

Sustainability Appraisal of the South Staffordshire Local Plan Review

Issues and Options

September 2018



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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report has been produced to assess the sustainability effects of the South Staffordshire Local Plan Review and meets the requirements of the SEA Directive. It is not intended to be a substitute for Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Contents

1	Introduction.....	1
1.1	Background	1
1.2	South Staffordshire	2
1.3	The Local Plan Review	2
1.4	Sustainability Appraisal	5
1.5	Integrated approach to SA and SEA	5
1.6	Best Practice Guidance	6
2	Methodology	7
2.1	Scoping stage	7
2.2	Assessment of reasonable alternatives	8
2.3	Appraisal process.....	11
2.4	Significance.....	12
2.5	Geographic scale.....	13
2.6	Impact magnitude.....	14
2.7	General assumptions and limitations.....	15
2.8	Accessible Natural Greenspace Standards.....	16
2.9	Objective specific assumptions and limitations.....	17
3	Assessments.....	23
3.1	Preface.....	23
3.2	Vision.....	24
3.3	Strategic objectives	25
3.4	Residential growth: Option A	27
3.5	Residential growth: Option B.....	29
3.6	Residential growth: Option C.....	31
3.7	Residential growth: Option D	33
3.8	Residential growth: Option E.....	35
3.9	Likely impacts of not satisfying the OAN.....	37
3.10	Gypsy, Travellers and Showpeople growth: Option A.....	38
3.11	Gypsy, Travellers and Showpeople growth: Option B.....	39
3.12	Employment growth: Option A.....	40
3.13	Employment growth: Option B.....	42
3.14	Employment growth: Option C.....	43
3.15	Residential spatial distribution: Option A.....	44
3.16	Residential spatial distribution: Option B.....	50
3.17	Residential spatial distribution: Option C.....	54
3.18	Residential spatial distribution: Option D.....	58
3.19	Residential spatial distribution: Option E	62
3.20	Residential spatial distribution: Option F	66
3.21	Employment spatial distribution: Option A	71
3.22	Employment spatial distribution: Option B	72
3.23	Employment spatial distribution: Option C	73
3.24	Employment spatial distribution: Option D	74
3.25	Overview of quanta and distribution results.....	75
3.26	Housing Mix.....	76
3.27	Homes for Older People and Specialist Housing.....	77
3.28	Affordable Housing – Percentage Requirement.....	79
3.29	Affordable Housing – Tenure Split	80
3.30	Affordable Housing – Boosting Supply	82

3.31	Rural Exception Sites	83
3.32	Entry Level Exception Sites.....	84
3.33	Entry Level Exception Sites – Tenure Split.....	84
3.34	Entry Level Exception Sites – Local Connection.....	85
3.35	Self-build and Custom Housebuilding.....	86
3.36	Gypsies, Travellers and Travelling Showpeople	87
3.37	Design and Residential Amenity.....	88
3.38	Parking Provision – Public Parking	89
3.39	Parking Provision – Residential Parking	90
3.40	Space About Dwellings	91
3.41	Internal Space Standards.....	92
3.42	Health and Wellbeing.....	93
3.43	Leisure Facilities	94
3.44	Children’s Play and Youth Development	95
3.45	Employment Sites.....	96
3.46	Inclusive Growth.....	97
3.47	Rural Employment and Tourism	98
3.48	Village Centres and Retail	99
3.49	Protecting Community Services and Facilities.....	100
3.50	Wolverhampton Business Airport.....	101
3.51	Infrastructure	102
3.52	Public Transport and the Highway Network	103
3.53	Green Belt.....	104
3.54	Open Countryside.....	105
3.55	Landscape Character.....	106
3.56	Natural Environment.....	107
3.57	Adapting to a Changing Environment – Fabric and Energy Conservation.....	108
3.58	Adapting to a Changing Environment – Renewable, Low Carbon Energy Generation.....	109
3.59	Historic Environment.....	110

Appendix A: SA Framework for the South Staffordshire LPR

Acronyms

AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CAMS	Catchment Abstraction Management Strategy
DECC	Department of Energy and Climate Change
DEFRA	Department for Environment, Food and Rural Affairs
EU	European Union
GI	Green Infrastructure
GIS	Geographic Information Systems
GWh	GigaWatt-hours
IMD	Index of Multiple Deprivation
LA	Local Authority
LNR	Local Nature Reserve
LoGS	Local Geological Site
LPR	Local Plan Review
LSOA	Lower Layer Super Output Area
LTP	Local Transport Plan
LWS	Local Wildlife Site
MHCLG	Ministry of Housing, Communities and Local Government
MWh	Megawatt-hours
NCA	National Character Area
NO₂	Nitrogen Dioxide
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PM₁₀	Particulate Matter (10 micrometres)
PPP	Policies, Plans and Programmes
PRoW	Public Rights of Way
RBMP	River Basin Management Plan
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
UKCP09	United Kingdom Climate Projections 2009

Tables

Table 1.1: The range of options considered within the LPR Issues and Options document, each of which has been appraised for their likely sustainability impacts in Chapter 3.....	3
Table 2.1: Guide to the significance matrix.	12
Table 2.2: Geographic scales and sensitivity of receptors.....	13
Table 2.3: Impact magnitude.	14
Table 2.4: Sustainable distances.....	16
Table 2.5: Assumptions, limitations and uniformities of the appraisal process for each SA Objective.....	17
Table 3.1: SA Scoring matrices for each of the spatial distribution and development quantity options assessed in this report.....	75

Figures

Figure 1.1: South Staffordshire District.....	4
Figure 2.1: Stages in the SA process.....	10

1 Introduction

1.1 Background

- 1.1.1 South Staffordshire District Council (the Council) is in the process of preparing a Local Plan Review (LPR). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the LPR making process for the Council by identifying the likely environmental effects of reasonable alternatives and various options.
- 1.1.2 The Council has prepared an Issues and Options (July 2018) document as part of the LPR making process. The Issues and Options identify a range of potential issues in the Plan area that could be addressed through the LPR, and considers various options for doing so. This includes options for the quantity of residential, employment and gypsy and traveller development that should be delivered through the LPR as well as various spatial strategy options which would help to deliver the development (see **Table 1.1**).
- 1.1.3 This SA/SEA document follows on from the Scoping Report, prepared by Lepus in 2017¹.
- 1.1.4 The purpose of this report is to provide an appraisal of each option in the Issues and Options paper to identify their likely sustainability impacts on each objective of the Framework. This will help the Council to identify the most sustainable options and to prepare an LPR which is economically, environmentally and socially sustainable.

¹ Lepus Consulting (2017) Sustainability Appraisal, of the South Staffordshire Local Plan Review, Scoping Report

1.2 South Staffordshire

- 1.2.1 In 1974, Cannock Rural District and Seisdon Rural District merged to form South Staffordshire, a district in the county of Staffordshire, located just north west of the West Midlands county (see **Figure 1.1**). Approximately 111,000 residents are spread over the 40,400ha rural district, of which 80% (32,114ha) lies within the West Midlands Green Belt.
- 1.2.2 South Staffordshire is a popular and attractive destination for migrants, particularly those from urban areas in the West Midlands. The district has no dominant settlement or urban area. Instead, it can be considered to be a 'community of communities' with 27 parishes and a diverse pattern of hamlets and villages with distinct characters distributed amongst idyllic countryside. Approximately 82% of land in the district is used for agriculture, 12% is built on and urban whilst 6% of the district is considered to be natural².

1.3 The Local Plan Review

- 1.3.1 The South Staffordshire LPR will include the overall strategy for development in the district for the period 2018 - 2037, including a vision for the future, relevant objectives, site allocations, site based policies and development management policies.
- 1.3.2 The purpose of the LPR is to review existing planning policy documents and determine the development needed within the district up until 2037. It will also set out policies which will guide the determination of planning applications. The Issues and Options paper is the first stage of the LPR. It offers the Council a chance to consult with the public on whether the correct issues have been identified and on the potential strategies and policies needed to meet the different development needs in the Plan area. It is also a chance for the Council to undergo an additional call for sites and to prepare an initial SA report. **Table 1.1** lists the range of options being considered by the Council in the Issues and Options document, and which are assessed in this report.

² Col, B. Kin, S. Ogutu, B. Palmer, D. Smith, G. Belzter, H. (2015) Corine Land Cover 2012 for the UK, Jersey and Guernsey. NERC Environmental Information Data Centre
<https://doi.org/10.5285/32533dd6-7c1b-43e1-b892-e80d61a5ea1d>

Table 1.1: The range of options considered within the LPR Issues and Options document, each of which has been appraised for their likely sustainability impacts in Chapter 3.

Strategy or policy	Number of options
Vision	
Objectives	
Quantity of development options	
Quanta of residential development	5
Quanta of GTT development	2
Quanta of employment development	3
Spatial strategy options	
Spatial options for residential development	6
Spatial options for employment development	4
Policy options	
Housing mix	3
Specialist and elderly housing	4
Affordable housing percentage requirement	3
Affordable housing tenure split	3
Boosting affordable housing supply	2
Rural exception sites	3
Entry level exception sites percentage requirement	1
Entry level exception sites tenure split	2
Entry level exception sites local connection	1
Self-build and custom house building	3
GTT sites identification	3
Design & residential amenity	3
Parking provision – public parking	4
Parking provision – residential parking	2
Space about dwellings	2
Internal space standards	3
Health and wellbeing	2
Leisure facilities	2
Children's Play and Youth Development	4
Employment sites safeguarding and identification	3
Inclusive growth	3
Rural employment and tourism	2
Village centres and retail	3
Protecting community centres and facilities	2
Wolverhampton Business Airport	2
Infrastructure	2
Public transport and the highway network	2
Green Belt	2
Open Countryside	3
Landscape character	2
Natural environment	2
Fabric and energy conservation	3
Renewable, low carbon energy generation	3
Historic environment	2

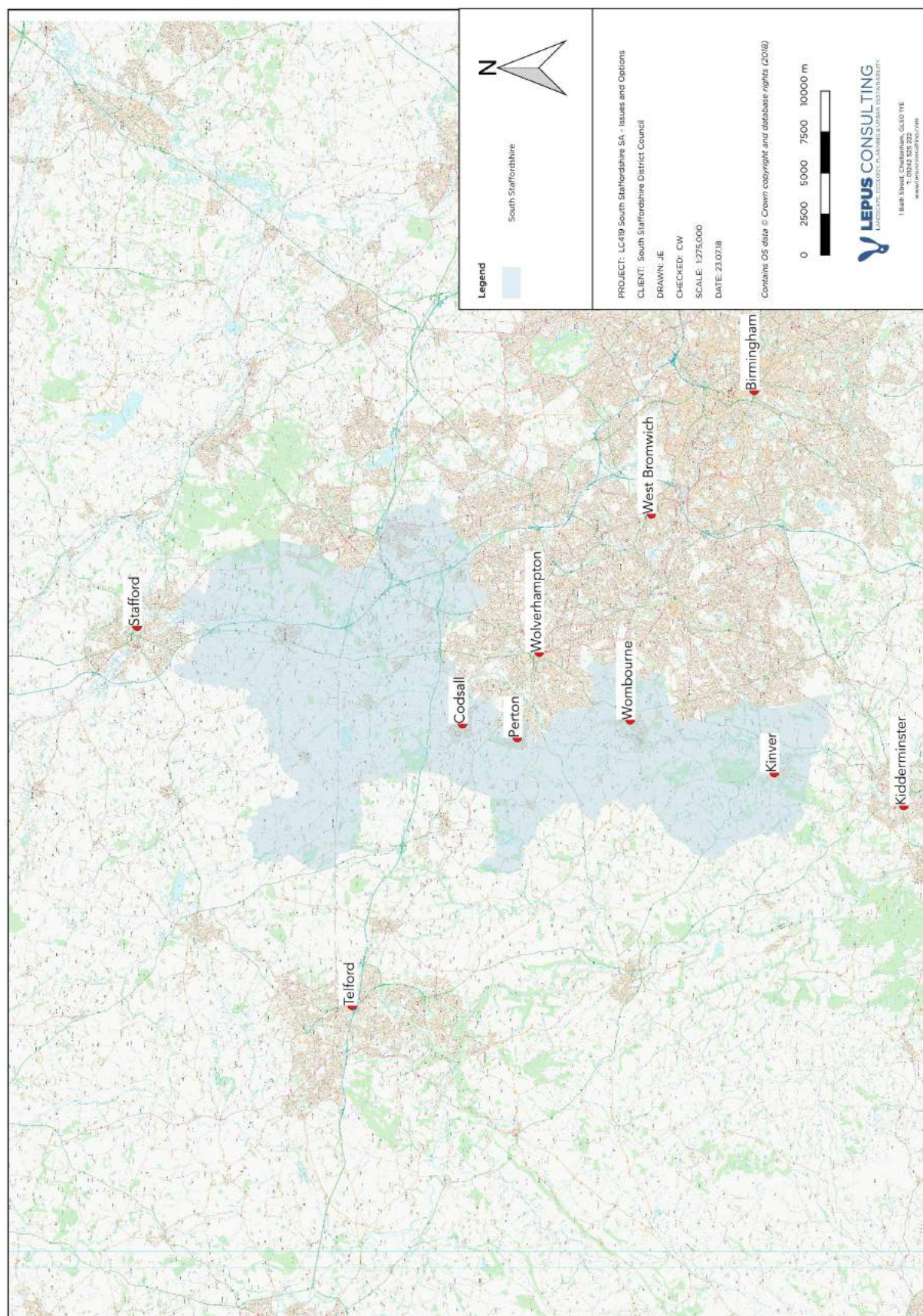


Figure 1.1: South Staffordshire District.

1.4 Sustainability Appraisal

- 1.4.1 This document is a component of the SA of the LPR. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 2.1**, according to Planning Practice Guidance (2016) on Sustainability Appraisal³.
- 1.4.2 SA is the process of informing local development plans to maximise their sustainability value. SA is a statutory requirement for development plan documents. The SA process informs soundness tests for development plan documents, the key objective of which is to promote sustainable development.

1.5 Integrated approach to SA and SEA

- 1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.5.2 The European Union Directive 2001/42/EC⁴ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The Strategic Environmental Assessment (SEA) procedure can be summarised as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified. The public and the relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report prepared.
- 1.5.3 The Directive has been transposed into English law by the SEA Regulations (SI no. 1633). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore it is a legal requirement for the LPR to be subject to SEA throughout its preparation.

³ MHCLG (2016) Planning practice guidance. Available at: <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

⁴ Available online at: ec.europa.eu/environment/eia/sea-legalcontext.htm . Accessed 07.11.17

- 1.5.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004⁵ and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012⁶. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

1.6 Best Practice Guidance

- 1.6.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This is to be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- Office of the Deputy Prime Minister (September 2005): A Practical Guide to the SEA Directive⁷; and
- Ministry for Housing, Communities and Local Government (MHCLG) updated 2015 Planning Practice Guidance - Strategic environmental assessment and sustainability appraisal; web based guidance to accompany the National Planning Policy Framework (NPPF) including guidance on the SEA/SA process⁸.

- 1.6.2 This report has also been carried out in accordance with the latest SEA guidance from the Royal Town Planning Institute⁹.

⁵ Available online at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> . Access 07.11.17

⁶ Available online at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> . Accessed 07.11.17

⁷ Available online at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguide_sea.pdf Accessed 07.11.17

⁸ MHCLG (2016) Planning practice guidance. Available at:

<http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

⁹ RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans, January 2018, available online at:

<http://www.rtpi.org.uk/media/2668152/sea-sappracticeadvicefull2018c.pdf>

2 Methodology

2.1 Scoping stage

2.1.1 The SA scoping report represented Stage A of the SA process (see **Figure 2.1**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

2.1.2 The Scoping report was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency, as well as other relevant parties and the public. Following consultation, the Scoping report was updated in light of the comments received. Each of the reasonable alternatives appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of the following SA Objectives:

- **Climate change mitigation:** Minimise the district's contribution to climate change;
- **Climate change adaptation:** Plan for the anticipated impacts of climate change;
- **Biodiversity and geodiversity:** Protect, enhance and manage the biodiversity and geodiversity asses of the district, including flora and fauna;
- **Landscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening its distinctiveness;
- **Pollution and waste:** Ensure sustainable management of waste whilst minimizing the extent and impacts of water, air and noise pollution.
- **Natural resources:** Protect, enhance and ensure the efficient use of the district's land, soils and water;
- **Housing:** Provide a range of housing to meet the needs of the community;

- **Health:** Safeguard and improve physical and mental health of residents;
- **Cultural heritage:** Conserve, enhance and manage sites, features and areas of historic and cultural importance;
- **Transport and accessibility:** Improve choice and efficiency of sustainable transport in the district and reduce the need to travel;
- **Education:** Improve education, skills and qualifications in the district; and
- **Economy and employment:** Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.

2.1.3 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Annex 1(f)¹⁰ of the SEA Directive. Including the SEA topics in the SA Objectives helps ensure that all of the environmental criteria of the SEA Directive are included. Consequently, the SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough.

2.1.4 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

2.2 Assessment of reasonable alternatives

2.2.1 The purpose of this document is to provide an appraisal of the reasonable alternatives (those listed in **Table 1.1**) in line with Article 5 Paragraph 1 of the SEA Directive¹¹:

¹⁰ Annex 1(f) identifies: 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'.

¹¹ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council.
Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN>
[Date Accessed: 13/07/18]

“Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.”

2.2.2 This document also provides information in relation to the likely characteristics of effects, as per Annex II of the SEA Directive (see **Box 2.1**).

