon Assessment and demonstrate actions to reduce life-cycle carbon emissions.

For all major residential and non-residential developments, applicants must also implement a recognised quality regime that ensures the 'as built' performance (energy use, carbon emissions, indoor air quality, and overheating risk) matches the calculated design performance of dwellings as specified above. This will be secured via planning conditions. Developers must ensure that a recognised monitoring regime is put in place to allow the assessment of energy use, indoor air quality, and overheating risk for 10% of the proposed dwellings (of the Council's choosing) for the first five years of their occupancy, and ensure that the information recovered is provided to the applicable occupiers and the planning authority.

Retrofit

Proposals which would result in considerable improvements to the energy efficiency, carbon emissions and/or general suitability, condition and longevity of existing buildings will be supported, with significant weight attributed to those benefits.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB6	++	0	0	0	0	+	0	0	0	0	0	0

- I.10.2.1 DM Policy NB6 seeks to achieve energy, water and heat efficiency within all major residential developments through the target for a 63% improvement over current requirements, as set out in Part L of the Building Regulations and the BREEAM targets for non-residential development. This policy would be likely to promote climate change mitigation and help reduce GHG emissions associated with development throughout South Staffordshire, due to

the promotion of energy efficient design and provision for the use of on or near-site renewable technologies. The Climate Change Adaptation and Mitigation' (CCAM) study⁵² states that new development, built to existing Building Regulation requirements, could increase GHG emissions by approximately 5%. This policy seeks higher energy efficiency standards and will ensure that development proposals regard embodied carbon and that proposals which meet certain size thresholds must undertake Whole Life Carbon Assessments and demonstrate plans on reducing life-cycle carbon emissions. Therefore, a major positive impact on climate change would be expected (SA Objective 1).

- I.10.2.2 Additionally, this policy would help to encourage new developments to use water more efficiently. By adopting the optional requirement for water consumption as set out in the Planning Practice Guidance, water consumption and energy usage would be reduced, and therefore, residents would benefit from lower water and energy bills. The efficient use of water and energy would be expected to have a minor positive impact on natural resources (SA Objective 6) and contribute to a reduction in the energy needed in water treatment works to produce potable water for domestic use (SA Objective 1).

I.10.3 NB7: Managing flood risk, sustainable drainage systems & water quality

NB7: Managing flood risk, sustainable drainage systems & water quality

Managing flood risk

New development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, and will not increase flood risk elsewhere. Any proposals for new development (except water compatible uses) within Flood Zones 2 and 3 will be required to provide sufficient evidence for the Council to assess whether the requirements of the sequential test and exception test have been satisfied, taking climate change into account. Where development meets the sequential test in an area of higher flood risk, it must be designed to be flood resilient and safe for its users for the lifetime of the development, taking climate change and the vulnerability of any residents or users into account.

For developments within Flood Zones 2 and 3, and for developments elsewhere involving sites of 1ha or more, development proposals must be accompanied by a site-specific Flood Risk Assessment which meets the requirements of the NPPF and Planning Practice Guidance. Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account in accordance with the latest Environment Agency guidance.

All more Vulnerable and Highly Vulnerable development within Flood Zone 2 and 3 should set finished floor levels 300mm above the known or modelled at 1% and 3.3% annual exceedance probability (AEP) flood level, including an allowance for climate change in accordance with the latest National guidance.

For developments located in areas at risk of fluvial flooding, safe access/egress must be provided in the form of a safe dry route for people as a minimum and vehicles wherever possible.

For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan should be prepared.

All new development in Flood zones 2 and 3 should not adversely affect flood routing or result in a net loss of flood storage capacity thereby increase flood risk elsewhere. Where possible opportunities should be sought to achieve an increase in the provision of floodplain storage.

Flood resilience measures should be incorporated into design including taking into account allowances for climate change.

⁵² AECOM (2020) 'Climate Change Adaptation and Mitigation: Final Report October 2020' Available at <https://www.sstaffs.gov.uk/planning/local-plan-review-3.cfm> [Accessed on 11/08/22].

NB7: Managing flood risk, sustainable drainage systems & water quality

Where the development site would benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be sought.

