

Sustainability Appraisal of the South Staffordshire Local Plan Review (2023-2041)

Regulation 19 SA Report

Volume 1 of 3: Non-Technical Summary

March 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the South Staffordshire Local Plan Review 2023-2041

Regulation 19 SA Report

Volume 1 of 3: Non-Technical Summary

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1 Introduction

The purpose of this report

- N1. Lepus Consulting Ltd (Lepus) has been instructed by South Staffordshire District Council (SSDC) to undertake a Sustainability Appraisal (SA), incorporating the requirements of Strategic Environmental Assessment (SEA), of the South Staffordshire Local Plan Review (LPR) (2023-2041).
- N2. This document comprises a Non-Technical Summary (NTS) of the Regulation 19 SA for the South Staffordshire LPR, which presents an assessment of the likely sustainability impacts of proposals set out in the LPR.
- N3. The LPR has been prepared to review existing planning policy documents and determine the development needed within South Staffordshire (the Plan area) until 2041. The LPR sets out the updated development strategy in the Plan area, a vision for the future, relevant objectives, site allocations, strategic policies and development management policies which will guide the determination of planning applications.
- N4. This NTS document comprises **Volume 1** of the SA; it is accompanied by **Volume 2**: The Main SA Report and **Volume 3**: Appendices to the main SA Report.

What is Sustainability Appraisal and Strategic Environmental Assessment?

- N5. The Planning and Compulsory Purchase Act¹ requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations² (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including local plans, to ensure that environmental issues are fully integrated and addressed during decision-making.
- N6. SA is the process of informing and influencing the preparation of a local plan to optimise its sustainability. SA considers the social, economic and environmental performance of the plan. The SA (and SEA) can help to ensure that proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the plan throughout its development.
- N7. Sustainability can be defined as "*meeting the needs of the present generation without compromising the ability of future generations to meet their own needs*"³. To be

¹ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 29/02/24]

² The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 29/02/24]

³ Brundtland (1987) Report of the World Commission on Environment and Development: Our Common Future. Available at: <http://www.un-documents.net/our-common-future.pdf> [Date accessed: 29/02/24]

sustainable, development requires the integration of the needs of society, the economy and the environment (see **Figure N.1**).

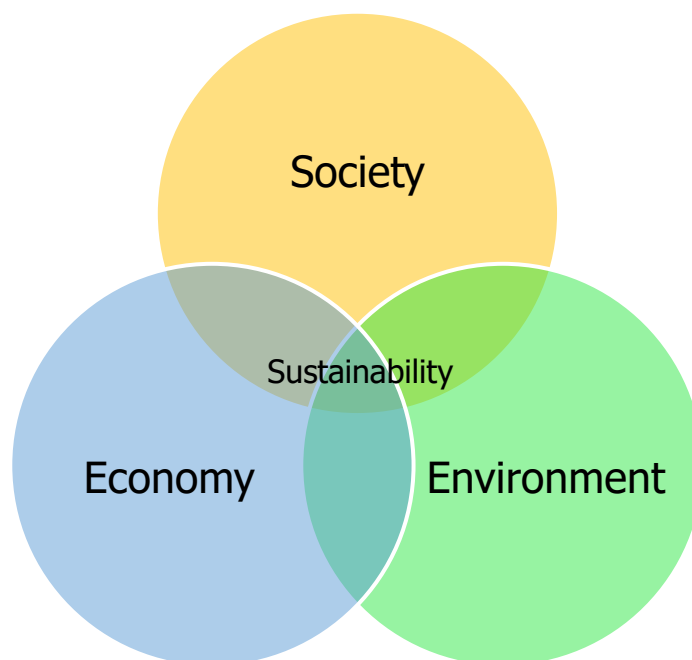


Figure N.1: Sustainable development

South Staffordshire

- N8. South Staffordshire is a local governmental district in the West Midlands, adjacent to the western boundary of the Black Country, bordering Shropshire on its east, Worcestershire to the south and Stafford on its northern border. In total, South Staffordshire District covers approximately 40,700ha, with an estimated population of 112,369 as of 2022⁴. The district is predominantly rural with several larger towns, including Codsall which is the administrative centre of the South Staffordshire district (see **Figure N.2**).
- N9. The Plan area is characterised by distinctive rural landscapes comprised of agricultural and Green Belt land, with 19 conservation areas currently listed across the South Staffordshire District⁵. These include the Shropshire Union Canal and Staffordshire and Worcestershire Canal. On the north eastern border, South Staffordshire lies adjacent to Cannock Chase, which is an Area of Outstanding Natural Beauty (AONB) and also contains a Special Area of Conservation (SAC). Other notable features include Baggeridge Country Park and the historic Weston Park.

⁴ City Population (2022) South Staffordshire. Available at: https://www.citypopulation.de/en/uk/westmidlands/admin/E07000196_south_staffordshire/. [Date accessed: 06/11/23]

⁵ South Staffordshire District Council (2022) Conservation Areas. Available at: <https://www.sstaffs.gov.uk/planning/conservation-areas.cfm> [Date accessed: 06/11/23]

N10. South Staffordshire has some larger towns, although a large proportion of employment comes by way of commuting to the neighbouring Black Country and other districts.

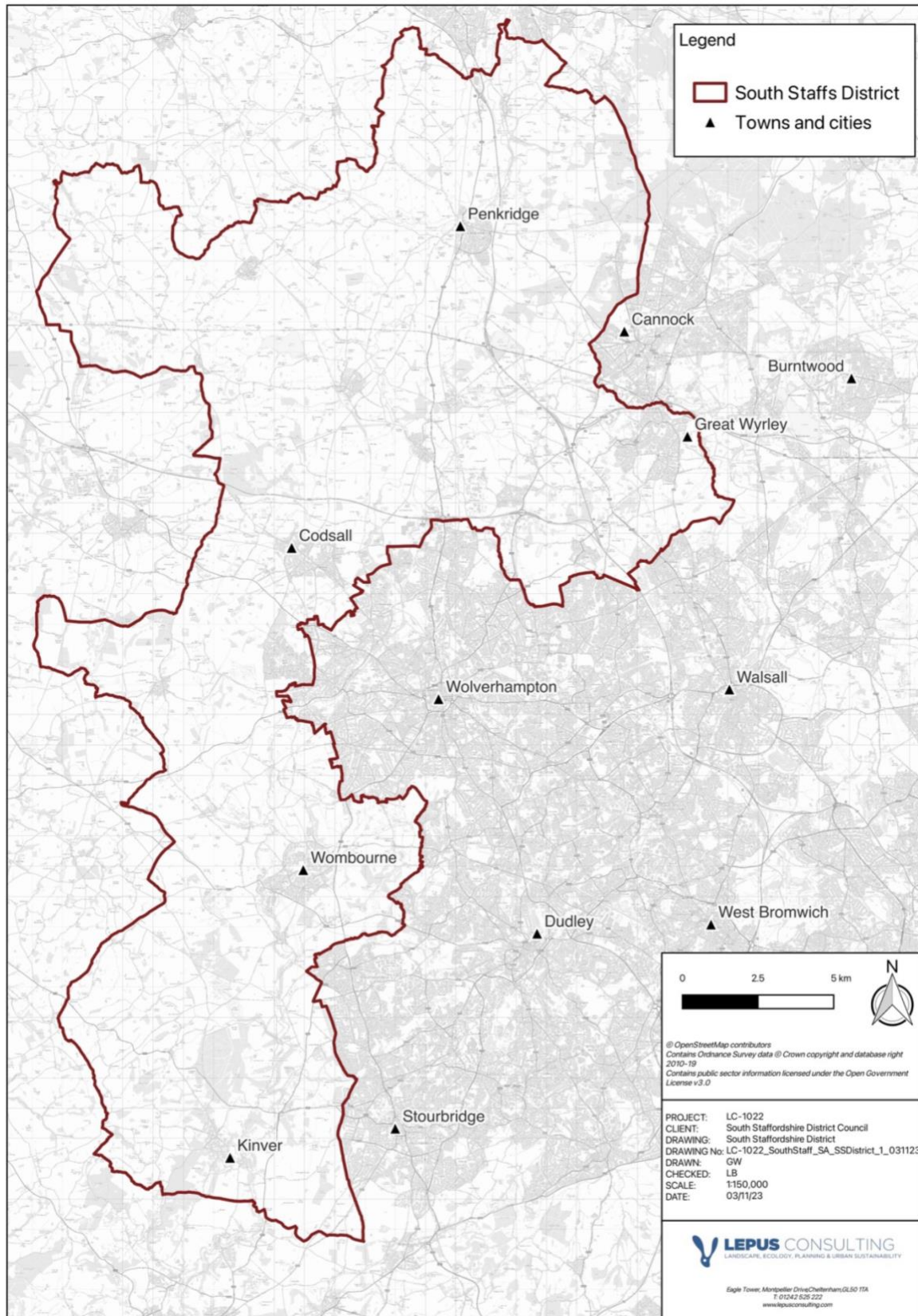


Figure N.2: Map of South Staffordshire District

The SA and LPR process so far

N11. The LPR is at the plan-making stage Regulation 19, known as 'Publication' in the Local Plan Regulations 2012⁶, as shown in Stage C of **Figure N.3**.



Figure N.3: Sustainability Appraisal process

⁶ The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767

- N12. Figure N.4 shows the stages that have been undertaken during the preparation of the LPR and the accompanying SA outputs.
- N13. Each stage included consultation with the statutory bodies for SA/SEA: Historic England, Natural England and the Environment Agency. Comments received were taken into consideration during the preparation of the SA outputs.