Box 2.1: Annex II of the SEA Directive¹²

Criteria for determining the likely significance of effects (Article 3(5) of SEA Directive)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste- management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
- special natural characteristics or cultural heritage;
- exceeded environmental quality standards or limit values;
- intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

¹² EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council.
Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN>
[Date Accessed: 13/07/18]

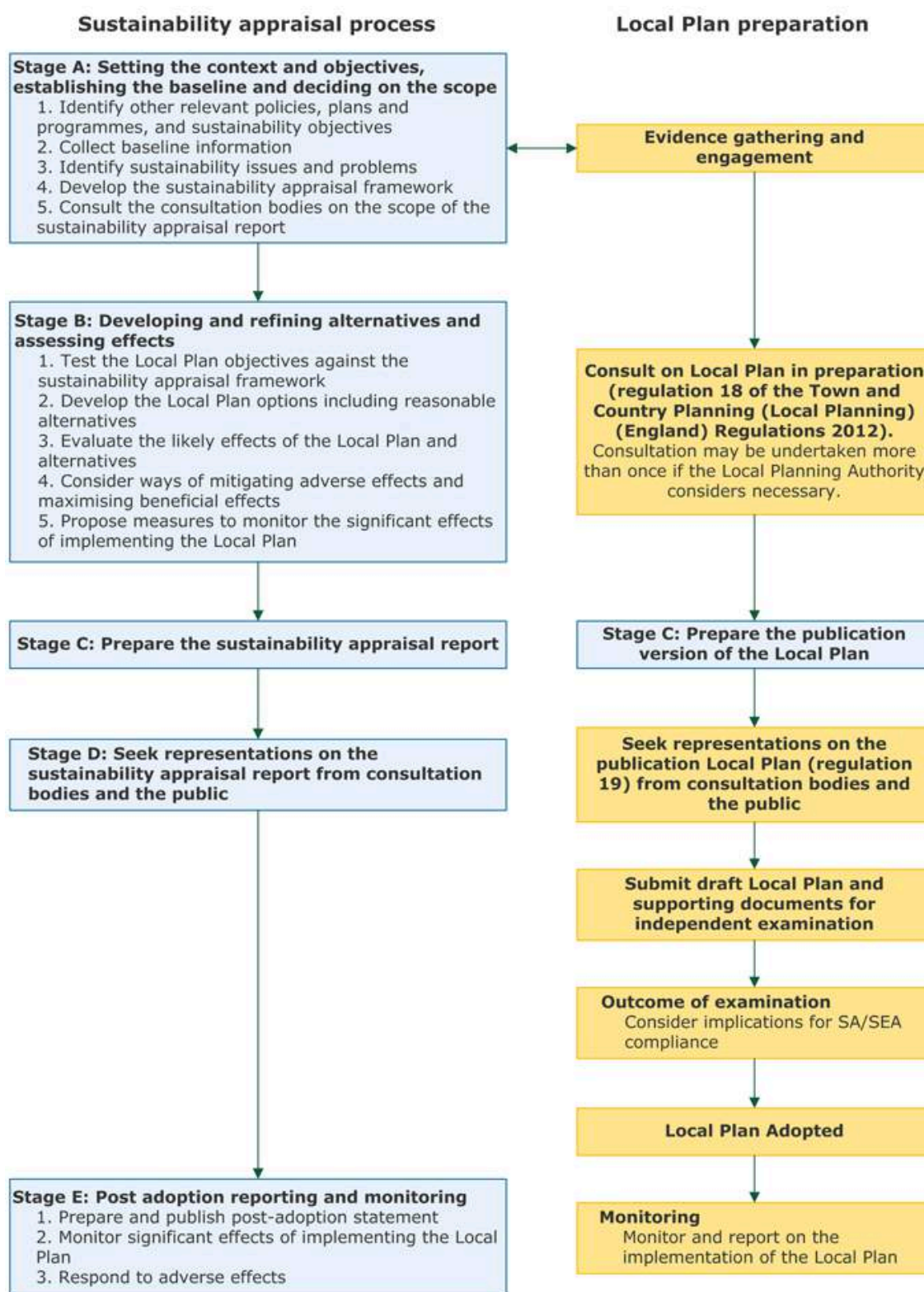


Figure 2.1: Stages in the SA process¹

2.3 Appraisal process

- 2.3.1 The appraisal process has used the SA Framework, the review of plans, programmes and policies and the baseline (including various mapped data sources), as presented in the SA Scoping Report¹³, to assess each option. Assessments have been undertaken using this empirical evidence and, to a lesser extent, expert judgement.
- 2.3.2 **The first stage of assessment** considers the questions in the SA Framework, using the results to determine whether the proposal is likely to bring positive, negative or uncertain effects in relation to each SA Objective. The precautionary principle is applied within these assessments.
- 2.3.3 **The second stage of assessment** considers the level of significance of the effects identified in the first stage. To do so, it draws on criteria for determining significance of effects in Annex II of the SEA Directive (see **Box 2.1**). Any assessment rated as negligible does not constitute a significant effect.
- 2.3.4 A single value from **Table 2.1** is allocated to each SA Objective for each option and discussed in the supporting text narrative. When selecting a single value to best represent the sustainability performance of the relevant SA Objective, the precautionary principle is used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criteria within the SA Framework and a negative effect is identified in relation to another criteria within the same SA Objective, that proposal will be **given an overall negative value for that objective**.

¹³ Lepus Consulting (2017) Sustainability Appraisal, of the South Staffordshire Local Plan Review, Scoping Report

2.4 Significance

2.4.1 The nature of the effect can be either beneficial or adverse depending on the type of development and the design and mitigation measures proposed. Significance can be categorised as minor or major. **Table 2.1** lists the significance matrix and explains the terms used.

2.4.2 Each proposal assessed in the SA is awarded a score for each SA Objective in the Framework, as per **Table 2.1**. Scores are not intended to be summed. Each score is an indication of the overall sustainability performance for the proposal being assessed.

Table 2.1: Guide to the significance matrix.

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of an option would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<p>The size, nature and location of an option would be likely to:</p> <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	<p>The size, nature and location of an option would be likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	<p>The size, nature and location of an option would be likely to:</p> <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific regional or national designation.

- 2.4.3 By assessing impacts against each SA Objective for every proposal in this way, the environmental, social and economic sustainability of each site and policy can be understood and expressed. An adverse impact against one or more SA Objectives does not render that site or policy as unsustainable or unsuitable. All impacts should be taken together as a whole to better understand the site's sustainability performance.
- 2.4.4 It is important to note that this method of scoring and presenting an option's sustainability performance is supported in every case with narrative text which details the key decision-making criteria behind each awarded score. Assumptions and limitations in **Table 2.1** offer further insight into how each score was arrived at.

2.5 Geographic scale

- 2.5.1 Geographic scale relates primarily to the level of importance of the receptor, and hence it's sensitivity, or the level at which it is designated - if applicable. Geographic scale may also refer to the physical area of the receptor, or the part of the receptor likely to be affected. A guide to the range of scales used in the impact significance matrix is presented in **Table 2.2**.

Table 2.2: Geographic scales and sensitivity of receptors.

Scale and sensitivity	Typical criteria
International/national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

2.6 Impact magnitude

2.6.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the effects (see **Box 2.1**). The magnitude of an impact, or the size of an effect, is determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**). On a strategic basis, the appraisal considers the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline).

2.6.2 The description of effects will also be in accordance with the footnote of Annex 1(f) of the SEA Directive, where feasible, which states:

“These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects.”

Table 2.3: Impact magnitude.

Impact magnitude	Typical criteria
High	<p>Likely total loss of or major alteration to the receptor in question;</p> <ul style="list-style-type: none"> • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	<p>Partial loss/alteration/improvement to one or more key features; or The impact is one of the following:</p> <ul style="list-style-type: none"> • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	<p>Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following:</p> <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

2.7 General assumptions and limitations

- 2.7.1 There are a range of uncertainties and limitations that should be borne in mind when considering the assessments and conclusions in this report.

Predicting effects

- 2.7.2 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design of development and the success of mitigation measures.
- 2.7.3 The assessments in this report are based on the best available information, including that provided to us by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 2.7.4 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. For example, some sites may be considered to have a relatively high biodiversity value based on site visits, previous survey reports, satellite imagery or nearby biodiversity hotspots. A detailed ecological survey conducted in the recent past could potentially find the ecological value of such a site to be relatively limited and subsequently the conclusions in the SA should be changed. However, all sites must be assessed in the same way and any introduction of site based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.

Distances

- 2.7.5 Where distances have been measured, these are ‘as the crow flies’ unless specified otherwise. New residents require access to a range of facilities and amenities. The distances that are considered to be sustainable in this regard are based on the Barton, Grant and Guise (2010) Shaping Neighbourhoods for Local Health and Global Sustainability¹⁴ and are presented in **Table 2.4**.

Table 2.4: Sustainable distances.

Target and optimal distances to facilities and amenities		
Facilities & Amenities	Optimal Distance (m)	Target Distance (m)
GP Surgery	800	1,000
Hospital with A&E	6,000	8,000
Leisure Centre	1,500	2,000
Access to Green Network	600	800
Bus stop	400	400
Train Station	2,000	3,000
Primary School	800	1,000
Secondary School	1,500	2,000
Major Employment Centre	5,000	8,000

2.8 Accessible Natural Greenspace Standards

- 2.8.1 The Accessible Natural Greenspace Standards (ANGSt), developed in the 1990s¹⁵ and updated in 2008, are based on the minimum distances people would travel to the natural environment. It is considered that, should new developments meet this standard, it would improve access to green spaces for residents, improve the naturalness of green spaces and improve the connectivity between green spaces. Good access to natural greenspaces improves the health and wellbeing of residents, whilst potentially also reducing visitor pressures on biodiversity hotspots¹⁶. ANGSt are presented in **Box 2.2**.

¹⁴ Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

¹⁵ Accessible Natural Greenspace Standards in Towns and Cities: A review and toolkit for their implementation, England Nature Research Report, No 526

¹⁶ Natural England (2010) 'Nature Nearby' Accessible Natural Greenspace Standard, March 2010

Box 2.2: Accessible Natural Greenspace Standards (ANGSt)

ANGSt recommend that everyone, wherever they live, should have an accessible natural greenspace of:

- At least 2ha in size, no more than 300 metres (5 minutes' walk) from home;
- At least one accessible 20ha site within 2km of home;
- One accessible 100ha site within 5km of home;
- One accessible 500ha site within 10km of home; plus
- A minimum of one hectare of statutory Local Nature Reserves per thousand population.

2.9 Objective specific assumptions and limitations

2.9.1 A number of assumptions, limitations and uniformities are inherent to the appraisal process for specific SA Objectives (see **Table 2.5**). These should be borne in mind when considering the assessment findings presented in **Chapter 3**.

Table 2.5: Assumptions, limitations and uniformities of the appraisal process for each SA Objective.

Obj.	Assumptions, limitations and uniformities of assessments
1. Climate change mitigation	<ul style="list-style-type: none"> • Proposals which would be likely to increase greenhouse gas (GHG) emissions in the local area will make it more difficult for the Council to reduce the Plan area's contribution towards the causes of climate change. • People in more rural locations generally have higher carbon footprints than residents in urban locations, which is a trend seen throughout England. • The carbon footprint for the Plan area in 2015 was 906,400 tonnes CO₂/year. The carbon footprint per person per year was 8.2 tonnes¹⁷. • It is assumed that development on previously undeveloped sites or greenfields will result in an increase in local GHG emissions due to the increase in the local population and the local number of operating businesses and occupied homes. • Plan proposals which may be likely to increase the Plan area's carbon footprint by 1% or more are recorded a strong adverse score for this objective. • The increase in GHG emissions caused by new residents and new employees is as a result of the impacts of the construction phase, the occupation and operation of homes and businesses, oil, gas and coal consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible.

¹⁷ UK local authority and regional carbon dioxide emissions national statistics: 2005-2015, available online at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2015>

2. Climate change adaptation	<ul style="list-style-type: none"> • An adverse score is recorded for proposals that would be expected to increase the number of residents at risk of flooding. • The level of fluvial and pluvial (surface water) flood risk present at each site is based on the Environment Agency's flood risk data, such that: <ul style="list-style-type: none"> - Flood Zone 3: 1% - 3.3+% chance of flooding each year; - Flood Zone 2: 0.1% - 1% chance of flooding each year; and - Flood Zone 1: Less than 0.1% chance of flooding each year. • Where site proposals coincide with Flood Zone 2, a minor adverse score is recorded. Where site proposals coincide with Flood Zone 3, a strong adverse score is recorded. • Urban greenspaces help urban areas adapt to the impacts of climate change through the provision of cooler microclimates and by reducing surface water run-off. Trees are important for shade provision whilst water surfaces provide evaporative cooling. They thereby alleviate the 'urban heat island' effect. Vegetation (including trees, hedgerows and grasses) and soils also play a vital role in attenuating flood risk, particularly on steep slopes, by intercepting surface water flow. • Plan proposals which are expected to result in a loss of greenspace will be assumed to be adversely impacting the ability of the Plan area to adapt to the impacts of climate change and an adverse score for this objective is recorded. • It is assumed that development proposals will be in perpetuity and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of flooding.
3. Biodiversity and Geodiversity	<ul style="list-style-type: none"> • No ecological surveys have been completed by Lepus to inform the assessments in this report. • It is assumed that the loss of biodiversity assets, such as a stand of Ancient Woodland or an area of Priority Habitat, are permanent and irreversible effects. • Adverse scores are recorded where the following designations may be harmed or lost as a result of proposals: Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), Ramsar sites, Ancient Woodlands, National Nature Reserves (NNR), Local Nature Reserves (LNRs) and Local Wildlife Sites (LWSs) as well as Priority Habitats and Priority Species protected under the 2006 NERC Act¹⁸. • Adverse effects are commonly associated with impacts of the construction phase (e.g. habitat fragmentation and noise, air and light pollution associated with the construction process and construction vehicles) as well as the operation/occupation phase (e.g. increases in public access associated disturbances, increases in local congestion resulting in a reduction in air quality at the designation and the increased risk of pet predation). • It is assumed that construction and occupation of previously undeveloped greenfields will result in a net reduction in vegetation cover in the Plan area. Proposals which will result in the loss of a greenfield are therefore expected to contribute towards a cumulative loss in vegetation cover. This would also be expected to lead to greater levels of fragmentation and isolation for the local ecological network, such as due to the loss of steeping stones and corridors.

¹⁸ Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents>

4. Landscape	<ul style="list-style-type: none"> Baseline data on landscape character types (LCTs) within the Plan area are derived from the 1996 Landscape study (adopted 2001)¹⁹. Features and the condition of each LCT have informed the appraisal of each Plan option on the Landscape objective. Options that may alter views of a predominantly rural or countryside landscape, for a variety of receptors including local residents, are assumed to have adverse impacts on the landscape objective. It is expected that the Council will require developers to prepare Landscape and Visual Impact Assessments (LVIAs) for site proposals where relevant. Options which may alter existing settlement boundaries or patterns will be expected to have an adverse impact on this objective. Options which would discord with the local character (whether its rural or urban), or which may diminish the tranquility of a landscape, will also be expected to have an adverse impact on this objective.
5. Waste and pollution	<ul style="list-style-type: none"> This objective is concerned with identifying the likely impacts of options in the LPR on the generation of waste in the plan area and rates of air, water and soil pollution. For the purpose of assessments, it is assumed that new residents in South Staffordshire will have an annual waste production of 412kg per person, in line with the England average. Adverse scores are recorded for options which would increase waste generation. Adverse scores are recorded for options which would be expected to exacerbate rates of, or the impacts of, air, noise, light or water pollution. The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (GSPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. Air pollution is a major hazard to human health. An adverse score is therefore recorded for options which would expose new and existing residents to poor air quality. Approximately 5.1% of deaths associated with particulate matter in 2016, up from 4.7% in 2015.

¹⁹ Staffordshire County Council (2001) Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996 – 2011. Available online at: <https://www.staffordshire.gov.uk/environment/eLand/planners-developers/landscape/NaturalEnvironmentLandscape.aspx>

6. Natural Resources	<ul style="list-style-type: none"> • In accordance with the core planning principles of the NPPF²⁰, development on previously developed land (PDL) will be recognised as an efficient use of land. Development of previously undeveloped land and greenfields is not considered to be an efficient use of land. • Development proposals for previously undeveloped or green field sites are expected to pose a threat to soil within the site perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during construction. • The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grade 1, 2 and 3a, are referred to as 'Best and Most Versatile' land. • Adverse scores are recorded for options which would result in a net loss of ecologically or agriculturally valuable soils. • A significant proportion of the Districts biodiversity is in the underground biomass of soils. In the absence of healthy and well-structured soils, above ground biodiversity is unlikely to improve. • It is assumed that proposals will at least be in accordance with the national mandatory water efficiency standard of 125 litres per person per day, as set out in the 2010 Building Regulations. • It is assumed that all housing proposals in the Local Plan will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.
7. Housing	<ul style="list-style-type: none"> • The Council have prepared evidence documents in relation to the housing needs in the Plan area over the Plan period. Options are assessed for the extent to which they will help to meet the diverse needs of current and future residents of the Plan area. • Options are assessed to meet the needs outside the Plan area and the unmet need of dwellings from nearby Districts, in particular the unmet needs of approximately 37,900 dwellings from Birmingham and 22,000 dwellings from the Black Country. • Adverse scores are recorded where an option would be unlikely to satisfy the needs of current or future residents. • Unless otherwise stated, it is assumed development options will provide a good mix of housing type and tenure opportunities.
8. Health and wellbeing	<ul style="list-style-type: none"> • In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the LPR should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure centres and a diverse range of natural habitats. Sustainable distances to each of these necessary services are listed in Chapter 2 and are derived from Barton <i>et al</i>²¹. • Adverse scores are recorded where they would not be expected to facilitate active and healthy lifestyles for current or future residents.

²⁰ Ministry of Housing, Communities and Local Government (July 2018) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

²¹ Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

9. Cultural Heritage	<ul style="list-style-type: none"> Impacts on heritage assets will be largely determined by the specific layout and design of development proposals. These are currently unknown and therefore the likelihood, extent and permanence of effects on heritage assets is somewhat uncertain at this stage. In line with the precautionary principle, where adverse impacts cannot be ruled out and where there is no evidence that shows how the potential adverse effects will not arise, the adverse effects are assumed to occur. This is reflected in the scoring for each Plan proposal. Adverse scores are recorded for options which would be expected to have an adverse impact on sensitive cultural heritage designations, including Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas. Adverse scores are also recorded where options would be likely to have an adverse impact on above and below ground archaeology (including that which is as yet undiscovered). Adverse impacts on Grade I and Grade II* Listed Buildings are considered to be more severe than adverse impacts on Grade II Listed Buildings. Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the designation. Development which would discord with the local character or setting, such as due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets for which the character of the local area is an important component of setting.
10. Transport	<ul style="list-style-type: none"> Options are assessed for the extent to which they would provide residents with access to a range of transport modes that provide them with sustainable access to key services and amenities, including employment and retail locations. In line with Barton <i>et al</i>'s sustainable distances²², residents would ideally be situated within 2km of a railway station, 400m of a bus stop offering a frequent service and have access onto the cycle and PRoW network. Options will be assessed for their likely impacts on congestion in the Plan area. Where residents have restricted access to sustainable transport modes, it is assumed that they will have a relatively high reliance on personal car usage (this would also have ramifications for the assessments on air pollution and climate change due to road transport GHG emissions).
11. Education	<ul style="list-style-type: none"> It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents. In line with Barton <i>et al</i>'s sustainable distances, residential development proposals would ideally be within 800m of a primary school and 1.5km of a secondary school. Proposals for residential development in urban areas and existing settlements are considered to be more likely to provide new residents with good access to education opportunities than residential development in more rural locations would. Access to sustainable transport modes, such as buses and trains, are generally better in urban areas and existing settlements and these offer residents a sustainable mode of transport for reaching school.

²² Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability.

12. Economy and employment

- The Council are preparing various evidence documents to inform their decision making process on the quantity and types of employment floorspace they should seek to deliver through the LPR. Options in this report will be assessed for the extent to which they would satisfy the objectively assessed needs of the Plan area.
- Options are assessed to meet the needs outside the Plan area and the unmet need of employment land from nearby Districts, in particular the unmet needs of Cannock Chase and the Black Country.
- It is assumed that, in line with Barton *et al*'s sustainable distances, new residents need to be situated within 5km of major employment areas to ensure they have access to a range of employment opportunities capable of meeting their needs.
- Major employment areas are the four freestanding employment sites, which includes i54, Hilton Cross, ROF Featherstone and Four Ashes.
- Other employment areas within the District are predominantly larger settlements in and outside the Plan area, which includes the Tier 1 settlements identified in the Rural Services and Facilities Audit (2018), which includes: Bilbrook, Cheslyn Hay, Codsall, Great Wyrley and Penkridge.

3 Assessments

3.1 Preface

3.1.1 The following sections of this chapter provide an appraisal of each option considered by the Council in the Issues and Options document (see **Table 1.1**). Each appraisal includes an SA Scoring matrix that provides an indication of the nature and magnitude of effects. Text narrative follows the scoring matrices for each option, within which the findings of the appraisal and the rational for the recorded scores are described.

3.1.2 Each option is assessed against the SA Framework, which is comprised of the following objectives:

- **SA Objective 1. Climate change (C.C.) mitigation:** Minimise the district's contribution to climate change;
- **SA Objective 2. Climate change (C.C.) adaptation:** Plan for the anticipated impacts of climate change;
- **SA Objective 3. Biodiversity and geodiversity:** Protect, enhance and manage the biodiversity and geodiversity asses of the district, including flora and fauna;
- **SA Objective 4. Landscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening its distinctiveness;
- **SA Objective 5. Pollution and waste:** Ensure sustainable management of waste whilst minimizing the extent and impacts of water, air and noise pollution.
- **SA Objective 6. Natural resources:** Protect, enhance and ensure the efficient use of the district's land, soils and water;
- **SA Objective 7. Housing:** Provide a range of housing to meet the needs of the community;
- **SA Objective 8. Health:** Safeguard and improve physical and mental health of residents;
- **SA Objective 9. Cultural heritage:** Conserve, enhance and manage sites, features and areas of historic and cultural importance;
- **SA Objective 10. Transport and accessibility:** Improve choice and efficiency of sustainable transport in the district and reduce the need to travel;
- **SA Objective 11. Education:** Improve education, skills and qualifications in the district; and
- **SA Objective 12. Economy and employment:** Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.