Sustainable urban drainage systems (SuDs)

All new major development or developments involving large areas of hard standing (e.g. car parks) will incorporate Sustainable urban Drainage Systems (SuDs) appropriate to the nature of the site. Such systems shall provide optimum water runoff rates and volumes taking into account relevant local or national standards and the impact of the Water Framework Directive on flood risk issues, unless it can be clearly demonstrated that they are impracticable.

Sustainable drainage systems will be expected to reflect the design requirements and drainage hierarchy set out in the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook - February 2017, or subsequent updates.

SuDS design should be an integral part of the design and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application. Only proposals which clearly demonstrate that a satisfactory SuDS layout with appropriate maintenance is possible, or compelling justification as to why SuDS should not be incorporated into a scheme, or are unviable, are likely to be successful. SuDS systems should be designed to ensure that it can be accessed for maintenance and operation requirements and that ongoing maintenance costs are economically proportionate.

The dual use of land for Sustainable Urban Drainage and Open Space can be supported where neither use is compromised by the other. It may be supported in circumstances where land is safely usable by the public as open space and where SuDs will contribute towards an attractive and well landscaped environment where use as open space does not compromise the efficient and effective functioning of the SuDs in the short or longer term.

Water quality

Development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water or indirectly through the treatments of wastewater.

In order to protect and enhance water quality, all development proposals must demonstrate that:

- There are adequate water supply, sewerage and land drainage systems (including water sources, water and wastewater infrastructure) to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development. Where development is being phased, each phase must demonstrate sufficient water supply and wastewater conveyance, treatment and discharge capacity.
- The quality of ground, surface or water bodies will not be harmed, and opportunities have been explored and taken for improvements to water quality, including denaturalisation of river morphology, and ecology;
- Appropriate consideration is given to sources of pollution, and appropriate Sustainable Drainage Systems (SuDS) measures incorporated to protect water quality from polluted surface water runoff.

Foul drainage to a public sewer should be provided wherever possible, but where it is demonstrated that it is not feasible, alternative facilities must not pose unacceptable risk to water quality or quantity.

Development proposals should be consistent with other local plan policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB7	0	++	0	0	+	0	0	0	0	0	0	0

- I.10.3.1 DM Policy NB7 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are put in place within new developments to promote resilience to flooding. The policy sets out various criteria for certain development proposals to meet, such as the requirement for sufficient evidence that sequential and exception tests have been satisfied for all development located within Flood Zones 2 and 3. These, and other requirements as set out in the policy including requirements for sustainable drainage systems (SuDS), would be expected to ensure that all future development proposals would not locate new residents in areas at risk of flooding or exacerbate flood risk in areas surrounding the development. Therefore, a major positive impact on climate change adaption would be expected (SA Objective 2).
- I.10.3.2 This policy also states that “*development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water or indirectly through the treatments of wastewater*” and therefore is likely to enhance protection of surface and/or groundwater, potentially leading to a minor positive impact on water pollution within South Staffordshire (SA Objective 5).

I.11 Enhancing the Historic Environment

I.11.1 NB8: Protection and Enhancement of the Historic Environment and Heritage Assets

NB8: Protection and enhancement of the historic environment and heritage assets

The historic environment will be conserved and enhanced, and heritage assets will be protected in a manner appropriate to their significance. Development proposals should demonstrate how they preserve or enhance the character, appearance and function of heritage assets and their settings and respect the significance of the historic environment.

Development proposals which would cause harm to the significance of a heritage asset, or its setting, will not be permitted without a clear justification in accordance with legislation and national policy.

Proposals which could impact on the significance of a heritage asset (including its setting) should be accompanied by a heritage statement which is proportionate to the importance of the asset and its setting.

Where there is the potential for areas of archaeological interest to be affected, an archaeological assessment should be prepared informed by available evidence including desk-based assessments and where appropriate field evaluation to establish the significance of known or potential heritage assets.

The loss of heritage assets will be resisted. Where this is not possible, development consent which would result in the loss of all, or part of, the significance of a heritage asset, a historic building record and/or archaeological excavation will be required. Results should be published and made publicly available.