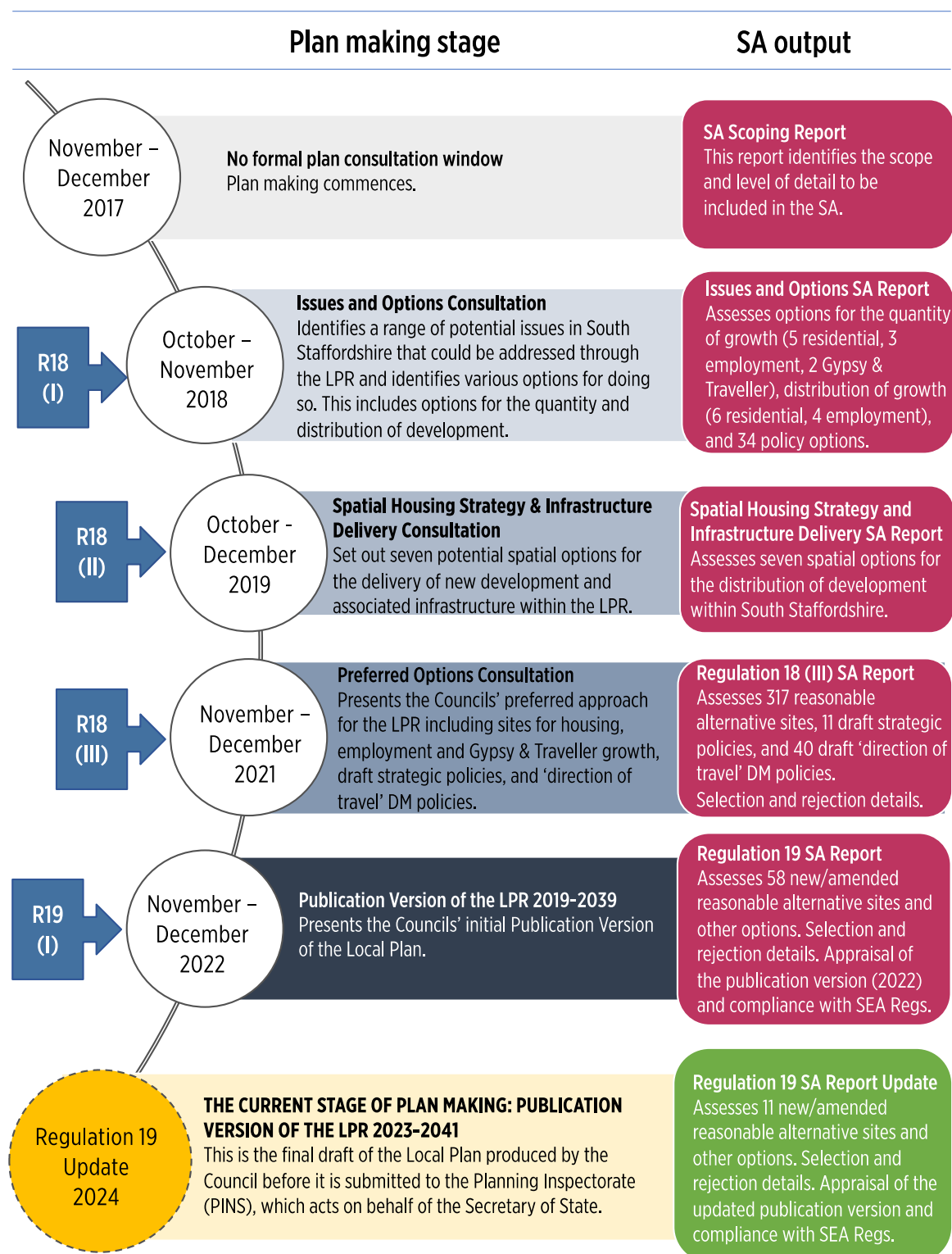


Figure N.4: Stages in the plan-making process accompanied by SA outputs

2 Baseline and key sustainability issues

Overview

- N14. The SEA Regulations requires the Environmental Report to present *"an outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes"*, *"the environmental characteristics of areas likely to be significantly affected"* and *"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance"*.
- N15. There are a number of plans, policies and programmes (PPPs) that set out the environmental protection objectives which proposals within the Local Plan should adhere to. These are discussed within the Scoping report and are updated in Appendix A (Volume 3). Some examples of these include the National Planning Policy Framework (NPPF) and the Habitats Regulations, as well as regional or local guidance and strategies such as local transport initiatives, South Staffordshire's Flood Risk Assessment, and Climate Change Action Plan.
- N16. PPPs that could potentially affect the Local Plan have been reviewed and considered alongside the current characteristics of the Plan area.
- N17. **Volume 2** (the main Regulation 19 SA Report) includes information relating to the baseline and key issues for the South Staffordshire LPR area, drawing on information gathered during the Scoping stage, relating to the following sustainability topics (which incorporate the topics identified in Schedule 2 of the SEA Regulations⁷):
- Air;
 - Biodiversity, flora and fauna;
 - Climatic factors;
 - Cultural heritage;
 - Human health;
 - Landscape;
 - Population and material assets;
 - Soil; and
 - Water.
- N18. An overview of each topic, including the key issues, is provided below.

⁷ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including *"issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)."*

Air

- N19. The issue of air quality has been considered under SA Objective 5 'Pollution and Waste', which seeks to minimise the extent and impacts of water, air and noise pollution. Indicators for this objective include the number of residents in areas of poor air quality, proximity to pollutants (e.g. main roads), local increases in traffic or congestion and proximity to AQMAs.

Key issues relating to air quality

- ⇒ There is currently one AQMA within South Staffordshire District, 'AQMA No. 5 Oak Farm', declared due to excessive levels of NO₂.
- ⇒ 5.1% of mortality in the district is attributable to particulate matter air pollution.
- ⇒ New housing, employment development areas, commercial and domestic sources, transport, and increasing visitor numbers in the area have the potential to lead to adverse impacts on air quality.

Biodiversity and geodiversity

- N20. Biodiversity, flora and fauna have been predominantly considered under SA Objective 3 'Biodiversity and Geodiversity' which aims to help protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the district.

Key issues relating to biodiversity, flora and fauna

- ⇒ There are several internationally, nationally and locally designated sites of biological and geological importance in the district.
- ⇒ Important sites and habitats may be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution.
- ⇒ Most of the district falls within Impact Risk Zones (IRZs) of one or more Sites of Special Scientific Interest (SSSIs).
- ⇒ It is essential that there is a coherent ecological network of habitats that enable the free movement of species and gene exchange.
- ⇒ It will be necessary to ensure there will be no adverse impact on the site integrity of

Key issues relating to areas designated pursuant to Directives 79/409/EEC and 92/43/EEC (the Birds and Habitats Directives)

- ⇒ The following vulnerabilities have been identified in the HRA screening process:
 - Recreation (Cannock Chase SAC, Motte Meadows SAC);
 - Water issues (Cannock Chase SAC, Motte Meadows SAC, West Midlands Mosses SAC / Midlands Meres & Mosses Phase 1 Ramsar and Midlands Meres & Mosses Phase 2 Ramsar); and
 - Air quality (Cannock Chase SAC, Cannock Extension Canal SAC, Motte Meadows SAC, Pasturefield Saltmarsh SAC, West Midlands Mosses SAC / Midlands Meres & Mosses Phase 1 Ramsar and Midlands Meres & Mosses Phase 2 Ramsar).
- ⇒ The HRA which accompanies the LPR identified and reviewed Habitats sites within a 20km radius of South Staffordshire.
- ⇒ The Publication Draft HRA document evaluates each site in terms of likely significant effects of the plan, and concluded that adverse effects on integrity from recreation and water issues could be ruled out, alone or in combination. However, adverse effects on integrity relating to air quality could not be ruled out at this stage and ongoing traffic data collection

Climatic factors

- N21. Throughout the SA process, climate change has been considered under SA Objective 1 'Climate change mitigation' which seeks to minimise South Staffordshire's contributions towards climate change, and SA Objective 2 'Climate change adaptation' which seeks to plan for the anticipated levels of climate change in the future. However, it should be noted that climate change is a cross-cutting theme with relevance across all objectives of the SA Framework and SEA topics.

Key issues relating to climatic factors

- ⇒ There is a lack of shade cover available in urban areas of South Staffordshire due to the urbanised character of the areas, and a lack of mature trees along road networks and within and on the edges of centres. GI should be enhanced and expanded, wherever possible.
- ⇒ Overall, there is a general trend of CO₂ emissions in South Staffordshire decreasing over time; however, CO₂ emissions per capita remain relatively high. If more concerted efforts for sustainably sourced energy and materials are not made, then total carbon emissions would be likely to increase further following the development proposed in the LPR.
- ⇒ New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change.
- ⇒ Climate change has the potential to increase the frequency and severity of flooding. A range of further risks linked to climate change may affect South Staffordshire. These include:
 - an increased incidence of heat related illnesses and deaths during the summer; increased risk of injuries and deaths due to increased number of storm events and flooding;
 - adverse effect on water quality due to a change in water levels and turbulent flow after heavy rain and a reduction of water flow;
 - a need to increase the capacity of sewers;
 - loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
 - an increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for local business; and

Cultural heritage

- N22. Heritage assets are predominantly considered under SA Objective 9 'Cultural Heritage', which seeks to enhance, conserve and manage sites, features and areas of historic and cultural importance.

Key issues relating to cultural heritage

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

Health

- N23. The issue of human health is dealt with under SA Objective 8 'Health and Wellbeing'. Indicators for the objective include the proximity and access to GP surgeries, NHS hospitals and natural greenspaces.

Key issues relating to human health

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

Landscape

- N24. The issue of landscape has been primarily considered under SA Objective 4 'Landscape and Townscape', which seeks to conserve, enhance and manage the character and appearance of the landscape and townscape, whilst maintaining and strengthening their distinctiveness.

Key issues relating to landscape

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

Population and material assets

- N25. 'Population' is a broad topic and has been addressed under several SA Objectives: 5 'Pollution and Waste', 7 'Housing', 8 'Health and Wellbeing', 10 'Transport and accessibility', 11 'Education' and 12 'Economy and Employment'. With respect to population, these objectives seek to create places where residents live a high quality of life for longer, are well educated and have the necessary skills to gain employment and succeed in modern society. Indicators include the proximity of development proposals to schools, accessibility to employment land and proximity to services and amenities.

- N26. 'Material assets' covers a variety of built and natural assets which are accounted for in a range of SA Objectives. It is a requirement of Schedule 2 of the SEA Regulations to consider material assets, although they are not defined. The SA process has considered material assets as the health centres, schools and other essential infrastructure resources required to meet the demands of the local population and development aspirations of the Local Plan. Other aspects of natural assets, such as agricultural land, have been considered under other SEA topics (i.e. 'soil').

Key issues relating to population and material assets

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

Soil

- N27. The issue of soil was primarily taken into consideration under SA Objective 6 'Natural Resources' which aims to protect, enhance, and ensure efficient use of, the district's land, soils and water. Soils have been considered to some extent under SA Objectives 2 'Climate Change Adaptation' and 3 'Biodiversity and Geodiversity'.

Key issues relating to soil

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

Water

- N28. The issue of water quality has been primarily taken into consideration under SA Objective 5 'Pollution and Waste', which seeks to minimise the extent and impacts of water, air and noise pollution. Flooding has been considered under SA Objective 2 'Climate Change Adaptation'.
- N29. The water environment and water resources have also been considered to some extent within SA Objective 6 'Natural Resources' which aims to protect, enhance, and ensure efficient use of, the district's land, soils and water as well as SA Objective 3 'Biodiversity and Geodiversity' in terms of ecological implications.

Key issues relating to water

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

3 Evolution of the environment without the Plan

- N30. The SEA Regulations requires the Environmental Report to present *"information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"*.
- N31. Without the LPR, no new plan-led development would take place within South Staffordshire over and above that which is currently proposed in the Core Strategy (2012) and Site Allocations Document (SAD) (2018) which form the current adopted Local Plan⁸. This means that instead, an 'appeal-led' system would predominate. Under this scenario, the nature and scale of development that may come forward is uncertain.
- N32. In a 'no plan' scenario, other plans and policies would continue to be a material consideration in planning decisions and legislative protection would continue to be in place. Table N.1 presents the likely evolution of the baseline without the LPR.

Table N.1: Likely evolution without the LPR

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

⁸ South Staffordshire Local Plan. Available at: <https://www.sstaffs.gov.uk/planning/south-staffordshire-local-plan.cfm>
 [Date accessed: 29/02/24]

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

4 SA methodology

The SA Framework

- N33. Taking into consideration the key issues identified above, an SA Framework was established which includes SA Objectives, decision-making criteria and indicators. The SA Framework provides a way in which sustainability effects can be described, analysed and compared. SA Objectives and indicators can be revised as further baseline information is collected and sustainability issues and challenges are identified and are used in monitoring the implementation of the Local Plan.
- N34. The full SA Framework including indicators is presented in Appendix B, with a summary of the 12 SA Objectives shown in Table N.2. It should be noted that the order of SA Objectives does not infer any prioritisation.

Table N.2: SA Framework summary

No.	SA Objective	Relevance to SEA Regulations – Schedule 2
1	Climate Change Mitigation: Minimise South Staffordshire’s contribution to climate change.	Climatic factors
2	Climate Change Adaptation: Plan for the anticipated impacts of climate change.	Climatic factors
3	Biodiversity and Geodiversity: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the district.	Biodiversity, flora and fauna
4	Landscape and Townscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Landscape and cultural heritage
5	Pollution and Waste: Reduce waste generation, increase the reuse of, and recycling of, materials whilst minimizing the extent and impacts of water, air and noise pollution.	Air, water, soil, human health, population and material assets
6	Natural Resources: Protect, enhance and ensure the efficient use of the district’s land, soils and water.	Soil, water and material assets
7	Housing: Provide a range of housing to meet the needs of the community.	Population
8	Health and Wellbeing: Safeguard and improve the physical and mental health of residents.	Human health and population
9	Cultural Heritage: Conserve, enhance and manage sites, features and areas of historic and cultural importance.	Cultural heritage

No.	SA Objective	Relevance to SEA Regulations – Schedule 2
10	Transport and Accessibility: Improve the choice and efficiency of sustainable transport in the district and reduce the need to travel.	Climatic factors, population and material assets
11	Education: Improve education, skills and qualifications in the district.	Population
12	Economy and Employment: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Population

Significant effects

- N35. Each section of the LPR has been subject to SA. Using the SA Framework and expert judgement, the likely sustainability impacts of the LPR have been assessed. The SA has considered positive, negative, secondary, cumulative and synergistic effects.
- N36. A single value from **Table N.3** has been allocated to each SA Objective for each reasonable alternative. Symbols and colours are used to enable quick identification of effects and comparison between options. Justification for the classification of the impact for each SA Objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.
- N37. When selecting a single value to best represent the sustainability performance, and to understand the significance of effects in terms of the relevant SA Objective, the precautionary principle⁹ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts provide an overview only, and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.
- N38. The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors. Significance of effect has been categorised as minor or major.

