

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

Regulation 19 SA Report

Volume 1 of 3: Non-Technical Summary

October 2022



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the South Staffordshire Local Plan Review

Regulation 19 SA Report

Volume 1 of 3: Non-Technical Summary

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Non-Technical Summary

Introduction: The South Staffordshire Local Plan

- N1. Lepus Consulting Ltd (Lepus) has been instructed by South Staffordshire District Council (SSDC) to undertake a Sustainability Appraisal (SA), incorporating the requirements of Strategic Environmental Assessment (SEA), of the South Staffordshire Local Plan Review (LPR) (2019-2039).
- N2. This document comprises a Non-Technical Summary (NTS) of the Regulation 19 SA for the South Staffordshire LPR, which presents an assessment of the likely sustainability impacts of proposals set out in the LPR.
- N3. This NTS document comprises **Volume 1** of the SA; it is accompanied by **Volume 2: The Main SA Report** and **Volume 3: Appendices to the main SA Report**.
- N4. The LPR has been prepared to review existing planning policy documents and determine the development needed within South Staffordshire (the Plan area) until 2039. The LPR sets out the updated development strategy in the Plan area, a vision for the future, relevant objectives, site allocations, site-based policies and development management policies which will guide the determination of planning applications.

What is Sustainability Appraisal?

- N5. The Planning and Compulsory Purchase Act¹ requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations² (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including local plans, to ensure that environmental issues are fully integrated and addressed during decision-making.
- N6. SA is the process of informing and influencing the preparation of a local plan to optimise its sustainability. SA considers the social, economic and environmental performance of the plan. The SA (and SEA) can help to ensure that proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the plan throughout its development.

¹ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 14/04/22]

² The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 14/04/22]

- N7. Sustainability can be defined as “*meeting the needs of the present generation without compromising the ability of future generations to meet their own needs*”³. To be sustainable, development requires the integration of the needs of society, the economy and the environment (see **Figure N.1**).

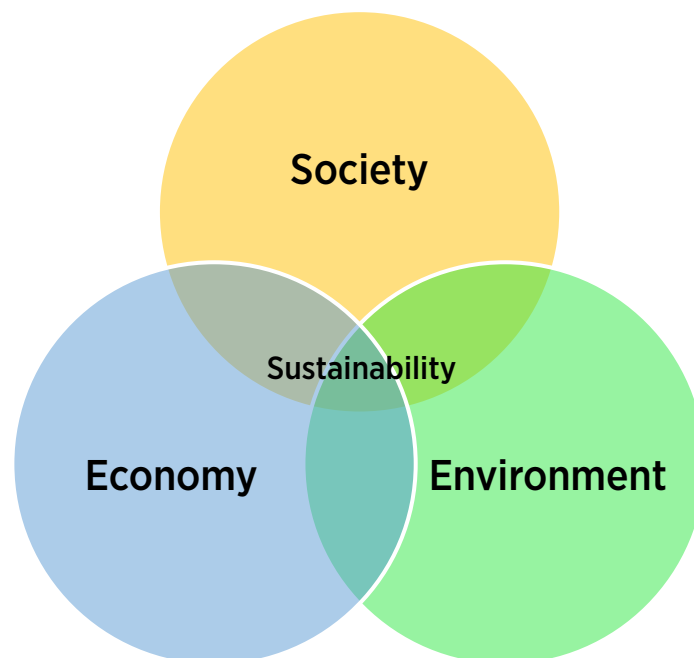


Figure N.1: Sustainable development

- N8. The LPR is at the plan-making stage Regulation 19, known as ‘Publication’ in the Local Plan Regulations 2012⁴, as shown in Stage C of **Figure N.2**.

³ Brundtland (1987) Report of the World Commission on Environment and Development: Our Common Future. Available at: <http://www.un-documents.net/our-common-future.pdf> [Date Accessed: 14/04/22]

⁴ The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767



Figure N.2: Sustainability Appraisal process

N9. **Figure N.3** shows the stages that have been undertaken during the preparation of the LPR and the accompanying SA outputs. This process is expanded in this Non-Technical Summary.

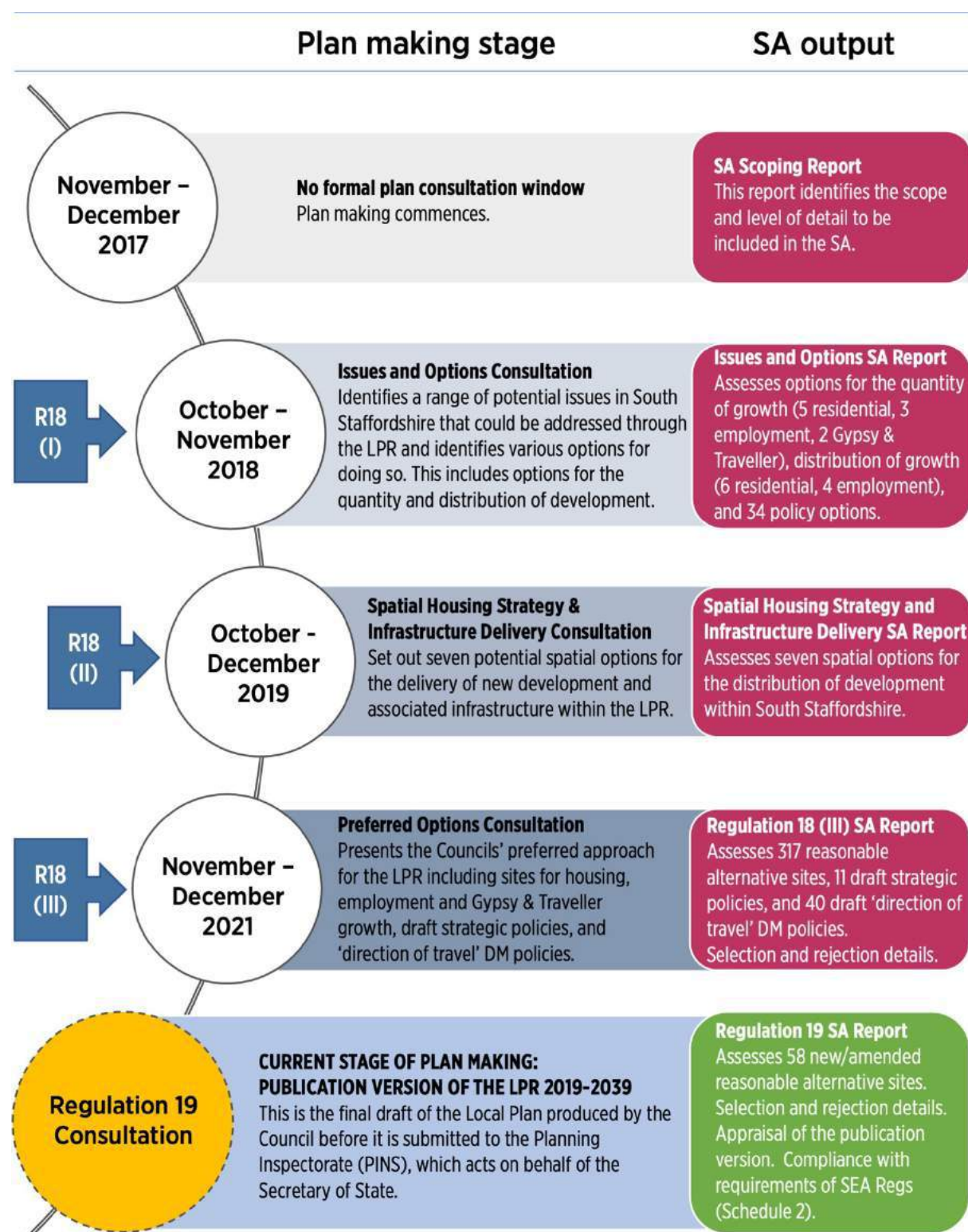


Figure N.3: Stages in the plan-making process accompanied by SA outputs

South Staffordshire

- N10. South Staffordshire is a local governmental district in the West Midlands, adjacent to the western boundary of the Black Country, bordering Shropshire on its east, Worcestershire to the south and Stafford on its northern border. In total, South Staffordshire District covers approximately 40,700ha, with an estimated population of 112,369 as of 2022⁵. The district is predominantly rural with several larger towns, including Codsall which is the administrative centre of the South Staffordshire district⁶ (see **Figure N.4**).
- N11. The Plan area is characterised by distinctive rural landscapes comprised of agricultural and Green Belt land, with 19 conservation areas currently listed across the South Staffordshire District⁷. These include the Shropshire Union Canal and Staffordshire and Worcestershire Canal. On the north eastern border, South Staffordshire lies adjacent to Cannock Chase, which is an Area of Outstanding Natural Beauty (AONB) and also contains a Special Area of Conservation (SAC). Other notable features include Baggeridge Country Park and the historic Weston Park.
- N12. South Staffordshire has some larger towns, although a large proportion of employment comes by way of commuting to the neighbouring Black Country and other districts.

⁵ City Population (2022) South Staffordshire. Available at:

https://www.citypopulation.de/en/uk/westmidlands/admin/E07000196_south_staffordshire/. [Accessed 21/07/22]

⁶ South Staffordshire District Council (2022) Council Service Directory. Available at: <https://www.sstaffs.gov.uk/contact-us/view-full-directory.cfm>. [Accessed 04/08/22]

⁷ South Staffordshire District Council (2022) Conservation Areas. Available at: <https://www.sstaffs.gov.uk/planning/conservation-areas.cfm> [Accessed 04/08/22]

