

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

## Volume 2 of 3: Regulation 19 SA Report

March 2024



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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

## Volume 2 of 3: Regulation 19 SA Report

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# Acronyms & abbreviations

<b>A&amp;E</b>	Accident and Emergency
<b>ALC</b>	Agricultural Land Classification
<b>AONB</b>	Area of Outstanding Natural Beauty
<b>AQMA</b>	Air Quality Management Area
<b>BAP</b>	Biodiversity Action Plan
<b>BMV</b>	Best and Most Versatile
<b>BREEAM</b>	Building Research Establishment Environmental Assessment Method
<b>C of E</b>	Church of England
<b>CCDC</b>	Cannock Chase District Council
<b>CEA</b>	Cumulative Effects Assessment
<b>CO<sub>2</sub></b>	Carbon Dioxide
<b>DEFRA</b>	Department for Environment, Food and Rural Affairs
<b>DfT</b>	Department for Transport
<b>DLUHC</b>	Department for Levelling Up, Housing and Communities
<b>DM</b>	Development Management
<b>DMRB</b>	Design Manual for Roads and Bridges
<b>DTA</b>	David Tyldesley and Associates
<b>EDNA</b>	Economic Development Needs Assessment
<b>EU</b>	European Union
<b>FEMA</b>	Functional Economic Market Area
<b>GBHMA</b>	Greater Birmingham Housing Market Area
<b>GHG</b>	Greenhouse Gas
<b>GI</b>	Green Infrastructure
<b>GIS</b>	Geographic Information Systems
<b>GP</b>	General Practitioner
<b>GTAA</b>	Gypsy and Traveller Accommodation Assessment
<b>GTTS</b>	Gypsies, Travellers and Travelling Showpeople
<b>HER</b>	Historic Environment Record
<b>HLC</b>	Historic Landscape Characterisation
<b>HMA</b>	Housing Market Area
<b>IMD</b>	Indices of Multiple Deprivation
<b>IRZ</b>	Impact Risk Zone
<b>JWMB</b>	Joint Waste Management Board
<b>km</b>	Kilometre
<b>LCA</b>	Landscape Character Assessment
<b>LCT</b>	Landscape Character Type
<b>LNR</b>	Local Nature Reserve
<b>LNRS</b>	Local Nature Recovery Strategy
<b>LPR</b>	Local Plan Review
<b>LSOA</b>	Lower Super Output Area
<b>LWS</b>	Local Wildlife Site

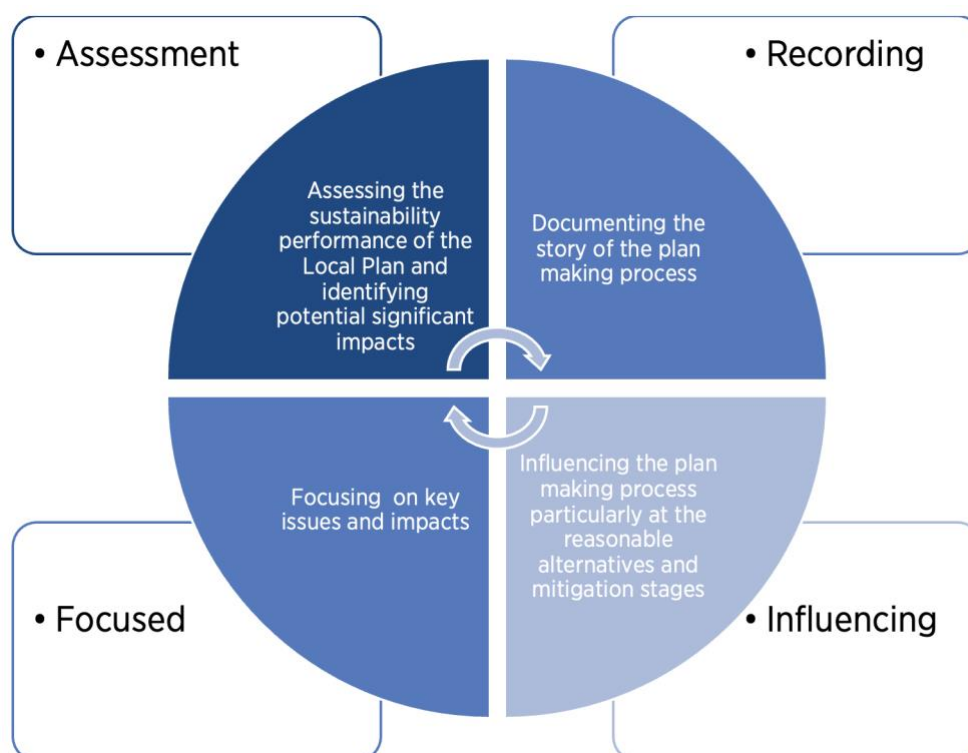
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<b>MHCLG</b>	Ministry of Housing, Communities and Local Government
<b>MOU</b>	Memorandum of Understanding
<b>NCA</b>	National Character Area
<b>NERC</b>	Natural Environment and Rural Communities
<b>NHS</b>	National Health Service
<b>NNR</b>	National Nature Reserve
<b>NO<sub>2</sub></b>	Nitrogen Dioxide
<b>NPPF</b>	National Planning Policy Framework
<b>NVQ</b>	National Vocational Qualification
<b>OAN</b>	Objectively Assessed Need
<b>ODPM</b>	Office of the Deputy Prime Minister
<b>PINS</b>	Planning Inspectorate
<b>PO</b>	Preferred Options
<b>PPG</b>	Planning Practice Guidance
<b>PPP</b>	Policies, Plans and Programmes
<b>PRoW</b>	Public Rights of Way
<b>RBMP</b>	River Basin Management Plan
<b>RCA</b>	Regional Character Area
<b>RIGS</b>	Regionally Important Geological and Geomorphological Site
<b>RPG</b>	Registered Park and Garden
<b>RTPI</b>	Royal Town Planning Institute
<b>SA</b>	Sustainability Appraisal
<b>SAC</b>	Special Area of Conservation
<b>SAD</b>	Site Allocation Document
<b>SAMMM</b>	Strategic Access Management and Monitoring Measures
<b>SBI</b>	Site of Biological Importance
<b>SEA</b>	Strategic Environmental Assessment
<b>SFRA</b>	Strategic Flood Risk Assessment
<b>SHSID</b>	Spatial Housing Strategy and Infrastructure Delivery
<b>SM</b>	Scheduled Monument
<b>SPA</b>	Special Protection Area
<b>SPD</b>	Supplementary Planning Document
<b>SPZ</b>	Source Protection Zone
<b>SSDC</b>	South Staffordshire District Council
<b>SSSI</b>	Sites of Special Scientific Interest
<b>SuDS</b>	Sustainable Drainage System
<b>TAG</b>	Transport Analysis Guidance
<b>WCS</b>	Water Cycle Study
<b>WMI</b>	West Midlands Interchange
<b>ZOI</b>	Zone of Influence

# 1 Introduction

## 1.1 Purpose of this report

- 1.1.1 Lepus Consulting Ltd (Lepus) has been instructed by South Staffordshire District Council (SSDC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), for the South Staffordshire Local Plan Review (LPR) (2023-2041).
- 1.1.2 This Regulation 19 SA Report has been prepared to present full details of the SA process to date and inform SSDC's preparation of the South Staffordshire LPR.
- 1.1.3 This report follows on from the previous Regulation 19 SA Report (October 2022)<sup>1</sup> which was published for consultation alongside the Publication version of the LPR between 11<sup>th</sup> November and 23<sup>rd</sup> December 2022. In light of the government's recent changes to national planning policy, SSDC has decided to undertake a further Regulation 19 consultation to ensure the emerging LPR takes into account the latest and most relevant evidence.
- 1.1.4 There are four key purposes of the SA process at this stage of the plan making process are shown in **Figure 1.1**.



*Figure 1.1: Key purposes of the SA process*

<sup>1</sup> Lepus Consulting (2022) Sustainability Appraisal of the South Staffordshire Local Plan Review (2019-2039) Regulation 19 SA Report, Volumes 1 – 3, October 2022. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 10/11/23]

- 1.1.5 This SA report is one of a series of reports that have been prepared to document the iterative SA process. Such an approach enables the Council to demonstrate that it has identified, described and evaluated reasonable alternatives during the making of the Local Plan. **Chapter 2** provides further details of the SA process to date.

## 1.2 Sustainability Appraisal

- 1.2.1 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies<sup>2</sup>. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

- 1.2.2 This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the 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 development of the plan.

## 1.3 Strategic Environmental Assessment

- 1.3.1 Strategic Environmental Assessment (SEA) seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. Its purpose is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development. SEA considers only the environmental effects of a plan, whereas sustainability appraisal considers the plan's wider economic and social effects in addition to its potential environmental impacts<sup>3</sup>.

- 1.3.2 The SEA procedure can be summarised as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified. The public and the relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report prepared.

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<sup>2</sup> DLUHC and MHCLG (2021). Government guidance on plan making. Available at: <https://www.gov.uk/guidance/plan-making> [Date accessed: 03/11/23]

<sup>3</sup> DLUHC and MHCLG (2020) Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 03/11/23]

## 1.4 Integrated approach to SA and SEA

- 1.4.1 The SEA Directive applies to a wide range of public plans and programmes, including land use plans (see Article 3(2)) of the SEA Directive<sup>4</sup>). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633<sup>5</sup>).
- 1.4.2 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making. The SEA Directive and SEA Regulations necessitate an environmental report in which the likely significant effects on the environment are identified for local plan proposals and reasonable alternatives.
- 1.4.3 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19 (5) of the Planning and Compulsory Purchase Act 2004 and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012.

## 1.5 Legislative context

- 1.5.1 When submitting their local plan to the Secretary of State, section 19(5) of the Planning and Compulsory Purchase Act<sup>6</sup> requires that local planning authorities (LPAs) must have prepared and be able to submit an SA at the same time.
- 1.5.2 The Environmental Assessment of Plans and Programmes Regulations<sup>7</sup> (SEA Regulations) require that Strategic Environmental Assessments (SEA) be prepared for a wide range of plans and programmes, including Local Plans.
- 1.5.3 Planning Practice Guidance (PPG) advocates that the SA process should integrate the requirements of the SEA Regulations. On this basis, this SA report incorporates the requirements of the SEA regulations.
- 1.5.4 PPG on SEA and SA<sup>8</sup> states: "*Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues*".

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<sup>4</sup> Directive 2001/42/EC of the European Parliament of the Council of 27 June 2001 (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 03/11/23]

<sup>5</sup> The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 03/11/23]

<sup>6</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 03/11/23]

<sup>7</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 03/11/23]

<sup>8</sup> MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 03/11/23]

## 1.6 How to read and understand the R19 SA Report

1.6.1 This report should be read alongside the Publication Version (2024) of the South Staffordshire LPR. The various appendices provide essential contextual information to the main body of the report. The contents of this SA Report are as follows:

- **VOLUME 1: Non-Technical Summary** provides a summary of the Regulation 19 SA work.
- **VOLUME 2: Main SA Report** (this document)
  - **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.

## 2 About the Plan and the sequencing of the SA process

### 2.1 Geography of the Plan area

- 2.1.1 South Staffordshire is a local governmental district in the West Midlands, adjacent to the western boundary of the Black Country, bordering Shropshire on the east, Worcestershire to the south and Stafford on the northern border. In total, South Staffordshire District covers approximately 40,700ha, with an estimated population of 112,369 as of 2022<sup>9</sup>. The district is predominantly rural with several larger towns, including Codsall which is the administrative centre of the South Staffordshire District<sup>10</sup> (see **Figures 2.1** and **2.2**).
- 2.1.2 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 District<sup>11</sup>. 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 – also known as National Landscape) and also contains a Special Area of Conservation (SAC). Other notable features include Baggeridge Country Park and the historic Weston Park.
- 2.1.3 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.