⁹The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.

Table N.3: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • 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 -	The size, nature and location of development proposals would be likely to: <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 +	The size, nature and location of a development proposal would be likely to: <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 ++	The size, nature and location of a development proposal would be likely to: <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 international, national or regional designation.

N39. Limitations, assumptions and topic-specific methodologies applied in the SA are discussed in further detail within **Chapter 4** of the Regulation 19 SA Report (**Volume 2**) and **Appendix D (Volume 3)**.

5 Reasonable alternatives

Context

- N40. The SEA Regulations state as part of the requirements for preparing an environmental report, that the local plan making process must identify, describe, and evaluate reasonable alternatives that have been considered.
- N41. The Council has demonstrated how they have identified, described and evaluated reasonable alternatives as part of the plan-making process within this Regulation 19 SA Report (which meets the requirements of an SEA Environmental Report).
- N42. There is no precise guide as to what constitutes a 'reasonable alternative'. It is possible to derive reasonable alternatives for different aspects of a local plan.

Identification of reasonable alternatives

- N43. All reasonable alternatives have been identified and described by the Council as the Plan makers. Reasonable alternatives have been identified through consultation and close working with stakeholders for a range of topics, including residents, local communities, statutory consultees, shareholders, suppliers and 'hard to reach' groups.
- N44. Stakeholder engagement carried out throughout the plan making process has been primarily through the consultation periods, with response forms accompanying the consultation documents, as well as exhibitions to discuss more contentious issues allowing communities to share their aspirations and concerns with planning officers¹⁰.

Types of reasonable alternative

- N45. The Council have identified reasonable alternatives for the LPR at different stages of the plan making process, as well as different types of alternatives:
- **Residential Growth Options x8** – high level options for the quantity of residential growth to be delivered through the Plan.
 - **Employment Growth Options x3** – high level options for the quantity of employment growth to be delivered through the Plan.
 - **Residential Spatial Distribution Options x6** – high level thematic options for where new residential growth could be located in the district.
 - **Employment Spatial Distribution Options x4** – high level options for where new employment growth could be located in the district.
 - **Spatial Options x9** – options for the broad distribution of new housing growth in the Plan area, drawing on information gathered through testing the earlier residential spatial distribution options.

¹⁰ South Staffordshire Council (2019) Statement of Community Involvement 2019. Available at: <https://www.sstaffs.gov.uk/planning/statement-of-community-involvement.cfm> [Date accessed: 03/11/23]

- **Policy Options x86** – 86 policy options covering 34 possible policies for inclusion in the Plan, relating to housing, design, landscape and other development management issues. These were later formed into fully worded policies that were assessed in the SA.
- **Development Sites x358** – residential, employment and Gypsy, Traveller and Travelling Showpeople (GTTS) sites identified throughout the plan making process.

N46. The SA has assessed different options and reasonable alternatives on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is SSDC's role as the plan makers to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the LPR and which to 'reject' from further consideration.

N47. The key SA stages where reasonable alternatives have been assessed are as follows:

- **Regulation 18 (I) Issues and Options SA (2018)**¹¹
 - Five residential growth options
 - Three employment growth options
 - Six residential spatial distribution options
 - Four employment spatial distribution options
 - 86 policy options (for 34 policy areas)
- **Regulation 18 (II) Spatial Housing Strategy and Infrastructure Delivery SA (2019)**¹²
 - Seven spatial options
- **Regulation 18 (III) Preferred Options SA (2021)**¹³
 - 317 reasonable alternative sites
- **Regulation 19 SA (2022)**¹⁴
 - One residential growth option
 - 39 reasonable alternative sites
- **Regulation 19 SA (2024) – this report**
 - Two residential growth options
 - Two spatial options

¹¹ Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options.

Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sustainability_appraisal_sa_sea_issues_and_options_2018.pdf [Date accessed: 29/02/24]

¹² Lepus Consulting (2019) Sustainability Appraisal of the South Staffordshire Local Plan Review: Spatial Housing Strategy and Infrastructure Delivery. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sustainability_appraisal_sa_sea_shsid_2019.pdf [Date accessed: 29/02/24]

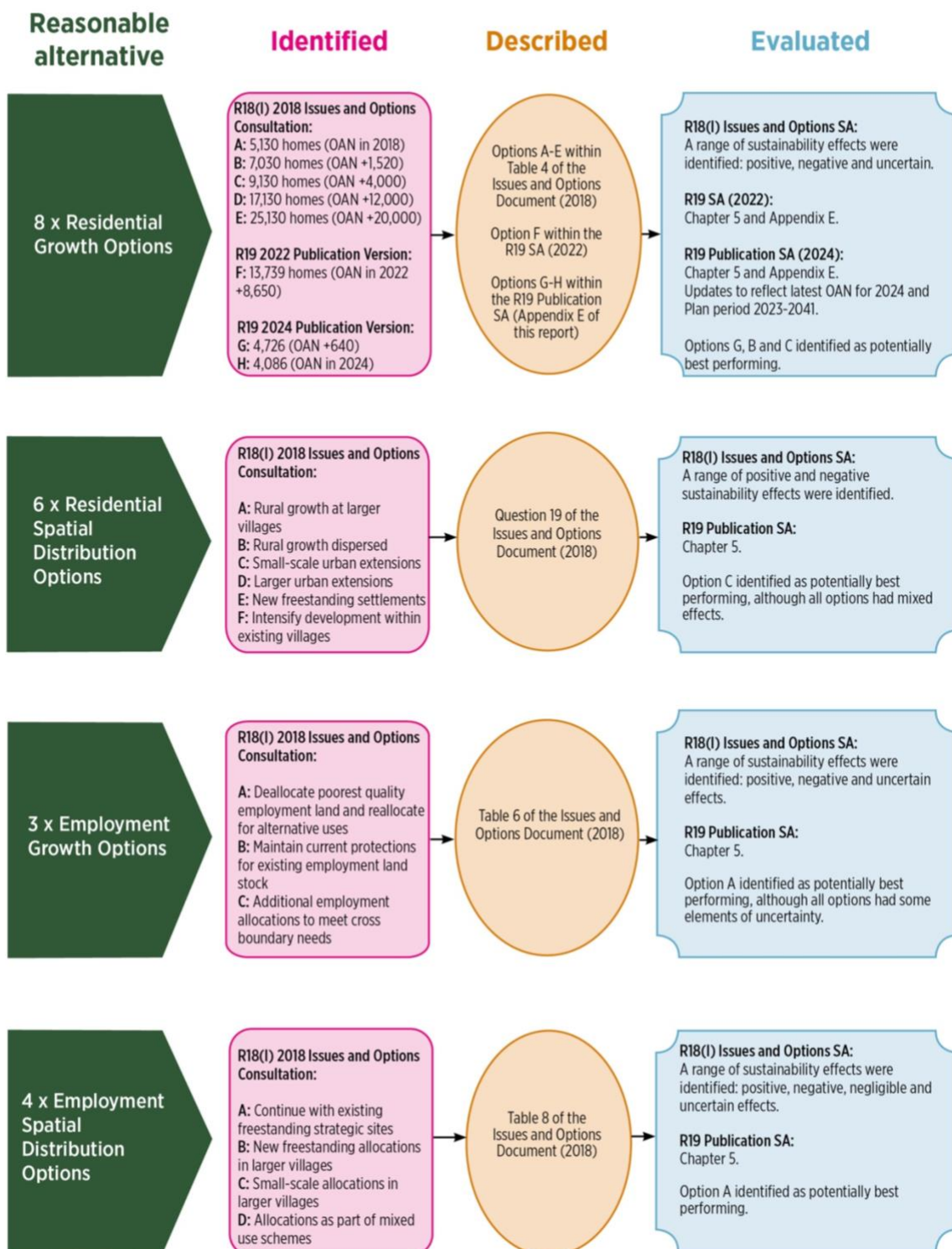
¹³ Lepus Consulting (2021) Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan, Regulation 18 (III) SA Report. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/sustainability_appraisal_sa_sea_preferred_options_2021.pdf [Date accessed: 29/02/24]

¹⁴ Lepus Consulting (2022) Sustainability Appraisal of the South Staffordshire Local Plan Review (2019-2039): Regulation 19 SA Report Volume 1-3. Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-02/02_sa_volume_2_october_2022.pdf [Date accessed: 29/02/24]

- Two reasonable alternative sites

N48. **Figure N.5** summarises the reasonable alternatives considered throughout the plan-making process, and where these alternatives have been identified, described, and evaluated.

Quick guide to reasonable alternatives



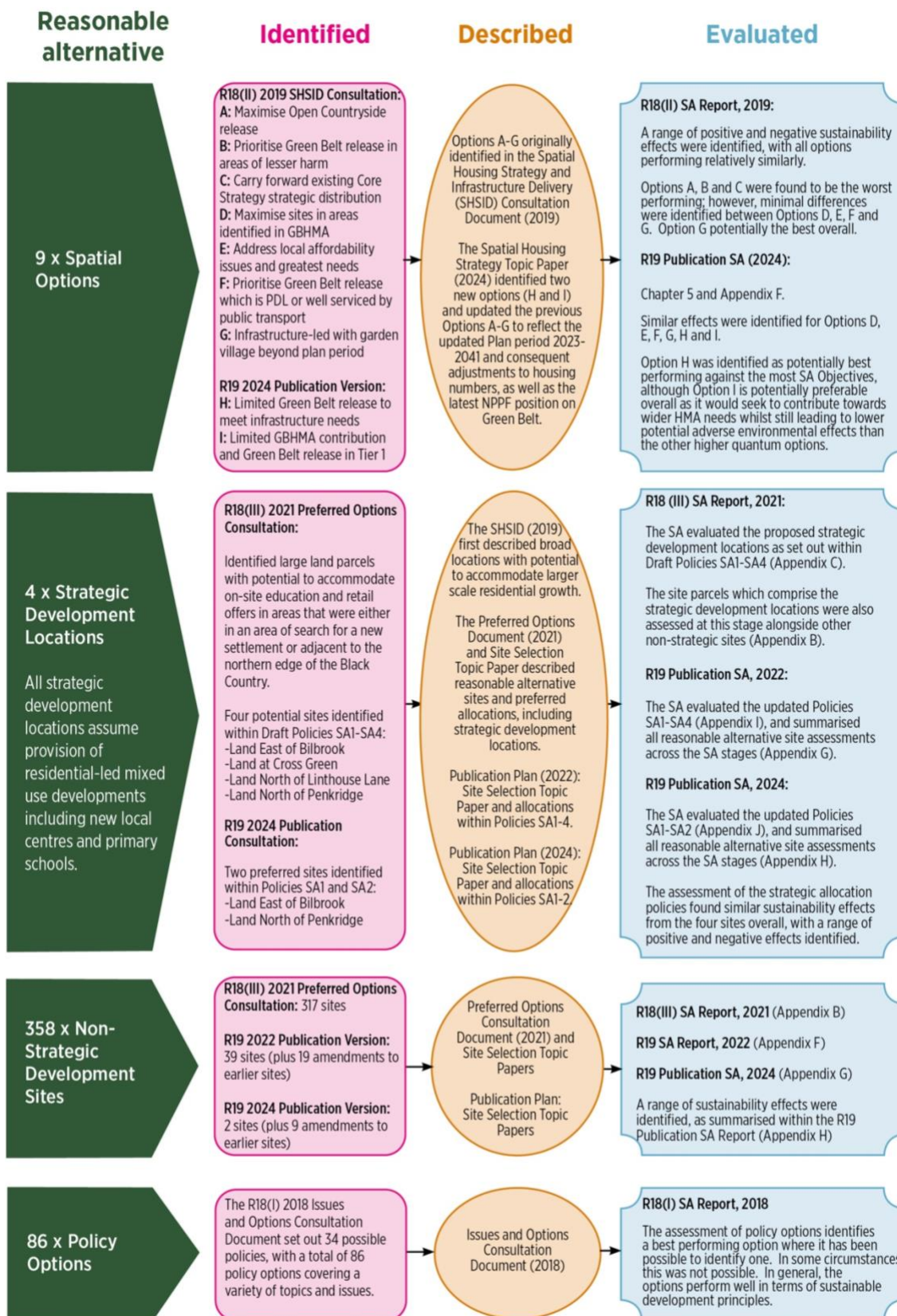


Figure N.5: The identification, description and evaluation of reasonable alternatives considered throughout the plan-making process

6 The preferred approach

Selection and rejection of sites

- N49. The SA findings relating to reasonable alternative sites were fed back to the Council on an iterative basis to assist in decision-making regarding the selection or rejection of each site within the emerging LPR. The Council’s outline reasons for selection and rejection of all reasonable alternative sites considered throughout the SA process are set out in **Appendix H, Volume 3**.