3.2 Vision

1	2	3	4	5	6	7	8	9	10	11	12
C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
+	+	+	+	+	+	+	+	+	+	+	+

3.2.1 The Issues and Options document proposes the following vision for the Plan area:

“South Staffordshire will strive to protect and enhance its distinctive character, communities and landscape whilst creating beautiful and thriving new places in which people can live, work and play.”

3.2.2 This vision sets out the Council's clear objective to conserve and enhance important aspects of the Plan area's housing, infrastructure, economic growth and environmental protection. By pursuing this vision, the Council has placed sustainable development at the core of their Plan making process. It is expected that this will help to ensure the Council's decision making process seeks out and maximises opportunities for protecting and enhancing the natural environment, economic growth and social cohesion. This will be likely to positively impact each SA Objective.

3.3 Strategic objectives

1	2	3	4	5	6	7	8	9	10	11	12
C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
+	+	+	+	+	+	+	+	+	+	+	+

3.3.1 In order to achieve the vision set out above, the Council have identified strategic objectives for the social, economic and environmental spheres of sustainable development:

Social:

1. To provide a good range of market and affordable housing of varying sizes including housing that meets the needs of an ageing population;
2. To develop a built environment that respects the character of our existing settlements and reflect local vernacular so to create places where people want to live, work and play;
3. To encourage healthy communities through the provision of good access to green infrastructure, sport and leisure, children's play and youth development facilities;
4. To create sustainable village centres enabling good access to community infrastructure including education, health and leisure facilities, retail and community services; and
5. To maximize community cohesion and safety by ensuring that new developments are designed to support crime reduction.

Economic

6. Develop an economic strategy that fosters sustainable economic growth and encourages inward investment and job creation in key sectors such as research and design and advanced manufacturing; providing the skills to enable local residents to access these jobs
7. Support the vitality of rural areas by enabling the sustainable growth and diversification of local businesses
8. Support the development of sustainable transport network including ensuring that where possible existing and new development is well served by various public transport modes
9. Ensure that new development is served by appropriate physical infrastructure including road improvements where robust evidence demonstrates network capacity issues.

Environmental

10. Protect the Green Belt as far as possible ensuring that where Green Belt release is necessary that compensatory improvements to the environmental quality and accessibility of remaining Green Belt,

including improving access to the countryside and ecological and biodiversity enhancement, are made.

11. Safeguard and enhance the districts district landscape character, green infrastructure and natural environment
12. Enhance the built environment including conserving and enhancing district's heritage assets.
13. Ensure that our communities are resilient to the effects of climate change ensuring development does not increase the risk of flooding to new and existing properties and provide opportunities from renewable or low carbon energy supply systems.

3.3.2 By pursuing these strategic objectives, it is considered to be likely that development delivered through the LPR will satisfy local development needs, whilst also providing for the needs of the growing elderly population. These objectives point towards sustainable and vibrant communities where residents can pursue high quality, active and healthy lifestyles and comfortably access a variety of employment and education opportunities.

3.3.3 Development will be more likely to accord with the existing setting of its location, including in terms of design, layout, scale and type and adverse impacts on the natural environment objectives may be avoided in many circumstances. Achieving these objectives would help to ensure that Green infrastructure (GI) assets, including sensitive biodiversity designations, are likely to be protected and enhanced to some extent and the Plan area becomes increasingly resilient to the impacts of climate change.

3.4 Residential growth: Option A

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

Option A for residential growth

Provide enough housing to meet South Staffordshire's objectively assessed housing need. This option would equate to:

- **5,130 dwellings between 2018-2037**
- **Average yearly minimum requirement of 270 dwellings throughout the plan period**

South Staffordshire would provide enough housing to meet its own local housing needs, but would not contribute towards the unmet needs of neighbouring authorities/regional housing shortfalls, such as the shortfall arising from the Greater Birmingham Housing Market Area.

- 3.4.1 This Option would satisfy the OAN for residential development in the Plan area over the Plan period. This Option would not satisfy the unmet development needs from outside the Plan area. It would therefore be expected to make a minor positive contribution towards the housing SA Objective.
- 3.4.2 Impacts on SA Objectives other than housing are entirely uncertain as these impacts are largely dependent on the distribution of development. However, by pursuing a quantity of development that does not exceed the local OAN, the Council will be likely to have flexibility and choice when deciding on their preferred distribution of development and in so doing will be likely to have good scope for avoiding or mitigating any anticipated adverse sustainability impacts.
- 3.4.3 At 2.5 people per dwelling, 5,130 new dwellings could be expected to increase the local population by 12,825. It is uncertain the extent to which this may result in over-capacity issues at key services such as GP surgeries and schools as this dependent on the capacity of the services and the distribution of development.

- 3.4.4 In 2015 the District had a total annual carbon footprint of 906,400 tonnes CO₂, whilst residents of the District had an average annual carbon footprint of 8.2 tonnes CO₂ per person²³. The introduction of 12,825 new residents may therefore be expected to increase the annual carbon footprint of the District by 105,165 tonnes CO₂, or 11.6%. This would significantly increase the local area's contribution towards the causes of climate change (SA Objective 1).
- 3.4.5 In 2014-15, a total of 46,460 tonnes of waste was collected in South Staffordshire²⁴. The average waste generated per capita in England in 2016 was 412kg. Assuming new residents generate 412kg per capita, 12,825 new residents could be expected to increase the total annual waste generated in the Plan area by 5,283.9 tonnes, or 11.4%. This would have a strong adverse impact on SA Objective 5, which is concerned with reducing waste generation.

²³ UK local authority and regional carbon dioxide emissions national statistics: 2005-2015, available online at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2015>

²⁴ UK local authority and regional waste national statistics, https://data.gov.uk/dataset/local_authority_collected_waste_management_statistics

3.5 Residential growth: Option B

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

Option B for residential growth

Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and a modest contribution to the HMA's unmet housing needs. This additional contribution could reflect the maximum yearly completions historically achieved within the district amounting to 1520 dwellings. This option would equate to:

- **Around 7,030 dwellings between 2018-2037**
- **Average yearly minimum requirement of 370 dwellings throughout the plan period**

This would provide a moderate uplift in housing provision within the district to contribute towards the housing shortfall arising from the Greater Birmingham Housing Market Area, based upon the maximum levels of growth which have proved realistic and deliverable in the last 22 years. It would ensure a greater degree of certainty that the level of additional housing could be achieved. However, this approach would not be sufficient to deliver the levels of growth implied by the recommended strategic Green Belt and Open Countryside areas of search for South Staffordshire set out in the HMA Strategic Growth Study.

3.5.1 This Option would deliver more than enough houses to satisfy the OAN of South Staffordshire over the Plan period, and would therefore make a strong positive contribution towards achieving SA Objective 7. In so doing, the Council would also contribute towards meeting the OAN for other authorities in the HMA.

3.5.2 Impacts on SA Objectives other than housing are entirely uncertain as these impacts are largely dependent on the distribution of development. However, by pursuing a quantity of development that exceeds the local OAN, the Council may have less choice over the spatial distribution of development, to some extent, and this may make avoiding or mitigating adverse sustainability impacts more difficult.

-
- 3.5.3 At 2.5 people per dwelling, 7,030 new dwellings could increase the local population by 17,575. It is uncertain if this could result in over-capacity issues at key services as this would be dependent on the capacity of services and distribution of development.
- 3.5.4 In 2015 the District had a total annual carbon footprint of 906,400 tonnes CO₂, whilst residents of the District had an average annual carbon footprint of 8.2 tonnes CO₂ per person. The introduction of 17,575 new residents may therefore be expected to increase the annual carbon footprint of the District by 144,115 tonnes CO₂, or 15.9%. This would significantly increase the local area's contribution towards the causes of climate change (SA Objective 1).
- 3.5.5 In 2014-15, a total of 46,460 tonnes of waste was collected in South Staffordshire. The average waste generated per capita in England in 2016 was 412kg. Assuming new residents generate 412kg per capita, 17,575 new residents could be expected to increase the total annual waste generated in the Plan area by 7,240.9 tonnes, or 15.6%. This would have a strong adverse impact on SA Objective 5, which is concerned with reducing waste generation.

3.6 Residential growth: Option C

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

Option C for residential growth

Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and provide enough land to accommodate a minimum of an additional 4,000 dwellings towards wider housing shortfalls from the HMA (having regard to the minimum capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to:

- A minimum requirement of 9,130 dwellings between 2018-2037
- A minimum average yearly requirement of 481 dwellings throughout the plan period

This would ensure South Staffordshire provided a significant contribution towards unmet needs of the HMA, based upon the levels of growth implied by the strategic areas of search for South Staffordshire within the HMA Strategic Growth Study. It would provide certainty to other HMA authorities that the Council was testing its recommended capacity to accommodate additional growth based upon a consistent HMA-wide evidence base. This quantum of dwellings represents a significant (30%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.

3.6.1 This option would deliver significantly more houses than is needed to satisfy the OAN of South Staffordshire over the Plan period, and would therefore make a strong positive contribution towards achieving SA Objective 7. In so doing, the Council would also make a significant contribution towards meeting the OAN for other authorities in the HMA.

3.6.2 Impacts on SA objectives other than housing are entirely uncertain as these impacts are largely dependent on the distribution of development. However, by pursuing a quantity of development that far exceeds the local OAN, it is thought to be likely that the Council will have less scope for avoiding adverse sustainability impacts. There could potentially be relatively dense populations in some locations under this option.

-
- 3.6.3 At 2.5 people per dwelling, 9,130 dwellings could be expected to increase the local population by 22,825. It is currently uncertain if this growth could result in over capacity issues of some key services as this is largely dependent on the distribution of development and the capacity of services.
- 3.6.4 In 2015 the District had a total annual carbon footprint of 906,400 tonnes CO₂, whilst residents of the District had an average annual carbon footprint of 8.2 tonnes CO₂ per person. The introduction of 22,825 new residents may therefore be expected to increase the annual carbon footprint of the District by 187,165 tonnes CO₂, or 20.6%. This would significantly increase the local area's contribution towards the causes of climate change (SA Objective 1).
- 3.6.5 In 2014-15, a total of 46,460 tonnes of waste was collected in South Staffordshire. The average waste generated per capita in England in 2016 was 412kg. Assuming new residents generate 412kg per capita, 22,825 new residents could be expected to increase the total annual waste generated in the Plan area by 9,403.9 tonnes, or 20.2%. This would have a strong adverse impact on SA Objective 5, which is concerned with reducing waste generation.

3.7 Residential growth: Option D

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

Option D for residential growth

Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and provide enough land to accommodate an additional 12,000 dwellings towards wider housing shortfalls from the HMA (having regard to the mid-point capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to:

- A minimum requirement of 17,130 dwellings between 2018-2037
- A minimum average yearly requirement of 902 dwellings throughout the plan period

This would ensure South Staffordshire provided a large contribution towards unmet needs of the HMA, based upon the levels of growth implied by the strategic areas of search for South Staffordshire within the HMA Strategic Growth Study. This quantum of dwellings represents a very significant (144%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.

3.7.1 Under this option, the housing needs of South Staffordshire would be satisfied over the LPR period whilst a large portion of the needs of the HMA would also be met. In so doing, this would have a major strong impact on the housing objective.

3.7.2 Assessing the impacts of this option on SA objectives other than housing is rendered difficult by the uncertainty over the distribution of development. However, it is considered to be likely that the quantity of development proposed under this option would make it difficult for the Council to avoid adverse sustainability impacts. The quantity of development proposed under this option would be highly likely to result in proposals for a large number of homes in locations where the development would discord with the existing character and setting of local landscapes and townscapes (SA Objective 4).

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- 3.7.3 At 2.5 people per dwelling, 17,130 new dwellings could be expected to increase the local population by 42,825. It is considered to be likely that this would result in over-capacity issues at some key services, although the extent to which it would do so is dependent on the distribution of development and the capacity of services. However, this quanta of development would represent a 144% increase on the single highest yearly level of housing completions in the Plan area in the last two Plan periods (1996 to present). It could be possible that some key services and facilities, as well as essential infrastructure, would not have the capacity to accommodate such rapid growth, depending on the strategy adopted for locating development. A minor adverse impact on SA Objectives 8, 10 and 11 can therefore not be ruled out.
- 3.7.4 In 2015 the District had a total annual carbon footprint of 906,400 tonnes CO₂, whilst residents of the District had an average annual carbon footprint of 8.2 tonnes CO₂ per person. 42,825 new residents may therefore be expected to increase the annual carbon footprint of the District by 351,165 tonnes CO₂, or 38.7%. This would significantly increase the local area's contribution towards the causes of climate change (SA Objective 1).
- 3.7.5 In 2014-15, a total of 46,460 tonnes of waste was collected in South Staffordshire. The average waste generated per capita in England in 2016 was 412kg. Assuming new residents generate 412kg per capita, 43,775 new residents could be expected to increase the total annual waste generated in the Plan area by 17,643.9 tonnes, or 38.6%. This would have a strong adverse impact on SA Objective 5, which is concerned with reducing waste generation.

3.8 Residential growth: Option E

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

Option E for residential growth

Provide enough housing to meet South Staffordshire's objectively assessed housing needs, and enough land to accommodate an additional 20,000 dwellings towards wider housing shortfalls from the HMA (having regard to the upper capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to:

- A minimum requirement of 25,130 dwellings between 2018-2037
- A minimum average yearly requirement of 1,323 dwellings throughout the plan period

Under this option South Staffordshire would provide around a third of the current HMA-wide housing shortfall set out in the HMA Strategic Growth Study, before any recommendations to increase supply and densities within the existing urban areas have been fully examined by other HMA authorities. This quantum of dwellings represents a very significant (257%) annual increase above the single highest yearly level of housing completions achieved in the district in the last 22 years.

3.8.1 Under this option, the housing needs of South Staffordshire would be satisfied over the LPR period whilst a large portion of the needs of the HMA would also be met. In so doing, this would have a major strong impact on the housing objective.

3.8.2 Assessing the impacts of this option on SA objectives other than housing is rendered difficult by the uncertainty over the distribution of development. However, it is considered to be likely that the quantity of development proposed under this option would make it difficult for the Council to avoid adverse sustainability impacts. The quantity of development proposed under this option would be highly likely to result in proposals for a large number of homes in locations where the development would discord with the existing character and setting of local landscapes and townscapes (SA Objective 4).

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- 3.8.3 At 2.5 people per dwelling, 25,130 new dwellings could be expected to increase the local population by 62,825. It is considered to be likely that this would result in over-capacity issues at some key services, although the extent to which it would do so is dependent on the distribution of development and the capacity of services. However, this quanta of development would represent a 257% increase on the single highest yearly level of housing completions in the Plan area in the last two Plan periods (1996 – present). It could be possible that some key services and facilities, as well as essential infrastructure, would not have the capacity to accommodate such rapid growth, depending on the strategy adopted for locating development. A minor adverse impact on SA Objectives 8, 10 and 11 can therefore not be ruled out.
- 3.8.4 In 2015 the District had a total annual carbon footprint of 906,400 tonnes CO₂, whilst residents of the District had an average annual carbon footprint of 8.2 tonnes CO₂ per person. 62,825 new residents may therefore be expected to increase the annual carbon footprint of the District by 515,165 tonnes CO₂, or 56.8%. This would significantly increase the local area's contribution towards the causes of climate change (SA Objective 1).
- 3.8.5 In 2014-15, a total of 46,460 tonnes of waste was collected in South Staffordshire. The average waste generated per capita in England in 2016 was 412kg. Assuming new residents generate 412kg per capita, 62,825 new residents could be expected to increase the total annual waste generated in the Plan area by 25,882.9 tonnes, or 55.7%. This would have a strong adverse impact on SA Objective 5, which is concerned with reducing waste generation.

3.9 Likely impacts of not satisfying the OAN

- 3.9.1 Five options for residential growth have been assessed in this report. Each of these options either meets or exceeds the OAN for residential growth in South Staffordshire for the Plan period.
- 3.9.2 Generally speaking, it is easier to avoid adverse impacts on natural environment SA Objectives such as Landscape, Biodiversity, Climate Change Adaptation and Natural Resources when there is less development. An option for development that does not support the local OAN may therefore be a relatively sustainable option.
- 3.9.3 A growth option that does not satisfy the local development needs would be likely to result in strong adverse impacts on social and economic SA Objectives such as Housing and the Economy.
- 3.9.4 The wider HMA area has a major shortfall in housing, potentially in excess of 60,000 dwellings between 2014 – 2036. The Council are therefore committed to assessing the potential impacts of taking on some of this unmet need, which could be an appropriate strategy for the predominantly urban HMA, given the relatively open nature of the District.
- 3.9.5 Paragraph 35 of the NPPF (July, 2018) states:
- 3.9.6 “Plans are sound if they are... a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.”
- 3.9.7 For the purpose of ‘reasonable alternatives’, a growth option that does not satisfy the OAN of South Staffordshire, as a *minimum*, would not allow for a ‘sound’ plan and in that sense can be considered to not be reasonable.

3.10 Gypsy, Travellers and Showpeople growth: Option A

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

Option A for Gypsy, Travellers and Travelling Showpeople needs

Provide enough Gypsy and Traveller pitches and Travelling Showpeople plots to meet identified needs up to 2037 within the district.

This would mean South Staffordshire would allocate additional land sufficient to deliver 67 residential pitches and 3 Travelling Showpeople plots. Given the scale of these needs, this would likely require additional land to be released in Green Belt locations.

- 3.10.1 This option would deliver enough pitches and plots to satisfy the needs of the Gypsy, Traveller and Travelling Showpeople community in the Plan area over the Plan period. In so doing, this option would make a strong positive contribution towards SA Objective 7.
- 3.10.2 It is currently considered by the Council that the lack of large sites availability in existing development boundaries will mean that satisfying the needs of the Gypsy, Traveller and Travelling Showpeople community would require allocating sites in the Green Belt. Developing on large sites in the Green Belt is more likely to be discordant with the existing character and setting of the local landscape in some locations than development within existing urban areas. A minor adverse impact on SA Objective 4 could therefore potentially occur.
- 3.10.3 Impacts on SA Objectives other than Landscape and Housing are uncertain at this stage as they are dependent on the precise distribution of pitches and plots. It is considered to be likely that if adverse impacts were identified they would be relatively minor and mostly reversible given the quantity and type of development proposed.

3.11 Gypsy, Travellers and Showpeople growth: Option B

1	2	3	4	5	6	7	8	9	10	11	12
C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
0	0	0	0	0	0	++	0	0	0	0	0

Option B for Gypsy, Travellers and Travelling Showpeople needs

Export any unmet needs for Gypsy and Traveller pitches and Travelling Showpeople plots to neighbouring local authorities.

The Council could pursue this option if, having examined its own ability to meet its own needs, there were more sustainable sites available to meet additional pitch requirements in neighbouring local authorities (for example, where non-Green Belt options are available). Any redistribution of the district's needs would have to be agreed with other neighbouring authorities through the Duty to Co-operate.

- 3.11.1 This option would avoid adverse impacts in South Staffordshire, such as on landscape, as no new development would arise in the District. Any unmet plot or pitch needs of the local Gypsy, Traveller and Travelling Showpeople community would be satisfied in neighbouring authorities (SA Objective 7).

3.12 Employment growth: Option A

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

Option A for employment - level of growth

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

This could involve a targeted approach of deallocating employment sites that are of poorer quality, and could focus on those that include vacant units/land, where these would represent a sustainable location for an alternative use such as housing. However, there is a risk that this approach would reduce flexibility in the employment land supply, and could result in an under provision if employment sites were lost unexpectedly.

- 3.12.1 In order to determine the employment land needs of the District, the Council have prepared an Economic Development Needs Assessment (EDNA) (2018). The EDNA has identified an oversupply of employment land in the District for the Plan period, although South Staffordshire may have a role to play in helping to satisfy the employment needs of the wider Functional Economic Market Assessment (FEMA) (for example the Black Country have a requirement for approximately 800ha of employment land needed to fulfil their LEP aspirations).
- 3.12.2 Under Option A for employment growth, the Council would undertake a targeted approach to deallocating existing employment sites of poor quality and reallocating them for an alternative use. This approach would help to ensure that businesses in the Plan area are diverse, successful and making a positive contribution to the local economy. Overall, it would help to ensure that the employment land provision satisfies the local development needs, whilst the local economy is more vibrant, sustainable and balanced. Highly valuable brownfield land would also be freed up for redevelopment, which could help to reduce adverse impacts caused by the LPR on SA Objectives 1, 3 4 and 6.