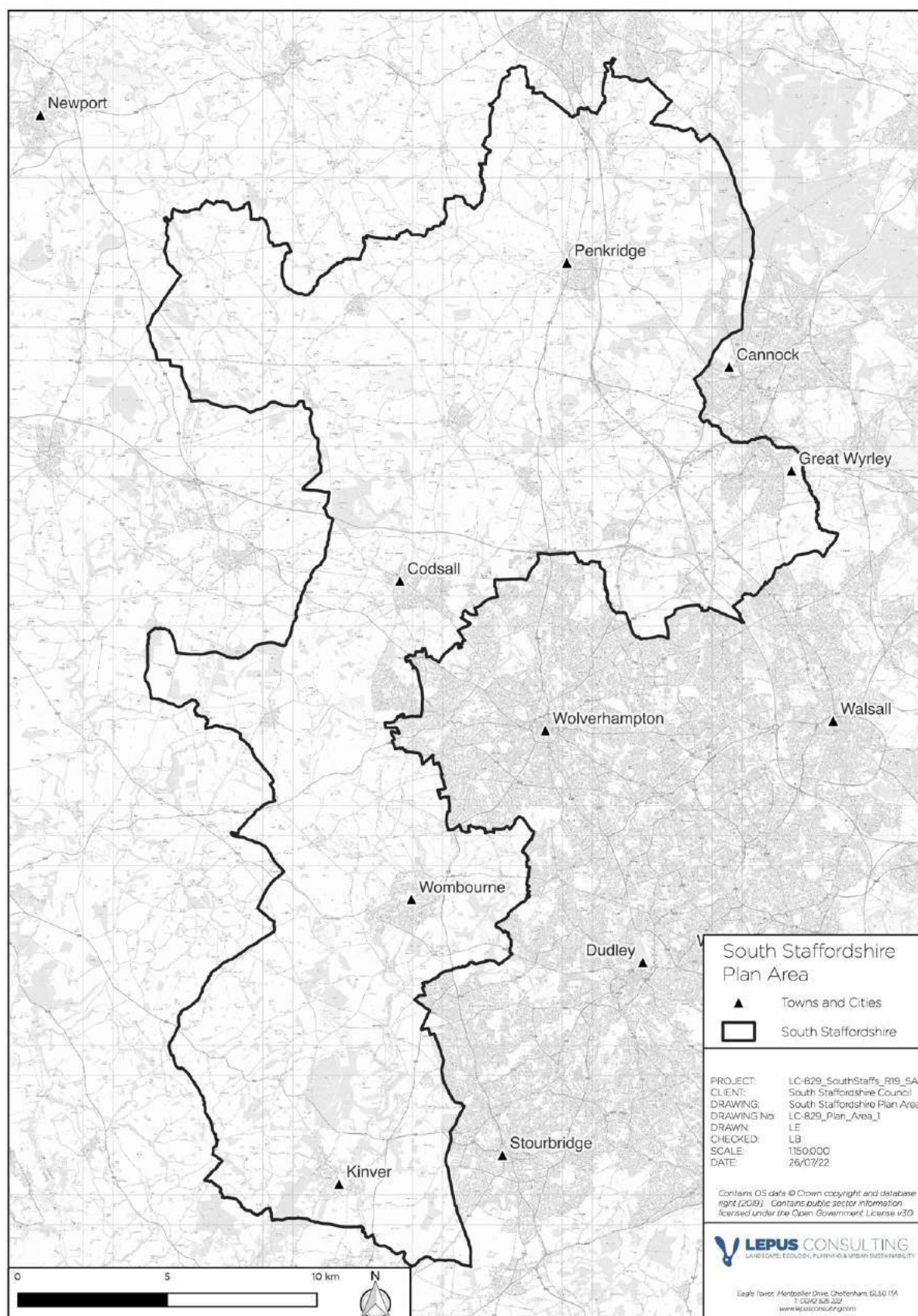


Figure N.4: Map of South Staffordshire District

Evolution of the environment without the Plan

- N13. The SEA Regulations requires the Environmental Report to present “*information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*”.
- N14. Without the LPR, no new plan-led development would take place within South Staffordshire over and above that which is currently proposed in the Core Strategy (2012) and Site Allocations Document (SAD) (2018) which form the current adopted Local Plan⁸. This means that instead, an ‘appeal-led’ system would predominate. Under this scenario, the nature and scale of development that may come forward is uncertain.
- N15. In a ‘no plan’ scenario, other plans and policies would continue to be a material consideration in planning decisions and legislative protection would continue to be in place. **Table N.1** presents the likely evolution of the baseline without the LPR.

Table N.1: Likely evolution without the LPR

SEA theme	Likely evolution without the LPR
Air	<ul style="list-style-type: none"> Current national trends suggest that NO₂ concentrations are declining in the district’s AQMAs, with two of the three AQMAs being revoked in 2022. Traffic and congestion are likely to increase with population growth, with implications for air quality, residents and wildlife within 200m of busy roads.
Biodiversity, flora and fauna	<ul style="list-style-type: none"> Sites designated for their national and international biodiversity and/or geodiversity value will continue to benefit from legislative protection. Biodiversity and wildlife sites would be likely to continue to benefit from the Staffordshire Biodiversity Action Plan by increasing in extent, resilience and quality. Potential negative impacts on locally designated sites which benefit from local planning policy framework.
Climatic factors	<ul style="list-style-type: none"> It is anticipated that the risk of fluvial flooding is likely to increase as a result of climate change. The risk of surface water flooding will depend on the size, nature and extent of non-porous built surface cover in the Plan area in the future. Per capita emissions would be likely to decrease over time as renewable energy increases its market share. The Future Homes Standard will come into effect in 2025 and apply to all new developments, this will be accompanied by changes to Parts L (energy) and F (ventilation) of the Building Regulations. The Future Homes Standard will seek to ensure that new homes are future-proofed with low-carbon heating systems and high levels of energy efficiency. At the time of writing, it is understood that a full technical specification for the Future Homes Standard will be consulted on in 2023, with the necessary legislation introduced in 2024, ahead of implementation in 2025.
Cultural heritage	<ul style="list-style-type: none"> Nationally designated heritage assets will continue to benefit from legislative protection. Locally identified assets would potentially be afforded less protection.

⁸ South Staffordshire Local Plan. Available at: <https://www.sstaffs.gov.uk/planning/south-staffordshire-local-plan.cfm> [Date accessed: 10/10/22]

SEA theme	Likely evolution without the LPR
Human health	<ul style="list-style-type: none"> • The life expectancy of men and women is anticipated to rise over time. • Rates of deprivation would be likely to continue to decline. • Some residents will continue to need to travel relatively far, likely by driving, to reach important health facilities and services. Although, this inequality may be addressed to some extent by the Local Transport Plan.
Landscape	<ul style="list-style-type: none"> • The Green Belt will continue to benefit from legislative protection. • The district will remain a predominantly rural and agricultural landscape. • Increased development pressure on the open countryside areas outside the Green Belt.
Population and material assets	<ul style="list-style-type: none"> • The number of jobs in the district is expected to increase based on current trend data. • The number of businesses is expected to increase. • Increasing lack of available supply of employment land to meet local and wider market demand. • House prices are expected to increase. • Less control over location of future housing including increased pressure on the areas of open countryside. • Provision of affordable and specialist housing likely to be negatively impacted, as well as an inability to better balance the housing market through provision of more small homes. • Less opportunity to enhance community benefits associated with plan-led housing proposals. • Less ability to refine the housing stock to meet the changing demands of existing residents such as provision of elderly specific housing accommodation. • Energy consumption in the transport sector is anticipated to keep rising. • Electricity generated from renewable sources is expected to increase slightly. • The population of the district is expected to continue to increase. This will place greater pressure on the capacity of key services and amenities, including health and leisure facilities and housing. • In the absence of development proposed in the LPR, there could potentially be a rise in the number of homelessness due to an unmet housing need.
Soil	<ul style="list-style-type: none"> • Soil is a non-renewable resource that would continue to be lost. • Rates of soil erosion and loss of soil fertility will be likely to continue to rise due to the impacts of agriculture and climate change.
Water	<ul style="list-style-type: none"> • Water demand may increase over time. • Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the RBMP, WRMP and CAMS in line with the Water Framework Directive.

The scoping stage (2017)

- N16. The first phase of preparation for the SA was the scoping stage. 'Scoping' is the process of deciding the scope and level of detail of an SA, including the environmental effects and alternatives to be considered, the assessment methods to be used, and the structure and contents of the SA Report, in accordance with Planning Practice Guidance (PPG)⁹.
- N17. A scoping report covers the early stages of the SA process and includes information about:
- Identifying other relevant policies, plans and programmes (PPPs), and environmental objectives;
 - Collecting baseline information;
 - Identifying environmental issues and problems; and
 - Developing the SA Framework.
- N18. The scoping process set the criteria for assessment (including the SA Objectives) and established the baseline data and other information, including a review of relevant PPPs. The scoping process involved an overview of key issues, highlighting areas of potential conflict.
- N19. The output of the scoping phase was the Scoping Report prepared by Lepus Consulting in 2017¹⁰, as shown in **Figure N.3**. The Scoping Report was subject to a five-week period of consultation between November and December 2017 with the statutory consultees (Natural England, Historic England and the Environment Agency). The Scoping Report was revised following consideration of the comments received and re-issued to the Council in 2018.

Key sustainability issues

- N20. There are a number of plans, policies and programmes (PPPs) that set out the environmental protection objectives which proposals within the Local Plan should adhere to. These are discussed within the Scoping report and are updated in **Appendix A (Volume 3)**. Some examples of these include the NPPF and the Habitats Regulations, as well as regional or local guidance and strategies such as local transport initiatives, South Staffordshire's Flood Risk Assessment, and Climate Change Action Plan.
- N21. PPPs that could potentially affect the Local Plan have been reviewed and considered alongside the current characteristics of the Plan area. Key issues identified during the Scoping stage within South Staffordshire are as follows:

⁹ DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date Accessed: 12/01/22]

¹⁰ Lepus Consulting (2017) Sustainability Appraisal of the South Staffordshire Local Plan Review: Scoping Report. Available at: <https://www.sstaffs.gov.uk/doc/179881/name/FINAL%20LC%2D342%20South%20Staffs%20SA%20Scoping%20Report%20%5F4%5F201117J%20Ecompressed.pdf/> [Accessed 04/08/22]

Key issues relating to air quality

- ⇒ There is currently one AQMA within South Staffordshire District, declared due to excessive levels of NO₂.
- ⇒ 4.9% of mortality in the district is attributable to particulate matter air pollution.
- ⇒ New housing, employment development areas, commercial and domestic sources, transport, and increasing visitor numbers in the area have the potential to lead to adverse impacts on air quality.

Key issues relating to biodiversity, flora and fauna

- ⇒ There are several internationally, nationally and locally designated sites of biological and geological importance in the district.
- ⇒ Important sites and habitats may be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution.
- ⇒ Most of the district falls within IRZs of one or more SSSIs.
- ⇒ It is essential that there is a coherent ecological network of habitats that enable the free movement of species and gene exchange.
- ⇒ It will be necessary to ensure there will be no adverse impact on the site integrity of Habitats sites, either alone or in-combination, as a result of the LPR via a Habitat Regulations Assessment.