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<sup>9</sup> City Population (2022) South Staffordshire. Available at:

[https://www.citypopulation.de/en/uk/westmidlands/admin/E07000196\\_south\\_staffordshire/](https://www.citypopulation.de/en/uk/westmidlands/admin/E07000196_south_staffordshire/) [Date accessed: 03/11/23]

<sup>10</sup> South Staffordshire District Council (2022) Council Service Directory. Available at: <https://www.sstaffs.gov.uk/contact-us/view-full-directory.cfm> [Date accessed: 03/11/23]

<sup>11</sup> South Staffordshire District Council (2022) Conservation Areas. Available at:

<https://www.sstaffs.gov.uk/planning/conservation-areas.cfm> [Date accessed: 03/11/23]

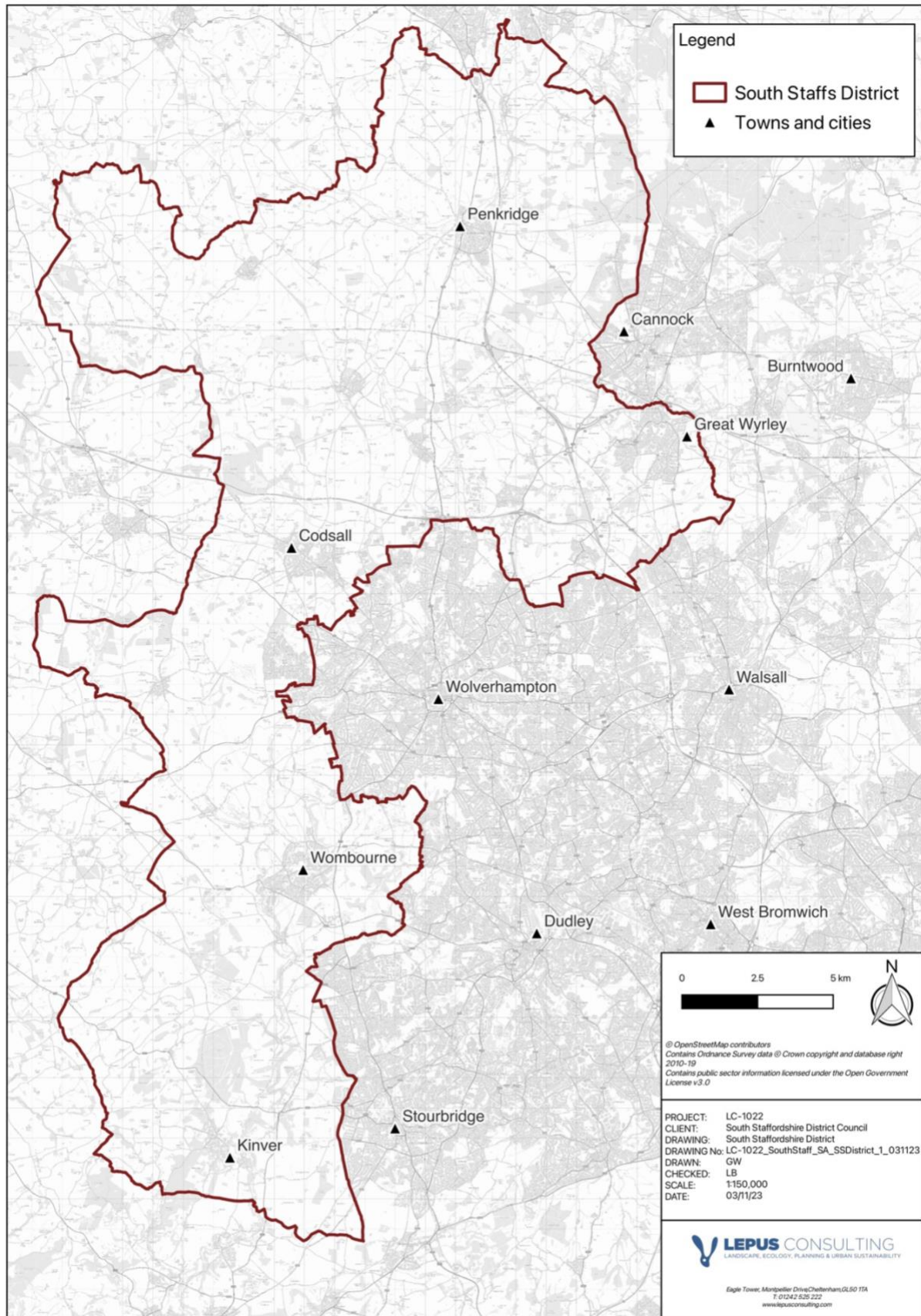


Figure 2.1: Map of South Staffordshire District



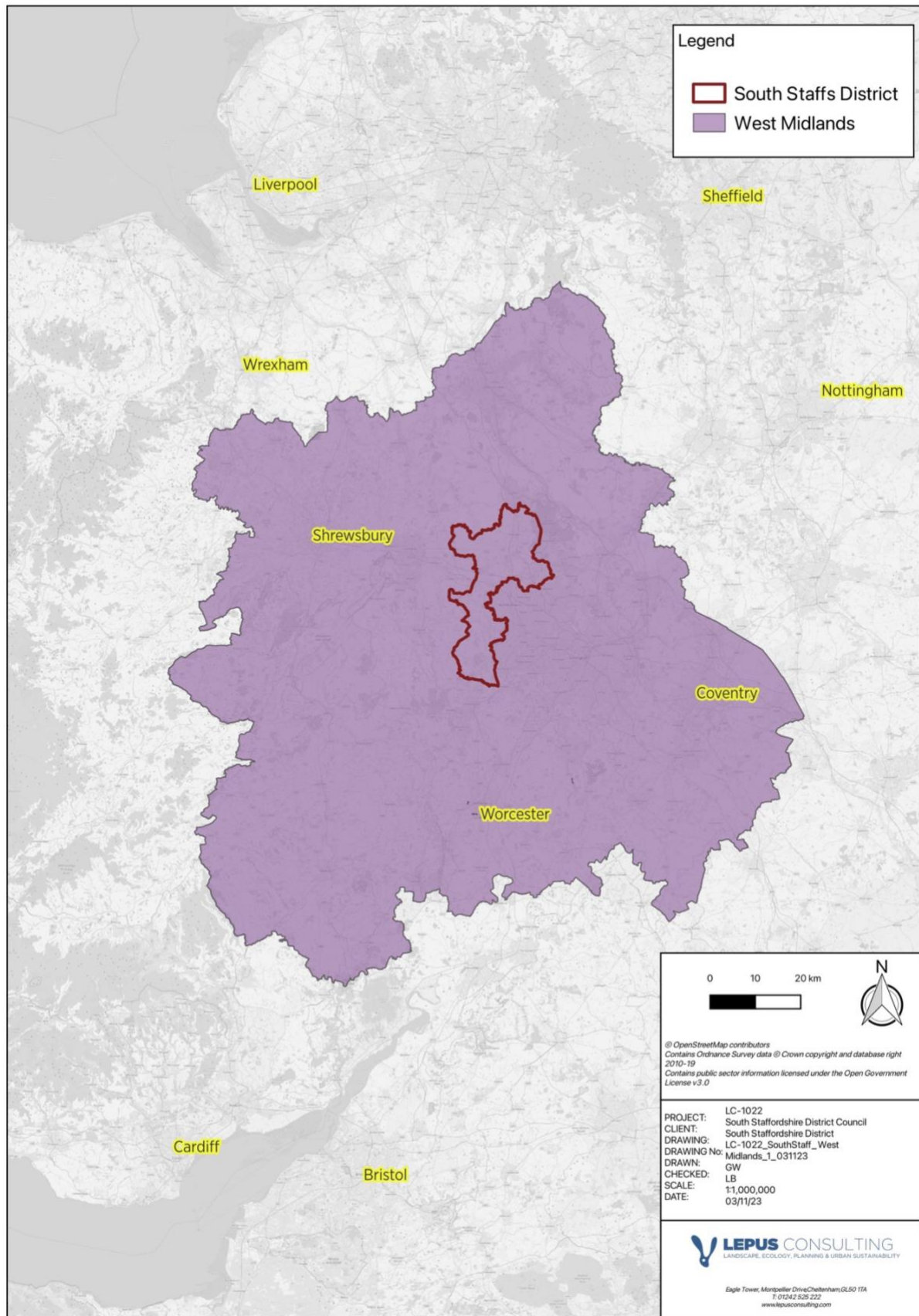


Figure 2.2: Map of South Staffordshire District located within West Midlands

## 2.2 The South Staffordshire Local Plan Review

- 2.2.1 The UK Government requires that local plans should be reviewed every five years and updated as necessary. The current adopted Local Plan for South Staffordshire consists of the Core Strategy and the Site Allocations Document (SAD). The South Staffordshire LPR will update and replace these documents and will set out the overall strategy for development in the district to 2041, including a vision for the future, relevant objectives, site allocations, site-based policies and development management policies which will guide the determination of planning applications.
- 2.2.2 The vision of the LPR is as follows: "*South Staffordshire will strive to protect & enhance its distinctive rural character, communities, and landscape, whilst playing its part in addressing the climate emergency and creating beautiful and thriving new places in which people can live, work, and enjoy leisure activities*".
- 2.2.3 The LPR identifies 13 strategic objectives which will help to achieve this vision, as presented in **Table 2.1**.
- 2.2.4 During the Local Plan preparation process, SSDC has conducted three rounds of Regulation 18 consultation. The Issues and Options Consultation (2018) was the first stage of the LPR (known as Regulation 18 (I)). The Spatial Housing Strategy and Infrastructure Delivery Consultation (2019) was the second stage of the LPR (known as Regulation 18 (II)), which refined the spatial options assessed at the Issues and Options stage and offered the Council a chance to consult with the public on the spatial strategy alternatives. The third stage of LPR preparation was the Preferred Options Consultation (2021) (known as Regulation 18 (III)), which set out proposed sites for housing, employment and the Gypsy and Traveller community, and included new policies and policy directions.
- 2.2.5 Following completion of the Preferred Options Consultation in December 2021, SSDC progressed work on the Publication Version of the LPR for the Regulation 19 stage that was published for consultation between 11<sup>th</sup> November and 23<sup>rd</sup> December 2022.
- 2.2.6 Since then, SSDC have prepared a second iteration of the Publication Version of the LPR, as appraised within this Regulation 19 SA Report, taking into account changes to national planning policy and other evidence updates.

**Table 2.1:** Strategic Objectives of the South Staffordshire LPR

## Development Strategy

- **Strategic Objective 1:** Protect the Green Belt and Open Countryside, ensuring that where Green Belt release is proposed, mechanisms are in place to secure compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.
- **Strategic Objective 2:** Meet the housing and employment needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country Housing Market Area and wider Functional Economic Market Area. New housing will be focused on sustainable locations within the district, with a particular focus on the district's most sustainable Tier 1 settlements.

## Homes and Communities

- **Strategic Objective 3:** Provide housing to meet the needs of different groups of the community, including a good range of market and affordable housing of varying sizes and housing that meets the needs of an ageing population and people with specialist housing needs, as well as the needs of people wishing to build their own home and members of the traveller community.
- **Strategic Objective 4:** Develop a built environment that is of high-quality design, respects the character of our existing settlements, reflects local vernacular and creates beautiful and sustainable places where people want to live, work and enjoy leisure activities.
- **Strategic Objective 5:** Encourage healthy communities through the provision of good access to health and education infrastructure, open space, sport and leisure and children's play and youth development facilities.

## Economic Prosperity

- **Strategic Objective 6:** Develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing and providing the skills to enable residents to access these jobs.
- **Strategic Objective 7:** Support the vitality of rural areas by enabling the sustainable growth and diversification of rural businesses, including supporting tourism and agriculture.
- **Strategic Objective 8:** Protect and enhance sustainable village centres, retaining the existing retail offer and ensuring good access to community services and facilities.
- **Strategic Objective 9:** Ensure that new development is served by appropriate infrastructure such as road improvements, health, recreation, and education facilities.
- **Strategic Objective 10:** Support the development of sustainable transport networks including ensuring that where possible existing and new development is well served by various public transport modes and active travel options such as walking and cycling.

## The Natural and Built Environment

- **Strategic Objective 11:** Protect and enhance the district's natural environment including the district's landscape character and key natural assets such as the Cannock Chase Special Area of Conservation, whilst ensuring that biodiversity net gain is delivered across the district.
- **Strategic Objective 12:** Ensure that our communities are resilient and adaptable to the effects of climate change. Deliver appropriate climate change mitigation through renewable energy generation and ensuring that developments are designed and located in a way that delivers greater energy conservation and reduces carbon emissions.
- **Strategic Objective 13:** Enhance the built environment, conserving and enhancing district's heritage assets including the district's canal network.

## 2.3 Sustainability Appraisal alongside the LPR stages: Iteration

- 2.3.1 **Figure 2.3** provides a summary of the main plan making stages and includes SA outputs that were prepared at each stage.
- 2.3.2 The preparation of a Scoping Report was the first phase of the SA process. The scoping process set the criteria for assessment (including the SA Objectives) and established the baseline data and other information, including a review of relevant policies, programmes and plans (PPPs). The scoping process involved an overview of key issues, highlighting areas of potential conflict. The output of the scoping phase was the SA Scoping Report prepared by Lepus Consulting in 2017<sup>12</sup>.
- 2.3.3 Between November and December 2017, the content of the SA Scoping Report was consulted on with Historic England, Natural England, the Environment Agency and other relevant bodies. The Scoping Report was revised following consideration of the comments received and re-issued to the Council in 2018. **Appendix C** presents a summary of issues raised through comments received during each stage of consultation, including the Scoping Report, from the Environment Agency, Historic England and Natural England.
- 2.3.4 The Regulation 18 (I) Issues and Options SA Report<sup>13</sup> assessed five options for levels of residential growth, two options for Gypsy and Traveller growth, three options for employment growth, six options for residential distribution, four options for employment distribution and 34 options for policies to be included in the LPR.
- 2.3.5 The Regulation 18 (II) SA Report<sup>14</sup> set out the appraisal of seven spatial options, as identified in the Spatial Housing Strategy and Infrastructure Delivery document. These spatial options constitute reasonable alternatives for the distribution of new housing growth in the Plan area.
- 2.3.6 The Regulation 18 (III) SA Report<sup>15</sup> included an assessment of 40 draft Development Management (DM) 'direction of travel' policies, 11 draft strategic policies and 317 reasonable alternative sites. The SA report also set out the preliminary reasons for selecting and rejecting reasonable alternative sites.