LPR policies

- N50. Following consideration of comments received during the Regulation 18 consultations, the 2022 Regulation 19 consultation, and recommendations set out in the SA reports, SSDC has revised the LPR policies.
- N51. The LPR contains a total of 54 policies, including five strategic Development Strategy Policies and six Site Allocation Policies (see **Table N.4**). The LPR policies have been assessed in **Appendix J, Volume 3**.

Table N.4: South Staffordshire LPR policies

Policy reference	Policy name
	Development Strategy
DS1	Green Belt
DS2	Green Belt compensatory improvements
DS3	Open Countryside
DS4	Development needs
DS5	Spatial Strategy to 2041
	Site Allocations
MA1	Master planning strategic sites
SA1	Strategic masterplanning location - Land East of Bilbrook
SA2	Strategic masterplanning location - Land North of Penkridge
SA3	Housing allocations
SA4	Gypsy and Traveller allocations
SA5	Employment allocations
	Delivering the Right Homes
HC1	Housing mix
HC2	Housing density
HC3	Affordable housing
HC4	Homes for older people and others with special housing requirements
HC5	Specialist housing schemes
HC6	Rural exception sites
HC7	First homes exception sites
HC8	Self and custom build housing
HC9	Gypsy, Traveller and Travelling Showpeople

Policy reference	Policy name
	Design and Space Standards
HC10	Design requirements
HC11	Protecting amenity
HC12	Space about dwellings and internal space standards
HC13	Parking provision
	Promoting Successful and Sustainable Communities
HC14	Health infrastructure
HC15	Education
HC16	South Staffordshire College
HC17	Open space
HC18	Sports facilities and playing pitches
HC19	Green infrastructure
	Building a Strong Local Economy
EC1	Sustainable economic growth
EC2	Retention of employment sites
EC3	Employment and skills
EC4	Rural economy
EC5	Tourism
EC6	Rural workers dwellings
EC7	Equine related development
	Community Services, Facilities and Infrastructure
EC8	Retail
EC9	Protecting community services and facilities
EC10	Wolverhampton Halfpenny Green Business Airport
EC11	Infrastructure
EC12	Sustainable transport
EC13	Broadband
	Protecting and Enhancing the Natural Environment
NB1	Protecting, enhancing and expanding natural assets
NB2	Biodiversity
NB3	Cannock Chase SAC
NB4	Landscape character
	Climate Change and Sustainable Development
NB5	Renewable and low carbon energy generation
NB6A	Net Zero new build residential development (operational energy)
NB6B	New build non-residential development (operational energy)
NB6C	Embodied carbon and waste
NB7	Managing flood risk, sustainable drainage systems and water quality
	Enhancing the Historic Environment
NB8	Conservation, preservation and protection of historic assets
NB9	Canal network

- N52. The development strategy policies set out SSDC's vision for the district over the Plan period, ensuring a strong policy position is made for the protection of the Green Belt and setting out a framework for the protection of the special character of the district's open countryside as far as possible.
- N53. Wherever possible, SSDC has sought to locate development on suitable brownfield sites to reduce pressure on the Green Belt, which covers approximately 80% of South Staffordshire. However, opportunities for brownfield developments are very limited due to the largely rural nature of the district.
- N54. SSDC has identified a wide range of locations to contribute towards the delivery of approximately 4,726 new homes within the LPR, which would meet the identified housing requirement of 4,086 homes in South Staffordshire as well as a 640-home contribution towards unmet housing needs of the Greater Birmingham and Black Country HMA.
- N55. Following the assessment of reasonable alternatives in the SA and consideration of other evidence base documents, SSDC has selected two strategic development sites for allocation in the LPR as set out in Policies SA1 and SA2:
- SA1: Land East of Bilbrook (Site 519); and
 - SA2: Land North of Penkrige (Sites 420, 584 and 010).
- N56. Furthermore, SSDC has selected a further 30 residential sites as set out in Policy SA3, nine sites for Gypsy and Traveller pitches set out in Policy SA4, and five employment sites set out in Policy SA5.
- N57. The Council has also prepared a range of development management policies which set out the requirements for development and seek to protect the natural and built environment and ensure there is sufficient community infrastructure to support new residents. This includes ensuring the delivery of an appropriate housing mix; meeting housing needs for different groups, including for older people and Gypsies and Travellers; protecting community infrastructure and the vibrancy of settlements; and, protecting and enhancing natural assets such as biodiversity (such as Cannock Chase SAC), heritage, the landscape (including the setting of Cannock Chase AONB) and managing flood risk and surface water, amongst others.
- N58. The impact matrices for all policy assessments are presented in **Table N.5**. These impacts should be read in conjunction with the assessment text narratives in **Appendix J**.

Table N.5: Summary of policy assessments (extracted from Appendix J)

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & employment
DS1	0	0	-	-	0	-	+	+	0	+	+	+
DS2	0	0	0	0	0	0	0	+	0	+	0	0
DS3	0	0	0	+	0	+	+	+	0	0	+	+
DS4	-	+/-	+/-	--	--	--	++	-	+/-	+/-	+/-	++
DS5	-	-	-	--	-	--	++	-	-	-	-	++
MA1	+	+	+	+	+	+	+	++	+	+	+	0
SA1	-	0	0	--	-	-	++	-	0	-	++	+
SA2	-	0	0	--	-	-	++	-	0	+	++	+
SA3	+/-	0	-	--	-	-	++	-	-	-	-	-
SA4	0	-	-	-	-	-	+	-	-	-	-	--
SA5	-	--	-	-	-	-	0	-	-	-	0	++
HC1	0	0	0	0	0	+/-	+	+	0	0	0	0
HC2	+/-	0	0	0	0	+/-	+	0	0	0	0	0
HC3	0	0	0	0	0	0	+	+	0	0	0	0
HC4	0	0	0	0	0	0	+	+	0	0	0	0
HC5	0	0	0	0	0	0	+	+	0	0	0	0
HC6	0	0	0	0	0	+/-	+	0	0	0	0	0
HC7	0	0	0	0	0	+/-	+	+	0	0	0	0
HC8	0	0	0	0	0	0	+	0	0	0	0	0
HC9	0	+	0	0	+	0	+	+	0	0	0	0
HC10	+	0	0	+	0	0	+	+	0	+	0	0
HC11	0	0	0	0	+	0	0	+	0	0	0	0
HC12	0	0	0	0	0	0	0	+	0	0	0	0
HC13	+	0	0	0	+	0	0	0	0	+	0	0
HC14	0	0	0	0	0	0	0	+	0	0	0	0
HC15	0	0	0	0	0	0	0	0	0	0	+	0
HC16	0	0	0	0	0	0	0	0	0	0	+	0
HC17	0	0	0	+	0	0	0	+	0	0	0	0
HC18	0	0	0	0	0	0	0	+	0	0	0	0
HC19	+	+	+	+	+	0	0	+	0	0	0	0
EC1	+	+	+/-	+/-	+/-	+	0	+	+/-	+	0	++
EC2	0	0	0	0	0	0	0	0	0	0	0	+
EC3	+	0	0	0	0	0	0	0	0	+	0	+
EC4	0	0	0	+	0	+	0	0	0	0	0	+
EC5	0	0	0	+	0	0	0	+	+	+	0	+
EC6	0	0	0	+	0	0	+	0	0	0	0	+
EC7	0	0	0	0	0	0	0	+	0	0	0	+
EC8	+	0	0	0	0	0	0	0	0	+	0	+
EC9	+	0	0	0	0	0	0	+	0	+	0	+

Policy Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & employment
EC10	0	0	0	0	0	0	0	0	0	0	0	+
EC11	0	0	+	0	0	0	0	+	0	+	+	0
EC12	+	0	0	0	+	0	0	+	0	++	+	+
EC13	+	0	0	0	0	0	0	0	0	+	+	+
NB1	+	+	++	+	+	+	0	+	0	0	0	0
NB2	+	0	++	0	0	0	0	0	0	0	0	0
NB3	0	0	+	0	+	0	0	+	0	0	0	0
NB4	0	0	+	++	0	0	0	0	+	0	0	0
NB5	+	0	-	-	+/-	+/-	0	0	0	0	0	0
NB6A	++	0	0	0	+	0	0	0	0	0	0	0
NB6B	++	0	0	0	+	0	0	0	0	0	0	0
NB6C	++	0	0	0	+	+	0	0	0	0	0	0
NB7	0	++	+	0	+	0	0	0	0	0	0	0
NB8	0	0	0	+	0	0	0	0	++	0	0	+
NB9	+	0	+	+	+	0	0	+	+	0	0	0

- N59. The post-mitigation SA findings for the sites chosen for allocation by SSDC are summarised in **Table N.6**, illustrating a range of identified sustainability effects identified through the assessment process.
- N60. The full post-mitigation findings for all reasonable alternative sites considered throughout the SA process, including these sites that have been selected, are set out in **Appendix H**.

Table N.6: Summary of post-mitigation site assessments for allocated sites (extracted from **Appendix H**)

Site Ref	Site Cluster	1	2	3	4	5	6	7	8	9	10	11	12
		Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
213	Bilbrook & Codsall	+/-	+	0	0	0	+	+	-	0	++	++	+
224	Bilbrook & Codsall	+/-	+	0	--	-	-	+	-	0	-	-	+
SAD228	Bilbrook & Codsall	+/-	+	0	0	-	+	+	-	0	++	++	+
419a/b	Bilbrook & Codsall	+/-	+	0	-	0	-	+	-	0	-	--	-
617	Brewood	+/-	0	0	--	0	-	+	-	0	-	--	-
119a	Cheslyn Hay & Great Wyrley	+/-	+	0	-	0	-	+	-	0	-	++	+
136	Cheslyn Hay & Great Wyrley	+/-	+	0	-	-	-	+	-	0	++	-	+
SAD136	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	-	+	-	0	++	++	+
SAD139	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	-	+	-	0	-	++	-
SAD141	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	-	+	-	0	++	++	+
523	Cheslyn Hay & Great Wyrley	+/-	+	0	-	0	-	+	-	0	-	++	+
536a	Cheslyn Hay & Great Wyrley	+/-	+	0	--	-	-	+	-	0	-	-	-
638	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	+	+	-	0	++	-	-
704	Cheslyn Hay & Great Wyrley	+/-	+	0	0	-	+	+	-	0	-	++	-
730	Cheslyn Hay & Great Wyrley	+/-	+	0	-	0	+	+	-	0	-	++	-
082	Coven	+/-	+	0	0	-	-	+	-	0	-	-	-
397	Featherstone	+/-	+	0	-	0	-	+	-	0	-	-	-
016	Huntington	+/-	+	0	0	-	-	+	-	0	-	-	-
274	Kinver	+/-	+	0	-	0	-	+	-	0	-	-	-
251	Pattingham	+/-	+	0	-	0	-	+	-	0	-	-	-
005	Penkridge	+/-	+	0	-	-	-	+	-	0	-	++	-
006	Penkridge	+/-	+	0	-	0	-	+	-	0	-	-	-
239	Perton	+/-	+	0	-	0	-	+	-	0	-	--	-
036c	Stafford	+/-	+	0	--	-	-	+	-	0	-	++	-
SAD313	Swindon	+/-	+	0	0	0	-	+	-	0	-	-	-
SAD379	Wheaton Aston	+/-	+	0	-	0	-	+	-	0	-	-	-
285	Wombourne	+/-	+	0	-	0	-	+	-	0	-	-	-
416	Wombourne	+/-	+	0	-	0	-	+	-	0	-	-	-
459	Wombourne	+/-	+	0	-	0	-	+	-	0	-	++	-