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- 3.12.3 This Option would not meet the unmet need for employment land from outside the Plan area and would therefore be expected to make a minor positive contribution towards the housing SA Objective.
- 3.12.4 Under Option A, there could potentially be a net loss in employment floorspace over the Plan period. Whilst employment needs of the Plan area may still continue to be met, the Council may find it more difficult under this option to contribute to the unmet needs of the wider FEMA by reducing the flexibility in employment land supply.

3.13 Employment growth: Option B

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

Option B for employment - level of growth

Maintain current protections for the existing employment land stock.

This reflects the oversupply of employment land in the District but would not deallocate sites in order to provide a degree of flexibility in provision.

- 3.13.1 Under this option, the existing stock of employment floorspace would remain unchanged. This strategy would help to ensure that employment floorspace needs in the Plan area are satisfied over the Plan period, whilst also affording the Council some opportunities to contribute to the unmet needs of the wider FEMA. However, it would be expected that this Option would not satisfy the overall unmet need from outside the District and would not free up previously undeveloped land for reallocation and redevelopment for another use. Therefore, this Option has been awarded a minor positive score for employment.

3.14 Employment growth: Option C

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

Option C for employment - level of growth

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

This approach would seek to meet evidenced unmet needs for employment land originating from other areas of the FEMA. A surplus of employment land identified through the EDNA Stage 1 could form (in full or in part) to our contribution to these wider employment needs.

- 3.14.1 This strategy would enable the LPR to satisfy a larger portion of the unmet employment floorspace needs from the wider FEMA. Such a strategy would be expected to require a greater quantity of greenfield sites to be developed on in the Plan area, thereby leading to more adverse impacts on SA Objectives 1, 3, 4 and 6.

3.15 Residential spatial distribution: Option A

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

Option A for housing spatial options

Rural housing growth focused on the district's larger and better connected villages

This option would focus housing growth in and around the villages within the district with the greatest level of services and facilities and public transport access to wider services, such as employment centres i.e. Tier 1 and Tier 2 villages set out in the revised settlement hierarchy. **New housing would primarily be focused on Tier 1 villages, reflecting the high level of public transport access and greater variety of services and facilities** within these locations, whilst also focusing a **moderate amount of new housing allocations in Tier 2 villages, reflecting the relative level of public transport access and significant variety of services and facilities** in these locations. Housing supply in Tier 3 and 4 villages would be reliant on windfall supply and exception sites.

This option may offer an opportunity to test the HMA Strategic Growth Study's recommendations for an **urban extension to the north of Penkridge (1,500 – 7,500 dwellings)** and **dispersed housing development at Codsall/Bilbrook (500 – 2,500 dwellings)**. It would also offer an opportunity to test the alternative areas of search recommended by the HMA Strategic Growth Study, including an alternative proposed **urban extension to the south of Penkridge (1,500 – 7,500 dwellings)**.

Focusing development into a smaller number of larger villages would offer greater opportunities for these villages to accommodate **larger sites capable of delivering new infrastructure/services, such as primary schools and local shopping centres**. However, this option may also offer opportunities to allocate small sites in sustainable locations that could make a significant contribution to the national requirement for 10% of housing sites to be on sites of 1ha or less. There is already a supply of safeguarded land in these villages that could contribute towards meeting their housing requirement.

3.15.1 This option for the spatial distribution of new housing in the District would focus development in a small number of large villages. This approach would be expected to have sustainability benefits for several SA Objectives.

3.15.2 By placing the majority of new residents in Tier 1 and Tier 2 settlements, the Council would be helping to ensure that these residents have excellent access to a wide variety of frequent and affordable public transport links. This will help to reduce their reliance on personal car use and thereby limit increases in road transport associated GHG emissions (SA Objective 1).

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- 3.15.3 Under this spatial strategy there could potentially be urban extensions to the north and south of Penkridge for between 1,500 - 7,500 dwellings each. Running through the village of Penkridge is the River Penk. This river introduces long stretches of Flood Zones 2 and 3 throughout the District. An urban extension to the north of Penkridge could potentially situate new residents in the active floodplain. The land north of the village is predominantly previously undeveloped greenfield that could be playing an essential role in local flood risk attenuation. A small area of Great Wryley is also at risk of fluvial flooding. It is uncertain as to the quantity of development that would be directed towards some Tier 1 villages and whether further surface water flooding issues may be exacerbated. Development here would result in a net loss of vegetation (which intercepts surface water) and permeable soils (which rain and surface water infiltrates), which could exacerbate the risk of flooding in some locations (SA Objective 2).
- 3.15.4 This spatial strategy could potentially focus a large proportion of new development in locations near Penkridge, Codsall, Bilbrook, Great Wryley or Cheslyn Hay. This land is not considered to coincide with any sensitive biodiversity or geodiversity designations of international, national or local significance. However, approximately 3,000 – 15,000 homes could potentially be delivered north and south of Penkridge. Just over 5km north east of Penkridge is Cannock Chase SAC, a large, diverse area of semi-natural vegetation comprising the most extensive area of lowland heathland in the midlands. The SAC is vulnerable to the effects of excessive atmospheric nitrogen deposition, a form of air pollution that arises from road transport. Running through and adjacent to the SAC is a network of minor and major roads, including the A460. Cannock Extension Canal SAC is situated approximately 2.5km south of Great Wryley. The SAC is designated for its large population of floating water-plantain (*Luronium natans*) and its presence on site is threatened by water pollution, overgrazing, invasive species and atmospheric nitrogen deposition. Under this spatial option, it may be necessary to carefully consider the potential impacts of a large quantity of new homes near Penkridge or Great Wryley on atmospheric nitrogen deposition at Cannock Chase SAC and Cannock Extension Canal SAC.
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- 3.15.5 Cheslyn Hay is situated approximately 1km south of Stowe Pool and Walk Mill Clay Pit SSSI which is designated for its population of white-clawed crayfish (*Austropotamobius pallipes*). The impacts of new development at Cheslyn Hay on water quality of the SSSI are currently uncertain and therefore, should be monitored.
- 3.15.6 Under this strategy, development would be likely to occur on previously undeveloped greenfields in agricultural use, such as land north and south of Penkridge. These fields play an important role in the local ecological network, with hedgerows and trees delineating the field boundaries providing stepping stones and wildlife corridors between biodiversity hotspots. It is thought to be likely that this spatial strategy would diminish the stepping stone and corridor capacity of the GI in these locations to some extent. It is uncertain what quantity of previously undeveloped land would be developed in other Tier 1 villages under this strategy. Overall, a net loss in vegetation cover would be likely under this option (SA Objective 3).
- 3.15.7 By focusing new development near existing settlements, this option would help to avoid development in highly sensitive rural locations with renowned long distance views and a sensitive character. Views from Cannock Chase AONB, 3.5km north of Cheslyn Hay and 4km east of Penkridge, are unlikely to be altered. It is likely that the new development would be largely in keeping with the existing character of the built form to some extent.
- 3.15.8 The village of Penkridge benefits from a distinct sense of place and a well-defined character of historic significance. The 2011 census recorded a population of 8,526. This spatial option could see a significant increase in housing numbers within Penkridge, Codsall, Bilbrook, Great Wryley and Cheslyn Hay, which could be discordant with the current scale of villages and significantly alter the current sense of place. Residents near the edge of settlements would be likely to see their countryside and rural views significantly altered under this option (SA Objective 4).
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- 3.15.9 The dispersed housing near Codsall and Bilbrook that would be delivered under this option, as well as the urban extension south of Penkridge, would be situated within a groundwater SPZ 3 and could increase the risk of contaminating groundwater. There is a complicated network of waterways throughout the Plan area, many of which run through or in close proximity to Penkridge, Bilbrook and Codsall. It is considered to be likely that development on the edge of these settlements as well as other Tier 1 villages will increase the risk of contamination or siltation of these surface water bodies to some extent, particularly during the construction phase of development. The M6 acts as a boundary to the eastern edge of Penkridge. It is considered to be likely that any residential development north or south of Penkridge would expose new residents to noise, air and light pollution associated with road transport and road infrastructure of the M6. In addition, development near Great Wryley/ Cheslyn Hay would be likely to expose residents to pollution associated with the M6 Toll, parts of which, are designated as AQMAs (SA Objective 5).
- 3.15.10 There would be limited scope for developing on previously developed or brownfield land under this option. Land to the north and south of Penkridge, as well as land to the north of Codsall and Bilbrook, is predominantly Grade 2 and Grade 3 ALC land. Land surrounding Great Wryley and Cheslyn Hay is predominantly Grade 3 and 4 ALC land. South Staffordshire as a whole is predominantly Grade 3 ALC land and therefore it has been assumed this is the case for the majority of the Tier 1 and 2 villages. Grade 1, 2 and 3 soils are assumed to be some of the best and most versatile soils in the Plan area. These soils are also ecologically important, providing the basis of life that is necessary for vegetation and ecosystems such as woodland to survive. Development here would be expected to result in a permanent and irreversible net loss of ecologically and agriculturally valuable soils caused by excavation, compaction, erosion, contamination and removal of vegetation cover (primarily due to the construction phase) (SA Objective 6).
- 3.15.11 This spatial strategy would allow the LPR to deliver a quantity of housing that satisfies the local OAN whilst also making a significant contribution towards meeting the housing needs of other authorities in the HMA (SA Objective 7).
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- 3.15.12 In order to facilitate healthy and active lifestyles for current and future residents, the LPR should seek to preserve and enhance residents' access to health facilities including a GP surgery, an NHS hospital, leisure facilities and a diverse range of natural habitats. Focusing new residential development around existing Tier 1 and Tier 2 settlements will help to ensure that new residents are within sustainable distances of these services. However, the potential significant level of growth at Penkridge, which would deliver up to 15,000 homes to a village of just over 8,500 people and where there is only one medical practice, would be likely to result in over-capacity issues at the GP surgery. The larger sites could potentially enable the delivery of additional surgery capacity to the area (either by expanding the existing Penkridge Medical Practice or adding a new GP surgery), but it is uncertain if this would occur. All new residents within South Staffordshire would be expected to have excellent access to a diverse range of natural habitats, such as via the local PRow network, and some would also be within the target distance of Cannock Chase and New Cross hospitals (SA Objective 8).
- 3.15.13 There is a large number of Listed Buildings in Penkridge, including the Grade II* Listed 'The Old Deanery'. There are also several Listed Buildings in Codsall, including the Grade II* Listed 'Church of St Nicholas'. There are two Conservation Areas in Penkridge, including the 'Canal Conservation Area' and the 'Penkridge Conservation Area'. There are also two Codsall Conservation Areas in the village of Codsall. It is considered to be likely that the scale of growth proposed at both Codsall/Bilbrook and Penkridge would alter the setting of Listed Buildings whilst potentially altering the character of Conservation Areas. Development north of Codsall could potentially impact the setting of the Registered Parks and Gardens surrounding the Grade I Listed Building 'Chillington Hall'. There are two Grade II Listed Buildings in Cheslyn Hay where new development could potentially alter their setting. The same is said for many historic Tier 1 settlements across the Plan area. These impacts would be largely dependent on the layout and design of development and there would be good scope for mitigation, but overall a minor adverse impact on the cultural heritage objective cannot be ruled out (SA Objective 9).

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- 3.15.14 This spatial strategy would situate the significant majority of new residents in the District to within the 2.5km target distance of either Penkridge, Bilbrook, Codsall or Landywood Railway Stations. It would be expected that all locations would offer excellent access to a variety of frequent and affordable bus links. Overall, this spatial strategy would help to ensure the Plan area's residents can use sustainable transport modes for travelling to locations throughout and beyond the District. These areas of the district are also considered to be generally very accessible. In general, the local PRoW network has a large range of footpaths and bridleways that provide good pedestrian and cycle access to locations throughout the district as well as locally to nearby villages. There is also a diverse network of minor and major roads available with Junction 12 of the M6 located 4km to the south east of Penkridge, Junction T7 of the M6 Toll to the north of Great Wryley and Junction 2 of the M54 4.5km to the north east of Codsall (SA Objective 10).
- 3.15.15 There are several schools in Penkridge, including Wolgarston High School, Penkridge Middle School and Marshbrook First School. In Bilbrook and Codsall, including St Nicholas CE First School, Codsall Community High School and Codsall Middle School. In Cheslyn Hay and Great Wryley, there are Cheslyn Hay Primary School, Landywood Primary School and Moat Hall Primary School, along with Cheslyn Hay High School and Great Wryley High School. Many new residents to Tier 1 settlements across the Plan area would also be expected to have good access to educational facilities. It is considered to be likely that this spatial option would help to ensure the significant majority of new residents are within the target distance of education facilities. The larger sites proposed would also provide an opportunity to increase the local schooling capacity, which would bring educational benefits to the wider area. The addition of potentially 15,000 new homes could result in overcapacity issues at some educational facilities. Although at this stage of assessment, it is uncertain if this would occur (SA Objective 11).
- 3.15.16 This spatial strategy would situate the majority of new residents in close proximity to Tier 1 and Tier 2 settlements where they would have excellent access to a range of employment opportunities, which are not only in close proximity but also accessible via public transport. The proposal for larger sites would also enable the delivery of new local services, which would provide a positive boost to the local economy and quantity of employment opportunities (SA Objective 12).
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3.16 Residential spatial distribution: Option B

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

Option B for housing spatial options

Rural housing growth dispersed across all settlements with a basic level of service provision within the district

This option would spread housing growth across all villages within the district with a basic level of services and facilities i.e. Tier 1-4 villages set out in the revised settlement hierarchy.

Whilst development would not be sited solely in villages with the greatest existing levels of services and infrastructure, it would offer an opportunity for new development to enhance and maintain services in the district's smaller villages, helping to maintain the vitality of these settlements. Spreading housing sites across multiple villages would likely mean more supply through small/medium sites. An increased supply of housing could therefore be more easily achieved in the early years of the plan and there would be greater opportunities to diversify the local housing market with small sites. This option therefore presents an opportunity to make a significant contribution to the national requirement for 10% of housing sites to be on sites of 1ha or less. There is already a supply of safeguarded land in some of these villages that could contribute towards meeting their housing requirement.

- 3.16.1 Under this spatial option, residents would be distributed across the number of Tiers 1, 2, 3 and 4 settlements. It is highly likely that a large proportion of new residents would be situated outside the target distance of a railway station as well as frequent bus links as these are generally lacking at smaller settlements and in the south of the District. This option could potentially result in a relatively high reliance on personal car use amongst new residents, and subsequently a high carbon footprint per capita (SA Objective 1).
- 3.16.2 This spatial strategy would require development on a larger number of smaller sites than residential spatial distribution Option A. As a result of this there would be likely to be greater scope for directing development towards land not at risk of flooding (SA Objective 2).

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- 3.16.3 This spatial option would offer flexibility over where to locate sites. It is therefore likely that the canal would be able to direct development towards sites that do not coincide with, and are not adjacent to, sensitive biodiversity designations such as SSSIs, NNRs, LNRs and stands of Ancient Woodland. However, smaller sites would also require development at a larger number of locations with options for developing on brownfield and previously developed sites very limited under this strategy. Development at a large number of greenfield sites would be expected to result in a net loss in vegetation cover in the Plan area whilst also contributing to further fragmentation of local ecological networks (SA Objective 3).
- 3.16.4 It is unlikely that small or medium sized development sites would significantly discord with the existing character of the local area (wherever they are located) in terms of scale. Development sites would also be less likely to significantly alter sensitive views, such as those from Cannock Chase AONB, whilst mitigation measures such as native screening vegetation would be more effective (SA Objective 4).
- 3.16.5 Most of the District is within a groundwater SPZ. The larger number of sites required under this option makes it likely that some of these sites will be situated within an SPZ and could therefore increase the risk of groundwater contamination. The smaller scale of development at each location would help to ensure that the any contamination events are also relatively limited. This spatial strategy would deliver development towards rural locations in and around Tier 3 and Tier 4 settlements where the air quality is likely to be better than air quality in larger settlements and urban areas. Development at these rural locations could risk worsening air quality (SA Objective 5).
- 3.16.6 Development at a large number of greenfield sites would be expected to result in a net loss of agriculturally and ecologically valuable soils. As the significant majority of soils in the District are Grades 2 and 3 soils, it is likely that this spatial option would result in a net loss of BMV soils. This impact would be permanent and non-reversible and would also reduce the carbon sink capacity of soils in the District (SA Objective 6).
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- 3.16.7 This spatial strategy would enable the LPR to deliver development of a quantity that satisfies the local housing OAN. Spreading new houses across a number of sites might provide an opportunity for an increased supply of housing to be delivered in the early years of the Plan as well as an opportunity to diversify the housing market in different locations across the District. New residents with specialist housing requirements may have a more varied choice in locations as a result of this spatial strategy (SA Objective 7).
- 3.16.8 Nearly all new residents would be expected to have excellent access to a diverse range of natural habitats and outdoor recreation opportunities via the local PRow network. However, this spatial strategy would direct a large portion of new residents to locations outside the target distance of a GP surgery as well as an NHS hospital. Options for accessing these health services via public transport modes would also be very limited for new residents (SA Objective 8).
- 3.16.9 Cultural heritage assets are widely distributed throughout the District, many of which are associated with historic settlements. It is considered to be likely that some of the development sites delivered under this spatial option would be in relatively close proximity to a Listed Building, Registered Park and Garden or Conservation Area. These impacts will be largely determined by the precise location, design and layout of development. However, the development sites would be relatively small or medium sized and there would be good scope for avoiding or mitigating potential adverse impacts on cultural heritage (SA Objective 9).
- 3.16.10 Access to the PRow network in South Staffordshire is generally excellent at most of the Tier 1, 2, 3 and 4 settlements. However, access to railway stations or frequent bus routes are more limited at smaller and more rural settlements and it is thought to be likely that a large proportion of new residents would be situated outside the target distance of public transport links. The rural location of many residents under this spatial strategy would be expected to contribute to a relatively high reliance on personal car use (SA Objective 10).
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- 3.16.11 It is considered to be likely that this spatial strategy would direct a large portion of new residents to locations that are outside the target distance of primary and secondary education facilities. Access to these facilities via public transport is also likely to be limited for many new residents situated in more rural locations near smaller settlements (SA Objective 11).
- 3.16.12 This spatial strategy could potentially situate some new residents in locations that are relatively far away from employment areas. There is potential for reasonable access to some employment areas through sustainable transport options such as rail. However, this strategy could potentially make a major positive contribution towards boosting the vitality of smaller settlements in the District. These benefits could be relatively quickly realized during the Plan period due to the relatively small site size – although the smaller site size also means major infrastructure enhancements are less likely (SA Objective 12).

3.17 Residential spatial distribution: Option C

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

Option C for housing spatial options

Small-scale urban extensions on the fringe of neighbouring urban areas

This option would allow for the release of small/medium housing sites adjacent to the neighbouring towns and cities which South Staffordshire borders. Much of the unmet needs in the HMA which South Staffordshire sits within come from the urban areas of Birmingham and the Black Country. There are also numerous sites suggested adjacent to the Black Country urban area through the Council's Call for Sites exercise, as well as other small/medium site options adjacent to the towns of Cannock and Stafford. Therefore, releasing numerous smaller sites with shorter lead-in times adjacent to the urban areas which neighbour the district may offer a sustainable option to deliver housing supply quickly to meet unmet housing needs from the wider HMA. It may also offer an opportunity to create housing sites in locations which 'round off' an existing urban edge, minimising encroachment of the urban area into the Green Belt. Through examining potential sites to deliver this option, the Council could test the recommended area for dispersed housing development set out in the HMA Strategic Growth Study on the western edge of the Black Country, between Wolverhampton and Stourbridge (500 – 2,500 dwellings).