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<sup>12</sup> Lepus Consulting (2017) Sustainability Appraisal of the South Staffordshire Local Plan Review: Scoping Report. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 03/11/23]

<sup>13</sup> Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 03/11/23]

<sup>14</sup> 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/local-plan-review-evidence-base> [Date accessed: 03/11/23]

<sup>15</sup> 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/local-plan-review-evidence-base> [Date accessed: 03/11/23]

2.3.7 The Regulation 19 SA Report (2022)<sup>16</sup> included a summary of the SA process to date and was prepared to meet the requirements of an SEA Environmental Report. The report set out the assessment of 55 LPR policies and proposed allocations, as well as 48 new/amended reasonable alternative sites for housing and employment use, and ten additional reasonable alternative sites for Gypsies and Travellers which had been identified since the Regulation 18 (III) stage. The report also set out the outline reasons for selecting and rejecting reasonable alternative sites considered throughout the SA process at the time of its preparation.

2.3.8 The updated Regulation 19 SA Report (this report) includes an updated summary of the SA process to date and has been prepared to help inform the examination stage of the preparation of the LPR, taking into account the amendments to the LPR which have been proposed since the preparation of the initial Regulation 19 SA in October 2022. This report sets out the assessment of the LPR policies and allocations (some of which have been amended since the 2022 Regulation 19 stage) as well as the following additional reasonable alternatives which have been identified since the previous stage:

- 11 new/amended reasonable alternative sites for housing and employment use;
- Two additional residential growth options; and
- Two additional spatial options.

2.3.9 **Appendix I** sets out the updated outline reasons for selecting and rejecting reasonable alternative sites considered throughout the SA process to date, taking into account the new/amended sites and latest evidence.

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<sup>16</sup> 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/local-plan-review-evidence-base> [Date accessed: 24/11/23]

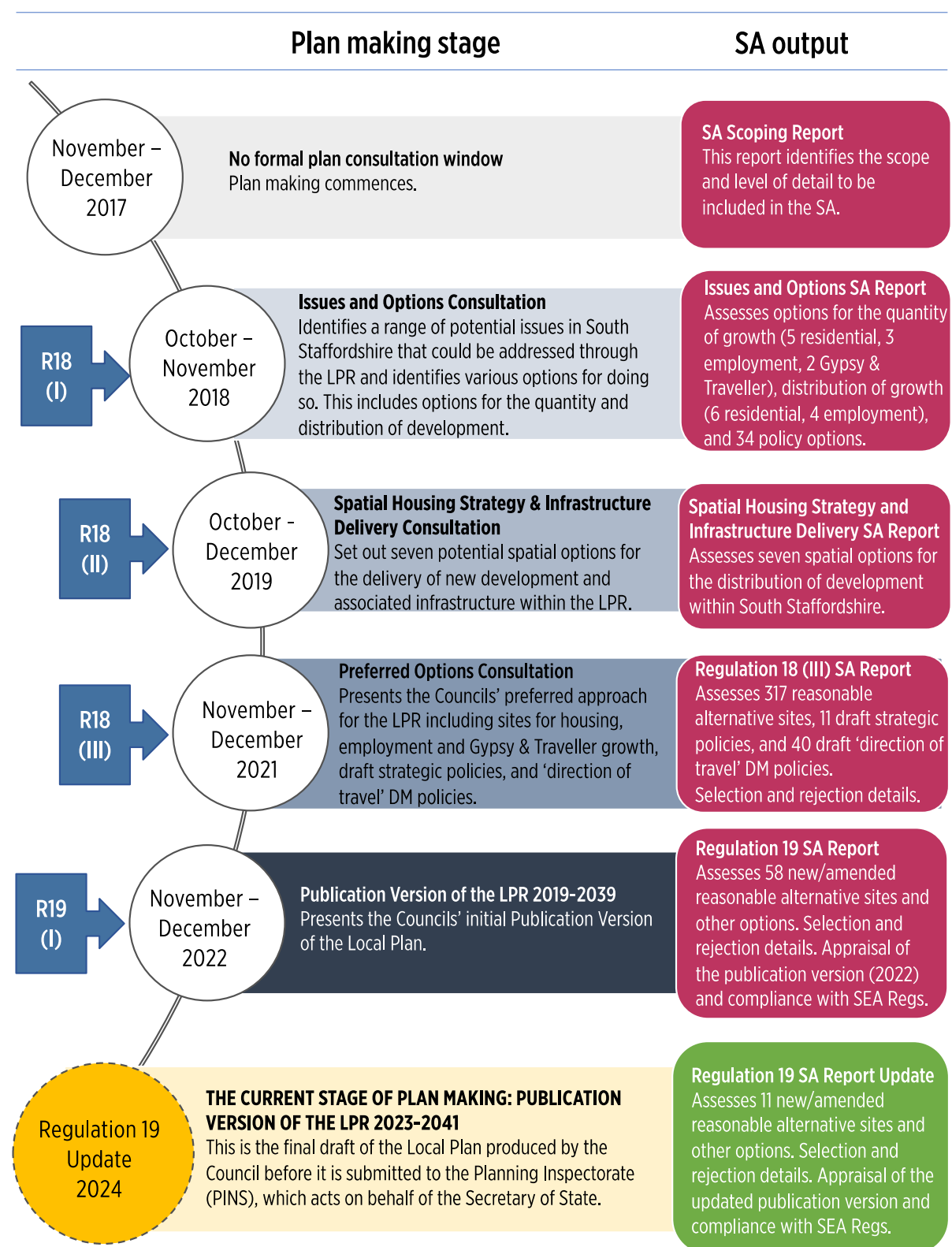


Figure 2.3: Stages in the plan making process accompanied by SA outputs

## 2.4 Meeting the requirements of the SEA Regulations

2.4.1 There are certain requirements that this report must satisfy in order for it to qualify as an 'environmental report', as set out in the SEA Regulations. These requirements, and where in the report they have been met, are presented in **Figure 2.4**.



a) Provide an outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.

See section 2.2; and Appendix A.



b) Understand the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

See the SA Scoping Report, Chapter 3, and the 'Baseline' and 'Key Issues' sections of Chapters 7 to 15.



c) The environment characteristics of areas likely to be significantly affected.

See Chapters 7 to 15.



d) 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, such as areas designated pursuant to the Birds and Habitats Directives.

See the SA Scoping Report and Chapters 7 to 15.



e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

See Appendix A.



f) The likely significant effects on the environment: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural and architectural heritage. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

See Chapters 7 to 16.



g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

See Chapters 7 to 15.



h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties in compiling the required information. See Chapters 5 and 6.



i) A description of measures envisaged concerning monitoring. See Chapter 17.



j) A non-technical summary of the information provided under the above headings.

See the Non-Technical Summary.

Figure 2.4: SEA checklist



# 3 Evolution of the environment without the Plan

## 3.1 Overview

3.1.1 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"*.

3.1.2 In the absence of the LPR, no new plan-led development would occur within the Plan area over and above that which is currently proposed in the adopted Core Strategy and SAD. In this scenario, an appeal-led system would predominate. The nature and scale of development that may come forward under an appeal-led system would be uncertain. 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.

3.1.3 **Table 3.1** considers the likely evolution of the baseline within South Staffordshire in the absence of the LPR. This takes into account information gathered at the Scoping stage and more up-to-date data and statistics.

*Table 3.1: Likely evolution without the Plan*

Theme	Likely evolution without the Plan
<b>Air</b>	<ul style="list-style-type: none"> <li>Current national trends suggest that NO<sub>2</sub> concentrations are declining in the district's AQMAs, with two of the three AQMAs being revoked in 2022.</li> <li>Traffic and congestion are likely to increase with population growth, with implications for air quality, residents and wildlife within 200m of busy roads.</li> </ul>
<b>Biodiversity, flora and fauna</b>	<ul style="list-style-type: none"> <li>Sites designated for their national and international biodiversity and/or geodiversity value will continue to benefit from legislative protection.</li> <li>Biodiversity and wildlife sites would be likely to continue to benefit from the Staffordshire Biodiversity Action Plan by increasing in extent, resilience and quality.</li> <li>Potential negative impacts on locally designated sites which benefit from local planning policy framework.</li> </ul>
<b>Climatic factors</b>	<ul style="list-style-type: none"> <li>It is anticipated that the risk of fluvial flooding is likely to increase as a result of climate change.</li> <li>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.</li> <li>Per capita emissions would be likely to decrease over time as renewable energy increases its market share.</li> <li>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.</li> </ul>
<b>Cultural heritage</b>	<ul style="list-style-type: none"> <li>Nationally designated heritage assets will continue to benefit from legislative protection.</li> <li>Locally identified assets would potentially be afforded less protection.</li> </ul>

Theme	Likely evolution without the Plan
<b>Human health</b>	<ul style="list-style-type: none"> <li>• The life expectancy of men and women is anticipated to rise over time.</li> <li>• Rates of deprivation would be likely to continue to decline.</li> <li>• 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.</li> </ul>
<b>Landscape</b>	<ul style="list-style-type: none"> <li>• The Green Belt will continue to benefit from legislative protection.</li> <li>• The district will remain a predominantly rural and agricultural landscape.</li> <li>• Increased development pressure on the open countryside areas outside the Green Belt</li> </ul>
<b>Population and material assets</b>	<ul style="list-style-type: none"> <li>• The number of jobs in the district is expected to increase based on current trend data.</li> <li>• The number of businesses is expected to increase.</li> <li>• Increasing lack of available supply of employment land to meet local and wider market demand.</li> <li>• House prices are expected to increase.</li> <li>• Less control over location of future housing including increased pressure on the areas of open countryside.</li> <li>• 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.</li> <li>• Less opportunity to enhance community benefits associated with plan-led housing proposals.</li> <li>• Less ability to refine the housing stock to meet the changing demands of existing residents such as provision of elderly specific housing accommodation.</li> <li>• Energy consumption in the transport sector is anticipated to keep rising.</li> <li>• Electricity generated from renewable sources is expected to increase slightly.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Soil</b>	<ul style="list-style-type: none"> <li>• Soil is a non-renewable resource that would continue to be lost.</li> <li>• 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.</li> </ul>
<b>Water</b>	<ul style="list-style-type: none"> <li>• Water demand may increase over time.</li> <li>• 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.</li> </ul>

## 4 Methodology

### 4.1 Scope of the Sustainability Appraisal

4.1.1 The purpose of the SA Scoping Report is to establish the scope of the sustainability appraisal. It includes information about:

- Relevant plans, programmes and their environmental objectives which may have a bearing on the SA of the LPR (see **Appendix A** for further information);
- Baseline information;
- Environmental issues and problems; and
- The SA Framework (see **Appendix B**).

4.1.2 The SA Scoping Report for the Local Plan was prepared by Lepus in 2017<sup>17</sup>. The Scoping Report was subject to a five-week period of consultation between November and December 2017 with the statutory consultees (Natural England, Historic England and the Environment Agency).

4.1.3 The appraisal uses objective geographic information relating to environmental receptors, the SA Framework and established standards (where available) to help make the assessment decisions transparent and robust.

4.1.4 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations<sup>18</sup>. The SA Objectives and the SEA Topics to which they relate are set out in **Table 4.1**.

4.1.5 Each SA Objective is considered when appraising LPR site allocations, policies and reasonable alternatives. The order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

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<sup>17</sup> Lepus Consulting (2017) Sustainability Appraisal of the South Staffordshire Local Plan Review: Scoping Report. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 05/03/24]

<sup>18</sup> 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).*”

**Table 4.1: Summary of the SA Objectives**

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	<b>Climate Change Mitigation:</b> Minimise South Staffordshire’s contribution to climate change.	Climatic factors
2	<b>Climate Change Adaptation:</b> Plan for the anticipated impacts of climate change.	Climatic factors
3	<b>Biodiversity and Geodiversity:</b> Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the district.	Biodiversity, flora and fauna
4	<b>Landscape and Townscape:</b> Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Landscape and cultural heritage
5	<b>Pollution and Waste:</b> 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	<b>Natural Resources:</b> Protect, enhance and ensure the efficient use of the district’s land, soils and water.	Soil, water and material assets
7	<b>Housing:</b> Provide a range of housing to meet the needs of the community.	Population
8	<b>Health and Wellbeing:</b> Safeguard and improve the physical and mental health of residents.	Human health and population
9	<b>Cultural Heritage:</b> Conserve, enhance and manage sites, features and areas of historic and cultural importance.	Cultural heritage
10	<b>Transport and Accessibility:</b> Improve the choice and efficiency of sustainable transport in the district and reduce the need to travel.	Climatic factors, population and material assets
11	<b>Education:</b> Improve education, skills and qualifications in the district.	Population
12	<b>Economy and Employment:</b> To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Population

## 4.2 Best practice guidance

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

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>19</sup>.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>20</sup>.
- Department for Levelling Up, Housing and Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)<sup>21</sup>.
- DLUHC and Ministry of Housing, Communities & Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)<sup>22</sup>.
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>23</sup>.