Site Ref	Site Cluster	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
562/415	Wombourne	+/-	+	0	-	0	-	+	-	0	-	++	-
E18	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E24	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E30	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
E33	Employment Sites	+/-	+	0	--	-	-	0	-	0	-	0	++
E44	Employment Sites	+/-	+	0	-	-	-	0	-	0	-	0	++
GT01	Gypsy & Traveller	+/-	+	0	--	-	+	+/-	-	0	-	--	--
GT06	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	+
GT07	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	--
GT08	Gypsy & Traveller	+/-	+	0	--	-	+	+/-	-	0	-	--	+
GT14	Gypsy & Traveller	+/-	+	0	--	-	-	+/-	-	0	-	--	+
GT17	Gypsy & Traveller	+/-	+	0	-	0	-	+/-	-	0	-	--	--
GT18	Gypsy & Traveller	+/-	+	0	-	0	+	+/-	-	0	-	++	--
GT23	Gypsy & Traveller	+/-	+	0	--	0	+	+/-	-	0	-	--	+
GT32	Gypsy & Traveller	+/-	+	0	-	-	+	+/-	-	0	-	++	--

7 Purpose and content of the Regulation 19 SA Report

Purpose and content of the Regulation 19 SA Report

- N61. The Regulation 19 SA Report has been prepared to summarise the SA process to date and help inform the examination stage of the preparation of the LPR. The Regulation 19 SA Report presents the findings of the sustainability appraisal of the LPR, which is composed principally of 54 policies including five strategic Development Strategy Policies and six Site Allocation Policies.
- N62. The Regulation 19 SA Report also contains an assessment of reasonable alternatives which have been identified since the previous SA stage (two residential growth option, two spatial options and 11 new/amended reasonable alternative sites).
- N63. The purpose of the SA of the LPR is to:
- Identify, describe and evaluate the likely sustainability effects of the LPR proposals and their reasonable alternatives;
 - Inform SSDC's decision making and preparation of the LPR; and
 - Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA.
- N64. The SA of the South Staffordshire LPR is presented in three volumes. The contents of this SA Report are listed as follows:
- **VOLUME 1: Non-Technical Summary** (this document) provides a summary of the Regulation 19 SA work.
 - **VOLUME 2: Main SA Report:**
 - **Chapter 1** presents an introduction to this report.
 - **Chapter 2** sets out information about the LPR and the SA process to date.
 - **Chapter 3** presents the evolution of the environment without the plan.
 - **Chapter 4** sets out the SA methodology.
 - **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
 - **Chapter 6** presents details on the preferred approach.
 - **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic.
 - **Chapter 16** presents the cumulative effects assessment.
 - **Chapter 17** sets out a range of monitoring recommendations for the LPR.



- **Chapter 18** summarises ways in which the SA has influenced the LPR throughout the plan making process, including through recommendations made in the SA.
- **Chapter 19** outlines the conclusions, residual effects and next steps.
- **VOLUME 3: Appendices:**
 - **Appendix A** presents a review of other relevant policies, plans and programmes (PPPs).
 - **Appendix B** presents the SA Framework.
 - **Appendix C** presents the consultation responses received during each stage of the SA process from statutory consultees.
 - **Appendix D** provides additional context to Chapter 4 of the main Regulation 19 SA Report regarding the topic specific methodologies and assumptions used to assess policies, proposals, and reasonable alternatives.
 - **Appendix E** presents the assessment of new residential growth options.
 - **Appendix F** presents the assessment of new spatial options.
 - **Appendix G** presents the assessment of 11 new/amended reasonable alternative sites (pre-mitigation) identified at this stage.
 - **Appendix H** summarises the assessment of all 358 reasonable alternative sites assessed through the SA process (pre-mitigation), considers the potential mitigating influence of the LPR policies, and presents the post-mitigation assessment of all 358 reasonable alternative sites.
 - **Appendix I** presents SSDC's outline reasons for selection and rejection of reasonable alternative sites which have been identified, described and evaluated through the SA process.
 - **Appendix J** presents the assessment of the LPR policies.



8 Likely significant effects on the environment

Identified impacts



- N65. Proposals in the South Staffordshire LPR have been assessed for their sustainability impacts, the results of which are presented in the relevant appendices as listed above. The assessment of the LPR, including reasonable alternatives, was undertaken using a combination of empirical evidence, and to a lesser extent, professional judgement.
- N66. In the main SA Report (**Volume 2**) and the Appendices (**Volume 3**), the SA assessment findings are presented in matrix format and are accompanied by a commentary on identified effects. The matrix is not a conclusive tool; its main function is to show visually the sustainability performance of the LPR. The assessment commentary should be relied upon to interpret the matrix findings.
- N67. **Table N.7** provides a summary of the potential negative impacts of the LPR relating to each of the SEA topics (as set out in full within **Chapters 7 – 15** of the Main SA Report, **Volume 2**). These are the negative impacts that have been identified prior to the implementation of LPR mitigation.

Table N.7: Summary of identified potential impacts of the LPR

SEA Topic	Summary of potential impacts of the LPR
 <p data-bbox="292 1529 347 1563">AIR</p>	<ul style="list-style-type: none"> • Increased pollutant emissions - The proposed development within South Staffordshire would be likely to increase the volume of traffic within the Plan area, and as a result, associated transport-related emissions including nitrogen dioxide (NO₂) and particulate matter (PM₁₀) would be released into the atmosphere, with adverse effects on local air quality. This is particularly an issue for development adjacent or in close proximity to main roads and Air Quality Management Areas (AQMAs) which put in place to facilitate a reduction in air pollution to within national air quality objectives. • Reduction in air quality with implications for human health and biodiversity – The LPR proposes the development of 4,726 dwellings and 107.45ha of employment floorspace, which would be expected to introduce many new residents to the area. This increase in population and likely associated increase in cars and traffic on the local roads would be expected to result in an increase in emissions, and consequently, decrease air quality. This increase in pollutants would be expected to have negative effects on human health, particularly for children or vulnerable people with respiratory issues. Poor air quality can also result in negative effects on wildlife and ecosystems, such as watercourses or habitats that are sensitive to changing levels of certain pollutants, such as nitrogen.
 <p data-bbox="209 1928 432 2033">BIODIVERSITY, FLORA & FAUNA</p>	<ul style="list-style-type: none"> • Threats or pressures to Habitats sites – One Special Area of Conservation (SAC) is located within South Staffordshire: Motte Meadows SAC. Further Habitats sites are located beyond the district boundary but may still be impacted by development, including Cannock Chase SAC which has an identified 15km recreational Zone of Influence (ZoI) which falls partially within the district. A Habitats Regulations Assessment (HRA) has been carried out alongside to the SA and plan-making process and considers the impacts of LPR development on Habitats sites in detail.




SEA Topic	Summary of potential impacts of the LPR
	<ul style="list-style-type: none"> • Threats or pressures to nationally or locally designated biodiversity assets and important habitats – The proposed development at some allocated sites within the LPR could potentially increase development-related threats and pressures to SSSIs, National Nature Reserves (NNRs), or locally designated / non-statutory biodiversity sites, ancient woodland and habitats of principal importance (priority habitats). Potential impacts include increased recreational disturbance caused by residents visiting the designated sites and poor air quality due to an increase in vehicular movements on roads near to sensitive habitats. • Effects on habitat fragmentation, connectivity and disturbance to ecological function – The Plan area contains a diverse multi-functional green infrastructure network. Most allocated sites are located on previously undeveloped land, which would result in the loss of soil resources, which in turn provide an important ecosystem service. Whilst in many cases these habitats can be conserved alongside development, it would be likely that in some cases fragmentation or loss of habitats and connections between habitats would occur.
 CLIMATIC FACTORS	<ul style="list-style-type: none"> • Increased carbon emissions – The proposed development of 4,726 dwellings and 107.45ha of employment floorspace within the LPR would be likely to increase to some extent local carbon emissions through energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production and use of materials during construction. This impact would be expected to accelerate anthropogenic climate change and is likely to contribute towards cumulative effects which exacerbate global events, such as sea level rise and extreme weather events. • Loss of multi-functional green infrastructure – The proposed development within the LPR would cumulatively result in the loss of a significant area of previously undeveloped land. Some of the proposed development could potentially also result in the loss of trees, hedgerows, and other vegetation currently on site. Green infrastructure is vital in helping to reduce the adverse impacts of climate change.
 CULTURAL HERITAGE	<ul style="list-style-type: none"> • Alter character and/or setting of designated heritage assets – South Staffordshire has a rich cultural heritage, with several historic villages and rural settlements. There is a broad range of Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas designated throughout the Plan area. Further to this, development which coincides with or is in close proximity to a designated heritage asset has the potential to affect both the asset itself and its setting. This will depend on contextual factors relating to the nature and location of development and factors that contribute to the significance of heritage assets. • Alter historic character – The Historic Environment Character Assessment for South Staffordshire¹⁵ provided a detailed assessment of the historic character of the district and evaluated the impact of medium to large scale housing development upon each of the zones. Allocated sites within areas of 'high' historic value could potentially have adverse impacts on the historic environment. • Impacts on archaeology – A range of archaeological features have been identified on the Historic Environment Record (HER), and elsewhere there is potential for below-ground archaeological remains or other locally recorded assets to be present that should be investigated prior to development. New development could potentially adversely affect the setting or character of these features.

¹⁵ South Staffordshire Council (2011) Historic Environment Character Assessment: South Staffordshire, January 2011. Available at: <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Documents/SouthStaffordshireHEA-FinalReport.pdf> [Date accessed: 29/02/24]

SEA Topic	Summary of potential impacts of the LPR
 <p data-bbox="260 703 376 775">HUMAN HEALTH</p>	<ul style="list-style-type: none"> • Sustainable access to healthcare / leisure facilities – There are no NHS hospitals providing an A&E service within the district itself (although there are several in the adjacent Black Country), and GP surgeries and leisure facilities are generally restricted to the larger settlement centres, meaning that a large proportion of the proposed growth will be located outside of the identified sustainable target distances to these facilities. Where there is more limited access to these facilities, residents may be discouraged from living active and healthy lifestyles, which could potentially have adverse impacts on mental wellbeing as well as physical health. • Exposure to air / noise pollution (from AQMAs / main roads) – As discussed within the 'Air' topic above, the long-term health of residents could be adversely impacted by local reductions in air quality, particularly for those located close to the strategic road network and within AQMAs. Living close to main roads or railway lines can also result in increased exposure to noise pollution and vibration which may have adverse effects on health and wellbeing. • Limited access to public greenspace – Good access to public green or open spaces, including natural or semi-natural habitats, and travelling via walking and cycling are known to have physical and mental health benefits. Whilst there is generally good access to open space across South Staffordshire as a whole, there are spatial variations on existing access to different types and sizes of open space across different areas. • Limited access to the Public Rights of Way (PRoW) or cycle network – The majority of allocated sites are in areas with good coverage by the PRoW and/or cycle networks, providing opportunities for active travel and recreation in the countryside. However, a small number of sites are located outside of the 600m target distance to active travel links, where site end users may be reliant upon less sustainable modes of transport including private car use.
 <p data-bbox="233 1503 405 1536">LANDSCAPE</p>	<ul style="list-style-type: none"> • Impacts on Cannock Chase AONB and its setting – New development can lead to the loss of landscape features and changes to landscape character and views. Changes in landscape character have the potential to adversely affect Cannock Chase AONB and its setting at certain locations. Adverse effects may also arise as a consequence of development proposals at other locations in the Plan area, with the potential to result in cumulative adverse impact on views from more sensitive locations within the designated landscapes. • Alteration of landscape character – The introduction of new built form can contradict and conflict with distinctive local character of existing landscapes and townscapes which can result in adverse impacts on the local landscape character. In some cases, it is anticipated that the development proposed in the LPR will adversely impact, or potentially result in the loss of, landscape features such as trees, hedgerows, woodlands and ponds, amongst others. • Impacts on sensitive landscapes and the West Midlands Green Belt – The potential for adverse effects of development proposals on landscape sensitivity and Green Belt have been identified with reference to the Landscape Sensitivity Study¹⁶ and Green Belt Study¹⁷. • Change in views from PRoWs / for local residents – Development proposed in the Plan has the potential to adversely impact informal high-quality viewing experiences that can be gained from the local PRoW network around proposed development locations. Development proposed in the Plan predominantly lies near existing residential properties and has the potential to adversely impact views from these properties.