Key issues relating to climatic factors

- ⇒ Climate change has the potential to increase the risk of fluvial and surface water flooding.
- ⇒ There is often a lack of shade cover available in urban areas of South Staffordshire due to the urbanised character of the areas. There is a lack of mature trees along road networks and within and on the edges of centres. GI should be enhanced and expanded, wherever possible.
- ⇒ Overall, CO₂ emissions in South Staffordshire have decreased from 2018 to 2020; however, CO₂ emissions per capita are above the mean levels for all local authority districts in the West Midlands. Whilst per capita carbon emissions may be in decline, if more concerted efforts for sustainably sourced energy and materials are not made then total carbon emissions would be likely to increase further following the development proposed in the LPR.
- ⇒ New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change.
- ⇒ A range of further risks linked to climate change may affect South Staffordshire. These include:
 - an increased incidence of heat related illnesses and deaths during the summer; increased risk of injuries and deaths due to increased number of storm events and flooding;
 - adverse effect on water quality due to a change in water levels and turbulent flow after heavy rain and a reduction of water flow;
 - a need to increase the capacity of sewers;
 - loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
 - an increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for local business; and
 - increased drought and flood related problems such as soil shrinkages and subsidence.

Key issues relating to cultural heritage

- ⇒ Development in the district may have the potential to lead to effects on historic landscapes and cause direct damage to archaeological sites, monuments and buildings and / or their settings.
- ⇒ Archaeological remains, both seen and unseen, could potentially be affected by new development.
- ⇒ Nationally designated heritage assets will continue to benefit from legislative protection.
- ⇒ Locally identified assets would potentially be afforded less protection.

Key issues relating to human health

- ⇒ The health levels of South Staffordshire residents are generally slightly lower than the average for England.
- ⇒ Obesity in children from the ages 4-5 and 10-11 years of age is higher than the average for England.
- ⇒ The life expectancy for women in the most deprived areas of the district is roughly 6.2 years lower than for women in the least deprived areas.
- ⇒ 10% of green sites are in poor condition.

Key issues relating to landscape

- ⇒ 80% of South Staffordshire is Green Belt, which heavily influences the characteristics and heritage of the district.
- ⇒ South Staffordshire borders Cannock Chase AONB on the north east boundary.

Key issues relating to population and material assets

- ⇒ The most common crimes in the district are associated with violence, anti-social behaviour and vehicular crime.
- ⇒ Overall, the population of the district is slowly increasing. This is predominantly due to increases in those aged over 64. The proportion of the population which is of typical working age (16-64) is decreasing. The biggest increase in population is anticipated in the age bracket of 70-89.
- ⇒ Significantly higher house prices than the national average.

Key issues relating to soil

- ⇒ Soils in the district are well equipped to support woodland, grassland and agriculture.
- ⇒ Soils in the district often have impeded drainage, which could potentially increase the risk of surface water flooding.
- ⇒ Most of the district is positioned on valuable soil types
- ⇒ Soils present in South Staffordshire have low carbon storage capacity.

Key issues relating to water

- ⇒ There are areas of groundwater source protection zones in the district.
- ⇒ Water demand is set to increase beyond supply in South Staffordshire, without intervention.
- ⇒ A large proportion of South Staffordshire is within zones prone to flooding.

Methodology

- N22. Taking into consideration the key issues identified above, an SA Framework was established which includes SA Objectives, decision-making criteria and indicators. The SA Framework provides a way in which sustainability effects can be described, analysed and compared. SA Objectives and indicators can be revised as further baseline information is collected and sustainability issues and challenges are identified and are used in monitoring the implementation of the Local Plan.
- N23. The full SA Framework including indicators is presented in **Appendix B**, with a summary of the 12 SA Objectives shown in **Table N.2**. It should be noted that the order of SA Objectives does not infer any prioritisation.

Table N.2: SA Framework summary

SA Objectives		Relevance to SEA Regulations – Schedule 2
1	Climate Change Mitigation: Minimise South Staffordshire’s contribution to climate change.	Climatic Factors
2	Climate Change Adaptation: Plan for the anticipated impacts of climate change.	Climatic Factors
3	Biodiversity and Geodiversity: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the district.	Biodiversity, Flora and Fauna
4	Landscape and Townscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Landscape and Cultural Heritage
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.	Air, Water, Soil, Human Health, Population and Material Assets
6	Natural Resources: Protect, enhance and ensure the efficient use of the district’s land, soils and water.	Soil, Water and Material Assets
7	Housing: Provide a range of housing to meet the needs of the community.	Population
8	Health and Wellbeing: Safeguard and improve the physical and mental health of residents.	Human Health and Population
9	Cultural Heritage: Conserve, enhance and manage sites, features and areas of historic and cultural importance.	Cultural Heritage
10	Transport and Accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Climatic Factors, Population and Material Assets
11	Education: Improve education, skills and qualifications in the district. Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population

SA Objectives	Relevance to SEA Regulations – Schedule 2
12 Economy and Employment: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Population
13 Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and Human Health

N24. Each section of the Local Plan has been subject to SA. Using the SA Framework and expert judgement, the likely sustainability impacts of the Local Plan have been assessed. The SA has considered positive, negative, secondary, cumulative and synergistic effects.

Reasonable alternatives

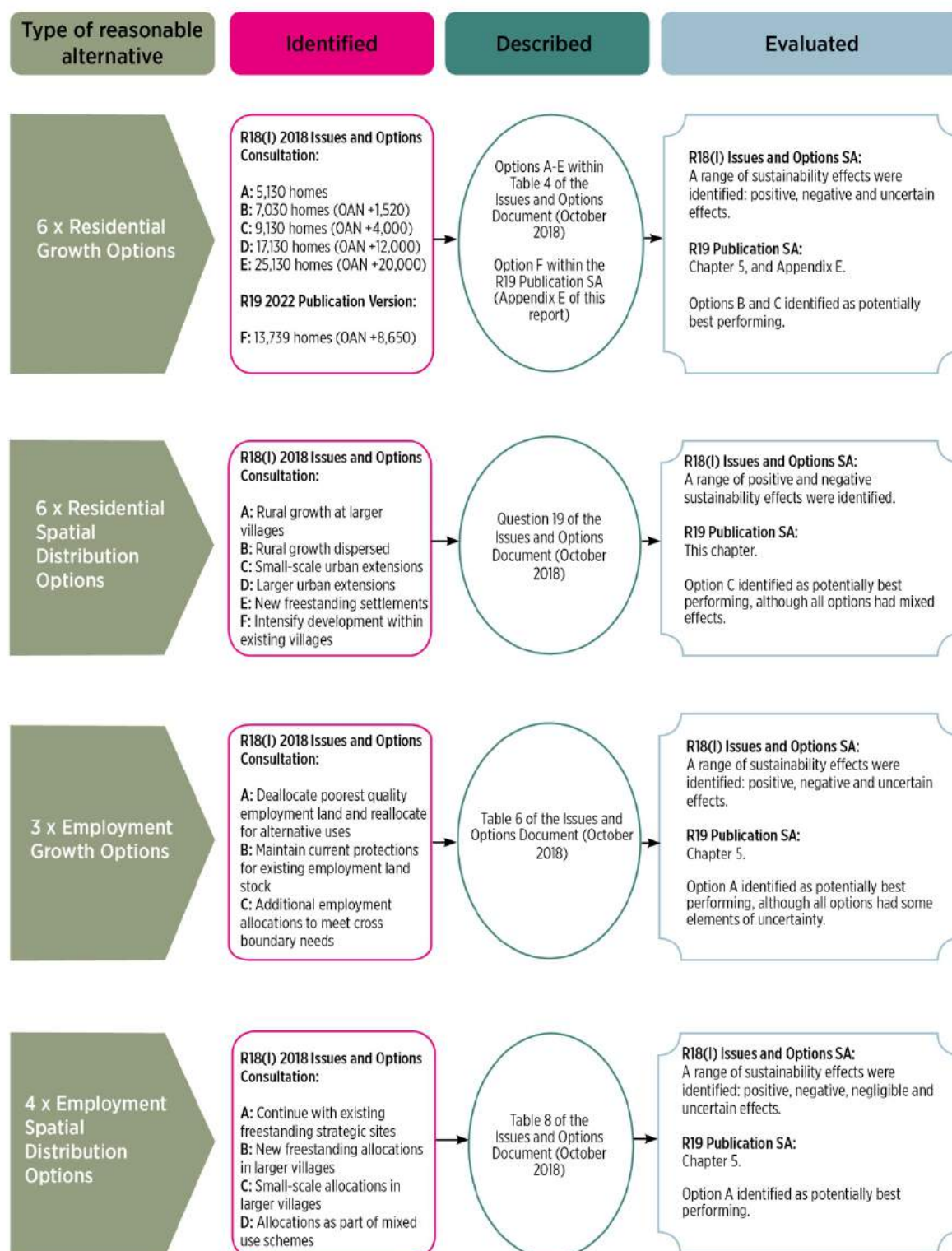
N25. The SEA Regulations state as part of the requirements for preparing an environmental report, that the local plan making process must identify, describe, and evaluate reasonable alternatives that have been considered.

N26. There is no precise guide as to what constitutes a ‘reasonable alternative’. The Council have identified reasonable alternatives for the LPR at different stages of the plan making process, as well as different types of alternatives, for example, different options for the overarching spatial strategy, policies, and for housing and employment allocation sites.

N27. The SA has assessed reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is SSDC’s role as the plan makers to use the SA findings, alongside other evidence base material, to decide which sites to ‘select’ for allocation in the LPR and which to ‘reject’ from further consideration.

N28. **Figure N.5** summarises the reasonable alternatives considered throughout the plan-making process, and where these alternatives have been identified, described, and evaluated.