- 3.17.1 By directing housing sites to locations adjacent to existing towns and cities north and east of South Staffordshire, this spatial strategy would be likely to help ensure that new residents have excellent access to public transport links, although access to a railway station is more limited in the south. This will help to reduce GHG emissions caused by road transport increases (SA Objective 1).
- 3.17.2 It is considered to be likely that most urban extensions would result in development on previously undeveloped land and therefore a net loss in vegetation and permeable soils would be expected. Fluvial flood risk in South Staffordshire is predominantly in the centre of the district. This spatial strategy would help to ensure the significant majority of new residents are situated away from land at risk of flooding (SA Objective 2).

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- 3.17.3 By situated new development adjacent to existing towns and cities, it is considered to be likely that adverse impacts on sensitive biodiversity designations such as SSSIs, NNRs, LNRs or Ancient Woodland will be avoided. However, a minor adverse impact on the biodiversity objective cannot be ruled out due to development on previously undeveloped greenfields and the potential impacts of this on the local ecological network (SA Objective 3).
- 3.17.4 By situating new development on the edge of existing towns and cities, it is likely that it will largely be in keeping with the existing setting and built form and there may be good opportunities for utilising infill sites. Some of the development under this option will potentially be within, adjacent to or viewable from Cannock Chase AONB. Developing on the edge of settlements may also extent the built form into the countryside, altering rural and long distance views for sensitive receptors including residents and users of the local PRoW network whilst potentially altering the local settlement pattern (SA Objective 4).
- 3.17.5 This strategy would direct a large portion of new development to land within groundwater SPZs, which will increase the risk of groundwater contamination (particularly during the construction phase). A large number of new residents would also be situated in close proximity to major roads including two motorways and several A-roads. These residents will be expected to be exposed to noise, air and light pollution associated with road transport and road infrastructure (SA Objective 5).
- 3.17.6 This spatial option would situate a large proportion of development adjacent to, and potentially coincident with, air quality management areas (AQMA) associated with neighbouring towns and cities. Such an approach could make it more difficult to achieve air quality improvement targets within the AQMA, whilst also exposing new residents to poor air quality.
- 3.17.7 This strategy could potentially direct new development on previously undeveloped greenfields and a permanent and irreversible net loss of ecologically valuable soils would be expected (SA Objective 6).
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- 3.17.8 By developing on smaller sites there would be a shorter lead in time for development under this strategy. This will help to ensure some of the unmet housing needs of the wider HMA are met earlier on in the Plan period. Whilst this strategy would enable the LPR to deliver development of a quanta that satisfies the local OAN, nearly all new development would be situated in the east of the district and new residents may have more limited choice in terms of location (SA Objective 7).
- 3.17.9 Situating new residents on the edge of existing towns and cities will help to ensure they have excellent access to necessary health services, including via foot, cycle and public transport. Access to a diverse range of habitats, as well as leisure facilities, would also be excellent for most new residents under this strategy (SA Objective 8).
- 3.17.10 Cultural heritage assets are generally more numerous in urban areas and there are a large number of Listed Buildings (of all grades), Scheduled Monuments and Registered Parks and Gardens in and around the towns and cities east of South Staffordshire. However, this strategy would situate small residential sites adjacent to existing residential development with which it is in keeping and this strategy would therefore be unlikely to alter the local character or setting of heritage assets (SA Objective 9).
- 3.17.11 By directing housing sites to locations adjacent to existing towns and cities east of South Staffordshire, this spatial strategy would be likely to help ensure that new residents have excellent access to public transport links, although access to a railway station is more limited in the south. Access to the PRow network would also be excellent for most new residents. However, the delivery of smaller sites is unlikely to enable major infrastructure enhancements in some locations (SA Objective 10).
- 3.17.12 By situating new residents adjacent to existing towns and cities, within which is a good range of education opportunities, it is considered to be likely that this strategy would facilitate good educational standards for new residents. The smaller sites are also unlikely to result in over-capacity issues at existing schools (SA Objective 11).
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- 3.17.13 The towns and cities north and east of South Staffordshire offer a significant quantity of employment prospects on a national scale. New residents would be expected to be in close proximity to, and to have excellent access via the local PRoW and public transport networks, to a vast range of employment opportunities. However, this strategy would avoid development in smaller settlements and will therefore be unlikely to help vitalise the local economies of the District's smaller settlements, particularly those in the west (SA Objective 12).

3.18 Residential spatial distribution: Option D

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

Option D for housing spatial options

Larger urban extensions on the fringe of neighbouring urban areas

The Council has received numerous site suggestions through the Call for Sites for strategic urban extensions to the Black Country urban area, many of which are significant in scale (e.g. over 500 dwellings). Urban extensions of this scale would be less likely to contribute significantly to housing supply early in the plan period, due to the longer lead-in times typically associated with larger housing sites. However, once underway, larger strategic sites such as these would be more likely to deliver key services such as primary schools and local shopping centres and would be located in close proximity to the areas from which much of the wider unmet housing need originates. This option would also allow the Council to consider the HMA Strategic Growth Study recommendation for an urban extension of 1,500 – 7,500 dwellings to the north of Wolverhampton around the i54 employment site. Delivery of this HMA recommendation may also help to deliver the existing proposal for a Brinsford Strategic Park and Ride Site in the same area.

- 3.18.1 By directing new housing towards black country urban extensions, this spatial strategy would be likely to help ensure that new residents have excellent access to public transport links, although access to a railway station is more limited in the south. Three known employment led sites for this option would be situated in close proximity to railway stations. The i54 site also offers excellent access to sustainable transport modes. This will help to reduce GHG emissions caused by road transport increases (SA Objective 1).
- 3.18.2 It is considered to be likely that there will be good opportunities for developing on previously developed and brownfield land under this strategy, although a net loss in vegetation cover and permeable soils would still be expected. Fluvial flood risk in South Staffordshire is predominantly in the centre of the district, although a relatively large proportion of the i54 employment location is in Flood Zone 3. Overall, this spatial strategy would help to ensure the significant majority of new residents are situated away from land at risk of flooding (SA Objective 2).

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- 3.18.3 By situating new development adjacent to existing towns and cities, it is considered to be likely that adverse impacts on sensitive biodiversity designations such as SSSIs, NNRs, LNRs or Ancient Woodland will be avoided. However, a minor adverse impact on the biodiversity objective cannot be ruled out due to development on previously undeveloped greenfields and the potential impacts of this on the local ecological network (SA Objective 3).
- 3.18.4 By directing new housing towards urban extensions it is likely that the development would be largely in-keeping with the character of the existing built form. The development sites will be likely to be relatively large and in some locations may discord with the existing scale or settlement pattern of urban areas. Being on the edge of existing urban areas may increase the risk of distinctive and long distance views being altered by development (SA Objective 4).
- 3.18.5 The majority of new development delivered under this option would be situated in a groundwater SPZ and could therefore increase the risk of contamination of groundwater. Most new residents would be situated adjacent to towns and cities where air quality is currently poor and likely to worsen as a result of road transport associated emissions. The distribution of development proposed under this option could potentially make improving air quality in these locations more difficult (SA Objective 5).
- 3.18.6 This spatial option would situate a large proportion of development adjacent to, and potentially coincident with, AQMAs associated with neighbouring towns and cities. Such an approach could make it more difficult to achieve air quality improvement targets within the AQMA, whilst also exposing new residents to poor air quality.
- 3.18.7 The majority of development would be expected to occur on previously undeveloped greenfields and this would result in a permanent and irreversible net loss of the District's ecologically and agriculturally valuable soils, including some of the BMV soils (SA Objective 6).
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- 3.18.8 This strategy would require larger sites with a relatively long lead in time that might mean most of the housing delivered through the Plan is a bit later on in the Plan period than under other strategies. However, it would help to ensure that housing which satisfies the unmet need of the wider HMA is in close proximity to other authorities of the HMA (SA Objective 7).
- 3.18.9 Situating new residents on the edge of existing towns and cities will help to ensure they have excellent access to necessary health services, including via foot, cycle and public transport. Access to a diverse range of habitats, as well as leisure facilities, would also be excellent for most new residents under this strategy (SA Objective 8).
- 3.18.10 Cultural heritage assets are generally more numerous in urban areas and there are a large number of Listed Buildings (of all grades), Scheduled Monuments and Registered Parks and Gardens in and around the towns and cities east of South Staffordshire. The sites delivered under this strategy will be relatively large and it is considered to be likely that in some locations this development would result in a minor alteration to the setting, or to the views of or from, sensitive heritage assets (SA Objective 9).
- 3.18.11 By directing housing sites to locations adjacent to existing towns and cities north and east of South Staffordshire, this spatial strategy would be likely to help ensure that new residents have excellent access to public transport links, although access to a railway station is more limited in the south. Access to the PRow network would also be excellent for most new residents. Where public transport infrastructure is currently limited, the large sites delivered under this strategy may provide opportunities for significant infrastructure improvements that help make residents' travel more sustainable (SA Objective 10).
- 3.18.12 By situating new residents adjacent to existing towns and cities, within which is a good range of education opportunities, it is considered to be likely that this strategy would facilitate good educational standards for new residents. Where there are potential over-capacity issues as a result of large sites of several thousand homes, there could potentially be an opportunity to deliver new education services and increase the local capacity under this option (SA Objective 11).
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- 3.18.13 The towns and cities east of South Staffordshire offer a significant quantity of employment prospects on a national scale. New residents would be expected to be in close proximity to, and to have excellent access via the local PRow and public transport networks, to a vast range of employment opportunities. Employment led sites would also be expected to contribute towards satisfying local employment needs and ensuring new residents can live close to work. However, this strategy would avoid development in smaller settlements and will therefore be unlikely to help vitalise the local economies of the District's smaller settlements, particularly those in the west (SA Objective 12).

3.19 Residential spatial distribution: Option E

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

Option E for housing spatial options

New freestanding settlements away from the existing villages/urban areas

These options are unlikely to release any supply in the first five years of the plan period and the Council may have to look to deliver additional smaller site options alongside any settlements to maintain a five year supply during the early stages of the plan period. Whilst the final recommended areas of search within the HMA Strategic Growth Study do not include any new settlements within South Staffordshire, there are nonetheless several options for large freestanding locations which have been promoted through the Call for Sites and the HMA Strategic Growth Study. Specifically the HMA Strategic Growth Study considered the potential for new settlements of 10,000 – 15,000 dwellings around Dunston and between Wolverhampton and Penkridge along the A449. Additionally the Council has had numerous sites suggested through the Call for Sites exercise which would be capable of accommodating smaller freestanding villages of around 1,500 dwellings, which reflect the government's threshold for considering garden village proposals and the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA). Therefore, given the potentially significant supply which could be realised if one or more of these sites are brought forward, it is important for the Council to test these options through the Local Plan process.

- 3.19.1 The four locations being considered under this option for a new settlement would be in close proximity to railway lines crossing the district. It is expected that the new settlement would provide good access to railway travel and would also provide several links to frequent and affordable bus routes. This would help to reduce GHG emission increases caused by road transport. Bringing forward an entirely new settlement may be a good opportunity to develop a relatively self-sustainable community that supports a diverse community and provides them with excellent access to necessary services and facilities as well as high quality natural habitats. However, the construction of a new settlement at a predominantly previously undeveloped location would result in a net increase in the carbon footprint of the local area in relation to current levels (SA Objective 1).

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- 3.19.2 The various locations potentially being considered for a new settlement under this option are not at risk of fluvial flooding and this strategy would therefore help to ensure that a significant portion of new residents are not exposed to fluvial flood risk. However, the construction of a new settlement at a predominantly previously undeveloped location would result in a net loss of permeable soils and vegetative cover, potentially altering flood risk in some locations. The construction of a new settlement is a good opportunity to develop a well-designed urban area of high quality and well-integrated GI and blue infrastructure that will help attenuate temperature rises caused by climate change (SA Objective 2).
- 3.19.3 The construction of a new settlement would keep a significant portion of new development in the District in one location, which will help to avoid fragmentation of the ecological network in many locations. Wherever the new site is located, it is considered to be unlikely that it would coincide with or be adjacent to a biodiversity designation of international or national significance (e.g. SAC, SPA or SSSI). If a new settlement was built in the north of the District, careful consideration of the potential impacts on Cannock Chase SAC as a result of air pollution, caused by an increase in road transport, may be necessary.
- 3.19.4 Whilst there would be good scope for spacious layout and design that permits high quality wildlife assets that preserve some of the stepping stone and corridor functions of the local GI network. However, overall it is considered to be likely that a new settlement would coincide with Priority species and habitats to some extent and would also result in a net loss of vegetation cover within the site perimeter (SA Objective 3).

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- 3.19.5 A major benefit of a new settlement for the landscape objective is that potential adverse impacts on character and views would be limited to one main location in the District. Depending on the new settlement's layout and design, there would be some scope for mitigating these adverse impacts. However, the construction of a new settlement would be expected to significantly discord with the local area in terms of scale, particularly if it is situated in a predominantly rural location where small hamlets and open spaces are typical. It is highly likely that distinctive and long distance countryside views would be altered for many sensitive receptors, including local residents and users of the PRoW network. A new settlement in the north of the District could potentially alter views for sensitive receptors in Cannock Chase SAC (SA Objective 4).
- 3.19.6 Each location potentially being considered for a new settlement under this option would be situated within a groundwater SPZ and could potentially increase the risk of groundwater contamination, particularly when considering the scale of the development proposals. Each potential location is in a predominantly rural location where air quality is likely to be relatively good. The construction and occupation of large freestanding new settlements in these locations would be expected to exacerbate air pollution, including GHG emissions and particulate matter (SA Objective 6).
- 3.19.7 This spatial strategy would enable the Council to deliver enough housing to satisfy the local OAN whilst also making a significant contribution towards meeting the housing needs of the wider HMA. However, it would require longer lead in times that may mean many houses are not built until later on in the Plan period. This may require smaller sites to satisfy some of the local need in the meantime. It is considered to be likely that the construction of a new settlement is an opportunity to bring together houses that meet various needs and that support a diverse and vibrant community (SA Objective 7).
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- 3.19.8 Each location potentially being considered for a new settlement will have good access to an NHS hospital via public transport, as well as to a diverse range of natural habitats via the local PRoW network. It is assumed that, along with the construction of a new settlement, necessary services including a medical centre or GP surgery would be provided. This strategy would therefore help to ensure new residents have excellent access to health services whilst also improving the accessibility for existing local residents (SA Objective 8).
- 3.19.9 Listed Buildings are widely distributed throughout the District and it is considered to be likely that a new settlement would alter the setting of a limited number of these heritage assets to some extent. Given the scale of development there would be little scope for mitigating this impact. Approximately 1.5km west of Gailey, where a new settlement could potentially be situated, are a range of Scheduled Monuments associated with Roman camps. Careful consideration of the potential impacts of development on above and below ground archaeology, including that which is as yet undiscovered, would be required for this strategy (SA Objective 9).
- 3.19.10 The four locations being considered under this option for a new settlement would be in close proximity to railway lines crossing the district. It is expected that the new settlement would provide good access to railway travel and would also provide several links to frequent and affordable bus routes. Access onto the local PRoW network is excellent throughout the District, including at the locations where a new settlement would be considered under this option (SA Objective 10).
- 3.19.11 The construction of a new settlement is a good opportunity to provide new education facilities. This would help to ensure new residents have excellent access to primary and secondary schools whilst also increasing the local schooling capacity to the benefit of existing local residents (SA Objective 11).
- 3.19.12 Each of the potential locations considered for a new settlement under this option would provide new residents with excellent access to major employment locations via public transport. They would also be expected to increase local employment opportunities by providing employment floorspace, such as new shops and services, within the new settlement (SA Objective 12).
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3.20 Residential spatial distribution: Option F

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

Option F for housing spatial options

Introduce minimum housing densities on all housing sites and intensify development within the existing village development boundaries

Before releasing further land outside of the village development boundaries the Council will need to fully consider the extent of non-Green Belt land available within its existing villages. It will also need to consider how to efficiently deliver housing on any site in the Green Belt or wider Open Countryside to minimise the amount of land released in these locations. The HMA Strategic Growth Study recommends that additional supply could be realised across the HMA if a minimum density standard of 35 dwellings per hectare is adopted in authorities such as South Staffordshire, although this is of limited benefit in the context of existing supply within South Staffordshire. Going forward the Council could consider whether to introduce minimum densities for new housing developments having regard to factors such as the recommendations of the HMA Strategic Growth Study, density standards used in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) and the location of the site. It is also important to note that the district's existing settlements have different characters and scales and numerous villages contain Conservation Areas which may be sensitive to overly dense development.

- 3.20.1 One of the main benefits of higher housing densities is that the Plan has the potential to deliver more housing over the Plan period. Higher densities often allow for more sustainable communities with more residents living in close proximity to services, facilities and public transport modes. This Option may therefore help to improve the sustainability of development (in terms of carbon footprint) in some locations whilst exacerbating the carbon footprint of the District on the whole (as a result of greater quantities of development) (SA Objective 1).
- 3.20.2 The extent to which residents will be exposed to flood risk is entirely dependent on the location of development, which is uncertain under this option. However, the approach of adopting higher development densities could potentially mean that a higher proportion of new residents are situated within existing urban areas of low flood risk. On the other hand, where flood risk is present within a site's perimeter, the requirement for higher development densities may make it more difficult to situate the development on land not at risk of flooding.

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- 3.20.3 Higher density urban areas can contribute to, and also reduce, the vulnerability of humans to the effects of climate change. If residents are situated in vulnerable locations, such as on land at risk of flooding or in locations getting warmer, higher densities can increase the risk these residents will face. Situating higher density developments in locations where residents will not be exposed to flood risk or temperature rises is an effective way of improving the resilience of a large proportion of local residents (SA Objective 2).
- 3.20.4 Higher density developments should help to reduce the amount of land lost to development in the Plan area. This would also help to reduce vegetation cover lost to development and in that sense would have a positive impact on the biodiversity objective. However, if higher numbers of residents are likely under this option, there could potentially be more severe cumulative impacts from development on sensitive biodiversity designations. For example, Cannock Chase SAC is vulnerable to the impacts of atmospheric nitrogen deposition, which is a pollutant from road transport associated emissions. If there were to be higher numbers of new residents because of this spatial strategy, there could potentially be an increased numbers of residents driving on roads near the SAC and polluting it with atmospheric nitrogen deposition.
- 3.20.5 Residential gardens can play an essential role in the local ecological network. Garden trees, bushes and flowers provide stepping stones, corridors and sources of food for wildlife. Higher density developments may result in much smaller residential gardens throughout the District, thereby diminishing their biodiversity value. Overall, a minor adverse impact on the biodiversity Objective would be expected under this option (SA Objective 3).
- 3.20.6 Developing at higher densities would be likely to help reduce the number of locations at which development takes place in the District. This will help to avoid potentially adverse impacts on landscapes and townscapes in some cases. However, higher density developments are also more likely to result in more severe impacts on the local landscape or townscape by discording with the character of the local area to a greater extent. It is therefore considered that under this option, adverse impacts on the Landscape Objective may be avoided in some circumstances but exacerbated in others (SA Objective 4).
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- 3.20.7 The extent to which this spatial option would help to minimise the impacts of air, water and soil pollution is largely uncertain as this is dependent on the distribution of development. Higher densities of development may help to reduce the quantity of land being built on in the District²⁵. This would help to minimise the increase in the risk of soil, air or water contamination caused by development proposed in the LPR. However, there is a general trend of air pollution in higher density urban areas having more adverse impacts on human health than in air pollution in lower density urban areas. This is because of higher pollution emissions due to human activities in densely populated street canyons in combination with taller buildings stagnating the air flow. Higher densities of development also typically place increased demands on the local waste management system due to larger quantities, and more diverse, waste being generated in smaller areas²⁶, potentially leading to sanitation problems (SA Objective 5).
- 3.20.8 A key benefit of higher development densities is that less land would be required to be built on to satisfy the local development needs. This would help to limit the permanent and irreversible losses of agriculturally and ecologically valuable soils caused by development delivered through the LPR (SA Objective 6).
- 3.20.9 Pursuing a strategy of higher density developments would help to facilitate higher quantities of development in the District. This would help to ensure the LPR can satisfy local development needs (SA Objective 7).