The Council will support measures which secure the improved maintenance, management and sustainable reuse of heritage assets, particularly those which are identified nationally or locally as being at risk.

Development proposals should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB8	0	0	0	+	0	0	0	0	++	0	0	+

I.11.1.1 Throughout South Staffordshire, there is a diverse range of heritage assets which provide a strong sense of place and historic character.

I.11.1.2 DM Policy NB8 promotes the conservation and enhancement of the historic environment through the positive management of development proposals and the safeguarding of heritage assets and their setting through various criteria, in line with the NPPF and seeking opportunities to better reveal the significance of heritage assets. Therefore, a major positive impact on the historic environment would be anticipated (SA Objective 9).

I.11.1.3 This policy could lead to enhancement of local landscapes which focus around built heritage, leading to a minor positive impact, where development is to demonstrate “*how they preserve or enhance the character, appearance, and function of heritage assets and their settings*” (SA Objective 4). Additionally, this policy aims to ensure historic assets are protected and

enhanced which could potentially support and encourage tourism and the visitor economy. This could have a minor positive impact on the local economy (SA Objective 12).

I.11.2 NB9: Canal network

NB9: Canal network

The development of new, or the expansion of existing, canal side facilities such as mooring, service facilities and marinas should be located within or in close proximity to existing settlements. Developers will be required to demonstrate their commitment to integrating proposals within the local community to become part of the ‘public realm’ of the settlement.

Proposals will be supported where they:

- a) conserve and enhance the heritage, scenic and wildlife value of canals,
- b) are sensitively designed and enhance the setting of the waterways particularly in relation to scale, layout, character, massing, form, materials and landscaping
- c) enhance the recreation and tourism value of the canal network and
- d) contribute positively to the function and appearance of canals, and wherever possible provide new life for redundant buildings.

The recreational value of canals for walking cycling and canoeing will be encouraged and promoted for their contribution to the health and wellbeing of residents and visitors. Opportunities will be sought to improve the accessibility of the canal network through the provision of improved surfacing, access points and wayfinding as a recognition of their important role as a key element of the green/blue infrastructure network.

Proposals for the environmental improvement and restoration of canals, including the Hatherton Branch Canal (either fully or as a Heritage Towpath Trail), will be supported having regard to the benefits to the canal system and rural regeneration provided there will be no adverse impact on the natural and historic environment including designated sites and habitats. Prior to any canal being restored to a navigable condition, evidence will need to be provided to the Environment Agency to demonstrate that the abstraction of water to feed the canal is sustainable.

The route of the Hatherton Canal as shown on the Policies Map will be safeguarded from any development which would prejudice the restoration of the canal.

Development proposals should be consistent with other local planning policies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
NB9	+	0	+	+	+	0	0	0	+	0	0	0

I.11.2.1 Canals within South Staffordshire include ‘Shropshire Union Canal’, ‘Staffordshire and Worcestershire Canal’ and ‘Stourbridge Canal’. DM Policy NB9 seeks to support new canal-side development which can adhere to conservation and enhancement of the canal network through various measures.

I.11.2.2 This policy would help ensure that new canal-side development “*conserve and enhance the heritage, scenic and wildlife value of canals*” and it also sets out to support proposals for the “*environmental improvement and restoration of canals, including the Hatherton Branch*”

Canal". The canal network forms an important element of the area's heritage. Therefore, through conservation and restoration of these assets, a minor positive impact on the local historic environment could be expected (SA Objective 9).

- I.11.2.3 By supporting measures which would promote the biodiversity of canals and improve the accessibility of the canal network through their "*important role as a key element of the green/blue infrastructure network*", a minor positive impact on climate change mitigation, local biodiversity and pollution could be expected (SA Objectives 1, 3 and 5) where GI provides opportunities for habitat connectivity, flood mitigation and the filtration of pollutants.
- I.11.2.4 The canal network forms a distinctive element of the landscape character of the district. By appropriately guiding new canal-side development, the policy would serve to have a minor positive effect on landscape character (SA Objective 4).



Lepus Consulting
Eagle Tower,
Montpellier Drive,
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com