Quick guide to reasonable alternatives



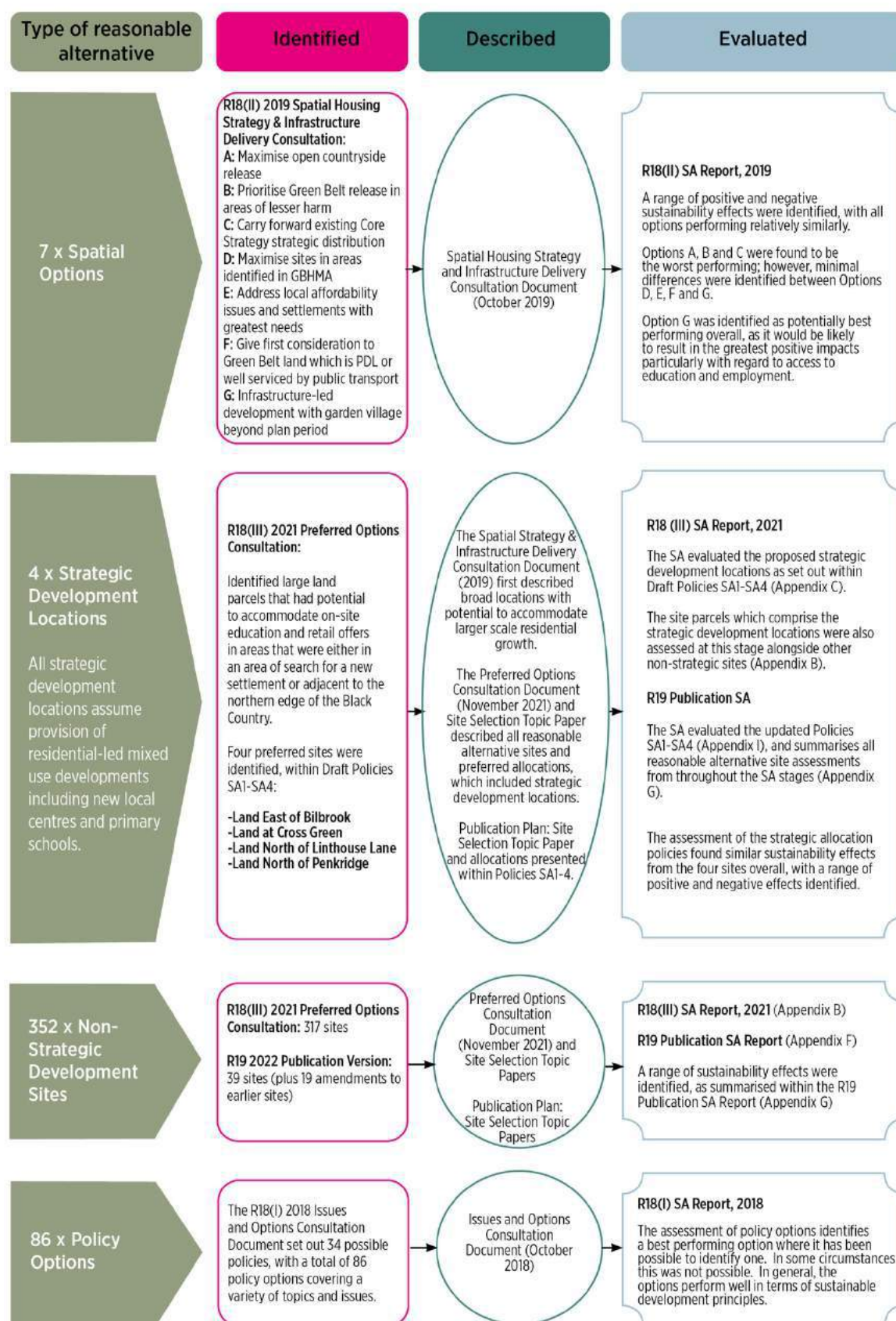


Figure N.5: The identification, description and evaluation of reasonable alternatives considered throughout the plan-making process

The identification of reasonable alternatives in the plan making process: residential growth options

N29. Five options for the quantity of residential growth were assessed within the Regulation 18 (I) Issues and Options SA Report (2018)¹¹, all of which meet or exceed the OAN for residential growth in South Staffordshire for the Plan period. A further residential growth option was identified since the Preferred Options (PO) consultation and has been assessed within this SA Report, known as Option F (see **Appendix E**).

N30. The six residential growth options can be summarised as follows:

- Residential Growth Option A – c.5,130 dwellings (2018-2037), providing enough homes to meet South Staffordshire's OAN.
- Residential Growth Option B – c.7,030 dwellings (2018-2037), meeting the OAN plus 1,520 dwellings towards the HMA's unmet needs.
- Residential Growth Option C – c.9,130 dwellings (2018-2037), meeting the OAN plus 4,000 dwellings towards the HMA's unmet needs.
- Residential Growth Option D – c.17,130 dwellings (2018-2037), meeting the OAN plus 12,000 dwellings towards the HMA's unmet needs.
- Residential Growth Option E – c.25,130 dwellings (2018-2037), meeting the OAN plus 20,000 dwellings towards the HMA's unmet needs.
- Residential Growth Option F – c.13,739 dwellings (2018-2039), meeting the OAN plus 8,650 dwellings towards the HMA's unmet needs.

N31. **Table N.3** summarises the SA findings. The full assessments are presented within the Issues and Options SA (Options A-E), and within **Appendix E** of **Volume 3** (Option F).

Table N.3: 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	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-

¹¹ Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/doc/179873/name/South%20Staffs%20SA%20Issues%26Options.pdf/> [Accessed 13/09/22]

N32. As discussed in **Appendix E of Volume 3**, the high-level assessment of housing growth is limited, resulting in uncertain impacts being identified for various SA Objectives.

N33. On balance, and drawing on the limitations discussed, 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 the larger-scale of growth under D, E and F, such as loss of the soil resource, whilst still seeking to positively prepare the LPR by providing some residential development to meet unmet needs of other authorities within the Housing Market Area (HMA).

The identification of reasonable alternatives in the plan making process: employment growth options

N34. Three options for employment growth were assessed within the Regulation 18 (I) Issues and Options SA Report (2018)¹², summarised as follows:

- Employment Growth Option A – To reflect the oversupply of employment land in the district, deallocate the poorest quality employment land as identified by the EDNA and reallocate poorer quality sites that would be suitable for alternative uses.
- Employment Growth Option B – Maintain current protections for the existing employment land stock.
- Employment Growth Option C – Allocate additional employment land to meet cross boundary employment needs, where an undersupply in other areas of the Functional Economic Market Area (FEMA) is robustly demonstrated.

N35. As shown in **Table N.4**, overall Option A was found to result in positive impacts across the most SA Objectives; however, Option C would make the greatest contribution the unmet employment floorspace needs. The most uncertainty was identified for Option B.

Table N.4: SA performance of the employment growth options (extracted from Issues and Options SA Report)

Employment 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	-	+/-	-	-	+/-	-	+/-	+/-	+/-	+/-	+/-	++

¹² Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/doc/179873/name/South%20Staffs%20SA%20Issues%26Options.pdf/> [Accessed 13/09/22]

The identification of reasonable alternatives in the plan making process: residential distribution options

N36. Six options for residential distribution were assessed within the Regulation 18 (I) Issues and Options SA Report (2018)¹³, as follows:

- Residential Distribution Option A – Rural housing growth focused on the district's larger and better connected villages;
- Residential Distribution Option B – Rural housing growth dispersed across all settlements with a basic level of service provision within the district;
- Residential Distribution Option C – Small-scale urban extensions on the fringe of neighbouring urban areas;
- Residential Distribution Option D – Larger urban extensions on the fringe of neighbouring urban areas;
- Residential Distribution Option E – New freestanding settlements away from the existing villages/urban areas; and
- Residential Distribution Option F – Introduce minimum housing densities on all housing sites and intensify development within the existing village development boundaries.

N37. As shown in **Table N.5**, a range of effects were identified in the SA assessments of all spatial options, although Option C was found to have positive effects across nine of the 13 SA Objectives. Option D was identified to result in more potential for adverse impacts than C on the setting cultural heritage assets owing to the larger scale extensions proposed; conversely, effects on education and employment were identified as more positive under Option D than C with a greater proportion of development in proximity to these services.

Table N.5: SA performance of the residential distribution options (extracted from Issues and Options SA Report)

Residential Spatial Distribution 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	-	-	-	-	-	+	+	-	-	-	-	-

¹³ Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/doc/179873/name/South%20Staffs%20SA%20Issues%26Options.pdf/> [Accessed 13/09/22]

The identification of reasonable alternatives in the plan making process: employment distribution options

N38. Four options for employment distribution were assessed within the Regulation 18 (I) Issues and Options SA Report (2018)¹⁴, as follows:

- Employment Distribution Option A – Continue with the existing policy approach and focus employment growth around the four existing freestanding strategic employment sites (ROF, i54, Hilton Cross and Four Ashes);
- Employment Distribution Option B – Identify new freestanding employment sites;
- Employment Distribution Option C – Deliver small scale employment allocations in the district's larger villages; and
- Employment Distribution Option D – Deliver employment allocations as part of mixed-use schemes.

N39. **Table N.6** summarises the SA findings for these four options. Option A was identified as potentially the best performing, largely owing to its focus on existing employment sites, which benefit from existing supporting infrastructure and provide opportunities for reuse of previously developed land. Development in these locations is likely to be mostly in keeping with the existing setting of the local area and would result in less fragmentation of the local ecological network compared to other options.

Table N.6: SA performance of the employment distribution options (extracted from Issues and Options SA Report)

Employment Spatial Distribution 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	0	0	0	0	0	+	0	0	0	0	0	++
Option B	0	0	-	-	0	-	0	0	0	0	0	++
Option C	0	0	0	0	0	-	0	0	0	0	0	++
Option D	0	0	0	0	0	+/-	0	0	0	0	0	++

¹⁴ Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/doc/179873/name/South%20Staffs%20SA%20Issues%26Options.pdf/> [Accessed 13/09/22]

The identification of reasonable alternatives in the plan making process: spatial options

- N40. The Regulation 18 (II) SA Report (2019)¹⁵ set out the appraisal of seven spatial options for the broad distribution of new housing growth in the Plan area, as identified in the Spatial Housing Strategy and Infrastructure Delivery (SHSID) document prepared by the Council.
- N41. The SHSID document was produced to set out new options for the approach to housing growth, following on from the previous Issues and Options stage where potential options for housing distribution were first considered. The SHSID spatial options were prepared to take on board information from responses to the Issues and Options consultation as well as new locally prepared evidence including the Green Belt and Landscape Studies.
- N42. The spatial options considered by the Council in the SHSID document, and assessed in the accompanying SA were:
- Spatial Option A – Maximise Open Countryside release.
 - Spatial Option B – Prioritise Green Belt land release in areas of lesser Green Belt harm.
 - Spatial Option C – Carry forward existing Core Strategy strategic approach to distribution.
 - Spatial Option D – Maximise sites in areas identified in the Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study.
 - Spatial Option E – Address local affordability issues and settlements with the greatest needs.
 - Spatial Option F – Give first consideration to Green Belt land which is previously developed or well-served by public transport.
 - Spatial Option G – Infrastructure-led development with a garden village area of search beyond the plan period.
- N43. **Table N.7** summarises the SA findings for these seven spatial options. Spatial Options A, B and C were identified as the worst performing, with potential for negative impacts associated with directing a higher proportion of new residents to more rural locations in South Staffordshire with limited access to essential services, such as education, employment and health centres, to a greater extent than Spatial Options D, E, F and G.
- N44. Overall, Spatial Option G could be identified as the best performing option, as the proposed development would be likely to result in the greatest positive impacts in terms of sustainability, in particular in regard to access to education and employment.