²⁵ Yuan, C, Ng, Edwards, Norford, Leslie, K. (2014) Improving air quality in high-density cities by understanding the relationship between air pollution dispersion and urban morphologies, Building and Environment, V71, pp245-258, January 2014

²⁶ Njoku, N., Lamond, J., Everett, G. and Manu, P. (2015) An overview of municipal solid waste management in developing and developed economies: Analysis of practices and contributions to urban flooding in Sub-Saharan Africa. In: 12th International Postgraduate Research Conference Proceedings, Manchester, UK, 10-12 June 2015., pp. 200- 212

- 3.20.10 Population density has a tangible impact on residents' day to day lives and higher density developments can have a variety of adverse impacts on the health and well-being of local residents. Generally speaking, higher densities can potentially reduce the accessibility of key services and facilities, such as GP surgeries and hospitals, due to over-capacity issues. Access to, and use of, green spaces such as play grounds and sports fields is also more limited in higher density areas²⁷. This is due to more demand on the open spaces coupled with the fact that local residents are more likely to perceive open spaces as being unsafe. The density of the urban area also influences the stability of the local community by partially determining the extent to which residents interact with one another. Higher rates of crime and anti-social behavior are also associated with high density development. It should be noted that through careful, innovative and high-quality design and layout techniques there is good scope for avoiding or mitigating adverse impacts caused by higher density development, such as by providing well-resourced and high capacity amenities²⁸ (SA Objective 8).
- 3.20.11 Many settlements in the District have a well-defined and sensitive historic character and scale, as evidenced by the numerous Conservation Areas throughout the Plan area. Higher density developments are considered to be more likely to discord with the local area, in part because there is less room available for effective mitigation techniques such as spacious layout or screening vegetation. A key challenge under this spatial option would be locating higher density developments in locations which do not significantly discord with the existing character or setting of their location. This will be more of a challenge in the smaller and more spacious villages in the District, particularly those in rural locations. Higher density development may also require taller buildings in some locations, which would be more likely to alter views of, or from, sensitive heritage assets. Whilst the impacts of development on the cultural heritage objective are largely dependent on the distribution of development in relation to the location of heritage assets, adverse impacts on are considered to be more likely, and less reversible, as a result of higher density development (SA Objective 9).

²⁷ Dempsey, N., Brown, C. and Bramley, G. (2012) The key to sustainable urban development in UK cities? The influence of density on social sustainability. *Progress in Planning* 77 (2012) 89-141

²⁸ Wong, K. W. (2010). Designing for high-density living: High rise, high amenity and high design. In E. Ng (Ed.), *Designing high density cities for social and environmental sustainability*. London: Earthscan

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- 3.20.12 Higher density developments could potentially help to ensure new residents have good access to services and amenities by placing more residents in closer proximity to them. However, there could potentially be over-capacity issues at some facilities in some locations depending on the scale of development. The impact on local congestion is likely to be more severe from higher density developments, with larger numbers of new residents accessing the site from the same roads and access points. The extent to which higher density proposals would facilitate sustainable and public transport modes uptake is largely uncertain as this is dependent on location (SA Objective 10).
- 3.20.13 The extent to which this spatial strategy would facilitate good education for new residents is almost entirely dependent on the location of development, which is uncertain at this stage. Careful consideration of the impacts of development on the capacity of local schools will be required and in some locations an expansion of capacity may be needed to support large scale higher density development proposals (SA Objective 11).
- 3.20.14 The extent to which higher density developments would impact the sustainability of the local economy is largely uncertain. However, there is a potential issue of access to employment opportunities for new residents. Higher density developments will introduce a larger number of people seeking work to the local area. If the high density developments are situated in smaller settlements, or areas of the District with relatively limited job opportunities and public transport access, a large proportion of new residents may find they have to travel longer distances, potentially via personal car use, to reach work (SA Objective 12).
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3.21 Employment spatial distribution: Option A

1	2	3	4	5	6	7	8	9	10	11	12
C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
0	0	0	0	0	+	0	0	0	0	0	++

Option A for employment – locations for growth

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)

This strategy would seek to address needs in these existing employment sites, which have good road access to the Strategic Road Network and have proved to be attractive to the market in the past. However, these locations are often relatively isolated from the villages which house the district's existing population and are often located closer to adjoining urban areas. Many of these sites have also received significant extensions in recent years, meaning that there may be limited scope to release further additional land in these locations.

3.21.1 Existing employment sites in the District benefit from the presence of existing supporting infrastructure and from being in close proximity to the strategic road network, which makes them an attractive proposition for the market. By continuing to allocate future employment floorspace here, there would be likely to be good opportunities for the reuse of previously developed land and brownfield sites (SA Objective 6). It is also highly likely that the development would be largely in keeping with the existing setting of the local area (SA Objective 4). With less 'new' sites required for development under this option, the LPR would result in less fragmentation of the local ecological network (SA Objective 3).

3.21.2 The existing employment sites in South Staffordshire are generally relatively isolated from most of the District's residents. By increasing the quantity of floorspace here, it would be unlikely to improve the accessibility of job opportunities for residents of the Plan area. It would also be unlikely to help revitalise or improve the vibrancy of local economies in the District's existing settlements. This strategy would help to satisfy the employment needs of the wider FEMA, whilst also situating new jobs in locations that are highly accessible for neighbouring towns and cities.

3.22 Employment spatial distribution: Option B

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

Option B for employment – locations for growth

Identify new freestanding employment sites

This would seek to address employment needs on new freestanding employment sites. Such sites could potentially be of a specified minimum size and be based on specific spatial characteristics (e.g. access to the Strategic Road Network, proximity to workforce etc.) to ensure they are more sustainable and likely to attract investment.

- 3.22.1 This strategy would afford the Council more flexibility over the location of new employment floorspace, enabling them to situate the right types of jobs in the right locations, potentially based on accessibility, local need or overall sustainability. This strategy would help to ensure that the employment floorspace needs of the local area, as well as the wider FEMA, are met through new sites that can be accessed via the strategic road network. This option would be expected to require development on relatively large greenfield sites, resulting in permanent losses of natural resources, an alteration to the local landscape character and fragmentation of the local ecological network (SA Objectives 3, 4 and 6).

3.23 Employment spatial distribution: Option C

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

Option C for employment – locations for growth

Deliver smaller scale employment allocations in the district's larger villages

This strategy would seek to address needs in locations which may be more closely located to the district's residents, potentially reducing commuting and ensuring local employment needs can be met in a more sustainable manner. However, despite such an approach being supported in the existing Core Strategy, to date there has been relatively little market interest in delivering such sites.

- 3.23.1 Under this strategy, new employment floorspace would be directed towards existing settlements. In some cases, this would be likely to help enhance the vibrancy and sustainability of the local economy. It would also provide local residents with excellent access to new employment opportunities. However, it is likely that this strategy would require development of greenfield sites in small settlements, which could potentially discord with the existing sensitive character of the local area. It is also uncertain how accessible these sites would be via the strategic road network and the extent to which they would be popular with the market.

3.24 Employment spatial distribution: Option D

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

Option D for employment – locations for growth

Deliver employment allocations of part of mixed-use schemes

This could see new employment focused at large strategic allocations such as new settlements and Sustainable Urban Extensions. This strategy would seek to address needs in locations which may be more closely located to the residents of neighbouring authorities. This may be an appropriate option if such sites are located adjacent to neighbouring authorities with unmet employment needs. However, this would mean that such sites may be less appropriate for meeting the employment needs of the district's existing residents.

- 3.24.1 By situating new employment floorspace alongside strategic sites, this option would help to ensure many new residents are in close proximity to, and have excellent access to, a range of employment opportunities. This approach may also help to protect or enhance the viability and sustainability of the local economy within the strategic site. However, it is unlikely that this approach would improve employment opportunities for existing residents who would be relatively isolated from this new floorspace. By incorporating the new employment floorspace alongside a strategic development, there could potentially be good opportunities for more efficient use of natural resources, although that is largely uncertain at this stage. This option would be likely to enable the Council to meet some of the unmet employment floorspace needs of the wider FEMA whilst also situating the new floorspace in locations easily accessed from neighbouring authorities.

3.25 Overview of quanta and distribution results

3.25.1 The scoring matrix for each of the development quanta options, as well as the spatial distribution options, has been brought together in **Table 3.1**. These scores reflect a ‘pre-mitigation’ scenario. The adopted version of the LPR will be likely to propose policies that help to avoid or mitigate many adverse impacts. The mitigating impacts of LPR policy proposals will be taken into consideration at a later stage of the SA process, when the policies are more finalised.

3.25.2 It should be noted that not all strategies should be considered as ‘stand-alone’ Options’ and in many cases, the most sustainable strategy may be a combination of some of the Options proposed.

Table 3.1: SA Scoring matrices for each of the spatial distribution and development quantity options assessed in this report.

	1	2	3	4	5	6	7	8	9	10	11	12
	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Residential growth options												
A	--	+/-	+/-	+/-	--	+/-	+	+/-	+/-	+/-	+/-	+/-
B	--	+/-	+/-	+/-	--	+/-	++	+/-	+/-	+/-	+/-	+/-
C	--	+/-	+/-	+/-	--	+/-	++	+/-	+/-	+/-	+/-	+/-
D	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-
E	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-
Gypsy, Traveller and Showpeople growth options												
A	+/-	+/-	+/-	-	+/-	+/-	++	+/-	+/-	+/-	+/-	+/-
B	0	0	0	0	0	0	++	0	0	0	0	0
Employment growth options												
A	+	+/-	+	+	+/-	+	+	+/-	+/-	+/-	+/-	+
B	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+
C	-	+/-	-	-	+/-	-	+/-	+/-	+/-	+/-	+/-	++
Residential spatial distribution options												
A	+	-	-	-	-	--	++	+	-	++	++	++
B	-	-	-	-	-	--	++	-	+	-	-	+
C	+	+	-	-	-	--	++	++	+	++	+	+
D	+	+	-	-	-	--	++	++	-	++	++	++
E	-	+	-	-	-	--	++	++	-	++	++	++
F	-	-	-	-	-	+	+	-	-	-	-	-
Employment spatial distribution options												
A	0	0	0	0	0	+	0	0	0	0	0	++
B	0	0	-	-	0	-	0	0	0	0	0	++
C	0	0	0	0	0	-	0	0	0	0	0	++
D	0	0	0	0	0	+/-	0	0	0	0	0	++

3.26 Housing Mix

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	++	0	0	0	0	0
B	0	0	0	0	0	0	++	0	0	0	0	0
C	0	0	0	0	0	0	++	0	0	0	0	0

Option A for housing mix:

Continue with current policy of encouraging a variety of housing options on new developments, guided by the SHMA, but in particular requiring an increased number of smaller homes.

Option B for housing mix:

Specify more precise housing mix requirements for new developments e.g. minimum of 60% of market housing should contain 3 bedrooms or less.

Option C for housing mix:

On strategic allocation sites (e.g. 150+ units), agree a full housing mix breakdown for both market and affordable housing at Local Plan stage.

3.26.1 Options A, B and C would help to ensure that, overall throughout the Plan area, the LPR delivers an appropriate mix of housing that meets the varied needs of current and future residents, in particular, an increased number of smaller homes would be likely to help with elderly people and first time buyers entering the market.

3.26.2 Under Option A, housing mix would be determined by site by site negotiations which might help to ensure that the appropriate mixes are in the right locations, although it is unclear the extent to which these negotiations would be appropriately evidenced and it remains uncertain what the proportion of smaller homes would be.

3.26.3 Under Option B, a large proportion (such as 60%) of new homes would contain three bedrooms or less, which would be likely to help ensure the elderly and first time buyers can enter the market in the Plan area in a variety of locations. The decision making on the mix of housing would be guided by evidence, which will help to ensure that the right homes are being built in the right locations.

3.26.4 It remains unclear what proportion of new homes would be smaller under Option C. This Option could lead to less flexibility in terms of deciding where smaller homes should be located and this may mean smaller developments of under 150 homes are more homogenous with less mixed communities in some part of the District. There would be likely to be smaller homes in a more limited number of locations, which could potentially limit the choice for new homes for the growing local elderly population. The sustainability of this Option could be improved if implemented in conjunction with one or more of the other options proposed.

3.26.5 Overall, a combination of Options B and C would be likely to result in the most sustainability benefits in terms of housing mix.

3.27 Homes for Older People and Specialist Housing

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	++	+	0	0	0	0
B	0	0	0	0	0	0	++	+	0	0	0	0
C	0	0	0	0	0	0	++	+	0	0	0	0
D	0	0	0	0	0	0	++	+	0	0	0	0

Option A for homes for older people and specialist housing:
Continue with existing positive policy which supports specialist housing and resists proposals for loss of specialist accommodation.

Option B for homes for older people and specialist housing:
Specify a percentage requirement of homes for older people e.g. bungalows, retirement apartments etc., including market and affordable options.

Option C for homes for older people and specialist housing:
Allocate sites, or parcels within larger strategic sites (e.g. 150+ units), specifically for specialist housing.

Option D for homes for older people and specialist housing:
Specify a percentage requirement of homes to be built to the optional higher technical standards.

3.27.1 Options A, B, C and D would help to ensure that, overall throughout the Plan area, the LPR delivers an appropriate mix of housing that meets the varied needs of current and future residents, specifically specialist and supported homes for the elderly.

-
- 3.27.2 Under Option A, the provision of homes for the elderly would be determined through site by site negotiations which might help to ensure the appropriate mixes are in the right locations. It is unclear the extent to which these negotiations would be appropriately evidenced and it remains uncertain what the proportion of specialist homes would be.
- 3.27.3 Option C could lead to less flexibility in terms of deciding where homes for the elderly should be located and this may mean smaller developments of under 150 homes are more homogenous with less mixed communities in some part of the District. There would be likely to be homes for the elderly in a more limited number of locations, which could potentially limit the choice for new homes for the growing local elderly population. The sustainability of this Option could be improved if implemented in conjunction with one or more of the other options proposed.
- 3.27.4 Under Option B, specifying a specific requirement of homes for the elderly would be likely to help to ensure a variety of appropriate homes are available in a variety of locations for the District's aging population. The requirement would be guided by evidence, which will help to ensure that the right homes are being built in the right locations. The same impact would be likely under Option D, although the optional higher technical standards could help to ensure that more specialist needs are met.
- 3.27.5 Options B and D would aim to ensure a specific percentage of homes would be built for older people such as bungalows, as well as specialist housing of higher technical standards. Combining these Options would help to ensure the varied housing needs of the growing elderly population are met whilst enabling more flexibility for negotiation and taking local circumstances into consideration. Overall, a combination of Options B, C and D would be likely to result in the most sustainability benefits in terms of homes for the elderly and specialist homes.

3.28 Affordable Housing – Percentage Requirement

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	++	0	0	0	0	0
B	0	0	0	0	0	0	++	0	0	0	0	0
C	0	0	0	0	0	0	++	0	0	0	0	0

Option A for affordable housing – percentage requirement:

Set a district wide affordable housing requirement on sites of 10 units or more, as guided by the SHMA.

Option B for affordable housing – percentage requirement:

Set different affordable housing requirements for different areas of the district to reflect varying levels of viability and need, as guided by the SHMA.

Option C for affordable housing – percentage requirement:

Implement specific percentage requirements for individual strategic sites (e.g. 150+ units)

3.28.1 Options A, B and C would help to ensure that, overall throughout the Plan area, the LPR delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents. In particular, an increased number of affordable homes would be likely to help with low income households, first time buyers and the elderly entering the market.

3.28.2 Under Option A, a specific percentage requirement for affordable housing would be set, although it remains uncertain if this percentage would be higher or lower than the SHMA need. This option would help to ensure that affordable housing is available at nearly all development sites across the District, providing those seeking affordable housing with more choice in where to locate, whilst helping to diversify small and rural communities. On the other hand, Option B would be more evidence based and thus more likely to help ensure that the right homes are being built in the right places.

3.28.3 Option C could lead to less flexibility in terms of deciding where affordable homes should be located and this may mean smaller developments of under 150 homes are more homogenous with less mixed communities in some areas of the District. This could potentially limit the choice in locations for first time buyers entering the market. The combination of Options B and C would be likely to result in the most sustainability benefits for affordable housing across the Plan area.

3.29 Affordable Housing – Tenure Split

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
D	0	0	0	0	0	0	++	0	0	0	0	0
E	0	0	0	0	0	0	++	0	0	0	0	0
F	0	0	0	0	0	0	++	0	0	0	0	0

Option D for affordable housing – tenure split:
Adopt a similar approach to the current policy, with a simple 50:50 split between affordable housing for rent and affordable home ownership.

Option E for affordable housing – tenure split:
Consider a more detailed tenure split which confirms specific tenures to be provided and the level required.

Option F for affordable housing – tenure split:
Implement specific tenure split requirements for individual strategic sites (e.g. 150+ units).

- 3.29.1 Options D, E and F would help to ensure that, overall throughout the Plan area, the LPR delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents, in particular, affordable homes for ownership or housing for rent.
- 3.29.2 Under Option D, the tenure split would be determined through site by site negotiations which could potentially help to ensure the appropriate housing mixes are in the right locations. However, it is uncertain if the split would deliver appropriate levels of affordable housing for rent or ownership in every circumstance.
- 3.29.3 Option E proposes a more detailed approach which would aim to ensure the affordable housing needs of the District are met. This would help to provide the most appropriate forms of affordable housing for the needs of the District which could potentially help to ensure the appropriate mixes are in the right locations.

- 3.29.4 Option F could lead to less flexibility in terms of deciding where affordable homes should be located and this may mean smaller developments of under 150 homes are more homogenous with less mixed communities in some areas of the District. There would be likely to be affordable homes in a more limited number of locations, which could potentially limit the choice of new homes for first time buyers entering the market. However, this option would help to ensure that major developments in the District seek to satisfy the affordable housing needs and support diverse communities. The sustainability of this Option could be improved if implemented in conjunction with one or more of the other options proposed.
- 3.29.5 Therefore, the combination of Options E and F would be likely to result in the most sustainability benefits across the Plan area.

3.30 Affordable Housing – Boosting Supply

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
G	0	0	0	0	0	0	++	0	0	0	0	+
H	0	0	0	0	0	0	++	0	0	0	0	0

Option G for affordable housing – tenure split:

Allocate additional small sites for 100% affordable housing in the local plan in order to boost supply and enhance the vitality of the district's smaller settlements.

Option H for affordable housing – tenure split:

Adopt an Affordable Housing SPD to further clarify the Council's expectations for the delivery of affordable housing.

3.30.1 Option G could help to improve the economic vitality of smaller settlements. This could result in affordable homes located in a more limited number of areas across the District, which could potentially limit the choice for low income households and first time buyers within the market. It would also result in small homogenous communities of only affordable homes. The sustainability of this Option could be improved if implemented in conjunction with one or more of the other Options proposed.

3.30.2 An Affordable Housing SPD, as proposed under Option H, would provide more detailed guidance and advice on the distribution, design, nominations and financial contributions for affordable housing issues in the District. The SPD would be likely to make the affordable housing requirements clearer and more consistent and therefore help to improve the supply of affordable housing throughout South Staffordshire.

3.30.3 A combination of both Options would be likely to lead to more sustainability benefits across the Plan area.

3.31 Rural Exception Sites

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	++	0	0	0	0	0
B	0	0	0	0	0	0	++	0	0	0	0	0
C	0	0	0	0	0	0	++	0	0	0	0	0

Option A for rural exception sites: Continue with existing rural exception site policy.
Option B for rural exception sites: Adapt the policy to widen the evidence base required to demonstrate a need for a Rural Exception Site, rather than a Parish Needs Survey only.
Option C for rural exception sites: Consider allowing an element of market housing on rural exception sites in the Green Belt in order to cross-subsidise the affordable homes.