## 4.3 Appraisal process

4.3.1 The purpose of this document is to provide an appraisal of the LPR including reasonable alternatives in line with Regulation 12 of the SEA Regulations<sup>24</sup> which states that:

4.3.2 *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*

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<sup>19</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at:

[http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date accessed: 03/11/23]

<sup>20</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguides\\_ea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf) [Date accessed: 03/11/23]

<sup>21</sup> DLUHC (2023) National Planning Policy Framework, December 2023. Available at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 20/12/23]

<sup>22</sup> DLUHC & MHCLG (2023) Planning practice guidance. Available at:

<https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 24/11/23]

<sup>23</sup> RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans.

Available at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Date accessed: 03/11/23]

<sup>24</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at:

<https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/11/23]

- 4.3.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 4.1**).

**Box 4.1: Schedule 1 of the SEA Regulations<sup>25</sup>**

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

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

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

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

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

## 4.4 Impact assessment and determination of significance

- 4.4.1 Significance of effect is a combination of the sensitivity of receptors and the magnitude of anticipated impacts. Sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

<sup>25</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/11/23]

## Sensitivity

4.4.2 Sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and, for example, if impacts will affect designated areas or landscapes.

4.4.3 A guide to the range of scales used in determining sensitivity is presented in **Table 4.2**. For most receptors, sensitivity increases with geographic scale.

*Table 4.2: Impact sensitivity*

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

## Magnitude

4.4.4 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 4.3**).

*Table 4.3: Impact magnitude*

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

## 4.5 Significant effects

4.5.1 A single value from **Table 4.4** has been allocated to each SA Objective for each reasonable alternative. 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.

4.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations<sup>26</sup>, where feasible, which states that the effects should include: "*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

**Table 4.4:** Guide to scoring significant effects

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

<sup>26</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 05/03/24]



- 4.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of a spatial option in terms of the relevant SA Objective, the precautionary principle<sup>27</sup> 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 (see the second column of the SA Framework in **Appendix B**) 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 are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.
- 4.5.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 4.5.5 Significance of effect has been categorised as minor or major. **Table 4.4** sets out the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 4.5.6 Each reasonable alternative that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per **Table 4.4**. Likely impacts are not intended to be summed.
- 4.5.7 It is important to note that the assessment scores presented in **Table 4.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. Topic specific methods and assumptions in **Appendix D** offer further insight into how each significant effect score was arrived at.
- 4.6 Limitations of predicting effects**
- 4.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 4.6.2 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

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<sup>27</sup>The 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”.

4.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.

4.6.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. The appraisal of the LPR is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects.

4.6.5 All data used is secondary data obtained from the Council or freely available on the internet.

#### **4.7 SEA topic methodologies and assumptions**

4.7.1 A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives (see **Appendix D**). These should be borne in mind when considering the assessment findings.

## 5 Reasonable alternatives

### 5.1 Context

5.1.1 Regulation 12 of the SEA Regulations<sup>28</sup> states that: *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme"*.

5.1.2 PPG<sup>29</sup> states that: *"Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made"*.

5.1.3 The Council has therefore demonstrated how they have identified, described and evaluated reasonable alternatives as part of the plan making process within this SA Report (which includes the requirements of an SEA Environmental Report). The following sections of this chapter document the process of identifying and evaluating different types of reasonable alternative, when and where the Council considered reasonable alternatives, and how the SA influenced the preparation of the LPR.

### 5.2 Different types of reasonable alternatives

5.2.1 It is possible to derive reasonable alternatives for different aspects of a local plan. There is no prescribed formula or procedure about which aspects of a local plan require reasonable alternatives.

5.2.2 In the case of the LPR, 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. 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 officers<sup>30</sup>.

5.2.3 A range of reasonable alternatives have been considered throughout the plan making process, including for the following different attributes of the LPR:

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<sup>28</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/11/23]

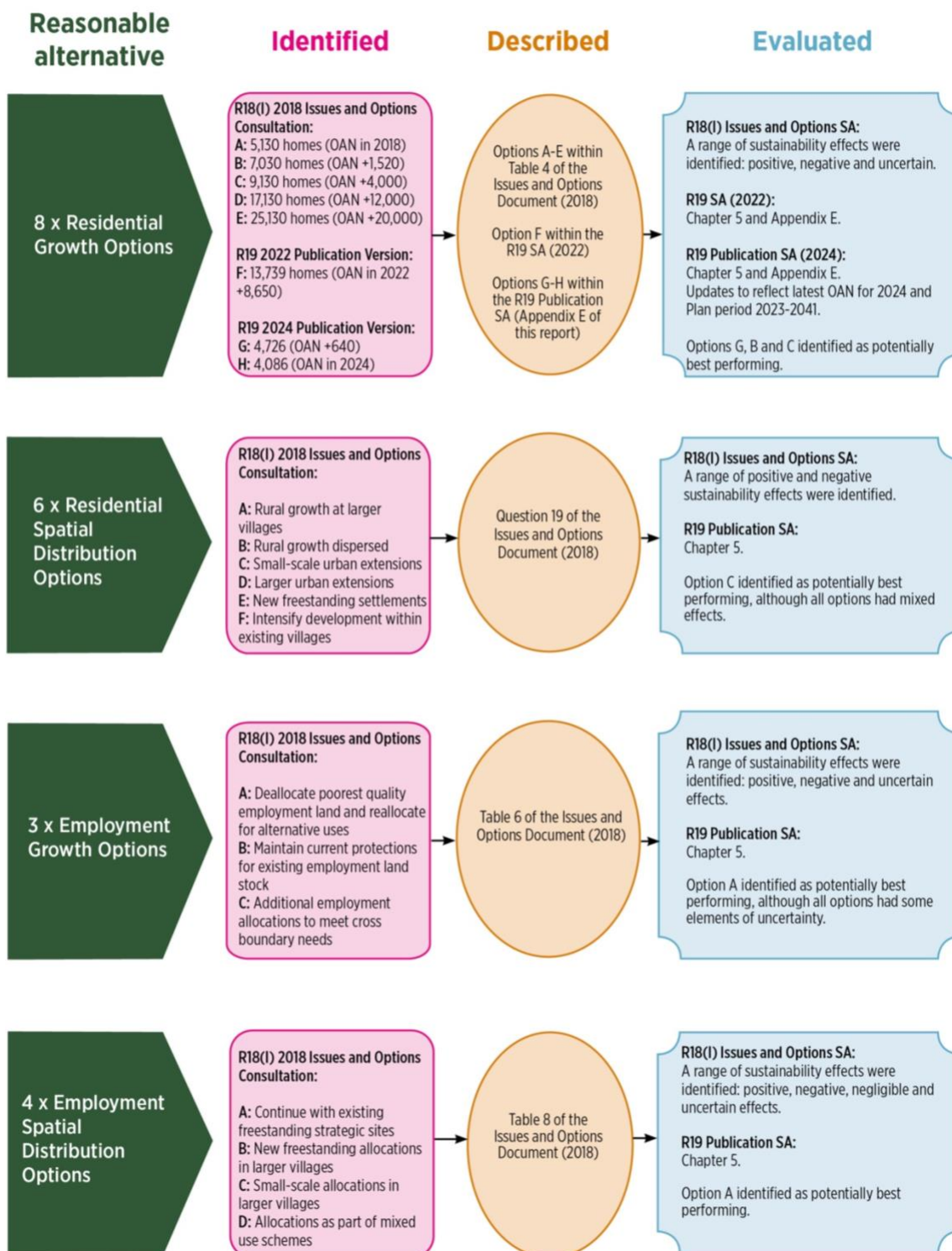
<sup>29</sup> MHCLG (2020) Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 03/11/23]

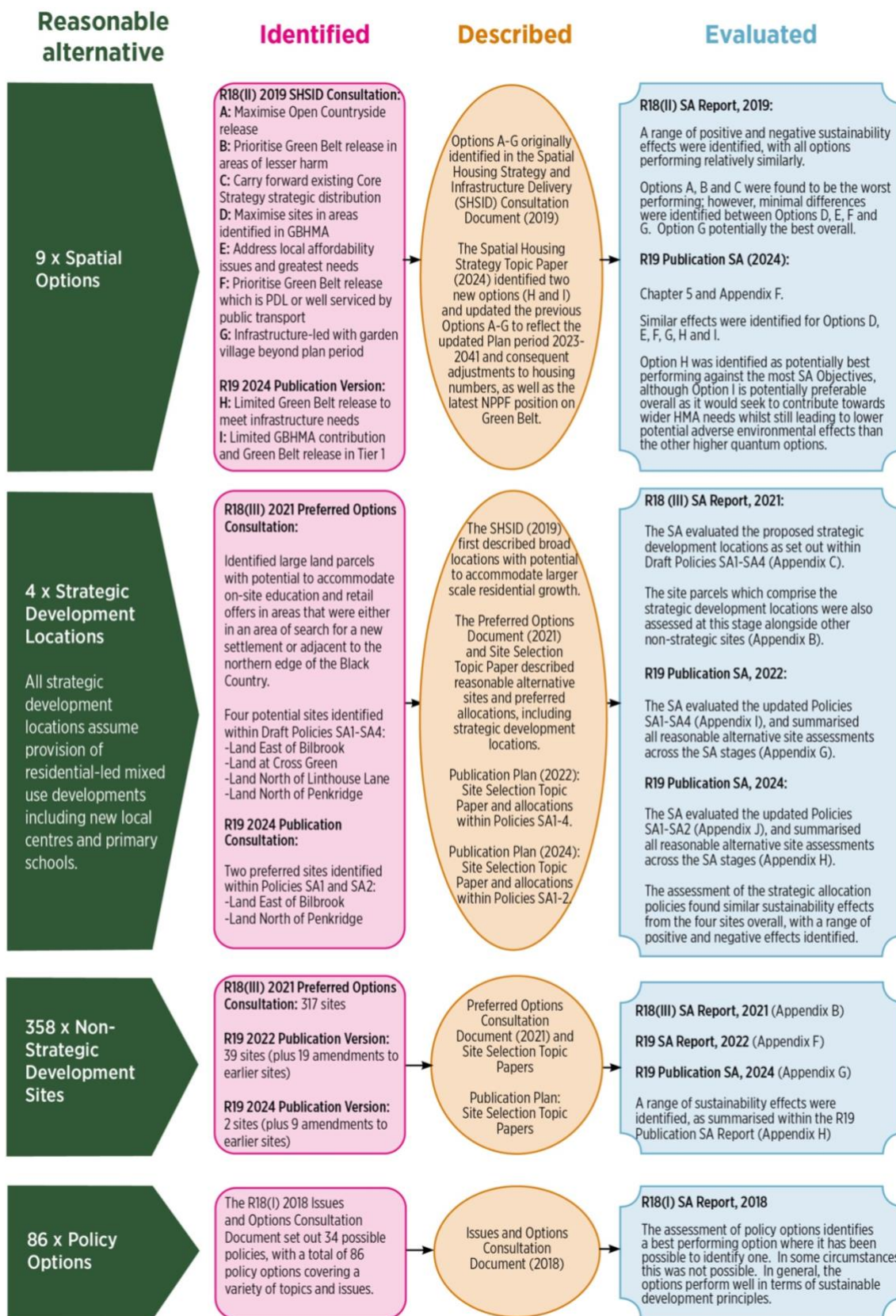
<sup>30</sup> South Staffordshire Council (2019) Statement of Community Involvement 2019. Available at: <https://www.sstaffs.gov.uk/planning/statement-of-community-involvement.cfm> [Date accessed: 03/11/23]

- **Residential Growth Options x8** (five within the Issues and Options SA Report, 2018; one within the Regulation 19 SA Report, 2022; and two as part of this consultation (see **Appendix E**));
- **Employment Growth Options x3** (see the Issues and Options SA Report, 2018);
- **Residential Spatial Distribution Options x6** (see the Issues and Options SA Report, 2018);
- **Employment Spatial Distribution Options x4** (see the Issues and Options SA Report, 2018);
- **Spatial Options x9** (seven within the Spatial Housing Strategy and Infrastructure Delivery SA Report, 2019; and two as part of this consultation (see **Appendix F**));
- **Policy Options x86** (for 34 policy areas) (see Regulation 18(I) Issues and Options SA Report, 2018);
- **Development Sites x358** (317 within the Regulation 18(III) SA, 2021; 58 (39 new) within the Regulation 19 SA, 2022; and 11 (two) as part of this consultation (see **Appendix G**)).

5.2.4 **Figure 5.1** summarises the reasonable alternatives considered throughout the plan making process, and at which chronological stage of the SA process these alternatives have been identified, described and evaluated.