¹⁵ Lepus Consulting (2019) Sustainability Appraisal of the South Staffordshire Local Plan Review: Spatial Housing Strategy and Infrastructure Delivery. Available at: <https://www.sstaffs.gov.uk/doc/181110/name/SHSID%20Sustainability%20Appraisal.pdf> [Accessed 10/08/22]

Table N.7: SA performance of the spatial options (extracted from the Regulation 18 (II) SHSID SA Report)

Spatial 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	--	--	-	--	--	-	++	-	-	+	++	+
Option G	--	--	-	--	--	-	++	-	-	+	++	++

The identification of reasonable alternatives in the plan making process: policy options

Appraisal of policy options at Issues and Options (2018)

- N45. A total of 86 policy options were assessed within the Issues and Options SA Report (2018)¹⁶, focusing on 34 possible policies. These policies covered a range of topics, including housing mix, design and residential amenity, health and wellbeing, public transport, landscape character, and the historic environment.
- N46. Generally, the policy options performed similarly with major positive, minor positive or negligible impacts identified across the SA Objectives, with fewer policy options identified to result in minor negative effects on certain objectives.
- N47. The assessments identified the best performing option for each policy where possible, or in some circumstances recommended that a combination of options could potentially result in the most sustainability benefits. The assessment findings were fed back to the Council and consulted on alongside the Issues and Options Paper, in order to assist with decision-making as the emerging LPR policies were developed and refined.

¹⁶ Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/doc/179873/name/South%20Staffs%20SA%20Issues%26Options.pdf/> [Accessed 13/09/22]

Appraisal of draft policies at Regulation 18 (III) (2021)

- N48. The Regulation 18 (III) SA Report¹⁷ assessed 51 draft policies within the PO version of the Local Plan, including seven Site Allocation Policies, four Strategic Policies and 40 Development Management (DM) Policies.
- N49. The majority of the draft DM policies set out the requirements for development and seek to protect the natural and built environment and ensure there is sufficient community infrastructure to support new residents. As these policies largely seek to protect existing assets or enhance the provision of these features, the policy assessments predominantly identified minor positive or negligible impacts.
- N50. The Strategic Policies, which set out aspects of the Local Plan such as the proposed Spatial Strategy and the proposed strategic sites, were generally assessed as having the potential for a greater range of negative impacts in relation to environmental aspects of sustainability and greater positive effects in relation to meeting housing and employment needs.
- N51. **Appendix I of Volume 3** presents the assessment of the 55 revised LPR policies for the Regulation 19 stage, which have been updated to consider consultation comments, latest evidence base information and SA assessment findings.

The identification of reasonable alternatives in the plan making process: development sites

- N52. The identification, description and evaluation of development sites has been taking place throughout the plan making process at different stages. A total of 356 reasonable alternative sites have been considered, as follows:
- The Regulation 18 (III) SA Report (2021)¹⁸ included an assessment of 317 reasonable alternative sites, identified by the Council.
 - The Regulation 19 SA Report (**Volume 2**) includes an assessment of 58 reasonable alternative sites, identified by the Council since the previous stage (see **Appendix F, Volume 3**). Of these 58 sites:
 - 39 are new sites that have been identified since the PO Stage and have been considered in addition to the 317 sites assessed within the Regulation 18 (III) SA; and
 - 19 are amended versions of sites previously assessed in the Regulation 18 (III) SA Report. The amendments relate primarily to boundary alterations whereby landowners or site promoters have re-submitted their sites.

¹⁷ 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/> [Accessed 13/09/22]

¹⁸ Ibid

- N53. The sites identified by SSDC and assessed in the SA include those proposed for residential-led development (grouped into assessment 'clusters'¹⁹), employment-led sites and Gypsy, Traveller and Travelling Showpeople (GTTS) sites.
- N54. The SA identified a range of positive and negative potential impacts of the reasonable alternative sites on the objectives within the SA Framework.
- N55. Negative impacts were mainly related to issues associated with the rural nature of much of the development, including the loss of previously undeveloped land and BMV soil, the location of development in areas of high landscape sensitivity and/or where development could cause harm to the Green Belt purposes, as well as the access of site end users to a number of social facilities including schools, healthcare services, local shops and transport services.
- N56. Positive impacts were identified in relation to the provision of new housing and employment floorspace, as well as benefits to health and accessibility as many sites are located within a sustainable distance to public greenspaces, the Public Right of Way (PRoW) network and/or cycle routes. Many sites were assessed positively for climate change adaptation owing to their location in Flood Zone 1 where fluvial flood risk is low.
- N57. All reasonable alternative development sites have been assessed before and after mitigation. The main purpose of this exercise is to avoid any risk of 'green wash': a process whereby immediate application of policy prescription can give the impression that no adverse effects will arise, without knowing the extent of adverse effect that existed in the first place. This process helps achieve transparency in the appraisal process and follows established best practice (RTPI Guidance 2018²⁰) of presenting assessment results before and after mitigation has been applied. The pre- and post-mitigation assessment findings for all reasonable alternative sites that have been appraised throughout the SA process are summarised in **Appendix G, Volume 3**.

Strategic development sites

- N58. Following the identification and evaluation of 317 reasonable alternative sites at the Regulation 18 (III) stage, SSDC decided to identify a small number of strategic development sites which had potential to accommodate on-site education and retail offers alongside residential growth. These strategic sites were composed from one or more reasonable alternative sites that were assessed during the Regulation 18 (III) stage.
- N59. The Council proposed four strategic development sites for mixed use residential-led developments, to include new local centres and schools, as follows:

¹⁹ It should be noted that the clusters assessed within the SA are not synonymous with the settlements identified in the Preferred Options Plan. The cluster analysis is based on geographically proximate clusters of site options.

The sites have all been assessed individually, but sites within a cluster are expected to have similar impacts on terms of access to services and facilities and proximity to local environmental assets.

²⁰ RTPI (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Accessed 12/09/22]

- Land East of Bilbrook (Site 519);
- Land at Cross Green (Sites 646a/b);
- Land North of Linthouse Lane (Site 486c); and
- Land North of Penkridge (Sites 420, 584 and 010).

N60. The strategic development sites were evaluated in their entirety as part of the policy assessments in the SA, in draft form at Regulation 18 (III) and with latest policy wording for the Regulation 19 stage (see **Appendix I, Volume 3**).

The preferred approach

Selection and rejection of sites

N61. The SA findings relating to reasonable alternative sites were fed back to the Council on an iterative basis to assist in decision-making regarding the selection or rejection of each site within the emerging LPR. The Council's outline reasons for selection and rejection of all reasonable alternative sites considered throughout the SA process are set out in **Appendix H, Volume 3**.

LPR policies

N62. Following consideration of comments received during the Regulation 18 consultations and recommendations set out in the SA reports, SSDC have revised the LPR policies. The LPR contains a total of 55 policies, including six strategic Development Strategy Policies and eight Site Allocation Policies. The 55 policies have been assessed in **Appendix I, Volume 3**.

N63. The development strategy policies set out SSDC's vision for the district over the Plan period, ensuring a strong policy position is made for the protection of the Green Belt and setting out a framework for the protection of the special character of the district's open countryside as far as possible.

N64. Wherever possible, SSDC has sought to locate development on suitable brownfield sites to reduce pressure on the Green Belt, which covers approximately 80% of South Staffordshire. However, opportunities for brownfield developments are very limited due to the largely rural nature of the district.

N65. SSDC has identified a wide range of locations to contribute towards the delivery of 9,089 new homes within the LPR, which would meet the identified housing requirement of 5,089 homes in South Staffordshire as well as a 4,000-home contribution towards unmet housing needs of the Greater Birmingham and Black Country HMA.

N66. Following the assessment of reasonable alternatives in the SA and consideration of other evidence base documents, SSDC has selected four strategic development sites for allocation in the LPR as set out in Policies SA1 to SA4:

- SA1: Land East of Bilbrook (Site 519);
- SA2: Land at Cross Green (Sites 646a/b);
- SA3: Land North of Linthouse Lane (Site 486c); and
- SA4: Land North of Penkridge (Sites 420, 584 and 010).

- N67. Furthermore, SSDC has selected a further 33 residential development sites as set out in Policy SA5, 12 sites for Gypsy and Traveller pitches set out in Policy SA6, and seven employment development sites set out in Policy SA7.
- N68. The Council has also prepared a range of development management policies which set out the requirements for development and seek to protect the natural and built environment and ensure there is sufficient community infrastructure to support new residents. This includes ensuring the delivery of an appropriate housing mix; meeting housing needs for different groups, including for older people and Gypsies and Travellers; protecting community infrastructure and the vibrancy of settlements; and, protecting and enhancing natural assets such as biodiversity (such as Cannock Chase SAC), heritage, the landscape (including the setting of Cannock Chase AONB) and managing flood risk and surface water, amongst others.

Purpose and content of the Regulation 19 Sustainability Appraisal Report



- N69. The Regulation 19 SA Report has been prepared to summarise the SA process to date and help inform the examination stage of the preparation of the LPR. The Regulation 19 SA Report presents the findings of the sustainability appraisal of the LPR, which is composed principally of 55 policies including six strategic Development Strategy Policies and eight Site Allocation Policies.
- N70. The Regulation 19 SA Report also contains an assessment of reasonable alternative residential growth options and development sites (including an assessment of 58 new/amended reasonable alternative sites, and one new growth option, identified since the previous SA stage).
- N71. The purpose of the SA of the LPR is to:
- Identify, describe and evaluate the likely sustainability effects of the LPR proposals and their reasonable alternatives;
 - Inform SSDC's decision making and preparation of the LPR; and
 - Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA.
- N72. The SA of the South Staffordshire LPR is presented in three volumes. The contents of this SA Report are listed as follows:
- **VOLUME 1: Non-Technical Summary** (this document) provides a summary of the Regulation 19 SA work.
 - **VOLUME 2: Main SA Report**
 - **Chapter 1** presents an introduction to this report.
 - **Chapter 2** sets out information about the LPR and the SA process to date.
 - **Chapter 3** presents the evolution of the environment without the plan.
 - **Chapter 4** sets out the SA methodology.