¹⁶ LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 29/02/24]

¹⁷ LUC (2019) South Staffordshire Green Belt Study: Stage 1 and 2 Report. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 29/02/24]



SEA Topic	Summary of potential impacts of the LPR
	<ul style="list-style-type: none"> • Loss of tranquillity, and increased risk of urbanisation of the countryside / coalescence – The proposed development of 4,726 dwellings across South Staffordshire, with a number of developments located in rural areas and on previously undeveloped land, would be likely to result in a loss of tranquillity of the landscape as a consequence of increases in noise and light pollution. Development located in the open countryside can also increase the risk of ‘urban sprawl’ into the countryside, and coalescence (merging) of settlements.
 <p>POPULATION & MATERIAL ASSETS</p>	<ul style="list-style-type: none"> • Provision of housing and employment space to meet local need - The LPR proposes the development of 4,726 dwellings and 107.45ha of employment floorspace, which would be expected to ensure that enough homes and jobs are provided to meet the identified needs, in line with the latest evidence base documents, and contribute towards the needs of neighbouring authorities. • Reduced access to, and increased pressure on, services and facilities – The proposed development within the LPR would be expected to increase population density, applying greater pressure on the capacity of services, including schools, GP surgeries, leisure centres and open spaces. Some site allocations would be situated outside of the sustainable distance to existing services. Good access to these services is essential to reduce reliance on personal car use, encourage healthy and active lifestyles and provide accessibility to spaces which could potentially have benefits to mental wellbeing and community cohesion. • Increased household waste generation – It is likely that development of 4,726 dwellings as proposed within the LPR will increase household waste generation in the district.
 <p>SOIL</p>	<ul style="list-style-type: none"> • Loss of soil resources and BMV land, with implications for ecosystem services – The proposed development within the LPR would result in the loss of up to approximately 603ha of previously undeveloped land, approximately 575ha of which could represent ‘best and most versatile’ (BMV) soils¹⁸. This would be expected to result in the permanent and irreversible loss of soil resources. Soil provides essential services, including nutrient cycling, abating flood risk, filtering water and carbon storage. Direct loss of soil through construction would be expected to reduce these essential ecosystem services.
 <p>WATER</p>	<ul style="list-style-type: none"> • Flood risk – The majority of proposed development lies within Flood Zone 1, where flood risk is low; however, a small number of allocations are partially located within areas of Flood Zone 2 and/or 3. In addition, several allocated sites coincide with areas determined to be at low, medium or high risk of surface water flooding. Development in areas at risk of flooding may increase the risk of damage to property and increase risks to human health in the immediate area and/or contribute to exacerbation of flood risk in the surrounding areas. • Reduction in water quality and ecosystem services – Development and urbanisation can be associated with adverse impacts on water quality, with implications for biodiversity and the function of ecosystem services. This includes risks of water pollution associated with runoff from roads, and from water outflows during storm conditions, resulting in increased water at wastewater treatment works. Development located near to watercourses or within groundwater Source Protection Zones (SPZs) could affect water quality through pollution of surface water runoff. • Increased water demand and pressure on wastewater treatment – The proposed development of 4,726 dwellings over the Plan period will be likely to increase the local population with subsequent increases water demand and demand for wastewater treatment across the Plan area.

¹⁸ Please note this figure is based on gross site areas and so does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.



Mitigation



N68. The LPR sets out 54 policies which seek to positively respond to future development within the Plan area. These policies are expected to have positive impacts in relation to the development proposals within the LPR. Numerous policies would be likely to mitigate or lessen the identified adverse impacts of proposed development. **Table N.8** summarises these mitigating effects of the LPR policies (as set out in full within **Chapters 7 – 15** of the Main SA Report, **Volume 2**).




Table N.8: Summary of policy mitigation

SEA Topic	Summary of mitigating effects of the Local Plan policies
 <p>AIR</p>	<ul style="list-style-type: none"> • Policy HC11 'Protecting Amenity' seeks to protect residential amenity in relation to noise and other sources of pollution, which may help to reduce adverse impacts associated with exposure to poor air quality, such as those within or adjacent to AQMAs or main roads. • Policy HC19 'Green Infrastructure' supported by other policies such as HC10 'Design Requirements', would help to increase the quality of green infrastructure (GI) in developments and may serve to filter air pollution to some extent. • Policy NB3 'Cannock Chase SAC' supports developments only where it can be demonstrated that the proposal will not lead to likely significant effects upon the integrity of the SAC, either alone or in combination with other plans or projects. This would be expected to include impacts associated with air pollution and nitrogen deposition, which is one of the vulnerabilities of the SAC's qualifying features. • Policy EC12 'Sustainable Transport' sets out a wide range of measures to improve sustainable travel choices, including strengthening bus and rail services and their connections, encouraging walking and cycling, and improving availability of electric vehicle charging points. By encouraging the integration of sustainable transport options and reducing the need to travel by car, the policy may contribute towards a reduction in traffic related emissions. • Policy NB5 'Renewable and Low Carbon Energy Generation' promotes renewable and low carbon energy generation within South Staffordshire, which would be anticipated to play a role in reducing wider air quality impacts associated with fossil fuel generation.
 <p>BIODIVERSITY, FLORA & FAUNA</p>	<ul style="list-style-type: none"> • Policy NB3 'Cannock Chase SAC' will support the recommendations of the SAC Partnership which has developed a strategy to mitigate the effects of development on Cannock Chase SAC relating to recreational pressures, including monetary payments per new dwelling¹⁹. • Policy NB1 'Protecting, enhancing and expanding natural assets' supports proposals "which protect and enhance the quality of the natural environment", including nationally designated sites (SSSIs and NNRs) and seeks to safeguard local sites (SBI, RIGS and LNRs) from development in line with the mitigation hierarchy. The policy also supports the restoration, creation and enhancement of habitats and linkages between these sites and contributions towards the Nature Recovery Network. • Policy NB2 'Biodiversity' will require development proposals to consider biodiversity as part of any proposal and supports the inclusion of features such as green walls, roofs and bat/bird boxes. All new development will be required to deliver a 10% biodiversity net gain.

¹⁹ South Staffordshire District Council (2022) Cannock Chase Special Area of Conservation (SAC). Available at: https://www.sstaffs.gov.uk/sites/default/files/2023-03/cannock_chase_sac_mitigation_guidance_2022.pdf [Date accessed: 28/02/24]

SEA Topic	Summary of mitigating effects of the Local Plan policies
	<ul style="list-style-type: none"> • Policy NB4 'Landscape Character' seeks to ensure that development proposals retain and protect all trees, woodland and hedgerows. • Policy HC19 'Green Infrastructure', supported by other policies such as HC10 'Design Requirements' and HC17 'Open Space', will promote the protection, maintenance and enhancement of a network of interconnected, multi-functional and accessible green and blue spaces. Policy HC19 states that all development proposals should seek to maximise on-site provisions for GI, with likely benefits for biodiversity and wildlife habitats.
 <p>CLIMATIC FACTORS</p>	<ul style="list-style-type: none"> • Policy DS5 'The Spatial Strategy to 2041' directs development towards Tier 1 settlements and the urban edge of existing larger towns outside the district, which would be likely to facilitate more sustainable communities by locating residents in closer proximity to services, facilities and public transport, including railway stations. This would help to reduce the need to travel and encourage less use of private cars, which is one of the key contributors to the district's carbon emissions. • Policy HC13 'Parking Provision' includes requirements for electrical vehicle charging facilities for development proposals to meet. • Policies EC8 'Retail' and EC9 'Protecting Community Services and Facilities' seek to maintain the vitality of village centres in existing settlements and in doing so may reduce the need to travel by car to access facilities. • Policy EC12 'Sustainable Transport' sets out a wide range of measures to improve sustainable travel choices, including strengthening bus and rail services and their connections, encouraging walking and cycling, and improving availability of electric vehicle charging points. • Policy NB5 'Renewable and Low Carbon Energy Generation' promotes solar, wind and biomass energy schemes, which would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. • Policies NB6A 'Net Zero New Build Residential Development', NB6B 'New Build Non-Residential Development' and NB6C 'Embodied Carbon and Waste' together set out requirements for high energy efficiency and sustainable design within new development, including residential development to achieve a 63% reduction in carbon emissions in comparison to the baseline rates, as set out within the Building Regulations and non-residential development to achieve a 15% improvement in energy efficiency and demonstrate Building Research Establishment Environmental Assessment Method (BREEAM) Excellent standard. • Policy HC19 'Green Infrastructure' sets out principles to conserve and enhance multi-functional GI, which could help to mitigate the effects of climate change through carbon sequestration in soils and vegetation and the shading/cooling effects of trees and vegetation. The provision of GI in proximity to new development, as required by Policy HC10 'Design Requirements' and Policy HC17 'Open Space', may also encourage residents to enjoy the local environment and reduce the need to travel for exercise, dog walking etc.
 <p>CULTURAL HERITAGE</p>	<ul style="list-style-type: none"> • Policy NB8 'Protection and Enhancement of the Historic Environment and Heritage Assets' promotes the conservation and enhancement of the historic environment through the safeguarding of heritage assets and their setting through various criteria, in line with the NPPF, and seeking opportunities to better reveal the significance of heritage assets. The policy also requires an archaeological assessment to be prepared where there is potential for adverse effects on areas of archaeological interest. • Policy NB4 'Landscape Character' seeks to protect and enhance the intrinsic rural character and local distinctiveness of South Staffordshire, through ensuring that development proposals take into consideration the surrounding environment, views and sensitivities. This includes having regard to heritage assets and especially for any development within Historic Landscape Areas where there may be a greater concentration of designated heritage assets. • Policy HC10 'Design Requirements' would help to ensure that development proposals take into account local character and distinctiveness including historic

SEA Topic	Summary of mitigating effects of the Local Plan policies
	<p>assets. The policy would also ensure that the design of new development reflects the requirements of any Conservation Area Management Plans that are relevant to the site in question.</p> <ul style="list-style-type: none"> • Policy EC5 'Tourism' supports development proposals for tourist accommodation and facilities where they would not adversely affect the character of any nearby heritage assets and their settings. • Policy DS1 'Green Belt' seeks to restrict development in the Green Belt, one of the purposes of which is to "<i>preserve the setting and special character of historic towns</i>"; consequently, this policy may help to prevent inappropriate development proposals coming forward which could harm areas of historic value. Similarly, Policy DS3 'Open Countryside' seeks in part to protect historic and archaeologically sensitive areas from inappropriate development in areas outside of existing settlement boundaries.
 <p>HUMAN HEALTH</p>	<ul style="list-style-type: none"> • Policy HC14 'Health Infrastructure' seeks to protect existing healthcare infrastructure and seeks proportionate financial contributions where development is assessed to have an adverse impact on capacity of existing facilities. • Policy EC12 'Sustainable Transport', and various other policies such as HC5 'Specialist Housing', HC13 'Parking Provision', EC4 'Rural Economy', EC5 'Tourist Accommodation' and EC8 'Retail', support the improvement of sustainable transport and accessibility, including public transport and active travel, across the Plan area. This would be expected to improve residents' access to services and facilities. • Policy HC11 'Protecting Amenity' seeks to protect residential amenity in relation to noise and other sources of pollution. • Several LPR policies seek to protect, maintain and enhance multi-functional green infrastructure and open space / recreational provision across the Plan area alongside new development including Policy HC18 'Sports Facilities and Playing Pitches', Policy HC19 'Green Infrastructure', Policy HC10 'Design Requirements' and Policy HC17 'Open Space'. An Open Space, Sport and Recreation SPD and a Green Infrastructure SPD are proposed.
 <p>LANDSCAPE</p>	<ul style="list-style-type: none"> • Policy NB4 'Landscape Character' sets out measures to protect and enhance Cannock Chase AONB and its setting, in accordance with national policy and additional guidance including the Cannock Chase AONB Design Guide and the AONB Management Plan. The policy also seeks to maintain and, where possible, improve the rural character and distinctiveness of the South Staffordshire's landscape, and requires developments to have regard to the findings of the Landscape Character Assessment and Landscape Sensitivity Study. • Policy HC10 'Design Requirements', supported by Policy HC19 'Green Infrastructure', sets out requirements to ensure high quality design, including the requirement for proposed developments to respond positively to landform and respect existing landscape and settlement character. • Policies DS1 'Green Belt' and DS3 'Open Countryside' seek to protect the openness of the countryside and would serve to resist development outside of settlement development boundaries, other than in certain circumstances where various other requirements are met. • Policy MA1 'Master Planning Strategic Sites' sets out various requirements for the development of the two strategic sites, including provision of a Green Infrastructure Framework which should incorporate "<i>Utilisation and retention of existing landscape features and key views into and out of the site to create a distinctive and visually sensitive character to the development that links into the green infrastructure network beyond the site's boundaries</i>".