- 3.31.1 Options A, B and C would help to ensure that, overall throughout the Plan area, the LPR delivers an appropriate mix of housing that aims to meet the varied needs of current and future residents.
- 3.31.2 Under Option A, rural exception sites would be delivered in the same low quantities that they are currently being delivered, although it is unclear if this has resulted in an unmet need so far. Option B would be likely to help to ensure the right homes are being built in the right places due to its proposed evidence based approach. The number of sites delivered under Option C would be likely to be greater than under Options A and B, which would help to satisfy any unmet need, although an increased number of sites delivered in rural locations could make avoiding adverse impacts on the natural environment more difficult.
- 3.31.3 Option B could potentially be identified as the best performing Option as it would be likely to place development in appropriate locations.

3.32 Entry Level Exception Sites

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	+	0	0	0	0	0

Option A for entry level exception sites:

Do not adopt a policy on entry level exception sites and rely on NPPF for determining applications for such proposals.

- 3.32.1 This Option would comply with the national requirement for local authorities to support entry level housing. However, by not having a policy, there could potentially be a lack of certainty as to the provision of entry level homes within the District. Therefore, this Option could potentially have a minor positive impact on the housing objective.

3.33 Entry Level Exception Sites – Tenure Split

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
B	0	0	0	0	0	0	++	0	0	0	0	0
C	0	0	0	0	0	0	++	0	0	0	0	0

Option B for entry level exception sites – tenure split:

Set out specific requirements for the sites to provide a mix of affordable housing tenures, as led by a housing needs assessment, agreed with the Council.

Option C for entry level exception sites – tenure split:

Adopt a tenure mix for the affordable housing on the sites which mirrors the general affordable housing policy.

- 3.33.1 Under Option B, the tenure split for affordable housing would be determined through site by site negotiations which could potentially help to ensure that appropriate housing mixes are in the right locations. It is uncertain if the inelastic tenure mix considered under Option C would deliver appropriate levels of affordable housing for rent or ownership in every circumstance. Therefore, Option B could be considered the best performing Option.

3.34 Entry Level Exception Sites – Local Connection

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
D	0	0	0	0	0	0	++	0	0	0	0	0

Option D for entry level exception sites – local connection:
 Implement local connection criteria in perpetuity on the sites as with rural exception sites.

- 3.34.1 Option D would be likely to help to ensure current residents of the Plan area can live in close proximity to their families and communities. This is an important facet of sustainable and viable communities and will help residents to feel a sense of place. However, it could potentially make it more difficult for some residents to relocate to a different parish in a limited number of circumstances. Overall, this Option would be expected to have a major positive impact on the housing objective.

3.35 Self-build and Custom Housebuilding

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	++	0	0	0	0	0
B	0	0	0	0	0	0	++	0	0	0	0	0
C	0	0	0	0	0	0	++	0	0	0	0	0

Option A for self-build and custom housebuilding:
Continue with the current policy approach and include appropriate provisions within the Housing Mix policy for new development to have regard to the self-build and custom housebuilding register, as per Policy SAD9 of the Site Allocations Document.

Option B for self-build and custom housebuilding:
Specify a percentage requirement of serviced plots for self and custom housebuilders.

Option C for self-build and custom housebuilding:
Allocate small sites, or parcels within larger strategic sites (e.g. 150+ units) specifically for self-build and custom housebuilding.

3.35.1 Options A, B and C seek to satisfy the requirement to meet the needs of those wishing to build their own homes. Under Option A, plots for self-build housing would be determined through site by site negotiations which could potentially help to ensure the appropriate mixes are in the right locations. However, it is uncertain if this would meet the District's identified need whereas Options B and C would provide greater certainty in this regard.

3.35.2 Under Option B, serviced plots would be more widely distributed throughout the District, which would offer new and existing residents more choice over where to locate their self-build home than would be offered under Option C. Overall, Option B could be considered to be the best performing Option.

3.36 Gypsies, Travellers and Travelling Showpeople

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	++	0	0	0	0	0
B	0	0	0	0	0	0	++	0	0	0	0	0
C	0	0	0	0	0	0	++	0	0	0	0	0

Option A for gypsies, travellers and travelling showpeople: Continue with current criteria based policy approach of seeking to meet pitch needs where local family need arises.
Option B for gypsies, travellers and travelling showpeople: Look to allocate new private sites in sustainable locations.
Option C for gypsies, travellers and travelling showpeople: Look to allocate a public site(s) in a sustainable location, including consideration of cross-boundary options.

3.36.1 All three policy options satisfy the requirement for local authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs.

3.36.2 Option A could potentially limit the choice of locations for gypsies, travelers and travelling showpeople to allocations only where existing communities are situated. Options B and C could potentially lead to pitches and plots being located in a dispersed pattern across the District, potentially away from existing communities. Option C would allocate public sites, potentially as part of larger mix use developments which would lead to more diverse communities. Therefore, Option C is considered to be the best performing Option.

3.37 Design and Residential Amenity

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	-	0	0	++	0	0	0	0	0
B	0	0	0	0	0	0	++	0	0	0	0	0
C	0	0	+	0	0	0	++	+	0	0	0	0

Option A for design and residential amenity:

Continue with existing approach of having a positive policy that provides design parameters to apply on a case by case basis.

Option B for design and residential amenity:

In addition to a design policy (Option A), produce Design Codes to provide clear guidelines on design expectation for new developments.

Option C for design and residential amenity:

In addition to a design policy and design codes (Option B), positively and proactively promote high quality community master planning during plan formulation on strategic sites (e.g. 150+ units).

3.37.1 Option A would provide flexibility for individual developments in terms of design which could potentially lead to risks of new development being discordant with the local character. Under Option B, design codes would help to ensure development is in keeping with the local area on a site specific basis whilst still providing some degree of flexibility.

3.37.2 Option C could potentially help to ensure that large strategic developments are in fitting with the local character in terms of design, although it is uncertain if the scale of development (150 dwellings or more) would be in keeping with the type and scale of housing current in some areas. Under this Option, there could be potential for a greater measure of community engagement and improvement of the health and wellbeing of local residents and communities by promoting the allocation of open space and green infrastructure. Option C could potentially have positive impacts on the biodiversity and health objectives and therefore, is considered to be the best performing Option.

3.38 Parking Provision – Public Parking

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	0	++	0	+
B	+	0	0	0	0	0	0	0	0	++	0	+
C	0	0	0	0	0	0	0	0	0	++	0	+
D	0	0	0	0	0	0	0	0	0	++	0	+

Option A for parking provision – public parking:
Allocate new public parking as part of new housing development on the edge of villages, where within walking distance of existing centres and services and facilities.

Option B for parking provision – public parking:
Promote sustainable transport options by allocating land solely for car parking/cycle parking within walking distance to serve our railway stations, where available.

Option C for parking provision – public parking:
Allocate specific areas within strategic sites (e.g. 150+ units) for parking, where new services and facilities are being provided.

Option D for parking provision – public parking:
If the Council chooses to implement a Community infrastructure Levy, use monies from this towards improvements to existing parking in village centres.

3.38.1 An improved transport network and accessibility would be likely to improve the local economy to some extent by increasing access to local facilities. Option A would help to allocate public parking opportunities in areas with sustainable access to current local amenities. However, available sites for parking provision are likely to be limited.

3.38.2 Option B would help to promote sustainable communities by encouraging the use of cycle and rail travel as opposed to personal car use. If more residents used alternative transport, there would be a reduced need for public parking provision. This Option would also aim to allocate public parking provision near sustainable travel such as rail stations, although it is uncertain if there would be deliverability issues. This Option could potentially have a positive impact on the climate change mitigation objective.

- 3.38.3 Option C would help to ensure public parking is located appropriately near new services and facilities, however it is uncertain if this would provide appropriate accessibility to already established facilities in the area. Option D could potentially reconfigure existing parking arrangements and provide new cycle facilities. This could lead a more efficient use of current parking land and promote sustainable transport in the area.
- 3.38.4 The four Options tackle parking issues in South Staffordshire in different ways. A combination of all of the Options could potential result in the most sustainability benefits and therefore a single best performing Option cannot be identified.

3.39 Parking Provision – Residential Parking

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
E	0	0	0	0	0	0	0	0	0	++	0	0
F	+	0	0	0	0	0	0	0	0	++	0	0

Option E for parking provision – residential parking:
Continue with the existing policy approach by adopting the same Parking and Cycling standards as expressed in the current Core Strategy.

Option F for parking provision – residential parking:
To adopt a suite of improved Car Parking and Cycling Standards (including requirements for electric charging points and materials) as well as scheme design requirements to maximise off street private/communal parking.

- 3.39.1 It is anticipated that Options E and F would provide enough residential parking provision for new residents, reducing the requirement for on street parking. Option F would in addition supply electric car charging points as well as promote more sustainable transport options by improving cycling schemes. Maximising parking provision of off-street and communal parking could also contribute towards a more efficient use of land. therefore, Option F is considered to be the best performing Option.

3.40 Space About Dwellings

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	+	0	0	+	+	0	0	0	0
B	0	0	0	+	0	0	+	+	0	0	0	0

Option A for space about dwellings:

Continue with existing policy approach by maintaining the current standards as set out in the adopted Core Strategy.

Option B for space about dwellings:

Adopt a suite of improved space about dwelling standards that provide more clarity, including through the publication of an SPD.

3.40.1 Continuing with the existing Space About Dwellings Standards of the Core Strategy, as proposed under Option A, would help to ensure future housing will be in keeping with local townscapes.

3.40.2 An SPD, as proposed under Option B, would provide more detailed guidance and advice on the design and layout of new buildings to consider aesthetic and health benefits. The SPD would be likely to make the standards clearer and more consistent throughout the District and would help to ensure new development is still in keeping with the existing setting. Therefore, Option B would be considered to be the best performing Option.

3.41 Internal Space Standards

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	+	+	0	0	0	0
B	0	0	0	0	0	0	+	+	0	0	0	0
C	0	0	0	0	0	0	+	+	0	0	0	0

Option A for internal space standards:
Rely on the mandatory space standards required through the Building Control Regulations Part L.

Option B for internal space standards:
Adopt the Optional National Space Standards in part.

Option C for internal space standards:
Adopt the Optional National Space Standards.

3.41.1 An increased amount of internal space of a dwelling facilitates an improved standard of living, leading to a more comfortable and higher quality life. Communities with more space and therefore better qualities of life are likely to be more vibrant and interactive.

3.41.2 The minimum standard as proposed under Option A, helps to ensure that all development satisfies the requirement for internal space, in particular, ensuring more affordable homes still provide new residents with enough internal space. Option B is considered to be likely to provide a better standard of living for residents, whilst Option C would provide the greatest standard of living for new residents by aiming to ensure the greatest internal space. Option C has therefore been identified as the best performing Option.

3.42 Health and Wellbeing

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	+	+	0	0	0	++	0	0	0	0
B	0	0	+	+	0	0	0	++	0	0	0	0

Option A for health and wellbeing:

Continue with existing positive policy approach of promoting measures that contribute to health and wellbeing through varying policy themes (e.g design, green infrastructure).

Option B for health and wellbeing:

To adopt specific policy requirements on health in the new Local Plan that addresses the health needs identified, including how these are expected to be met through the design, landscaping, and master planning of development with guidance on this matters provided through a Healthy Communities Supplementary Planning Document.

3.42.1 Both Options would help to improve the health and wellbeing of current and new residents within the LPR area. By continuing with current policies under Option A, it would help to ensure that future housing is in keeping with the current development in terms of design, landscaping and land use. Option A would seek to ensure more specific health benefits are introduced through the design and landscaping of development, such as features specifically aiding people with dementia in the District.

3.42.2 An SPD, as proposed under Option B, would provide more detailed guidance and advice on specific health needs of local residents, in particular the aging population, tackle future health issues likely to arise and help to ensure these needs are met through design, landscaping and master planning of development. The SPD would be likely to help to ensure that requirements for health are clearer and more consistent throughout the District. Therefore, Option B could be considered to be the best performing Option.

3.43 Leisure Facilities

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	+	+	0	0	0	++	0	0	0	0
B	0	0	+	+	0	0	0	++	0	0	0	0

Option A for leisure facilities:

Continue with the current policy approach of expecting a contribution towards the provision and/or improvement, of open space, sport and recreation facilities.

Option B for leisure facilities:

In addition to maintaining the Council's Open Space Standards, introduce new standards for sports and leisure facilities.

3.43.1 Open space has multiple benefits within a District. This includes physical and mental health benefits by allowing residents access to a diverse range of natural habitats, alongside accessibility to outdoor recreational use. Open space is beneficial to the local biodiversity network by providing an increased number of natural habitats and to the local landscape by retaining long-distance and sensitive views within the area.

3.43.2 Under Option A the current provision of open space, sports and leisure facilities would be maintained and the current open space standards met. Option B would provide more clarity on the improvements of leisure facilities across the District by adopting additional standards for leisure facilities and sports areas. This would increase the provision of sports and leisure facilities and lead to a more detailed approach compared to Option A. Additional standards for the facilities would help to ensure better quality facilities are allocated in a diverse range of locations across the District which are appropriate to the local need. Overall, Option B could potentially be the best performing Option.

3.44 Children's Play and Youth Development

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	+	0	0	+	0
B	0	0	0	0	0	0	0	+	0	0	+	0
C	0	0	0	0	0	0	0	+	0	0	+	0
D	0	0	0	0	0	0	0	+	0	0	+	0

Option A for children's play and youth development: Continuation of the present approach of ensuring that new developments over a certain threshold provide facilities.
Option B for children's play and youth development: A targeted approach to providing facilities in locations where there is an existing shortfall, as well as ensuring new developments over a certain threshold provide new facilities informed by an updated Open Space Audit.
Option C for children's play and youth development: Allocate specific parcels within strategic sites (e.g. 150+ units) for children's play facilities.
Option D for children's play and youth development: If the Council chooses to implement a Community infrastructure Levy, use monies from this towards improving and providing children's play facilities.

3.44.1 Options A, B, C and D would help to ensure there is sufficient open space for children and young people within the LPR area. A variety of facilities for children and young people can provide health benefits by encouraging outdoor recreation and educational benefits by providing safe and secure areas to interact and develop. At this stage of assessment, it is uncertain if the addition of space for children's play and youth development would result in biodiversity benefits./.

3.44.2 Continuing with the current approach under Option A could potentially lead to further development of appropriate children and young people facilities across the District. Option C would also help to increase the provision of facilities across the District and in addition would help to ensure new strategic developments meet the requirements of new facilities. However, under Options A and C, facilities are likely to be located in areas of large development and it is uncertain if they would meet the specific requirements of areas currently with a shortfall of facilities, such as small villages.

3.44.3 Option B would be likely to help to ensure new facilities are accessible in various locations across the District as well as targeting areas of the existing shortfall and supply facilities to areas in most need. Option D would primarily target areas of greatest need to provide more and higher quality facilities.

3.44.4 A combination of Options B, C and D would be likely to result in the most sustainability benefits in the Plan area and a single best performing Option cannot be identified.

3.45 Employment Sites

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	0	0	0	++
B	0	0	0	0	0	0	0	0	0	0	0	++
C	0	0	0	0	0	0	0	0	0	0	0	++

Option A for employment sites:
Continue with criteria based policy to safeguard existing employment sites, including existing employment in villages, plus allocate new sites to meet evidenced future need.

Option B for employment sites:
Don't safeguard existing employment sites and compensate for the potential loss of employment in villages with new allocations to compensate for this loss (additional to allocations to meet evidenced future need).

3.45.1 Both Options would help to ensure sufficient employment land is allocated to encourage sustainable economic growth across the District.

3.45.2 Option A would encourage the distribution of employment sites in various areas of the LPR area, allowing sustainable access to employment opportunities for the majority of residents across the District. This Option would also lead to more viable and sustainable village communities and economies by providing local residents with good access to jobs. This Option also potentially allocates some employment sites in locations of higher demand outside of village locations. This would allow more location choices for business owners in the District.

3.45.3 Option B would focus development on a market-led approach, allocating employment sites in locations preferred from a market perspective but reduces the sustainability of employment throughout the District. This Option would reduce the number of employment sites in villages and therefore reduce accessibility to jobs which could potentially lead to loss of employment.

3.45.4 Option A would be likely to result in an increased number of employment sites across South Staffordshire and could therefore be consider to be the best performing Option.

3.46 Inclusive Growth

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	0	0	+	+
B	0	0	0	0	0	0	0	0	0	0	+	+
C	0	0	0	0	0	0	0	0	0	0	+	+

Option A for inclusive growth:

Require applicants to submit an Employment and Skills Plan (ESP) for developments of 10 or more residential units or 1000sqm of commercial floorspace, with the delivery of the Employment and Skills Plan secured through a Section 106 agreement or via a planning condition where it is considered appropriate to do so.

Option B for inclusive growth:

Require applicants to submit an Employment and Skills Plan (ESP) for developments of 20 or more residential units or 1000sqm of commercial floorspace, with the delivery of the Employment and Skills Plan secured through a Section 106 agreement or via a planning condition where it is considered appropriate to do so.

Option C for inclusive growth:

Require applicants to submit an Employment and Skills Plan (ESP) for developments of 100 or more residential units or 5000sqm of commercial floorspace, with the delivery of the Employment and Skills Plan secured through a Section 106 agreement or via a planning condition where it is considered appropriate to do so.

3.46.1 ESP's would help to ensure local businesses have access to a strong and skilled workforce through personal development programmes such as apprenticeships as well as local residents having access to job opportunities in nearby areas which provide training and personal development.

- 3.46.2 Under Option A, the largest number of applicants would be required to submit an ESP and therefore is likely to result in the most benefits for businesses and residents alike. Option B would require slightly fewer applicants to submit an ESP and Option C would require very few, with only large employment developers implementing an ESP. This is likely to limit the benefit local residents may have to local good opportunities. Therefore, Option A would be likely to be the best performing Option.

3.47 Rural Employment and Tourism

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	0	0	0	+
B	0	0	-	-	0	0	0	0	0	0	0	+

Option A for rural employment and tourism:

Continue with existing policy approach of supporting rural diversification with a preference for development within existing development boundaries. Development outside existing villages to be primarily restricted to opportunities related to reusing existing buildings.

Option B for rural employment and tourism:

In addition to strengthening the support for employment and tourism uses in redundant rural buildings, explore the potential that limited scale new buildings (in the form of limited infilling) to support employment/tourism development might be promoted in rural areas outside of existing centres where this is acceptable in sustainability terms and can be justified by a robust business case.

- 3.47.1 By restricting new development to within existing settlement boundaries, Option A could potentially prevent the development of rural employment and tourist opportunities, such as those only applicable to the open countryside, to some extent. This Option would help to ensure that new development is in keeping with current settlement boundaries and would not detract from the local landscape.
- 3.47.2 Option B would help to promote some tourism and employment opportunities in a more diverse range of locations which may be more appropriate to the business type, positively impacting the local economy. This Option would allow more choice for local businesses but it is uncertain if development would adversely impact biodiversity by causing the loss of part of the local ecological network, or landscape as development could detract from surrounding sensitive views. Overall, Option A would be considered to be the best performing Option.

3.48 Village Centres and Retail

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	0	0	0	+
B	0	0	0	0	0	0	0	0	0	0	0	+
C	0	0	0	0	0	0	0	0	0	0	0	+

Option A for village centres and retail:

Continue with existing policy approach of identifying and protecting the local centres with an emphasis on these meeting basic day to day needs. Continue to rely on larger centres outside the district to meet higher order needs.

Option B for village centres and retail:

Continue to protect the local centres with an emphasis on these meeting basic day to day needs; however also allocate new higher order retail in one or more of the most sustainable villages.

Option C for village centres and retail:

Allocate specific areas within strategic sites (e.g. 150+ units) for retail, where new services and facilities are being provided.

3.48.1 Options A and B would help to encourage the development of the current village centres within the District, which could lead to benefits for the local economy as well as providing employment for local residents.