- **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
- **Chapter 6** presents details on the preferred approach.
- **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic.
- **Chapter 16** presents the cumulative effects assessment.
- **Chapter 17** sets out a range of monitoring recommendations for the LPR.
- **Chapter 18** summarises ways in which the SA has influenced the LPR throughout the plan making process, including through recommendations made in the SA.
- **Chapter 19** outlines the conclusions, residual effects and next steps.
- **VOLUME 3: Appendices**
 - **Appendix A** presents a review of the Policies, Plans and Programmes (PPPs).
 - **Appendix B** presents the SA Framework.
 - **Appendix C** presents the consultation responses received during each stage of the SA process from Statutory Consultees.
 - **Appendix D** provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the topic specific methodologies and assumptions used to assess policies, proposals, and reasonable alternatives.
 - **Appendix E** presents the assessment of a new residential growth option.
 - **Appendix F** presents the assessment of 58 new/amended reasonable alternative sites (pre-mitigation).
 - **Appendix G** summarises the assessment of all 356 reasonable alternative sites assessed through the SA process (pre-mitigation), considers the potential mitigating influence of the LPR policies, and presents the post-mitigation assessment of all 356 reasonable alternative sites.
 - **Appendix H** presents SSDC's outline reasons for selection and rejection of reasonable alternative sites which have been identified, described and evaluated through the SA process.
 - **Appendix I** presents the assessment of the LPR policies.



Likely significant effects on the environment

- N73. Proposals in the South Staffordshire LPR have been assessed for their sustainability impacts, the results of which are presented in the relevant appendices as listed above. The assessment of the LPR, including reasonable alternatives, was undertaken using a combination of empirical evidence, and to a lesser extent, professional judgement.
- N74. In the main SA Report (**Volume 2**) and the Appendices (**Volume 3**), the SA assessment findings are presented in matrix format and are accompanied by a commentary on identified effects. The matrix is not a conclusive tool; its main function is to show visually the sustainability performance of the LPR. The assessment commentary should be relied upon to interpret the matrix findings.
- N75. **Table N.8** provides a summary of the potential negative impacts of the LPR relating to each of the SEA topics (as set out in full within **Chapters 7 – 15** of the Main SA Report, **Volume 2**). These are the negative impacts that have been identified prior to the implementation of LPR mitigation.

Table N.8: Summary of identified potential impacts of the LPR



SEA Topic	Summary of potential impacts of the LPR
 AIR	<ul style="list-style-type: none"> • Increased pollutant emissions – The proposed development within South Staffordshire would be likely to increase the volume of traffic within the Plan area, and as a result, associated transport-related emissions including nitrogen dioxide (NO₂) and particulate matter (PM₁₀) would be released into the atmosphere, with adverse effects on local air quality. This is particularly an issue for development adjacent or in close proximity to main roads and Air Quality Management Areas (AQMA) which put in place to facilitate a reduction in air pollution to within national air quality objectives. • Reduction in air quality with implications for human health – The LPR proposes the development of 9,089 new dwellings and 99ha of employment floorspace, which would be expected to introduce many new residents to the area. This increase in population and likely associated increase in cars and traffic on the local roads would be expected to result in an increase in emissions, and consequently, decrease air quality. This increase in pollutants would be expected to have negative effects on human health, particularly for children or vulnerable people with respiratory issues. • Reduction in air quality with implications for biodiversity – Poor air quality can also result in negative effects on wildlife and ecosystems, such as watercourses or habitats that are sensitive to changing levels of certain pollutants, such as nitrogen.
 BIODIVERSITY, FLORA & FAUNA	<ul style="list-style-type: none"> • Threats or pressures to Habitats sites – One Special Area of Conservation (SAC) is located within South Staffordshire: Motte Meadows SAC. Further Habitats sites are located beyond the district boundary but may still be impacted by development, including Cannock Chase SAC which has an identified 15km recreational Zone of Influence (Zoi) which falls partially within the district. A Habitats Regulations Assessment (HRA) has been carried out alongside to the SA and plan-making process and considers the impacts of LPR development on Habitats sites in detail. • Threats or pressures to nationally or locally designated biodiversity assets and important habitats – The proposed development at some allocated sites within the LPR could potentially increase development-related threats and pressures to SSSIs, NNRs, or locally designated / non-statutory biodiversity sites, ancient woodland and habitats of principal importance (priority habitats). Potential impacts include increased recreational disturbance caused by residents visiting the designated sites

SEA Topic	Summary of potential impacts of the LPR
	<p>and poor air quality due to an increase in vehicular movements on roads near to sensitive habitats.</p> <ul style="list-style-type: none"> • Effects on habitat fragmentation, connectivity and disturbance to ecological function – The Plan area contains a diverse multi-functional green infrastructure network. Most allocated sites are located on previously undeveloped land, which would result in the loss of soil resources, which in turn provide an important ecosystem service. Whilst in many cases these habitats can be conserved alongside development, it would be likely that in some cases fragmentation or loss of habitats and connections between habitats would occur.
 CLIMATIC FACTORS	<ul style="list-style-type: none"> • Increased carbon emissions – The proposed development of 9,089 dwellings and 99ha of employment floorspace within the LPR would be likely to increase to some extent local carbon emissions through energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production and use of materials during construction. This impact would be expected to accelerate anthropogenic climate change and is likely to contribute towards cumulative effects which exacerbate global events, such as sea level rise and extreme weather events. • Loss of multi-functional green infrastructure – The proposed development within the LPR would cumulatively result in the loss of a significant area of previously undeveloped land. Some of the proposed development could potentially also result in the loss of trees, hedgerows, and other vegetation currently on site. Green infrastructure is vital in helping to reduce the adverse impacts of climate change.
 CULTURAL HERITAGE	<ul style="list-style-type: none"> • Alter character and/or setting of designated heritage assets – South Staffordshire has a rich cultural heritage, with several historic villages and rural settlements. There is a broad range of Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas designated throughout the Plan area. Further to this, a range of archaeological features have been identified on the Historic Environment Record (HER), and elsewhere there is potential for below-ground archaeological remains or other locally recorded assets to be present that should be investigated prior to development. Development which coincides with or is in close proximity to a designated heritage asset has the potential to affect both the asset itself and its setting. This will depend on contextual factors relating to the nature and location of development and factors that contribute to the significance of heritage assets.
 HUMAN HEALTH	<ul style="list-style-type: none"> • Limited access to healthcare / leisure facilities – There are no NHS hospitals providing an A&E service within the district itself (although there are several in the adjacent Black Country), and GP surgeries and leisure facilities are generally restricted to the larger settlement centres, meaning that a large proportion of the proposed growth will be located outside of the identified sustainable target distances to these facilities. Where there is more limited access to these facilities, residents may be discouraged from living active and healthy lifestyles, which could potentially have adverse impacts on mental wellbeing as well as physical health. • Exposure to air / noise pollution (from AQMAs / main roads) – As discussed within the 'Air' topic above, the long-term health of residents could be adversely impacted by local reductions in air quality, particularly for those located close to the strategic road network and within AQMAs. Living close to main roads or railway lines can also result in increased exposure to noise pollution and vibration which may have adverse effects on health and wellbeing. • Limited access to public greenspace – Good access to public green or open spaces, including natural or semi-natural habitats, and travelling via walking and cycling are known to have physical and mental health benefits. Whilst there is generally good access to open space across South Staffordshire as a whole, there are spatial variations on existing access to different types and sizes of open space across different areas. • Limited access to the PRoW or cycle network – The majority of allocated sites are in areas with good coverage by the PRoW and/or cycle networks, providing opportunities for active travel and recreation in the countryside. However, a small number of sites are located outside of the 600m target distance to active travel

SEA Topic	Summary of potential impacts of the LPR
 <p>LANDSCAPE</p>	<p>links, where site end users may be reliant upon less sustainable modes of transport including private car use.</p> <ul style="list-style-type: none"> • Impacts on Cannock Chase AONB and its setting – New development can lead to the loss of landscape features and changes to landscape character and views. Changes in landscape character have the potential to adversely affect Cannock Chase AONB and its setting at certain locations. Adverse effects may also arise as a consequence of development proposals at other locations in the Plan area, with the potential to result in cumulative adverse impact on views from more sensitive locations within the designated landscapes. • Alteration of landscape character – The introduction of new built form can contradict and conflict with distinctive local character of existing landscapes and townscape which can result in adverse impacts on the local landscape character. In some cases, it is anticipated that the development proposed in the LPR will adversely impact, or potentially result in the loss of, landscape features such as trees, hedgerows, woodlands and ponds, amongst others. • Impacts on sensitive landscapes and the West Midlands Green Belt – The potential for adverse effects of development proposals on landscape sensitivity and Green Belt have been identified with reference to the Landscape Sensitivity Study²¹ and Green Belt Study²². • Change in views from PProWs / for local residents – Development proposed in the Plan has the potential to adversely impact informal high-quality viewing experiences that can be gained from the local PProW network around proposed development locations. Development proposed in the Plan predominantly lies near existing residential properties and has the potential to adversely impact views from these properties. • Loss of tranquillity, and increased risk of urbanisation of the countryside / coalescence – The proposed development of 9,089 dwellings across South Staffordshire, with a number of developments located in rural areas and on previously undeveloped land, would be likely to result in a loss of tranquillity of the landscape as a consequence of increases in noise and light pollution. Development located in the open countryside can also increase the risk of ‘urban sprawl’ into the countryside, and coalescence (merging) of settlements.
 <p>POPULATION & MATERIAL ASSETS</p>	<ul style="list-style-type: none"> • Provision of housing and employment space to meet local need – The LPR proposes the development of 9,089 homes and 99ha of employment floorspace, which would be expected to ensure that enough homes and jobs are provided to meet the identified needs, in line with the latest evidence base documents, and contribute towards the needs of neighbouring authorities. • Reduced access to, and increased pressure on, services and facilities – The proposed development within the LPR would be expected to increase population density, applying greater pressure on the capacity of services, including schools, GP surgeries, leisure centres and open spaces. Some site allocations would be situated outside of the sustainable distance to existing services. Good access to these services is essential to reduce reliance on personal car use, encourage healthy and active lifestyles and provide accessibility to spaces which could potentially have benefits to mental wellbeing and community cohesion. • Increased household waste generation – It is likely that development of 9,089 dwellings as proposed within the LPR will increase household waste generation in the district.