SEA Topic	Summary of mitigating effects of the Local Plan policies
 <p>POPULATION & MATERIAL ASSETS</p>	<ul style="list-style-type: none"> • Policy DS4 'Development Needs' sets out the delivery of 4,726 homes and 107.45ha of employment land over the plan period to 2041, which will provide enough homes to meet South Staffordshire's requirements as well as contributing towards the unmet housing and employment needs of neighbouring authorities, in line with the Duty to Cooperate. • Policy HC9 'Gypsy, Traveller and Travelling Showpeople' sets out requirements for the provision of high quality pitches and plots for the Gypsy, Traveller and Travelling Showpeople communities to ensure that their needs can be addressed in terms of access to essential services and well-designed locations. • A range of other LPR policies seek to meet the differing housing needs of the population, including Policy HC4 for older residents, Policy HC5 for those with specialist needs, Policy EC6 dwellings for rural workers, and Policy HC8 for self-build and custom housebuilding schemes. • Policies EC8 'Retail' and EC9 'Protecting Community Services and Facilities' will seek to protect the vibrancy of village centres by ensuring any new residential development does not result in the loss of essential services or facilities. • Policy EC11 'Infrastructure' seeks to ensure that the plan provides appropriate and proportionate infrastructure to deliver the proposed development, which may help to ensure that there are adequate services to meet the day to day needs of residents within the local area. • Policy HC14 'Health Infrastructure' seeks to protect existing healthcare infrastructure and ensure that major residential developments are assessed against existing healthcare facilities for potential negative impact and that contributions towards healthcare infrastructure are prioritised. • Policy HC15 'Education' will seek to protect existing education infrastructure and states that new education infrastructure required as a consequence of the delivery of the housing need would be calculated in line with the Staffordshire Education Infrastructure Contributions Policy.
 <p>SOIL</p>	<ul style="list-style-type: none"> • Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' seeks to ensure that valued soils, including BMV agricultural land, are protected and enhanced. The policy also encourages the restoration, enhancement and creation of habitats and linkages, which would be expected to help mitigate negative ecological impacts associated with development. • Policy HC2 'Housing Density' may help to reduce the overall land-take to deliver housing needs across the Plan area and may serve to reduce negative effects on soil loss and loss of BMV agricultural land, although this effect is uncertain as it would be dependent on the locations for development. • Policy DS3 'Open Countryside' states "<i>All types of development in the Open Countryside which are not explicitly supported by Policy DS3 will be considered on a case-by-case basis. Such proposals will only be permitted where they are not located on best and most versatile agricultural land.</i>" • Policies HC1 'Housing Mix', HC2 'Housing Density' and HC10 'Design Requirements' promote an efficient use of land for new development, including appropriate sizes of dwellings to meet local needs. • Policies HC17 'Open Space', HC18 'Sports Facilities and Playing Fields' and HC19 'Green Infrastructure' set out the requirements for provision of open space, play areas, sports pitches and other informal green spaces which would be likely to contribute towards retention and enhancement of GI and ecological assets, including soils, alongside built development.
 <p>WATER</p>	<ul style="list-style-type: none"> • Policy NB7 'Managing Flood Risk, Sustainable Drainage Systems & Water Quality' seeks to manage fluvial and surface water flood risk, through the requirement for site-specific Flood Risk Assessments and surface water drainage strategies for all developments. Site-specific flood risk assessments, such as the sequential and exception tests, should be in accordance with national requirements and take account of the latest climate change allowances. Policy

SEA Topic	Summary of mitigating effects of the Local Plan policies
	<p>NB7 would ensure that development proposals provide appropriate Sustainable Drainage System (SuDS) .</p> <ul style="list-style-type: none"> • Policy NB7 also states that all development proposals must demonstrate “adequate water supply, sewerage and land drainage systems (including water sources, water and wastewater infrastructure) to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development”. • Policy HC19 ‘Green Infrastructure’, Policy EC1 ‘Sustainable Economic Growth’ and Policy NB1 ‘Protecting, Enhancing and Expanding Natural Assets’ seek to protect and create GI in development proposals and could lead to various benefits for ecosystem services including reduced water runoff rates, and therefore mitigate fluvial and surface water flooding to some extent.

Residual effects

- N69. The LPR is anticipated to result in a range of positive effects on sustainability, which are summarised in **Table N.9**. This includes positive effects associated with the provision of homes and jobs to meet the varying needs of the population, as well as provision of and accessibility to GI, public greenspace and active travel infrastructure. The Plan is likely to lead to positive effects overall with regard to health and wellbeing, and promoting cohesive and sustainable communities.

Table N.9: Likely residual positive sustainability effects of the LPR

Summary of residual positive effects	
1	<p>Multi-functional green infrastructure network</p> <p>The LPR promotes the conservation and enhancement of multi-functional GI across the district, and encourages development proposals to seek opportunities to incorporate links and increase connectivity of the wider green and blue infrastructure network.</p> <p>Although the proposed development within the LPR would be expected to result in the loss of greenfield land and associated GI to some extent, policies within the LPR would be expected to mitigate this loss of GI, resulting in a positive effect on provision of GI in the longer term.</p>
2	<p>Access to public greenspace</p> <p>Various LPR policies seek to provide a range of open spaces, sports facilities and recreational spaces for site end users, which would be expected to help facilitate healthy and active lifestyles and supplement the district’s existing recreational resource. Notably, Policy HC17 sets out requirements for all development proposals to provide multi-functional open space, or financial contributions towards off-site open space provision, according to the size of the development.</p>
3	<p>Access to the PRow and cycle networks</p> <p>There is a relatively good coverage of existing PRowS and cycle paths within the district. Various LPR policies seek to create permeable neighbourhoods and promote cycling and walking which would be likely to improve the coverage of, and accessibility to, the pedestrian and cycle networks across South Staffordshire. This would be expected to encourage residents to participate in physical exercise and active travel, with benefits to health and wellbeing.</p>

Summary of residual positive effects	
4	<p>Provision of housing to meet local need</p> <p>In order to meet the identified housing need, the LPR proposes to deliver 4,726 new dwellings within the Plan period. Policies set out in the Plan include various requirements to ensure the provision of an appropriate mix of housing types and tenures that will address the needs of different groups including those with specialist needs, first time home buyers, and the Gypsy and Traveller community.</p>
5	<p>Provision of employment opportunities</p> <p>The Plan seeks to deliver 107.45ha of employment land, meeting the need identified in the latest Economic Development Needs Assessment (EDNA). Various LPR policies would also be expected to improve access to employment opportunities, including through provision of sustainable transport options and by aiming to locate employment-led development in areas with good accessibility with respect to the strategic road network.</p>
6	<p>Community cohesion</p> <p>The LPR policies demonstrate SSDC's commitment to enhancing community cohesion by addressing the diverse accommodation needs of the population, safeguarding community services and facilities, and encouraging development proposals to incorporate careful design which delivers a high-quality public realm and considers opportunities to co-locate new development with community facilities and open spaces. The impact of this broad range of policy interventions is anticipated to improve community cohesion through improving opportunities for social interaction, sense of place and reducing social inequalities.</p>

N70. The LPR provides a range of policies which would be expected to help mitigate some of the adverse impacts of the proposed development, as outlined in **Table N.8** above. Whilst mitigation has been proposed for some effects, where this is not possible, or is not likely to, wholly mitigate the nature of effect, the following residual effects remain and are drawn to the attention of the plan makers. These are presented in **Table N.10**.

Table N.10: Likely residual adverse sustainability effects of the LPR

Summary of residual adverse effects	
1	<p>Reduction in air quality and increased pollutant emissions</p> <p>Although various LPR policies seek to encourage sustainable transport modes and reduce air pollution, the introduction of 4,726 dwellings and 107.45ha of employment floorspace would be expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality.</p> <p>The policies would be expected to prevent unacceptable impacts on human health associated with air pollution but may lead to a cumulative adverse effect on air quality as a whole, which the policies in the Plan in itself cannot fully mitigate as it would require other transport interventions, for example.</p> <p>Over time, this adverse impact is likely to be reduced resulting from implementation of sustainable transport strategies, phasing out of petrol- and diesel-powered cars, and other advances in technology.</p>
2	<p>Fragmentation of the ecological network</p> <p>The LPR would be expected to result in the loss of a significant amount of previously undeveloped land, including soil resources, habitats and potentially ecological links between biodiversity assets.</p> <p>Fragmentation of the ecological network would be expected to be a long-term significant adverse effect. It may be temporary if biodiversity net gain and landscape scale ecological enhancements are effectively implemented through the adopted plan which would potentially deliver a significant beneficial effect in the long term.</p>

Summary of residual adverse effects	
3	<p>Increased greenhouse gas emissions</p> <p>Although the LPR policies seek to increase the uptake of sustainable transport and active travel, and would positively contribute to reducing emissions particularly in terms of building design and construction, the Plan would not be expected to fully mitigate the impacts associated with the occupation of development, including transport. An increase in carbon emissions in South Staffordshire would be likely to be a long-term and permanent significant effect. However, over time, advances in technologies and alternative solutions would be expected to reduce this adverse impact to some extent.</p>
4	<p>Alteration of historic environment and landscape character</p> <p>Various LPR policies seek to ensure that development proposals maintain and improve the district's intrinsic rural character and distinctiveness and have regard to the findings of the published Landscape Character Assessment (LCA) and Historic Landscape Characterisation (HLC). However, due to the scale of development proposed with a large proportion in previously undeveloped locations surrounding rural settlements with historic value, cumulatively the development set out in the LPR could have the potential to alter South Staffordshire's distinctive historic character to some extent.</p>
5	<p>Limited access to healthcare / leisure facilities and services</p> <p>The majority of site allocations are located outside of the sustainable target distance to an NHS hospital and GP surgery. LPR policies, such as Policies HC14 and EC12, would be likely to help prevent the loss of existing healthcare facilities and improve sustainable access to facilities for some residents; however, the policies would not be expected to fully mitigate the restricted access to healthcare services for sites in more rural settlements in South Staffordshire.</p>
6	<p>Impacts on sensitive landscapes and the West Midlands Green Belt</p> <p>Various LPR policies aim to maintain and enhance South Staffordshire's distinctive landscapes and ensure that development design responds to its surroundings, having regard to the findings of the latest Landscape Sensitivity Study, and providing protection for the retained Green Belt. However, it is unlikely that these impacts could be fully mitigated particularly for allocated sites in areas identified as being of 'high' sensitivity according to the Sensitivity Study or 'very high' / 'high' harm to the Green Belt according to the Green Belt Study, where the landscape is likely to be unable to accommodate new development without significant change.</p>
7	<p>Alteration of views</p> <p>Whilst the LPR policies serve to provide some proportionate protection of visual amenity and views and may help to mitigate some of the adverse impacts in this regard, it is likely a minor residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views for a number of the sites proposed in the LPR.</p>
8	<p>Urbanisation of the countryside and coalescence</p> <p>The need to provide housing and employment has led to the proposed allocation of development on previously undeveloped greenfield sites at a number of locations within South Staffordshire. Various policies in the LPR seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt and open countryside. However, due to the rural context in which much of the new development is situated, the LPR policies would not be expected to fully mitigate these impacts and a residual adverse effect is anticipated. This includes potential for reduced separation between some settlements / neighbourhoods.</p>

Summary of residual adverse effects	
9	<p>Loss of tranquillity</p> <p>The proposed development of 4,726 new dwellings and 107.45ha of new employment land across the district, with a number of development sites located within more rural areas, would be likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.</p>
10	<p>Access to, and demand on, local services and facilities</p> <p>Whilst the LPR policies seek to maintain and enhance local services and facilities as far as possible, these policies would not be expected to fully mitigate the restricted access to local facilities for some areas, particularly those in lower-tier settlements.</p>
11	<p>Increased household waste generation</p> <p>It is difficult for the LPR to specifically reduce waste generation within the Plan area. Although national trend data indicates a general decrease in household waste generation over time, the introduction of 4,726 new households would be expected to increase waste production to some extent.</p>
12	<p>Loss of soil resources and BMV land</p> <p>The proposed allocations would cumulatively result in the loss of up to approximately 603ha of previously undeveloped land²⁰, approximately 575ha of which could include BMV land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. The loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield.</p>
13	<p>Increased demand for water and wastewater management</p> <p>The increased population within the Plan area would be expected to increase water demand, such as for drinking water supply and wastewater treatment. The WCS identified some uncertainty regarding the potential for adverse impacts in terms of wastewater collection infrastructure that may require further monitoring and investment in infrastructure upgrades, to ensure that development can be accommodated throughout the Plan period.</p>

Cumulative effects

- N71. Cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the LPR are assessed alongside known existing underlying trends and other plan and programmes.
- N72. Cumulative effects are different from effects that occur alone. Cumulative effects are impacts caused either by a number of separate developments in the same area or continuous activity over time that may have an increased impact on the local environment.
- N73. Alone, the LPR may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.
- N74. **Table N.11** summarises the residual effects identified for each of the SEA topics and presents the likely cumulative effects of the LPR when considering these alongside other

²⁰ Please note this figure is based on gross site areas and so does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.

plans and programmes as well as national trends. Cumulative effects are discussed in further detail within Chapter 16 of the Main SA Report (Volume 2).