# Quick guide to reasonable alternatives





**Figure 5.1:** The identification, description and evaluation of reasonable alternatives considered throughout the plan making process

## 5.3 Reasonable alternatives: growth options

### Appraisal of residential growth options (2018, 2022 and 2024)

- 5.3.1 Five options for the quantity of residential growth were assessed within the Issues and Options SA Report<sup>31</sup> (Regulation 18(I), 2018), all of which met or exceeded the objectively assessed need (OAN) for residential growth in South Staffordshire for the Plan period at the time of their preparation.
- 5.3.2 Following the preferred Options (PO) consultation, a further residential growth option was identified and was assessed within the Regulation 19 SA Report (2022)<sup>32</sup>, known as Option F.
- 5.3.3 Since the 2022 Regulation 19 consultation and in light of the updated Plan period, SSSC have identified two further residential growth options, known as Options G and H, which have been assessed in this report (please see **Appendix E** for the full assessment of the residential growth options and explanation of the limitations).
- 5.3.4 The eight residential growth options are summarised in **Table 5.1**.

**Table 5.1:** Residential Growth Options identified by SSSC (see **Appendix E**)

Option	LPR stage	Description
<b>A</b>	Reg 18(I): Issues and Options, 2018	Provide enough housing to meet South Staffordshire’s objectively assessed housing need. This option would equate to: <ul style="list-style-type: none"> <li>• <b>5,130 dwellings between 2018-2037</b></li> <li>• <b>Average yearly minimum requirement of 270 dwellings throughout the plan period</b></li> </ul>
<b>B</b>	Reg 18(I): Issues and Options, 2018	Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and a modest contribution to the housing market area’s (HMA’s) unmet housing needs. This additional contribution could reflect the maximum yearly completions historically achieved within the district amounting to 1520 dwellings. This option would equate to: <ul style="list-style-type: none"> <li>• <b>Around 7,030 dwellings between 2018-2037</b></li> <li>• <b>Average yearly minimum requirement of 370 dwellings throughout the plan period</b></li> </ul>
<b>C</b>	Reg 18(I): Issues and Options, 2018	Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and provide enough land to accommodate a minimum of an additional 4,000 dwellings towards wider housing shortfalls from the HMA (having regard to the minimum capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to: <ul style="list-style-type: none"> <li>• <b>A minimum requirement of 9,130 dwellings between 2018-2037</b></li> <li>• <b>A minimum average yearly requirement of 481 dwellings throughout the plan period</b></li> </ul>
<b>D</b>	Reg 18(I): Issues and Options, 2018	Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and provide enough land to accommodate an additional 12,000 dwellings towards wider housing shortfalls from the HMA (having regard to the mid-point capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to: <ul style="list-style-type: none"> <li>• <b>A minimum requirement of 17,130 dwellings between 2018-2037</b></li> </ul>

<sup>31</sup> Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 03/11/23]

<sup>32</sup> 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/local-plan-review-evidence-base> [Date accessed: 24/11/23]

Option	LPR stage	Description
		<ul style="list-style-type: none"> <li>• <b>A minimum average yearly requirement of 902 dwellings throughout the plan period</b></li> </ul>
<b>E</b>	Reg 18(I): Issues and Options, 2018	Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and enough land to accommodate an additional 20,000 dwellings towards wider housing shortfalls from the HMA (having regard to the upper capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study). This would equate to: <ul style="list-style-type: none"> <li>• <b>A minimum requirement of 25,130 dwellings between 2018-2037</b></li> <li>• <b>A minimum average yearly requirement of 1,323 dwellings throughout the plan period</b></li> </ul>
<b>F</b>	Regulation 19 (2022)	Provide enough housing to meet South Staffordshire’s objectively assessed housing needs, and enough land to accommodate an additional 8,650 dwellings towards wider housing shortfalls from the HMA, reflecting South Staffordshire’s migration and commuting links with the Black Country authorities and Birmingham. This would equate to: <ul style="list-style-type: none"> <li>• <b>A minimum requirement of 13,739 dwellings between 2018-2039</b></li> <li>• <b>A minimum average yearly requirement of 654 dwellings throughout the plan period</b></li> </ul>
<b>G</b>	Regulation 19 (see <b>Appendix E</b> )	Provide enough housing to meet South Staffordshire Council’s objectively assessed housing need and provide enough land to accommodate a minimum of an addition 640 dwellings towards wider housing shortfalls. This option would equate to: <ul style="list-style-type: none"> <li>• <b>A minimum requirement of 4,726 dwellings between 2023-2041</b></li> <li>• <b>Average yearly minimum requirement of 263 dwellings throughout the plan period.</b></li> </ul>
<b>H</b>	Regulation 19 (see <b>Appendix E</b> )	Provide enough housing to meet South Staffordshire Council’s objectively assessed housing need. This option would equate to: <ul style="list-style-type: none"> <li>• <b>A minimum requirement of 4,086 dwellings between 2023-2041</b></li> <li>• <b>Average yearly minimum requirement of 227 dwellings throughout the plan period.</b></li> </ul>

5.3.5 **Table 5.2** summarises the SA findings. The assessments are presented in full within the Regulation 18(I) Issues and Options SA (2018)<sup>33</sup> (Options A-E), within the Regulation 19 SA (2022)<sup>34</sup> (Option F), and within **Appendix E** of this report (Options G-H).

<sup>33</sup> Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 03/11/23]

<sup>34</sup> 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/local-plan-review-evidence-base> [Date accessed: 24/11/23]



**Table 5.2:** Summary SA findings for assessment of Residential Growth Options A-H (see **Appendix E**)

Residential Growth Option	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
Option A	--	+/-	+/-	+/-	--	+/-	+	+/-	+/-	+/-	+/-	+/-
Option B	--	+/-	+/-	+/-	--	+/-	++	+/-	+/-	+/-	+/-	+/-
Option C	--	+/-	+/-	+/-	--	+/-	++	+/-	+/-	+/-	+/-	+/-
Option D	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-
Option E	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-
Option F	--	+/-	+/-	-	--	+/-	++	-	+/-	-	-	+/-
Option G	--	+/-	+/-	+/-	--	+/-	++	+/-	+/-	+/-	+/-	+/-
Option H	--	+/-	+/-	+/-	--	+/-	+	+/-	+/-	+/-	+/-	+/-

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

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

5.3.8 Option A would meet South Staffordshire’s OAN (at the time of its identification in 2018), and Option H sets out to meet the latest OAN for 2024; however, both options would not include any provisions to meet other authorities’ needs within the HMA. As such, these two options perform the worst with respect to SA Objective 7 and would not seek to accommodate unmet needs from neighbouring authorities in accordance with the NPPF. By not seeking to accommodate any of the housing need of the wider HMA, Options A and H could lead to challenges in delivering a suitable housing mix, including affordable homes, to meet the needs of the local population.

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

**Comment from Council:** The Council’s chosen residential growth option is Option G which will see a minimum requirement of a minimum of 4726 dwellings delivered between 2023-2041. This option was tested after the November 2022 Regulation 19 consultation and was the output of the capacity of the suitable housing sites, determined through the Council’s Housing Site Assessment Topic Paper, that conformed with the preferred spatial strategy (spatial option I).

### Appraisal of employment growth options (2018)

- 5.3.10 Three options for employment growth were assessed within the Issues and Options SA Report<sup>35</sup> (Regulation 18(I), 2018), as shown in **Table 5.3**.
- 5.3.11 The employment land needs for South Staffordshire were determined through an Economic Development Needs Assessment (EDNA). The EDNA (2022)<sup>36</sup> and 2024 update identified an oversupply of employment land in the district for the Plan period, although South Staffordshire may have a role to play in helping to satisfy the employment needs of the wider Functional Economic Market Assessment (FEMA).

**Table 5.3:** *Employment Growth Options identified by SSDC (see the R18 (I) Issues and Options SA Report, 2018)*

Option	Description
<b>A</b>	<b>To reflect the oversupply of employment land in the district deallocate the poorest quality employment land as identified by the EDNA and reallocate poorer quality sites that would be suitable for alternative uses</b> This could involve a targeted approach of deallocating employment sites that are of poorer quality, and could focus on those that include vacant units/land, where these would represent a sustainable location for an alternative use such as housing. However, there is a risk that this approach would reduce flexibility in the employment land supply, and could result in an under provision if employment sites were lost unexpectedly.
<b>B</b>	<b>Maintain current protections for the existing employment land stock.</b> This reflects the oversupply of employment land in the district but would not deallocate sites in order to provide a degree of flexibility in provision.
<b>C</b>	<b>Allocate additional employment land to meet cross boundary employment needs, where an undersupply in other areas of the Functional Economic Market Area (FEMA) is robustly demonstrated.</b> This approach would seek to meet evidenced unmet needs for employment land originating from other areas of the FEMA. A surplus of employment land identified through the EDNA could form (in full or in part) to our contribution to these wider employment needs.

- 5.3.12 Option A would help to ensure that the employment land provision satisfies the local development needs, whilst seeking to make the local economy more vibrant, sustainable and balanced. Brownfield land would be freed up for redevelopment, which could help to reduce adverse impacts caused by the LPR on SA Objectives 1, 3 4 and 6. However, there could potentially be a net loss of employment floorspace over the Plan period, meaning the Council may find it more difficult under this option to contribute to the unmet needs of the wider FEMA by reducing the flexibility in employment land supply.
- 5.3.13 Option B would help to ensure that employment floorspace needs in the Plan area are satisfied over the Plan period, whilst also affording the Council some opportunities to contribute to the unmet needs of the wider FEMA. However, it would be expected that this option would not satisfy the overall unmet need from outside the district and would not free up previously undeveloped land for reallocation and redevelopment for another use.

<sup>35</sup> Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 03/11/23]

<sup>36</sup> DLP Planning Ltd (2022) Economic Development Needs Assessment 2020-2040 for and on behalf of South Staffordshire District Council, June 2022. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 05/03/24]

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

5.3.15 As shown in **Table 5.4**, overall Option A was found to result in positive impacts across the most SA Objectives; however, Option C would make the greatest contribution the unmet employment floorspace needs. The most uncertainty was identified for Option B.

**Table 5.4:** SA performance of the employment growth options (see the R18 (I) Issues and Options SA Report, 2018)

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

**Comment from Council:** The Council’s chosen employment growth option is a combination of Option B (maintain protection of existing employment land) achieved through the implementation of Policy EC2, and Option C – allocating additional employment land to meet cross boundary needs. This is achieved through Policy DS4, that confirms the Council’s ability to meet its own objectively assessed needs for employment land (62.4ha) plus a 45.2ha contribution to unmet needs of the Black Country (plus a proportion of West Midlands Interchange). The decision to proceed with this approach has been led by the Council’s Economic Development Needs Assessment (EDNA) which confirmed strong functional links between South Staffordshire and the Black Country authorities, and demonstrated a surplus pipeline of strategic employment land that is bolstered further by the allocation of the suitable new site allocation at M6, Junction 13.

## 5.4 Reasonable alternatives: spatial distribution options

### Appraisal of residential distribution options (2018)

5.4.1 Six options for residential distribution were assessed within the Issues and Options SA Report<sup>37</sup> (Regulation 18(I), 2018), as follows:

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

5.4.2 It should be noted that these residential distribution options were presented as high-level thematic options at the Issues and Options stage, and later informed the more nuanced Spatial Options (A-I) as discussed in the following sections, involving more specific apportionment between areas in the 2019 SHSID consultation. It was not envisaged that a spatial strategy could be developed by pursuing any of the residential distribution options individually.

5.4.3 As shown in **Table 5.5**, mixed effects were identified in the SA assessments of all spatial options, although Option C was found to have positive effects across nine of the 12 SA Objectives.

5.4.4 Option A would be expected to have sustainability benefits for several SA Objectives, through ensuring new housing is located in close proximity to existing services and sustainable transport options, to a greater extent than other options such as Option B.

5.4.5 Options C and D both focus on urban extensions, which would result in development on previously undeveloped land where loss of vegetation and soil may occur to a greater extent than some other options. Option D was identified to result in more potential for adverse impacts than C on the setting of cultural heritage assets owing to the larger scale extensions proposed; conversely, effects on education and employment were identified as more positive under Option D than C with a greater proportion of development being located in proximity to these services.

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<sup>37</sup> Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 03/11/23]

5.4.6 Option E performed similarly to Option D in the sense that bringing forward a new settlement may be a good opportunity to develop a relatively self-sustainable community that supports a diverse community and provides excellent access to necessary services and facilities as well as high quality natural habitats.

5.4.7 Option F would have potential to allow for more sustainable communities with more residents living in close proximity to services, facilities and public transport modes, as well as reducing overall land-take for development. However, there could potentially be over-capacity issues at some facilities and limited job opportunities in some locations depending on the scale of development.

**Table 5.5:** SA performance of the residential distribution options (see the R18 (I) Issues and Options SA Report, 2018)

Residential Spatial Distribution Option	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
Option A	+	-	-	-	-	--	++	+	-	++	++	++
Option B	-	-	-	-	-	--	++	-	+	-	-	+
Option C	+	+	-	-	-	--	++	++	+	++	+	+
Option D	+	+	-	-	-	--	++	++	-	++	++	++
Option E	-	+	-	-	-	--	++	++	-	++	++	++
Option F	-	-	-	-	-	+	+	-	-	-	-	-

**Comment from Council:** The Council’s chosen residential distribution option is a combination of Option A, focusing growth on the districts larger and better connected villages, and Option F, of introducing minimum housing densities which the Council will achieve through the implementation of Policy HC2. The decision to proceed with this approach reflects the Council’s intention under the preferred spatial option (option I) of primarily focusing development at the Council’s most sustainable Tier 1 settlement with walking access to sustainable transport, including rail. This approach is complemented by proposing minimum densities in certain locations (through Policy HC2) to ensure an efficient use of land, whilst set at a threshold that balances this with protecting local character.