²¹ LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at: <https://www.sstaffs.gov.uk/planning-files/Spatial-Housing-Strategy/SHSID-Landscape-Study-2019.pdf> [Accessed 19/08/22]

²² 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/> [Accessed: 16/08/22]

SEA Topic	Summary of potential impacts of the LPR
 SOIL	<ul style="list-style-type: none"> • Loss of soil resources and BMV land, with implications for ecosystem services – The proposed development within the LPR would result in the loss of up to approximately 813ha of previously undeveloped land, approximately 788ha of which could represent ‘best and most versatile’ (BMV) soils²³. This would be expected to result in the permanent and irreversible loss of soil resources. Soil provides essential services, including nutrient cycling, abating flood risk, filtering water and carbon storage. Direct loss of soil through construction would be expected to reduce these essential ecosystem services.
 WATER	<ul style="list-style-type: none"> • Flood risk – The majority of proposed development lies within Flood Zone 1, where flood risk is low; however, a small number of allocations are partially located within areas of Flood Zone 2 and/or 3. In addition, several allocated sites coincide with areas determined to be at low, medium or high risk of surface water flooding. Development in areas at risk of flooding may increase the risk of damage to property and increase risks to human health in the immediate area and/or contribute to exacerbation of flood risk in the surrounding areas. • Reduction in water quality and ecosystem services – Development and urbanisation can be associated with adverse impacts on water quality, with implications for biodiversity and the function of ecosystem services. This includes risks of water pollution associated with runoff from roads, and from water outflows during storm conditions, resulting in increased water at wastewater treatment works. Development located near to watercourses or within groundwater SPZs could affect water quality through pollution of surface water runoff. • Increased water demand and pressure on wastewater treatment – Based on an average of 2.3 people per dwelling in South Staffordshire²⁴, the proposed development of approximately 9,089 dwellings over the Plan period could increase the local population by approximately 20,905 new residents. Subsequently, this growth would be likely to increase water demand and demand for wastewater treatment across the Plan area.

²³ Please note this figure is based on gross site areas and so does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.

²⁴ 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> [Accessed 26/08/22]



Mitigation




- N76. The LPR sets out 55 policies which seek to positively respond to future development within the Plan area. These policies are expected to have positive impacts in relation to the development proposals within the LPR. Numerous policies would be likely to mitigate or lessen the identified adverse impacts of proposed development. **Table N.9** summarises these mitigating effects of the LPR policies (as set out in full within **Chapters 7 – 15** of the Main SA Report, **Volume 2**).



Table N.9: Summary of LPR policy mitigation

SEA Topic	Summary of mitigating effects of the Local Plan policies
 AIR	<ul style="list-style-type: none"> Policy HC11 'Protecting Amenity' seeks to protect residential amenity in relation to noise and other sources of pollution, which may help to reduce adverse impacts associated with the exposure of site end users to poor air quality, such as those within or adjacent to AQMAs or main roads. 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. Policy NB3 'Cannock Chase SAC' sets out the Council's support for developments only where it can be demonstrated that the proposal will not lead to likely significant effects upon the integrity of the Cannock Chase SAC, either alone or in combination with other plans or projects. This would be expected to include impacts associated with air pollution and nitrogen deposition, which is one of the vulnerabilities of the SAC's qualifying features. Various LPR policies, including EC1 'Sustainable Economic Growth', HC13 'Parking Provision' and EC12 'Sustainable Transport' seek to improve sustainable transport provision across the district and may contribute towards reduced traffic-related emissions, through setting out a range of measures including strengthening bus and rail services, encouraging walking and cycling, the park and ride initiative at Cross Green and improving the availability of electric vehicle charging points. Policy NB5 'Renewable and Low Carbon Energy Generation' promotes renewable and low carbon energy generation within South Staffordshire, which would be anticipated to play a role in reducing wider air quality impacts associated with fossil fuel generation.
 BIODIVERSITY, FLORA & FAUNA	<ul style="list-style-type: none"> 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 relating to recreational pressures, including monetary payments per new dwelling²⁵. Policy NB1 'Protecting, enhancing and expanding natural assets' supports proposals "which protect and enhance the quality of the natural environment", including nationally designated sites (SSSIs and NNRs) and seeks to safeguard local sites (SBIs, RIGS and LNRs) from development in line with the mitigation hierarchy. The policy also supports the restoration, creation and enhancement of habitats and linkages between these sites and contributions towards the Nature Recovery Network. 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 and bat/bird boxes. All new development will be required to deliver a 10% biodiversity net gain. Policy NB4 'Landscape Character' seeks to ensure that development proposals retain and protect all trees, woodland and hedgerows.

²⁵ South Staffordshire District Council (2022) Cannock Chase Special Area of Conservation (SAC). Available at: <https://www.sstaffs.gov.uk/planning/cannock-chase-special-area-of-conservation-sac.cfm> [Accessed 25/08/22]

SEA Topic	Summary of mitigating effects of the Local Plan policies
 CLIMATIC FACTORS	<ul style="list-style-type: none"> Several LPR policies seek to protect, maintain and enhance multi-functional green infrastructure provision across the Plan area alongside new development including Policy HC19 'Green Infrastructure', Policy HC10 'Design Requirements' and Policy HC17 'Open Space'. Policy DS5 'The Spatial Strategy to 2039' 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. Policy EC12 'Sustainable Transport' sets out a wide range of measures to improve sustainable travel options, 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. Policy NB5 'Renewable and Low Carbon Energy Generation' promotes more sustainable energy schemes including policy provisions relating to solar, wind and biomass energy, which would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. Policy NB6 'Sustainable Construction' sets out energy and water efficiency standards for new developments including the requirement for all major residential development to achieve a minimum 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. Several LPR policies seek to protect, maintain and enhance multi-functional green infrastructure provision across the Plan area alongside new development including Policy NB2 'Biodiversity', Policy HC19 'Green Infrastructure', Policy HC10 'Design Requirements' and Policy HC17 'Open Space'. Vegetation provides several ecosystem services, including carbon storage as well as cooling/shading effects.
 CULTURAL HERITAGE	<ul style="list-style-type: none"> Policy NB8 'Protection and Enhancement of the Historic Environment and Heritage Assets' promotes 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. The policy also requires an archaeological assessment to be prepared where there is potential for adverse effects on areas of archaeological interest. 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. Policy HC10 'Design Requirements' would help to ensure that development proposals take into account local character and distinctiveness including historic assets. 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. Policy DS1 'Green Belt' seeks to restrict development in the Green Belt, one of the purposes of which is to "<i>preserve the setting and special character of historic towns</i>"; as such, this policy may help to prevent inappropriate development proposals coming forward which could harm areas of high historic value.

SEA Topic	Summary of mitigating effects of the Local Plan policies
 <p>HUMAN HEALTH</p>	<ul style="list-style-type: none"> Policy HC14 'Health Infrastructure' seeks to protect existing healthcare infrastructure and seeks proportionate financial contributions where development is assessed to have an adverse impact on capacity of existing facilities. Policy EC12 'Sustainable Transport' supports the improvement of transport and accessibility across the Plan area, which would be expected to improve residents' access to services and facilities, including healthcare. This policy also seeks to ensure development is designed to promote high quality walking and cycling routes, both within sites and linking to nearby services and facilities. Policy HC11 'Protecting Amenity' seeks to protect residential amenity in relation to noise and other sources of pollution, which may help to reduce adverse impacts associated with the exposure of site end users to poor air quality, such as those within or adjacent to AQMAs or main roads. Several LPR policies seek to protect, maintain and enhance multi-functional green infrastructure and open space / recreational provision across the Plan area alongside new development including Policy HC18 'Sports Facilities and Playing Pitches', Policy HC19 'Green Infrastructure', Policy HC10 'Design Requirements' and Policy HC17 'Open Space'. An Open Space, Sport and Recreation SPD and a Green Infrastructure SPD are proposed.
 <p>LANDSCAPE</p>	<ul style="list-style-type: none"> Policy NB4 'Landscape Character' sets out measures to protect and enhance Cannock Chase AONB and its setting, in accordance with national policy and additional guidance including the Cannock Chase AONB Design Guide and the AONB Management Plan. The policy also seeks to maintain and, where possible, improve the rural character and distinctiveness of the South Staffordshire's landscape, and requires developments to have regard to the findings of the Landscape Character Assessment and Landscape Sensitivity Study. Policy HC10 'Design Requirements', supported by Policy HC19 'Green Infrastructure', sets out requirements to ensure high quality design, including the requirement for proposed developments to respond positively to landform and respect existing landscape and settlement character. Policies DS1 'Green Belt' and DS3 'Open Countryside' seek to protect the openness of the countryside and would serve to resist development outside of settlement development boundaries, other than in certain circumstances where various other requirements are met. Policy MA1 'Master Planning Strategic Sites' sets out various requirements for the development of the four strategic sites, including provision of a Green Infrastructure Framework which should incorporate "<i>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</i>".
 <p>POPULATION & MATERIAL ASSETS</p>	<ul style="list-style-type: none"> Policy DS4 'Development Needs' sets out the delivery of 9,089 homes and 99ha of employment land over the plan period to 2039, which will provide enough homes to meet South Staffordshire's requirements as well as contributing towards the unmet housing and employment needs of neighbouring authorities, in line with the Duty to Cooperate. Policy HC9 'Gypsy, Traveller and Travelling Showpeople' sets out requirements for the provision of high quality pitches and plots for the Gypsy, Traveller and Travelling Showpeople communities to ensure that their needs can be addressed in terms of access to essential services and well-designed locations. A range of other LPR policies seek to meet the differing housing needs of the population, including Policy HC4 for older residents, Policy HC5 for those with specialist needs, Policy EC6 dwellings for rural workers, and Policy HC8 for self-build and custom housebuilding schemes. 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.

SEA Topic	Summary of mitigating effects of the Local Plan policies
	<ul style="list-style-type: none"> Policy EC11 'Infrastructure' seeks to ensure that the plan provides appropriate and proportionate infrastructure to deliver the proposed development, which may help to ensure that there are adequate services to meet the day to day needs of residents within the local area. Policy HC14 'Health Infrastructure' seeks to protect existing healthcare infrastructure and ensure that major residential developments are assessed against existing healthcare facilities for potential negative impact and that contributions towards healthcare infrastructure are prioritised. 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.
 SOIL	<ul style="list-style-type: none"> Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' states that <i>"Valued soils will be protected and enhanced, including the best and most versatile agricultural land"</i>. The policy also encourages the restoration, enhancement and creation of habitats and linkages, which would be expected to help mitigate negative ecological impacts associated with development. 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 BMV agricultural land, although this effect is uncertain as it would be dependent on the locations for development. 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> Policies HC1 'Housing Mix', HC2 'Housing Density' and HC10 'Design Requirements' promote an efficient use of land for new development, including appropriate sizes of dwellings to meet local needs. Policies HC17 'Open Space', HC18 'Sports Facilities and Playing Fields' and HC19 'Green Infrastructure' set out the requirements for provision of open space, play areas, sports pitches and other informal green spaces which would be likely to contribute towards retention and enhancement of green infrastructure and ecological assets alongside built development.
 WATER	<ul style="list-style-type: none"> Policy NB7 'Managing Flood Risk, Sustainable Drainage Systems & Water Quality' requires site-specific Flood Risk Assessments and surface water drainage strategies, in accordance with national requirements and taking account of the latest climate change allowances. Policy NB7 would ensure that development proposals provide appropriate SuDS. The policy also states that all development proposals must demonstrate <i>"adequate water supply, sewerage and land drainage systems (including water sources, water and wastewater infrastructure) to serve the whole development"</i>. 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. Policy NB6 'Sustainable Construction' aims to ensure that all residential schemes are compliant with a water efficiency standard of 110 litres/person/day and states that developments should include measures for the reuse and recycling of water and rainwater harvesting wherever feasible. These measures would be likely to reduce demand on mains water supply.