Table N.11: Cumulative effects assessment of the LPR

Summary of impacts identified in the SA process	Further details of the cumulative effect	Cumulative effect
<p>Air</p> <ul style="list-style-type: none"> Reduction in air quality Increased pollutant emissions 	<p>Nationally, measures to improve air quality are in place and continue to be prioritised by the government, which includes proposals to ban sales of petrol and diesel cars by 2035.</p> <p>Local and national policies together promote the improvement of sustainable transport modes which will help reduce reliance on private car use. Despite this, it is likely that many residents will be reliant on private vehicles for travel, to some extent. Traffic and congestion could potentially increase in the short-medium term with population growth, which will have implications for air quality, residents and wildlife particularly within proximity to main roads.</p> <p>Overall, the LPR would be expected to result in a medium-term cumulative adverse effect on air quality.</p>	-
<p>Biodiversity, flora and fauna</p> <ul style="list-style-type: none"> Threats or pressures to designated biodiversity sites Impacts on habitats of principal importance and ancient woodland Impacts on the ecological network 	<p>South Staffordshire supports a range of internationally, nationally and locally designated biodiversity sites, which will continue to benefit from legislative protection as well as agreed mitigation measures as set out within the planning policies.</p> <p>Although the LPR aims to conserve and enhance biodiversity sites, deliver biodiversity net gain and retain and improve the GI network, it is uncertain if the proposed development would adversely impact some biodiversity, flora and fauna features when considered together at a landscape scale. Site-based approaches to nature conservation can fail to identify landscape-scale ecological considerations. Local strategies such as the Staffordshire Biodiversity Action Plan (BAP) seek to increase the extent, resilience and quality of ecological networks; however, background trends indicate an overall picture of incremental habitat losses and reduction in species diversity.</p>	+/-
<p>Climatic factors</p> <ul style="list-style-type: none"> Increased carbon and GHG emissions Loss of multi-functional GI 	<p>Climate change is an international issue. The proposed development within the South Staffordshire LPR and subsequent increase in population would be expected to result in an increase in greenhouse gas (GHG) emissions, to some extent. This could include impacts from increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production and use of materials during construction.</p> <p>The LPR sets out a range of policies which focus on topics such as sustainable economic growth, construction and transport, as well as managing flood risk and enhancing GI. The Future Homes Standard is likely to come into effect during the Plan period which may help to ensure that homes are future-proofed with low-carbon heating systems and high energy efficiency.</p> <p>Despite these policies, without further research to better understand the precise nature of potential impacts arising from climate change at the district scale, the policies would not fully mitigate carbon emissions during occupation of new development including those associated with transport, or</p>	-

Summary of impacts identified in the SA process	Further details of the cumulative effect	Cumulative effect
	emissions associated with existing housing stock. Overall, the LPR could potentially result in a cumulative adverse effect which may lead to secondary effects such as on flood risk, health and safety of residents. This issue requires careful monitoring, and the findings and recommendations of the Staffordshire Climate Change Mitigation and Adaptation Plan (AECOM, 2020) should be actioned and monitored wherever possible.	
<p>Cultural heritage</p> <ul style="list-style-type: none"> • Impacts on the character or setting of heritage assets • Alteration of historic environment character • Impacts on archaeology 	<p>South Staffordshire has a rich cultural heritage, with a range of designated and non-designated historic features. Development proposed within the LPR would not be expected to cause significant harm to designated heritage assets and the Plan includes a number of policies which seek to conserve and enhance the historic environment and the distinctive character.</p> <p>Due to the scale of development proposed in the LPR with a large proportion in previously undeveloped locations surrounding rural settlements with historic value, cumulatively the development set out in the LPR could have the potential to alter South Staffordshire’s distinctive historic character to some extent.</p>	-
<p>Human health</p> <ul style="list-style-type: none"> • Sustainable access to healthcare and leisure facilities • Exposure to air/noise pollution (from AQMAs and main roads) • Access to green spaces • Access to PRow or cycle network 	<p>The health of residents within South Staffordshire is generally good. Many of the LPR policies would be expected to mitigate and result in positive effects in relation to human health, for example policies which seek to improve community cohesion, promote healthy lifestyles and provide a range of open spaces and recreational facilities for new and existing residents.</p> <p>However, the rural nature of the district means that many site end users will be situated further away from healthcare facilities than is recommended to support sustainable communities, with potential for restricted access to essential healthcare and likely reliance on private car use to reach the nearest facilities. This could especially present issues when considering South Staffordshire’s ageing population and the lack of hospitals within the district.</p> <p>Short, medium, and potentially long-term adverse effects on human health are likely to remain within the Plan period.</p> <p>Furthermore, air and noise pollution associated with road traffic and AQMAs can have adverse implications for health (see ‘air’ section above).</p>	-
<p>Landscape</p> <ul style="list-style-type: none"> • Impacts on the character or setting of Cannock Chase AONB • Alteration of landscape character • Impacts on sensitive landscapes and the West Midlands Green Belt • Alteration of views 	<p>The LPR spatial strategy prioritises development in higher tier settlements and existing urban areas, utilising previously developed land where possible. However, to meet the identified needs, some growth will occur on previously undeveloped land, with potential to lead to a cumulative negative effect on landscape character, tranquillity and views.</p> <p>The LPR policies would be expected to minimise potential adverse impacts on the setting or special qualities of Cannock Chase AONB, and seek to ensure that the local character and distinctiveness of South Staffordshire’s landscape is protected through encouraging sensitive design and ensuring that new development proposals have regard to the findings of the published LCA and landscape sensitivity information.</p> <p>However, there are other areas within South Staffordshire identified as being of ‘high’ sensitivity to development, and</p>	--

Summary of impacts identified in the SA process	Further details of the cumulative effect	Cumulative effect
<ul style="list-style-type: none"> Increased risk of urbanisation of the countryside and coalescence Loss of tranquility 	areas with potential for development to cause 'high' or 'very high' harm to the Green Belt. In such areas, the landscape is unlikely to be able to accommodate new development without significant change.	
<p>Population and material assets</p> <ul style="list-style-type: none"> Provision of housing to meet local need Provision of employment opportunities Sustainable access to, and increased pressure on, services and facilities Impacts on community cohesion Increased household waste generation 	<p>The LPR would be likely to have a positive cumulative effect on the population, due to the provision of new homes and jobs to meet the varied needs of the community, including affordable housing and a range of type, tenure and size of homes.</p> <p>Local and national policy promotes the improvement and integration of public transport, and LPR policies seek to improve travel choice and encourage sustainable modes of transport, including public transport, pedestrian and cycle networks. However, the LPR allocations may lead to an adverse impact on access to and provision of local services and facilities, particularly in the more rural settlements. Many residents in these areas are likely to rely on private car use for travel, and an increased population may lead to greater pressure on the capacity of key services. A cumulative adverse effect would be expected in terms of accessibility.</p> <p>Furthermore, there is potential for a cumulative adverse effect in relation to material assets, as the growth set out in the LPR would be likely to increase household waste generation over the Plan period. Although nationally recycling rates are increasing, it is uncertain if this would help to significantly decrease waste generation within the Plan area.</p>	-
<p>Soil</p> <ul style="list-style-type: none"> Loss of soil resource and BMV land Impact on ecosystem services 	<p>Nationally, rates of soil erosion are increasing. Soil is a non-renewable resource, which performs a number of important ecosystem services and supports a diverse range of habitats.</p> <p>The LPR includes measures to reduce the quantity of soil lost to development, including directing development towards existing urban areas including previously developed land, ensuring GI and open spaces are maximised, and promoting the efficient use of land such as through ensuring appropriate housing densities. Despite these measures, a number of allocations are situated on previously undeveloped land. The LPR would be expected to result in the loss of approximately 603ha of previously undeveloped land including approximately 575ha of potential BMV land. Together, this would be expected to have a cumulative adverse effect on soil resources.</p>	--
<p>Water</p> <ul style="list-style-type: none"> Fluvial and surface water flood risk Reduction in water quality and ecosystem services Increased water demand 	<p>In terms of flood risk, national policies and guidance in combination with various LPR policies would help to ensure development proposals do not exacerbate flood risk in the Plan area.</p> <p>In terms of water quality and ecosystem services, several LPR policies seek to protect and enhance water quality, ensure that development proposals incorporate sustainable drainage systems, and increase the provision of GI across the Plan area.</p> <p>The increased population in the Plan area would be expected to increase demand on water supply and management. The</p>	-

Summary of impacts identified in the SA process	Further details of the cumulative effect	Cumulative effect
<ul style="list-style-type: none"> Increased pressure on wastewater treatment 	<p>Water Cycle Study (WCS)²¹ identified some uncertainty regarding the potential for adverse effects in terms of wastewater collection infrastructure that may require further monitoring and investment in infrastructure upgrades, to ensure that development can be accommodated.</p> <p>Overall, there is potential for a cumulative adverse effect on water resources and water quality that may occur as a result of the development proposed in the LPR. Growth within the Plan area, combined with climate change and increased storm events, is likely to lead to increased potential for overflows of untreated sewage and storm water into rivers, as well as increased pressure on wastewater infrastructure.</p>	

Monitoring

- N75. The SA also discusses the importance of a monitoring programme to help ensure that adverse impacts of the Local Plan are identified, investigated and potentially avoided, mitigated or compensated. When opportunities for improving the sustainability performance of the Local Plan arise over time, monitoring helps to ensure that these opportunities are recognised and taken advantage of.
- N76. Some suggested monitoring proposals are set out in **Table N.12** for SSDC to consider in the implementation of the LPR.

Table N.12: Proposals for monitoring adverse sustainability impacts of the LPR

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
Air	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of planning approvals granted contrary to the advice of Natural England or Staffordshire Wildlife Trust	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Uplift in Biodiversity Net Gain units	Annually, Plan area wide	Increase
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Renewable energy generation	Annually, Plan area wide	Increase

²¹ JBA Consulting (2020) Southern Staffordshire Councils Water Cycle Study – Phase 1 Scoping Study. Available at: <https://tinyurl.com/2p88kscz>. [Date accessed: 29/02/24]

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Climatic factors	Extent and connectivity of green infrastructure	Annually, Plan area wide	Increase
Cultural heritage	Number of Conservation Area Appraisals	Annually, Plan area wide	Increase
Cultural heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP Surgeries	Annually, Plan area wide	Increase
Human health	Hectares of accessible open space per 1,000 population	Annually, Plan area wide	Increase
Landscape	Quantity of development in the Open Countryside	Annually, Plan area wide	Zero
Landscape	Change in tranquillity in the Open Countryside	Annually, Plan area wide	Zero
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in South Staffordshire within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste generation	Annually, Plan area wide	Decrease
Soil	Number of dwellings built on PDL	Annually, Plan area wide	Increase
Soil	Number of dwellings built on BMV land (Grades 1, 2 or 3a Agricultural Land Classification (ALC))	Annually, Plan area wide	Decrease
Water	Number of planning permissions granted contrary to EA advice	Annually, Plan area wide	Zero
Water	Quality of watercourses	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase

Consultation and next steps

- N77. The Regulation 19 SA Report will be published alongside the Publication Version of the South Staffordshire LPR.
- N78. A six-week period of consultation will be undertaken by SSDC to offer individuals, businesses and other organisations an opportunity to submit representations regarding the South Staffordshire LPR.
- N79. Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.



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