### Appraisal of employment distribution options (2018)

5.4.8 Four options for employment distribution were assessed within the Issues and Options SA Report<sup>38</sup> (Regulation 18(I), 2018), as follows:

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

5.4.9 Option A focuses on existing employment sites, which benefit from existing supporting infrastructure including access to the strategic road network and would be likely provide opportunities for the reuse of previously developed land. Development in these locations is likely to be largely in keeping with the existing setting of the local area and would result in less fragmentation of the local ecological network. However, this option would be unlikely to revitalise local economies within settlements.

5.4.10 Option B would afford the Council more flexibility over the location of new employment floorspace, enabling them to situate the right types of jobs in the right locations. However, this option would be expected to require development on relatively large greenfield sites, with potential for adverse impacts on natural resources, landscape character and fragmentation of the ecological network.

5.4.11 Option C may help to enhance the vibrancy and sustainability of the local economy within existing settlements and provide residents with good access to employment opportunities. However, it is likely that this strategy would require development of greenfield sites in small settlements, with potential for adverse impacts on the local landscape/townscape character. It is also uncertain how accessible these sites would be via the strategic road network and the extent to which they would be popular with the market.

5.4.12 Option D would benefit new residents within strategic sites by co-locating homes and jobs; however, existing residents may be relatively isolated from this new floorspace. By incorporating the new employment floorspace alongside a strategic development, there could potentially be good opportunities for more efficient use of natural resources. However, at the time of assessment this was largely uncertain.

5.4.13 **Table 5.6** summarises the SA findings for these four options, with Option A identified as potentially the best performing.

<sup>38</sup> Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 03/11/23]

**Table 5.6:** SA performance of the employment distribution options (see the R18 (I) Issues and Options SA Report, 2018)

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

**Comment from Council:** The Council’s chosen employment growth option is a combination of Option A of focusing employment growth at the existing freestanding strategic employment sites and Option B of identifying new freestanding employment sites. This is a result of most of the existing pipeline of employment land being on the existing strategic employment sites, most notably at i54 and ROF Featherstone, which have been assessed by the Council through its employment site assessment topic paper as suitable for re-allocation. Proceeding with Option B reflects the opportunity to allocate the West Midland Interchange (WMI) as a strategic employment site which already has DCO consent through the NSIP process, as well as the opportunity to allocate a non-Green Belt site assessed as suitable through the employment site assessment topic paper at M6, Junction 13.

**Appraisal of spatial options (2019 and 2024)**

- 5.4.14 The Regulation 18 (II) SA Report (2019)<sup>39</sup> set out the appraisal of seven spatial options for the broad distribution of new housing growth in the Plan area, as identified in the Spatial Housing Strategy and Infrastructure Delivery (SHSID) document prepared by the Council.
- 5.4.15 The SHSID document was produced to set out new options for the approach to housing growth, following on from the previous Issues and Options stage where potential options for housing distribution were first considered. The SHSID spatial options were prepared to take on board information from responses to the Issues and Options consultation as well as new locally prepared evidence including the Green Belt and Landscape Studies.
- 5.4.16 The spatial options considered by the Council in the SHSID document (2019), and assessed in the accompanying SA, were as follows:

<sup>39</sup> 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/local-plan-review-evidence-base> [Date accessed: 03/11/23]

- **Spatial Option A** – Maximise Open Countryside release;
- **Spatial Option B** – Prioritise Green Belt land release in areas of lesser Green Belt harm;
- **Spatial Option C** – Carry forward existing Core Strategy strategic approach to distribution;
- **Spatial Option D** – Maximise sites in areas identified in the Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study;
- **Spatial Option E** – Address local affordability issues and settlements with the greatest needs;
- **Spatial Option F** – Give first consideration to Green Belt land which is previously developed or well-served by public transport; and
- **Spatial Option G** – Infrastructure-led development with a garden village area of search beyond the Plan period.

5.4.17 Since the Regulation 18 (II) stage, SSDC have identified two further spatial options in the Spatial Housing Strategy Topic Paper (2024)<sup>40</sup> which have been assessed within **Appendix F** of this SA Report:

- **Spatial Option H** – Limited Green Belt development only to meet existing critical infrastructure needs; and
- **Spatial Option I** – Limited contribution towards GBBCHMA needs and limited Green Belt development in Tier 1 settlements.

5.4.18 The assessments presented in **Appendix F** also took into account amendments to the previously assessed options A-G to align with the updated Plan period (2023-2041).

5.4.19 Through the assessment process, Spatial Options A, B and C emerge as the worst-performing options, as the proposed development under these three options could potentially result in a greater proportion of likely adverse impacts and a lower proportion of positive impacts than the other six options (see **Table 5.7**). The identified negative impacts are likely to be in regard to these options directing a higher proportion of new residents to more rural locations with limited access to essential services, such as education, employment and health centres.

5.4.20 Spatial Options D, E, F, G, H and I performed similarly overall, with likely positive impacts associated with the provision of housing beyond the identified need for South Staffordshire in locations where the majority of new residents would be expected to have good access to essential services and sustainable transport options.

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<sup>40</sup> South Staffordshire District Council (2024) The Local Plan Review: Spatial Housing Strategy Topic Paper.



5.4.21 Option H proposes the lowest quantum of growth and was identified as the best performing against the most SA Objectives (Objectives 1 – climate change mitigation, 5 – pollution and waste, and 11 – education). However, on the whole, Option I could be identified as the preferable option as it would seek to positively prepare the Plan by making a contribution towards the unmet requirements of the wider HMA, whilst proposing a significantly lower quantum of growth, and with lower potential for adverse environmental effects, than the other options.

**Table 5.7: SA performance of the spatial options (see Appendix F)**

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

**Comment from Council:** The Council has chosen Spatial Option I that distributes growth in a way that meets the district’s own needs only and provide a limited contribution towards the unmet needs of the GBBCHMA, through sustainable non-Green Belt development and limited Green Belt development in Tier 1 settlements well-served by public transport. This option was tested after the November 2022 Regulation 19 consultation and reflected confirmation in the NPPF that there is no requirement for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared. In addition, the Strategic Growth Study (2018) that the Council’s previous spatial option to deliver a 4000-home contribution to the HMA was based on, is now considered out of date. The decision to proceed with Option I reflected this change of circumstances and the balanced approach taken to still releasing some Green Belt, but focused on the districts most sustainable settlements.

## 5.5 Reasonable alternatives: policy options

### Appraisal of policy options (2018)

5.5.1 A total of 86 policy options were assessed within the Issues and Options SA Report (2018)<sup>41</sup>, covering 34 possible policies, as shown in **Table 5.8**.

**Table 5.8:** Policy options identified by SSDC (extracted from the Regulation 18 (I) Issues and Options SA Report, 2018)

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

5.5.2 The full assessment findings are presented within the Regulation 18 (I) Issues and Options SA Report (2018). Generally, the policy options performed similarly with major positive, minor positive or negligible impacts identified across the SA Objectives, with fewer policy options identified to result in minor negative effects on certain objectives.

<sup>41</sup> Lepus Consulting (2018) Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 03/11/23]

5.5.3 The assessments identified the best performing option for each policy where possible, or in some circumstances recommended that a combination of options could potentially result in the most sustainability benefits. The assessment findings were fed back to the Council and consulted on alongside the Issues and Options Paper, in order to assist with decision-making as the emerging LPR policies were developed and refined.

**Appraisal of draft policies (2021 and 2022)**

5.5.4 The Regulation 18 (III) SA Report (2021) assessed 51 draft policies within the PO version of the Local Plan: seven Site Allocation Policies, four Strategic Policies and 40 Development Management (DM) Policies.

5.5.5 The majority of the draft DM policies set out the requirements for development and seek to protect the natural and built environment and ensure there is sufficient community infrastructure to support new residents. As these policies largely seek to protect existing assets or enhance the provision of these features, the policy assessments largely identified minor positive or negligible impacts.

5.5.6 The Strategic Policies, which set out aspects of the Local Plan such as the proposed spatial strategy and the proposed strategic sites, were generally assessed as having the potential for a greater range of adverse effects in relation to environmental aspects of sustainability and greater positive effects in relation to meeting housing and employment needs.

5.5.7 The Regulation 19 SA Report (2022) included an assessment of the 55 revised LPR policies prepared at that stage, which had been updated since the PO stage.

5.5.8 **Appendix J** of this Regulation 19 SA Report presents the assessment of the 54 revised LPR policies which have been updated to consider consultation comments, the latest evidence base information and SA assessment findings.

## 5.6 Reasonable alternatives: development sites

5.6.1 The identification, description and evaluation of development sites has taken place throughout the plan making process at different stages. A total of 358 reasonable alternative sites have been considered throughout the SA process, as follows:

- The Regulation 18 (III) SA Report (2021)<sup>42</sup> included an assessment of 317 reasonable alternative sites, identified by the Council, comprising:
  - 259 residential-led sites (grouped into 28 clusters<sup>43</sup>);
  - 28 employment-led sites; and
  - 30 Gypsy, Traveller and Travelling Showpeople (GTTS) sites.
- The Regulation 19 SA Report (2022)<sup>44</sup> included an assessment of 58 reasonable alternative sites, identified by the Council since the previous stage, including:
  - 39 new sites identified since the PO Stage (16 residential-led, 13 employment-led and 10 GTTS) which were considered in addition to the 317 sites assessed within the Regulation 18 (III) SA; and
  - 19 amended versions of sites previously assessed in the Regulation 18 (III) SA (17 residential-led and two employment-led). The amendments related primarily to boundary alterations whereby landowners or site promoters had re-submitted their sites.
- The updated Regulation 19 SA Report (this report) includes an assessment of 11 reasonable alternative sites, identified by the Council since the previous stage (see **Appendix G**). Of these 11 sites:
  - Nine are amended versions of sites previously assessed in the Regulation 18 (III) or Regulation 19 (2022) SA, primarily relating to boundary alterations whereby landowners or site promoters have re-submitted their sites. As such, these nine site assessments supersede those previously presented; and
  - Two are new sites that have been identified since the Regulation 19 (2022) stage and have been considered in addition to the 356 sites previously assessed.

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<sup>42</sup> 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/local-plan-review-evidence-base> [Date accessed: 03/11/23]

<sup>43</sup> It should be noted that the clusters assessed within the SA are not synonymous with the settlements identified in the Preferred Options Plan. The cluster analysis is based on geographically proximate clusters of site options. The sites have all been assessed individually, but sites within a cluster are expected to have similar impacts on terms of access to services and facilities and proximity to local environmental assets.

<sup>44</sup> 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/local-plan-review-evidence-base> [Date accessed: 24/11/23]

- 5.6.2 A range of positive and adverse effects on sustainable development arising from the reasonable alternative sites have been identified in the SA process. Adverse effects were mainly related to issues associated with the rural nature of much of the development, including the loss of previously undeveloped land and 'best and most versatile' (BMV) soil, the location of development in areas of high landscape sensitivity and/or where development could cause harm to the Green Belt purposes, as well as the access of site end users to a number of social facilities including schools, healthcare services, local shops and transport services. Positive effects were identified in relation to the provision of new housing and employment floorspace, as well as benefits to health and accessibility as many sites are located within a sustainable distance to public greenspaces, the PRoW network and/or cycle routes. Many sites were assessed positively for climate change adaptation owing to their location in Flood Zone 1 where fluvial flood risk is low.
- 5.6.3 All reasonable alternative development sites have been assessed before and after mitigation. The main purpose of this exercise is to avoid any risk of 'green wash': a process whereby immediate application of policy prescription can give the impression that no adverse effects will arise, without knowing the extent of adverse effect that existed in the first place. This process helps achieve transparency in the appraisal process and follows established best practice (RTPI Guidance 2018<sup>45</sup>) of presenting assessment results before and after mitigation has been applied. SA of the policies enables scrutiny of how effective the policies are as mitigation tools. **Appendix J** presents appraisal results for all policies proposed in the LPR.
- 5.6.4 All reasonable alternative sites have been assessed in terms of potential impacts on each SA Objective, the results of which are presented in their entirety in **Appendix H**. The SA impact matrix for each site, assessed 'pre-mitigation', is presented in **Table H.2.1**.
- 5.6.5 Scores should be read in conjunction with the detailed text narrative provided for each site in the relevant SA report. These tables are intended as an overview of the assessments to provide a useful indicator of sustainability performance associated with each site.
- 5.6.6 Mitigation, using the emerging LPR policies, has been applied to the SA results for each reasonable alternative site and presented in **Table H.4.1** within **Appendix H**.