Residual positive effects

N77. Some of the likely positive effects of the Local Plan are listed in **Table N.5**.

Table N.10: Likely residual positive sustainability effects of the Local Plan

Summary of residual positive effects	
1	<p>Multi-functional green infrastructure network</p> <p>The LPR promotes the conservation and enhancement of multi-functional green infrastructure across the district, and encourages development proposals to seek opportunities to incorporate links and increase connectivity of the wider green network</p> <p>Although the proposed development within the LPR would be expected to result in the loss of greenfield land and associated green infrastructure to some extent, policies within the LPR would be expected to mitigate this loss of multi-functional green infrastructure, resulting in a positive effect on provision of green infrastructure in the longer term.</p>
	<p>Access to public greenspace</p> <p>Various LPR policies seek to provide a range of open spaces, sports facilities and recreational spaces for site end users, which would be expected to help facilitate healthy and active lifestyles and supplement the district's existing recreational resource. Notably, Policy HC17 sets out requirements for all development proposals to provide multi-functional open space, or financial contributions towards off-site open space provision, according to the size of the development.</p>
3	<p>Access to the PProW and cycle networks</p> <p>There is a relatively good coverage of existing PProWs and cycle paths within the district. Various LPR policies seek to create permeable neighbourhoods and promote cycling and walking which would be likely to improve the coverage of, and accessibility to, the pedestrian and cycle networks across South Staffordshire. This would be expected to encourage residents to participate in physical exercise and active travel, with benefits to health and wellbeing.</p>
4	<p>Provision of housing to meet local need</p> <p>In order to meet the identified housing need, the LPR proposes to deliver 9,089 new dwellings within the Plan period. Policies set out in the Plan include various requirements to ensure the provision of an appropriate mix of housing types and tenures that will address the needs of different groups including those with specialist needs, first time home buyers, and the Gypsy and Traveller community.</p>
5	<p>Provision of employment opportunities</p> <p>The Plan seeks to deliver 99ha of employment land, meeting the need identified in the latest Economic Development Needs Assessment (EDNA). Various LPR policies would also be expected to improve access to employment opportunities, including through provision of sustainable transport options and by aiming to locate employment-led development in areas with good accessibility with respect to the strategic road network.</p>
6	<p>Community cohesion</p> <p>The LPR policies set out SSDC's support for improved community cohesion, including through seeking to ensure that the diverse accommodation needs of the population can be met, protecting community services and facilities, and by encouraging development proposals to incorporate careful design which delivers a high quality public realm and considered opportunities to co-locate new development with community facilities and open spaces.</p>

Residual adverse effects

- N78. The Council has proposed a range of policies in the Local Plan which would be expected to help mitigate some of the adverse impacts of development on sustainability. Whilst mitigation has been proposed for some effects, where this is not possible, or is not likely to, wholly mitigate the nature of effect, the following residual effects remain and are drawn to the attention of the plan makers. These are presented in **Table N.6**.
- N79. The LPR may also give rise to cumulative effects, which refers to impacts caused either by a number of separate developments in the same area or continuous activity over time that may have an increased impact on the local environment. Cumulative effects are brought out in **Table N.6**, and are discussed in further detail within **Chapter 16** of the Main SA Report (**Volume 2**).

Table N.11: Likely residual adverse sustainability effects of the Local Plan

Summary of residual adverse effects	
1	<p>Reduction in air quality and increased pollutant emissions</p> <p>Although various LPR policies seek to encourage sustainable transport modes and reduce air pollution, the introduction of 9,089 dwellings and 99ha of employment floorspace would be expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality.</p> <p>The policies would be expected to prevent unacceptable impacts on human health associated with air pollution but may lead to a cumulative negative impact on air quality as a whole, which the policies in the Plan in itself cannot fully mitigate as it would require other transport interventions, for example.</p> <p>Over time, this adverse impact is likely to be reduced resulting from implementation of sustainable transport strategies, phasing out of petrol- and diesel-powered cars, and other advances in technology.</p>
	<p>Fragmentation of the ecological network</p> <p>The LPR would be expected to result in the loss of a significant amount of previously undeveloped land, including soil resources, habitats and potentially ecological links between biodiversity assets.</p> <p>Fragmentation of the ecological network would be expected to be a long-term significant adverse effect. It may be temporary if biodiversity net gain and landscape scale ecological enhancements are effectively implemented through the adopted plan which would potentially deliver a significant beneficial effect in the long term.</p>
3	<p>Increased greenhouse gas emissions</p> <p>Although the LPR policies, notably NB6, would positively contribute towards reducing emissions particularly in terms of building design and construction, the plan would not be expected to fully mitigate the impacts associated with the occupation of development (including those associated with transport, as discussed above), or in terms of emissions associated with the existing housing stock.</p>
4	<p>Alteration of historic environment and landscape character</p> <p>Various LPR policies seek to ensure that development proposals maintain and improve the district's intrinsic rural character and distinctiveness and have regard to the findings of the published LCA and HLC. However, due to the scale of development proposed with a large proportion in previously undeveloped locations surrounding rural settlements with historic value, cumulatively the development set out in the LPR could have the potential to alter South Staffordshire's distinctive historic character to some extent.</p>

Summary of residual adverse effects	
5	<p>Limited access to healthcare / leisure facilities and services</p> <p>The majority of site allocations are located outside of the sustainable target distance to an NHS hospital and GP surgery. LPR policies, such as Policies HC14 and EC12, would be likely to help 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 for sites in more rural settlements in South Staffordshire.</p>
6	<p>Impacts on sensitive landscapes and the West Midlands Green Belt</p> <p>Various LPR policies aim to maintain and enhance South Staffordshire's distinctive landscapes and ensure development design responds to its surroundings, having regard to the findings of the latest Landscape Sensitivity Study, and providing protection for the retained Green Belt. However, it is unlikely that these impacts could be fully mitigated particularly for allocated sites in areas identified as being of 'high' sensitivity according to the Sensitivity Study or 'very high' / 'high' harm to the Green Belt according to the Green Belt Study, where the landscape is likely to be unable to accommodate new development without significant change.</p>
7	<p>Alteration of views</p> <p>Whilst the LPR policies serve to provide some proportionate protection of visual amenity and views and may help to mitigate some of the adverse impacts in this regard, it is likely a minor residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views for a number of the sites proposed in the LPR.</p>
8	<p>Urbanisation of the countryside and coalescence</p> <p>The need to provide housing and employment has led to the proposed allocation of development on previously undeveloped greenfield sites at a number of locations within South Staffordshire. Various policies in the LPR seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt and open countryside. However, due to the rural context in which much of the new development is situated, the LPR policies would not be expected to fully mitigate these impacts and a residual adverse effect is anticipated. This includes potential for reduced separation between the settlements / neighbourhoods of: Codsall and Pendeford; Wood Hayes and Ashmore; Coven Heath and Cross Green; and Four Ashes and Gailey.</p>
9	<p>Loss of tranquillity</p> <p>The proposed development of 9,089 new dwellings and 99ha of new employment land across the district, with a number of development sites located within more rural areas, would be likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.</p>
10	<p>Access to, and demand on, local services and facilities</p> <p>Whilst the LPR policies seek to maintain and enhance local services and facilities as far as possible, these policies would not be expected to fully mitigate the restricted access to local facilities for some areas, particularly those in lower-tier settlements.</p>
11	<p>Increased household waste generation</p> <p>It is difficult for the LPR to specifically reduce waste generation within the Plan area. Although national trend data indicates a general decrease in household waste generation over time, the introduction of 9,089 new households would be expected to increase waste production to some extent.</p>

Summary of residual adverse effects	
12	<p>Loss of soil resources and BMV land</p> <p>The proposed allocations would cumulatively result in the loss of up to approximately 813ha of previously undeveloped land²⁶, approximately 788ha of which could include BMV land. The proposed development within the LPR would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services. The loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield.</p>
13	<p>Increased demand for water and wastewater management</p> <p>The increased population within the Plan area would be expected to increase water demand, such as for drinking water supply and wastewater treatment. The Water Cycle Study (WCS) identified some uncertainty regarding the potential for adverse impacts in terms of wastewater collection infrastructure that may require further monitoring and investment in infrastructure upgrades, to ensure that development can be accommodated throughout the Plan period.</p>

Monitoring

N80. The SA also discusses the importance of a monitoring programme to help ensure that adverse impacts of the Local Plan are identified, investigated and potentially avoided, mitigated or compensated. When opportunities for improving the sustainability performance of the Local Plan arise over time, monitoring helps to ensure that these opportunities are recognised and taken advantage of.

N81. Monitoring has been suggested in relation to:

- Concentration of NO₂ and PM₁₀
- Traffic flows on main roads
- Rates of public transport uptake
- Percentage of SSSIs in favourable condition
- Number of Planning Approvals granted contrary to the advice of Natural England or Staffordshire Wildlife Trust
- Percentage loss of the ecological network
- CO₂ emissions per capita
- Renewable energy generation
- Number of Conservation Area appraisals
- Number of heritage assets identified as 'heritage at risk'
- Percentage of physically active adults
- Number of GP Surgeries
- Quantity of development in the open countryside
- Change in tranquillity in the open countryside
- Number of affordable housing completions
- Percentage of economically active residents
- LSOAs in South Staffordshire within the 10% most deprived in Great Britain

²⁶ Please note this figure is based on gross site areas and so does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.

- Quantity of household waste generation
- Number of dwellings built on PDL
- Number of dwellings built on BMV land (Grades 1, 2 or 3a ALC)
- Number of planning permissions granted contrary to EA advice
- Quality of watercourses
- Number of overflow events of untreated sewage discharges into rivers
- Water efficiency in new homes

Consultation and next steps

- N82. The Regulation 19 SA Report will be published alongside the Publication Version of the South Staffordshire LPR.
- N83. A six-week period of consultation will be undertaken by SSDC to offer individuals, businesses and other organisations an opportunity to submit representations regarding the South Staffordshire LPR.
- N84. Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.



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