3.48.2 Under Option A, the District requirements for retail floorspace may not be met if retail centres outside of the District are relied upon to provide the facilities required by residents. Option B would help to ensure this requirement is met by ensuring more retail provision is given in larger settlements. This would lead to a more viable and sustainable community by improving the local economy, local employment opportunities and reducing the requirement to travel outside of the District for essential services.

3.48.3 Under Option C, there could potentially be less flexibility in terms of where new retail sites are located in the District. Smaller developments of under 150 homes would be limited to using the facilities and services currently in the area with restricted opportunity for new retail development. This could potentially limit the choice in locations for new retail owners and it is uncertain if this Option would meet the retail floorspace requirement of the District.

3.48.4 A combination of Options B and C would be likely to result in the most sustainability benefits in terms of village centre and retail.

3.49 Protecting Community Services and Facilities

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	0	0	0	+
B	0	0	0	0	0	0	0	0	0	0	0	+

Option A for protecting community services and facilities:

Continue with existing policy approach of seeking to protect against the loss of the sole or last remaining service or facility in a settlement.

Option B for protecting community services and facilities:

A less restrictive approach where service provision is protected over a broader geographical area, rather than being restricted to each individual settlement.

- 3.49.1 Option A would help to ensure that facilities are accessible to the majority of local residents and provide benefits to community economies. However, the retention of some existing services may not be financially viable, potentially resulting in poorly supplied local services which do not meet the needs of the community.
- 3.49.2 Option B could potentially result in the loss of sole or last remaining facilities in some settlements within the District. This could limit the choice of services available to some local residents and may result in the requirement to travel to reach certain facilities, potentially increasing the reliance on personal car usage.
- 3.49.3 An integration of the two Options could potentially results in more sustainability benefits in terms of community services and facilities in the Plan area.

3.50 Wolverhampton Business Airport

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	0	+	0	+
B	0	0	0	0	0	0	0	0	0	+	0	+

Option A for Wolverhampton business airport:

Maintain existing policy approach of supporting development proposals relating to the general aviation role of the airport (along with the continued occupation of the site for existing non-aviation businesses) only within the developed area of the site as defined by the current policies map. Continue to encourage the owners to produce a masterplan setting out their long term vision for the airport.

Option B for Wolverhampton business airport:

Remove the boundary of the developed area as defined on the current policies map, which is currently the focus of support for development proposals relating to general aviation, and rely on Green Belt policy. Continue to encourage the owners to produce a masterplan setting out the long term vision for the airport.

- 3.50.1 Option A would help to ensure that development that has the potential to be detrimental to the environment would be resisted. This Option would prevent the allocation of land for non-aviation purposes. These services could potentially be beneficial to the local economy.
- 3.50.2 Under Option B, development would be allocated, in exceptional cases and special circumstances that justifies development, in the Green Belt as defined by national policies. This Option would allow the development of non-aviation business which may positively impact the local economic and local job opportunities.
- 3.50.3 At this stage of assessment, a single best performing Option in terms of Wolverhampton Airport cannot be identified.

3.51 Infrastructure

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	0	+	0	0
B	0	0	0	0	0	0	0	0	0	+	0	0

Option A for infrastructure:

Continue with the current approach of using Section 106 payments to fund all of the types of infrastructure as currently.

Option B for infrastructure:

Explore the opportunity to implement a Community Infrastructure Levy for the Local Plan Review.

3.51.1 Option A would help to ensure that new development is supported by new infrastructure where it can be demonstrated that this is necessary. Infrastructure provision could potentially include education establishments, open space or highways. This Option would be likely to help to ensure that there are adequate services for all new residents to the area and could potentially improve the type and range of services available to current residents.

3.51.2 Under Option B, there would be more flexibility in the type of new infrastructure able to be delivered on sites as these projects would not necessarily need to be related to the new development. However, it is uncertain the amount of CIL that would be available. A lack of funding could lead to essential new services not being provided for new development which could lead to pressures and overcrowding to the current nearby services and facilities. A combination of both Options could potentially result in the most sustainability benefits in terms of infrastructure across the Plan area.

3.52 Public Transport and the Highway Network

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	+	0	+	0	0
B	0	0	0	0	0	0	0	+	0	+	0	0

Option A for public transport and the highway network:

Require new developments to demonstrate through a Transport Statement how they will facilitate walking and cycling and the use of public transport.

Option B for public transport and the highway network:

In addition to the requirements of Option A, seek contributions to support sustainable transport choices through Section 106 agreements.

3.52.1 Enhanced provision of walking and cycling routes as well as public transport could positively impact the local transport network by decreasing the dependence on personal car usage. Increased walking and cycling will improve the physical health of local residents through exercise and mental health by encouraging time spent in a diverse range of natural habitats.

3.52.2 Option A would be likely to encourage walking, cycling and public transport use on new developments but it is uncertain to what extent. Option B would be likely to help to ensure that where walking, cycling and public transport provision is required alongside new development, that the appropriate infrastructure is provided. therefore, Option B would be likely to be the best performing Option.

3.53 Green Belt

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	+	+	0	+	0	0	+	0	0	0
B	0	0	+	+	0	+	0	0	+	0	0	0

Option A for green belt:

Update Policy GB1 of the adopted Core Strategy setting out the list of Green Belt exceptions reflecting national policy.

Option B for green belt:

Update Policy GB1 of the adopted Core Strategy setting out the list of Green Belt exceptions reflecting national policy; also update the existing Green Belt Supplementary Planning Document (SPD) that defines the key terms and what this means for South Staffordshire.

- 3.53.1 Options A and B need to be updated to be in line with the newly updated NPPF (July 2018). This states that *“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”*. Allocated Green Belt helps preserve the setting and character of historic towns, safeguards the countryside from encroachment and prevents town merging. It also encourages the redevelopment of urban land to prevent the loss of biodiversity features and some of the Districts best and most versatile soils.
- 3.53.2 Option A would help to ensure that local policies are in line with national policy but it is uncertain if this Option would result in the enhancement and further protection of the Green Belt in South Staffordshire.
- 3.53.3 Updating the Green Belt SPD, as proposed under Option B, would provide more detailed guidance and advice on exceptions and further Green Belt issues within the District. The SPD would be likely to make the requirement Green Belt exceptions clearer and more consistent and therefore help to improve retention of the Green Belt in South Staffordshire. Therefore, Option C would be considered to be the best performing Option.

3.54 Open Countryside

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	+	+	0	+	0	0	0	0	0	0
B	0	0	+	++	0	+	0	0	0	0	0	0
C	0	0	+	+	0	+	0	0	0	0	0	0

Option A for open countryside:

Specify what forms of development would be supported in the Open Countryside, and identify criteria against which to assess other proposals in the Open Countryside.

Option B for open countryside:

In addition to Option A, undertake further landscape evidence to identify key strategic gaps/areas of restraint surrounding settlements that should be protected and enhanced.

Option C for open countryside:

Continue with the current policy approach of protecting the Open Countryside for its own sake, positively encouraging only those forms of development which are specified under a new Open Countryside policy.

3.54.1 Option A would help to identify what forms of development would be supported in the open countryside and list criteria which needs to be met to support other development exclusive of this list. Criteria for proposals outside of the supported list could potentially include the protection and enhancement of local landscape by ensuring development is not a visual detractor, and local ecology by ensuring development does not damage current important areas of biodiversity. Protecting the open countryside also protects valuable soils of previously undeveloped land.

3.54.2 Option B would provide further information on sensitive landscape within the District. This would enable the council to use more specific evidence when determining if development should be allocated in the open countryside. This would help ensure that very limited development would take place in identified areas of restraint associated with high landscape sensitivity across the District, protecting and enhancing current importance areas of landscape.

3.54.3 Option C would result in the least amount of development allocated in the open countryside. This would positively impact the biodiversity, landscape and natural resources by safeguarding them. However, this Option would restrict the availability of land which could potentially be appropriate for the area. Overall, Option B could potentially be the best performing Option as it would be likely to place the most protection on important landscapes.

3.55 Landscape Character

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	+	++	0	+	0	0	0	0	0	0
B	0	0	+	++	0	+	0	0	0	0	0	0

Option A for landscape character:

Continuation of the current approach used in Core Strategy Policy EQ4 of setting out in broad terms how proposals will be expected to conserve and enhance the character of the landscape; along with the undertaking of a landscape sensitivity and capacity study to identify areas of high sensitivity and inform site selection.

Option B for landscape character:

A more prescriptive approach that could set out what would be expected for landscape led developments, with the potential for a greater role for masterplanning larger sites to achieve this. A policy could provide more detail on what would be expected for conserving and enhancing different landscape character types found in the district.

- 3.55.1 Options A and B would be expected to protect and enhance the important landscape features within the District by helping to ensure development is constrained to areas of low landscape sensitivity and does not detract from the local character and distinctiveness.
- 3.55.2 Option A would help to ensure all developments satisfy the primary requirements for conserving and enhancing the local landscape character. Adopting a landscape sensitivity and capacity study is expected to help reduce the loss of important landscapes.
- 3.55.3 Under Option B, larger sites would be analysed in further detail to establish the most appropriate design in which landscape can be conserved and enhanced. Large development sites often detract from the original landscape of an area. Considering landscape through the District Design Guide and Landscape Character SPD would help to ensure design features are considered in further detail. Therefore, Option B could be considered to be the best performing Option.

3.56 Natural Environment

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	++	+	0	+	0	0	0	0	0	0
B	0	0	++	+	0	+	0	0	0	0	0	0

Option A for natural environment:

Continue with current policy approach of promoting the protection and enhancement of the existing network of sites and encouragement for the development of green linkages; along with the continued protection of the hierarchy of designated sites.

Option B for natural environment:

Continuing the approach to protecting the hierarchy of designated sites however with a clearer and more positive approach to the development of a green/ecological network including measures for biodiversity offsetting.

3.56.1 The enhancement of the green network would lead to improved linkages between important areas of biodiversity and areas with potential for biodiversity significance. Option A would help to ensure the continuation of the current level of protection across the District and could further protect the current green network. This Option would aim to ensure the requirements of the NPPF are met across the District.

3.56.2 Under Option B, the green network identified would highlight areas of opportunity where biodiversity enhancement could be implemented. This Option could potentially lead to a District target of a net gain in biodiversity over the Plan period rather than a continuation of the current levels of protection. An increase in biodiversity net gain would lead to a more diverse range of natural habitats accessible to new residents. Overall, Option B can be considered to be the best performing Option.

3.57 Adapting to a Changing Environment – Fabric and Energy Conservation

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	+	0	0	0	0	0	0	+	0	0	0	0
B	+	0	0	0	0	0	0	+	0	0	0	0
C	+	0	0	0	0	0	0	+	0	0	0	0

Option A for adapting to a changing environment – fabric and energy conservation: Continue building to present energy efficiency standards in Building Regulations and local policies. These policies encourage higher design and energy efficiency standards.
Option B for adapting to a changing environment – fabric and energy conservation: Investigate whether standards equivalent to introducing higher fabric energy efficiency low carbon standards are appropriate and deliverable in South Staffordshire to: <ol style="list-style-type: none"> 1) All new build homes across all mix; or 2) House types and tenures that tend to house more vulnerable residents e.g. new build Affordable Homes and housing aimed at an ageing population This could be accompanied by a high quality level of service provision (e.g. an efficient boiler, low energy lighting etc.).
Option C for adapting to a changing environment – fabric and energy conservation: To investigate a policy that requires upgrading of existing energy inefficient buildings where a planning application is submitted on that building.

3.57.1 High energy consumption leads to an increase in energy generation, in particular the production of greenhouse gases. Greenhouse gases cause poor air quality which adversely impacts human health as well as the natural environment, primarily due to particulate matter pollution.

3.57.2 Under Option A, following the minimum energy efficient standards could potentially present difficulties for the District to reduce its overall emissions. It is uncertain if District targets would be met under this Option. Option B would help to ensure new developments are built to higher energy efficiency standards than proposed under Option A. Improved energy efficiency can lead to reduced energy bills for residents as well as health benefits from improved air quality. This Option can help boost the number of energy efficient homes in the District. Option C would help to increase the number of energy efficient homes across the District and make it easier for residents to conserve energy.

3.57.3 The three Options aim to tackle fabric and energy consumption in different ways and a combination of all three Options should be adopted to result in the most sustainability benefits across the Plan area.

3.58 Adapting to a Changing Environment – Renewable, Low Carbon Energy Generation

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
D	+	0	0	0	0	0	0	+	0	0	0	0
E	+	0	0	0	0	0	0	+	0	0	0	0
F	+	0	0	0	0	0	0	+	0	0	0	0

Option D for adapting to a changing environment – renewable, low carbon energy generation: Continue with current policy approach to districtwide delivery of renewable energy.

Option E for adapting to a changing environment – renewable, low carbon energy generation: Further investigation into renewable and low carbon technologies to consider the potential for alternative energy generation sources on strategic sites (e.g 150+ units).

Option F for adapting to a changing environment – renewable, low carbon energy generation: Prepare more detailed guidance through a Sustainable Development Supplementary Planning Document.

- 3.58.1 The use of renewable energy decreases the need for energy generation from unsustainable sources such as fossil fuels and therefore reduces the volume of greenhouse gases emitted. Greenhouse gases cause poor air quality which adversely impacts human health as well as the natural environment, primarily due to particulate matter pollution. Option D would help to ensure that minimum national renewable energy targets are met.
- 3.58.2 Option E would help to ensure larger developments are more energy efficient and could potentially rely more heavily on renewable and low carbon energy sources. However, it is uncertain that if by only focusing renewable energy resources on strategic sites, whether the renewable energy targets of the District will be met. It may also mean smaller developments do not have access to renewable and efficient energy.
- 3.58.3 An SPD, as proposed under Option F, would provide more detailed guidance and advice on energy conservation and energy generation measures within the District. The SPD would be likely to make the requirements for renewable energy clearer and more consistent and therefore help to reduce the carbon footprint in South Staffordshire.
- 3.58.4 A single best performing option cannot be identified and a combination of the three Options should be considered to result in more sustainability benefits.

3.59 Historic Environment

	1	2	3	4	5	6	7	8	9	10	11	12
Option	C.C. Mitigation	C.C. Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
A	0	0	0	0	0	0	0	0	++	0	0	0
B	0	0	0	0	0	0	0	0	++	0	0	0

Option A for historic environment:

Continue with the existing policy approach of setting out expectations on the conservation and enhancement of heritage assets.

Option B for historic environment:

Continue with the existing policy approach but with more detailed guidance provided through a Supplementary Planning Document.

3.59.1 Option A would help to ensure that local heritage assets are conserved in a manner appropriate to their significance in line with national policy. New development should make a positive contribution and promote heritage assets where possible.

3.59.2 An SPD, as proposed under Option B, would provide more detailed guidance and advice on the conservation and enhancement of heritage assets, in particular the significance of each asset within the District. The SPD would be likely to make the importance of the character of historic assets, and what that means in terms of design, scale and type of development clearer and more consistent and therefore help protect historic assets within South Staffordshire. It would be considered to be likely that Option B is the best performing Option.

Appendix A: SA Framework for the South Staffordshire LPR

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators include (but are not limited to)
1	Climate change Mitigation: Minimise the district's contribution to climate change.	Increase energy consumption or GHG emissions? Generate or support renewable energy?	<ul style="list-style-type: none"> • Energy consumption; • GHG emissions; • Access to sustainable transport; • Green infrastructure (carbon sink).
2	Climate Change Adaptation: Plan for the anticipated impacts of climate change.	Increase the number of residents at risk of flooding? Increase the risk of flooding?	<ul style="list-style-type: none"> • EA Flood Map for Planning; • Surface water flood risk; • The number of developments given planning permission on floodplains contrary to EA advice; • Presence or loss of green infrastructure.
3	Biodiversity & Geodiversity: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the district.	Result in a net loss of vegetation? Protect or enhance wildlife sites or biodiversity hotspots? Protect or enhance geodiversity hotspots?	<ul style="list-style-type: none"> • Number of planning approvals which generate adverse impacts on sites of biodiversity importance; • Length of greenways constructed; • Percentage of major development generating overall biodiversity enhancement; • Hectares of biodiversity habitat delivered through strategic site allocations; • Impacts on geodiversity sites.
4	Landscape & Townscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Protect or enhance the local landscape? Protect or enhance the local townscape?	<ul style="list-style-type: none"> • Use of locally sourced materials; • Is development in-keeping with surroundings?; • Impacts on existing setting; • Alter the urban / rural fringe; • Increase the risk of coalescence; • Amount of new development in the AONB with commentary on likely impact.
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.	Increase waste production? Increase the risk of air, noise or water pollution?	<ul style="list-style-type: none"> • Number of residents in areas of poor air quality; • Proximity to pollutants (e.g. busy roads, airports); • Quality of waterways in or adjacent to sites; • Local increases in road traffic or congestion;

		Increase the number of residents exposed to the risk of air, noise or water pollution?	<ul style="list-style-type: none"> The number of developments given planning permission contrary to Environment Agency advice relating to river water quality or the protection of groundwater; Proximity to AQMAs and current AQMA status.
6	Natural Resources: Protect, enhance and ensure the efficient use of the district's land, soils and water.	Impact on demand capacity of local water sources?	<ul style="list-style-type: none"> Proportion of previously developed land; Use of existing buildings; Likely impacts on soil fertility, structure and erosion; Agricultural Land Classification; Mineral Safeguarding Sites; Re-use of contaminated land.
		Use previously developed land or existing buildings?	
		Result in the loss of local soils?	
7	Housing: Provide a range of housing to meet the needs of the community.	<p>Ensure that residents will have the opportunity to meet in a home which meets their needs?</p> <p>Result in the loss of, or otherwise impact on, any existing housing?</p>	<ul style="list-style-type: none"> Proportion of affordable housing; Impacts on existing houses and estates; Number of care homes; Total number of homes planned for site.
8	Health & Wellbeing: Safeguard and improve the physical and mental health of residents.	Provide residents with adequate access to necessary health facilities and services?	<ul style="list-style-type: none"> Access to health facilities; Percentage of District's population with access to a natural greenspace within 400m of their home; Local air quality; Hectares of accessible open space per 1,000 population. Number of Listed Buildings adversely impacted by development; Number of Listed Buildings partially damaged or lost; Number of archaeological sites, scheduled monuments and registered parks adversely impacted by development; Quantity of development which is discordant with the relevant management plans but given planning permission in Conservation Areas.
		Encourage healthy lifestyles?	
9	Cultural Heritage: Conserve, enhance and manage sites, features and areas of historic and cultural importance.	Will the proposal conserve heritage assets/the historic environment?	<ul style="list-style-type: none"> Distance and accessibility to public transport options; Distance and accessibility to key services and amenities, as well as employment opportunities; Suitability of existing routes of access into sites, considering anticipated increases in usage.
		Will the proposal enhance heritage assets/the historic environment?	
10	Transport & Accessibility: Improve the choice and efficiency of sustainable transport in the district and reduce the need to travel.	Improve travel choice, reduce journey need and shorten the length and duration of journeys?	<ul style="list-style-type: none"> Distance and accessibility to public transport options; Distance and accessibility to key services and amenities, as well as employment opportunities; Suitability of existing routes of access into sites, considering anticipated increases in usage.
		Improve accessibility to key services and amenities for existing and new residents?	
11	Education: Improve education, skills and qualifications in the district.	<p>Raise educational attainment levels for residents in the district?</p> <p>Offer residents with frequent, affordable and sustainable access to educational facilities?</p>	<ul style="list-style-type: none"> Distance and accessibility to educational facilities, including primary and secondary schools; Local education attainment levels.

12	Economy and employment: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Encourage sustainable economic growth?	<ul style="list-style-type: none"> • Access and distance to local employment opportunities; • Local employment rates; • Increases or decreases in quantity of employment land in the district; • Support for sustainable businesses.
		Ensure high and stable levels of employment?	

Habitat Regulations Assessments
Sustainability Appraisals
Strategic Environmental Assessments
Landscape Character Assessments
Landscape and Visual Impact Assessments
Green Belt Reviews
Expert Witness
Ecological Impact Assessments
Habitat and Ecology Surveys



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