#### **Strategic development sites**

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

- Land East of Bilbrook (Site 519);

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<sup>45</sup> RTPI (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Date accessed: 03/11/23]

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

5.6.9 The strategic development sites were evaluated in their entirety as part of the policy assessments in the SA, in draft form at Regulation 18 (III) and again at Regulation 19 (2022). The latest policy wording for the two preferred sites has been assessed within this report (see **Appendix J**); the evaluation of these strategic development site allocation policies is discussed further within **Chapter 6**.

## 5.7 Selection and rejection of sites

5.7.1 The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is SSDC's role 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.

5.7.2 **Appendix H** summarises the SA findings for all reasonable alternative development sites that have been appraised throughout the SA process. A total of 358 sites have been appraised in the SA, with 317 at Regulation 18(III), 39 at Regulation 19 (2022) and two within this Regulation 19 SA Report<sup>46</sup>.

5.7.3 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.

5.7.4 **Appendix I** sets out the outline reasons for selection and rejection of all reasonable alternative sites considered throughout the SA process, provided by SSDC.

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<sup>46</sup> As discussed within paragraph 5.6.1, some sites were also re-assessed at both Regulation 19 stages owing to minor boundary changes.

## 6 The preferred approach

### 6.1 LPR policies

- 6.1.1 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.
- 6.1.2 The LPR contains a total of 54 policies, including five strategic Development Strategy Policies and six Site Allocation Policies. The final LPR policies are listed in **Table 6.1**, and have been assessed in **Appendix J**.

**Table 6.1:** South Staffordshire LPR policies

Policy reference	Policy name
	<b>Development Strategy</b>
DS1	Green Belt
DS2	Green Belt compensatory improvements
DS3	Open Countryside
DS4	Development needs
DS5	Spatial Strategy to 2041
	<b>Site Allocations</b>
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
	<b>Delivering the Right Homes</b>
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
	<b>Design and Space Standards</b>
HC10	Design requirements
HC11	Protecting amenity
HC12	Space about dwellings and internal space standards
HC13	Parking provision
	<b>Promoting Successful and Sustainable Communities</b>
HC14	Health infrastructure
HC15	Education

Policy reference	Policy name
HC16	South Staffordshire College
HC17	Open space
HC18	Sports facilities and playing pitches
HC19	Green infrastructure
	<b>Building a Strong Local Economy</b>
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
	<b>Community Services, Facilities and Infrastructure</b>
EC8	Retail
EC9	Protecting community services and facilities
EC10	Wolverhampton Halfpenny Green Business Airport
EC11	Infrastructure
EC12	Sustainable transport
EC13	Broadband
	<b>Protecting and Enhancing the Natural Environment</b>
NB1	Protecting, enhancing and expanding natural assets
NB2	Biodiversity
NB3	Cannock Chase SAC
NB4	Landscape character
	<b>Climate Change and Sustainable Development</b>
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
	<b>Enhancing the Historic Environment</b>
NB8	Conservation, preservation and protection of historic assets
NB9	Canal network



## 6.2 Development strategy policies

- 6.2.1 Policies DS1 to DS5 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 open countryside.
- 6.2.2 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.
- 6.2.3 SSDC’s spatial strategy seeks to locate development primarily in accordance with the settlement hierarchy, where new residents would generally be expected to have better access to existing services and facilities and access to sustainable transport. This approach has the potential to reduce greenhouse gas (GHG) emissions in comparison to a more dispersed pattern of development.
- 6.2.4 A range of sustainability impacts have been identified in the policy assessments, as shown in **Table 6.2**, with Policies DS1, DS2 and DS3 generally resulting in minor positive or negligible effects owing to the policies setting out protection for the Green Belt and open countryside. More varied effects are anticipated as a result of Policies DS4 and DS5, which set out the overall requirements for housing, employment and Gypsy and Traveller growth within the Plan period. Whilst these policies would be likely to ensure that the needs of the population are met, they also raise the potential for adverse impacts on many of the environmentally focused SA Objectives as a result of the large scale of proposed growth.
- 6.2.5 The assessment of these policies is provided in **Appendix J** and summarised in **Table 6.2**.

**Table 6.2:** Summary of development strategy policy assessments (see **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	-	-	-	--	-	--	++	-	-	-	-	++

## 6.3 Site allocation policies

- 6.3.1 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.
- 6.3.2 Strategic Policies SA1 to SA3 set out SSDC’s preferred locations for housing development, SA4 Gypsy and Traveller development, and SA5 employment development. Policy MA1 sets out requirements to improve the sustainability of the strategic sites under Policies SA1 (Land East of Bilbrook) and SA2 (Land North of Penkridge). The sustainability performance of these policies is provided in **Appendix J** and summarised in **Table 6.3**.
- 6.3.3 A range of positive and negative effects have been identified during the assessment of the Strategic Allocation Policies SA1 and SA2. In general, the strategic sites perform well against housing provision and access to education and employment; however, the large scale of development proposed at these currently undeveloped locations could potentially result in adverse effects on some SA Objectives, for example impacts on sensitive landscapes, natural resources and pollution.
- 6.3.4 The strategic site allocated through Policy SA1 and a small number of non-strategic sites allocated through Policy SA3 lie within the Green Belt, where according to the Green Belt Study there is potential for harm to the purposes of the Green Belt from removing these land parcels; this must also be considered alongside the other sustainability criteria. The Green Belt Study sets out a number of recommendations to help to mitigate the effects of removal of land from the Green Belt.

**Table 6.3:** Summary of site allocation policy assessments (see **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
MA1	+	+	+	+	+	+	+	++	+	+	+	0
SA1	-	0	0	--	-	-	++	-	0	-	++	+
SA2	-	0	0	--	-	-	++	-	0	+	++	+
SA3	+/-	0	-	--	-	-	++	-	-	-	-	-
SA4	0	-	-	-	-	-	+	-	-	-	-	--
SA5	-	--	-	-	-	-	0	-	-	-	0	++

## 6.4 Development management policies

6.4.1 The majority of the policies set out the requirements for development, seeking 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; protecting and enhancing natural assets such as biodiversity, heritage, the landscape (including the setting of Cannock Chase AONB); and managing flood risk and surface water, amongst others. As these policies largely seek to protect existing assets or enhance the provision of these features, the accompanying policy assessments largely identify minor positive or negligible impacts. The sustainability performance of the policies is provided in **Appendix J** and summarised in **Table 6.4**.

**Table 6.4:** Summary of policy assessments (see **Appendix J**)

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
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	+

	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
EC8	+	0	0	0	0	0	0	0	0	+	0	+
EC9	+	0	0	0	0	0	0	+	0	+	0	+
EC10	0	0	0	0	0	0	0	0	0	0	0	+
EC11	0	0	+	0	0	0	0	+	0	+	+	0
EC12	+	0	0	0	+	0	0	+	0	++	+	+
EC13	+	0	0	0	0	0	0	0	0	+	+	+
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

## 6.5 Assessment of site allocations

6.5.1 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 and discussed in **section 6.3**:

- SA1: Land East of Bilbrook (Site 519); and
- SA2: Land North of Penkrige (Sites 420, 584 and 010).

6.5.2 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.

6.5.3 The post-mitigation SA findings for the sites chosen for allocation by SSDC are summarised in **Table 6.5**, illustrating a range of identified sustainability effects identified through the assessment process.

6.5.4 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 6.5:** Summary of post-mitigation site assessments for allocated sites (extracted from **Appendix H**)

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
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	-	++	--

## 6.6 Whole plan appraisal

6.6.1 The following chapters present an assessment of the likely significant effects associated with the LPR in relation to the following topics:

- Air (**Chapter 7**);
- Biodiversity, flora and fauna (**Chapter 8**);
- Climatic factors (**Chapter 9**);
- Cultural heritage (**Chapter 10**);
- Human health (**Chapter 11**);
- Landscape (**Chapter 12**);
- Population and material assets (**Chapter 13**);
- Soil (**Chapter 14**); and
- Water (**Chapter 15**).

6.6.2 Each of the topic sections are presented in terms of baseline, impacts, mitigation and residual effects, where appropriate. The topics have been appraised in terms of plan-wide impacts and draw on all aspects of the SA process, including the findings presented for the assessment of policies and site allocations (see **Volume 3: Appendices** for the full assessments). The assessments include consideration of the impacts arising as a consequence of the inter-relationship between the different topics and identify secondary, cumulative and synergistic effects where they arise.

# 7 Air

## 7.1 Baseline

7.1.1 Poor air quality is directly linked to mortality, such as through heart disease, lung disease and various cancers. Particulate matter is predominantly associated with vehicular emissions, although agriculture, combustion from domestic heating and the construction industry are also significant sources. The fraction of mortality thought to be attributable to particulate air pollution is slightly less in South Staffordshire than it is for the West Midlands and England as a whole (see **Table 7.1**).

**Table 7.1:** Fraction of mortality attributable to particulate air pollution (2021)<sup>47</sup>

Region	Fraction of mortality attributable to particulate air pollution
South Staffordshire	5.1%
West Midlands	5.5%
England	5.5%

7.1.2 Poor air quality, and in particular excess atmospheric nitrogen deposition, can also have a variety of impacts on the natural environment which often result in losses in biodiversity, resulting from eutrophication, acidification and toxicity<sup>48,49</sup>.

7.1.3 At the time of carrying out the SA assessments at the Regulation 18 stages, three AQMAs were identified in South Staffordshire, predominantly associated with busy roads including the M6, A5 and A4601. These AQMAs are:

- AQMA No.1 – Woodbank;
- AQMA No.4 – Wedges Mills; and
- AQMA No.5 – Oak Farm.

7.1.4 There are several AQMAs adjacent to South Staffordshire, including:

- Cannock Chase AQMA;
- Cannock Chase District Council (CCDC) AQMA 1 and 2;
- Dudley AQMA;
- Walsall AQMA; and
- Wolverhampton AQMA.

<sup>47</sup> Office for Health Improvement and Disparities (2023) Public Health Profiles: Fraction of mortality attributable to particulate air pollution (new method). Available at: <https://fingertips.phe.org.uk/search/air%20pollution#page/4/gid/1/pat/15/ati/401/are/E07000196/iid/93861/age/230/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1> [Date accessed: 03/11/23]

<sup>48</sup> Sala, O. E. *et al.* (2000) Global biodiversity scenarios for the year 2100. *Science*. 287:1770-1774

<sup>49</sup> Air Pollution Information System (2016) Nitrogen Oxides (NOx). Available at: [http://www.apis.ac.uk/overview/pollutants/overview\\_NOx.htm](http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm) [Date accessed: 03/11/23]

- 7.1.5 Actions in the Council's 2008 Air Quality Action Plan<sup>50</sup> for improving air quality in each AQMA are generally centred around reducing congestion. Air quality in the district is improving, with the Council having revoked three AQMAs in 2022<sup>51</sup>. The latest information from DEFRA indicates one remaining AQMA in the district, known as 'AQMA No. 5 Oak Farm'<sup>52</sup>. The Council is continuously monitoring air quality in the district and has found that air quality is relatively good on the whole for the pollutants which are monitored.
- 7.1.6 Air quality impacts from vehicles are most likely to occur within 200m of the road<sup>53</sup>. It is therefore considered to be likely that, where residents are living within 200m of a relatively busy road, they will be exposed to poor air quality which is known to have long term health consequences.
- 7.1.7 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 NO<sub>2</sub>.
- ⇒ 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.

<sup>50</sup> South Staffordshire District Council (2008) Air Quality Action Plan, Draft for consultation, April 2008. Available at: [https://uk-air.defra.gov.uk/assets/documents/no2ten/Local\\_zone35\\_SouthStaffordshire\\_AQActionplan\\_1.pdf](https://uk-air.defra.gov.uk/assets/documents/no2ten/Local_zone35_SouthStaffordshire_AQActionplan_1.pdf) [Date accessed: 29/11/23]

<sup>51</sup> DEFRA (2023) Local Authority Details: South Staffordshire District Council. Available at: [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=250](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=250) [Date accessed: 05/03/24]

<sup>52</sup> DEFRA (2023) AQMA Dataset (correct as of October 2023). Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 05/03/24]

<sup>53</sup> Design Manual for Roads and Bridges (2019) LA 105 Air Quality. Available at: <https://www.standardsforhighways.co.uk/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Date accessed: 27/11/23]



<sup>54</sup> The Department for Transport in their Transport Analysis Guidance (TAG) consider that, "beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant". Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date accessed: 27/11/23]



## 7.2 Impacts on air

7.2.1 **Box 7.1** presents a plan-wide summary of the adverse impacts on air that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. **Box 7.2** lists the policies within the LPR which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on air. Where there are no mitigating policies, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 7.3** explores the nature of these residual effects.

### *Box 7.1: Summary of identified impacts on air*

Impact on air	Summary of identified effect
 <p><b>Reduction in air quality with implications for human health and biodiversity</b></p>	<p>Impacts on air quality may arise during construction and operation of different types of development proposed within the LPR. This includes new development which would be likely to increase the volume of traffic and associated emissions within the Plan area.</p> <p>An increase in air pollution from vehicle emissions could potentially have adverse impacts on biodiversity assets through mechanisms such as eutrophication, acidification and increased toxicity. Some sensitive ecosystems, including Habitats sites and SSSIs (see <b>Chapter 8</b>) are identified to be vulnerable to the impact of atmospheric nitrogen deposition.</p> <p>Exposure to sources of air pollution could potentially have adverse effects on the health of local residents, with children, the elderly and those of poor health identified as the most vulnerable. Development within or in close proximity to AQMAs would be likely to make it more difficult to achieve National Air Quality Objectives<sup>55</sup> within these areas.</p> <p>At the time of assessment, seven allocated sites were identified to be located within, or within 200m of, an AQMA. This includes three sites within 200m of CCDC AQMA which borders South Staffordshire to the north east, and three sites within 200m of Wolverhampton AQMA which borders the district to the east. One site, 010, was located within 200m of 'AQMA No. 1 (Woodbank)' which has since been revoked.</p> <p>18 allocated sites are located within 200m of a main road, raising the potential for air quality impacts associated with atmospheric pollution from vehicular traffic.</p>
 <p><b>Increased pollutant emissions</b></p>	<p>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 NO<sub>2</sub> and PM<sub>10</sub> would be released into the atmosphere, with adverse effects on local air quality.</p>

<sup>55</sup> Defra (no date) UK and EU Air Quality Limits. Available at: <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> [Date accessed: 27/02/24]

## 7.3 Local Plan mitigation

- 7.3.1 Various LPR policies aim to protect local air quality and seek to mitigate the impacts of air pollution, particularly in terms of protecting residential amenity. This includes several policies which seek to promote sustainable transport and active travel, to help reduce reliance on private car use. Policies also seek to increase the quality and quantity of GI across the Plan area which may indirectly benefit air quality.
- 7.3.2 The mitigating effects of the LPR on increases in GHGs are discussed in **Chapter 9**. The mitigating effects of the LPR in relation to air quality on biodiversity and human health are discussed further in **Chapters 8** and **11** respectively. Policies which would be expected to help mitigate the impact of development on air quality are presented in **Box 7.2**.

*Box 7.2: Mitigating effects of the LPR planning policies on air*

Policy mitigation for air	Summary of mitigating effect
 <p><b>Policy mitigation for impact of reduction in air quality</b></p>	<p>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.</p> <p>Policy HC19 'Green Infrastructure' supported by other policies such as HC10 'Design Requirements', would help to increase the quality of green infrastructure (GI) and may serve to filter air pollution to some extent.</p> <p>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.</p>
 <p><b>Policy mitigation for impact of increased pollutant emissions</b></p>	<p>Policy EC1 'Sustainable economic growth' seeks to promote the provision of active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the GI network.</p> <p>Policy HC13 'Parking Provision' also introduces the requirement for electric vehicle charging points and supports electric public transport where appropriate. This would serve to encourage the use of electric vehicles and reduce noise and air pollution to some extent.</p> <p>Policy EC12 'Sustainable Transport' sets out a wide range of measures to improve sustainable travel choices, including strengthening bus and rail services, 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.</p> <p>Policy MA1 'Master Planning Strategic Sites' sets out various requirements for the development of the two strategic sites, including provision of a "<i>Movement Framework and Access Strategy</i>" which promotes public transport and active travel.</p> <p>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>

## 7.4 Residual effects on air

- 7.4.1 Following the implementation of the LPR mitigation, residual adverse effects on air quality would be anticipated. This is primarily in relation to a likely increase in vehicles and traffic-associated emissions. The residual effects are discussed in **Box 7.3**.
- 7.4.2 LPR policies would be expected to reduce adverse impacts associated with the exposure of site end users to poor air quality, including that within or adjacent to AQMAs and alongside main roads. However, these policies would not be expected to fully mitigate the adverse impacts on air pollution associated with the scale of proposed development across the Plan area.
- 7.4.3 It is also acknowledged that collectively the policies in the LPR listed in **Box 7.2**, combined with other transport improvements, could potentially lead to localised improvements in air quality. This is also dependent on other PPPs and implementation of transport proposals at the strategic and site level. This should form part of the monitoring proposals for the LPR (see **Table 17.1**). Cumulative effects are summarised in **Chapter 16** of this report.

### *Box 7.3: Residual effects for air*

Residual effect	Further details of the residual effect
<b>Reduction in air quality</b>	<p>The introduction of 4,726 dwellings and 107.45ha of employment floorspace would be expected to increase vehicle emissions in the Plan area. The policies outlined in <b>Box 7.2</b> would be expected to reduce the likelihood of adverse impacts occurring and could potentially help reduce these adverse impacts. However, due to the volume of development proposed, an increase in traffic flows and subsequent reduction of air quality would be expected to have residual adverse effects which cannot be fully mitigated through LPR policies alone.</p> <p>Over time, technological advances, such as transitioning to electric vehicles and promoting sustainable transport options, along with legislative changes and behavioural shifts, are expected to improve air quality by reducing vehicle emissions. Strategies outlined in various plans and policies, including the Local Transport Plan, Air Quality Action Plan, Clean Air Strategy and 25 Year Environment Plan, would be expected to reduce air pollution from development activities to some extent.</p> <p><b>A reduction in air quality across the Plan area would be expected to be a long-term but potentially temporary significant effect.</b></p>
<b>Increased pollutant emissions</b>	<p>Whilst the policies outlined in <b>Box 7.2</b>, coupled with technological advances and alternative solutions to energy generation and transport modes, would be expected to reduce the likelihood of adverse impacts occurring an increase in pollutants including NO<sub>2</sub> and PM<sub>10</sub> would be expected following the development proposed within South Staffordshire. The introduction of 4,726 dwellings and 107.45ha of employment floorspace would be expected to increase traffic volumes and energy demand, which would be expected to result in an increase of pollutant emissions and associated impacts on air quality.</p> <p><b>An increase in pollutant emissions in would be likely to be a long-term but potentially temporary significant effect.</b></p>

## 8 Biodiversity, flora and fauna

### 8.1 Baseline

#### Internationally designated sites

- 8.1.1 Habitats sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive<sup>56</sup> and Special Protection Areas (SPAs) classified under the Birds Directive<sup>57</sup>. Additionally, the NPPF requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated Habitats sites.
- 8.1.2 These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU, have become part of the National Site Network.
- 8.1.3 There is one Habitats site in the district, Motte Meadows SAC, designated for its lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*). Threats and pressures which the lowland hay meadows of the SAC are vulnerable to, and which the LPR should therefore seek to avoid, include water pollution, hydrological changes, water abstraction and changes in land management<sup>58</sup>.
- 8.1.4 Cannock Chase SAC sits just outside the district, adjacent to its north-eastern perimeter (see **Figure 8.1**) and comprises an area of heathland designated for its northern Atlantic wet heaths with *Erica tetralix* and European dry heaths. The identified threats and pressures to the qualifying features of Cannock Chase SAC include air pollution (atmospheric nitrogen deposition), hydrological changes, and public access and disturbance<sup>59</sup>. Mitigation measures have been agreed to address potential increases in visitor use on the SAC resulting from additional housing allocations. A 15km Zone of Influence (ZOI) has been identified through analysis of visitor survey data<sup>60</sup>, within which new development could potentially have an adverse impact on the SAC. These mitigation measures apply to additional developments arising within the north-east of the district.

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<sup>56</sup> European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. Available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN> [Date accessed: 03/11/23]

<sup>57</sup> European Directive 2009/147/EC on the conservation of wild birds. Available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147&from=EN> [Date accessed: 03/11/23]

<sup>58</sup> Natural England (2014) Site Improvement Plan: Motte Meadows. Available at: <http://publications.naturalengland.org.uk/publication/6519033218203648> [Date accessed: 03/11/23]

<sup>59</sup> Natural England (2014) Site Improvement Plan: Cannock Chase. Available at: <http://publications.naturalengland.org.uk/publication/4957799888977920> [Date accessed: 03/11/23]

<sup>60</sup> Underhill-Day, J. & Liley, D. (2012) Cannock Chase Visitor Impacts Mitigation Report. Footprint Ecology. Unpublished Report.

- 8.1.5 Beyond any geographic zone, pathways via which the LPR may have an impact outside of the ZOI also need to be considered. A Habitats Regulations Assessment (HRA) has been undertaken alongside the preparation of the LPR to provide an assessment of the potential threats and pressures to Habitats sites and analysis of potential impact pathways. The evolving outputs of this process have informed the SA.
- 8.1.6 The HRA identified potential for likely significant effects regarding: recreation (Cannock Chase SAC, Motte Meadows SAC); water issues (Motte Meadows SAC); and air quality (Cannock Chase SAC, Cannock Extension Canal SAC, Motte Meadows SAC, Pasturefield Saltmarsh SAC, West Midlands Mosses SAC and Midlands Meres & Mosses Phase 1 and Phase 2 Ramsar). These issues were explored through the Appropriate Assessment.
- 8.1.7 The Publication Draft HRA (2022)<sup>61</sup> 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 that stage and ongoing traffic data collection was required in order to complete the HRA. The emerging HRA to support the 2024 version of the Publication Plan will provide the latest information regarding the necessary mitigation to ensure that no adverse effects will occur.

### **Nationally designated sites**

- 8.1.8 Natural England designates Sites of Special Scientific Interest (SSSIs) under the Wildlife and Countryside Act 1981 (as amended). There are 11 SSSIs in the district (see **Figure 8.1**):
- Kinver Edge;
  - The Wilderness and Vermin Valley;
  - Wollaston Ridge Quarry;
  - Checkhill Bogs;
  - Highgate Common;
  - Gospel End Road Cutting;
  - Big Hyde Rough;
  - Four Ashes Pit;
  - Belvide Reservoir;
  - Motte Meadows; and
  - Stowe Pool and Walk Mill Clay Pit.
- 8.1.9 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a tool for rapid initial assessment of the potential risks to SSSIs posed by development proposals<sup>62</sup>. Much of South Staffordshire lies within SSSI IRZs.

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<sup>61</sup> Footprint Ecology (2022) Habitats Regulations Assessment of the South Staffordshire Local Plan Review 2018-2038 (Publication Plan, Regulation 19) – Publication Draft, 10<sup>th</sup> October 2022. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-02/03\\_hra\\_october\\_2022.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-02/03_hra_october_2022.pdf) [Date accessed: 21/02/24]

<sup>62</sup> Natural England (2023) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 23 November 2023. Available online at: <https://www.data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones-england> [Date accessed: 27/11/23]

8.1.10 National Nature Reserves (NNRs) were established to protect some of the most important habitats, species and geology in the country and to provide 'outdoor laboratories' for research. Of the 224 NNRs in England, Motte Meadows NNR is the only one in South Staffordshire.

### **Ancient woodland**

8.1.11 Ancient woodland is an area that has been wooded continuously since at least 1600AD, including 'ancient semi-natural woodland' and 'plantations on ancient woodland sites', both of which have equal protection under the NPPF.

8.1.12 There are multiple areas of ancient woodland in South Staffordshire, mostly in the north of the district but fairly evenly distributed (see **Figure 8.1**).

### **Local Nature Reserves**

8.1.13 Natural England encourages local authorities to formally designate appropriate sites as Local Nature Reserves (LNR) under Section 21 of the National Parks and Access to the Countryside Act 1949. LNR designations demonstrate a commitment by the local authority to manage land for biodiversity, protect it from inappropriate development and provide opportunities for local people to study and enjoy wildlife. Six LNRs lie within South Staffordshire (see **Figure 8.2**), five of which are managed by the Council, including:

- Wyrley & Essington Canal LNR (managed by the Council);
- Shoal Hill Common LNR (managed by the Council);
- South Staffordshire Railway Walk LNR (managed by the Council);
- Wom Brook Walk LNR (managed by the Council);
- Highgate LNR; and
- Baggeridge Country Park LNR (managed by the Council).

### **Local Wildlife Sites**

8.1.14 Local Wildlife Sites (LWSs) are non-statutory designated sites, identified by local authorities in partnership with nature conservation charities, statutory agencies and ecologists, although they are privately owned. In South Staffordshire, LWSs are comprised of Sites of Biological Importance (SBIs) and Natural Heritage Sites. Grade 1 SBIs are of a greater ecological value than Grade 2 SBIs. There is a total of 69 LWSs spread throughout South Staffordshire.

### **Habitats and species**

8.1.15 The current legislation identified for UK Biodiversity Action Plan (BAP) Priority Habitats includes that provided by the NPPF<sup>63</sup> paragraph 185, which states that plans should "*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*".

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<sup>63</sup> DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 20/12/23]

8.1.16 There are a wide range of priority habitats within South Staffordshire, which is primarily dominated by deciduous woodland:

- Coastal and floodplain grazing marsh;
- Deciduous woodland;
- Good quality semi-improved grassland;
- Lowland dry acid grassland;
- Lowland fens;
- Lowland heathland;
- Lowland meadows;
- Purple moor grass and rush pastures;
- Reed beds; and
- Traditional orchard.

8.1.17 The Environment Improvement Plan (EIP) 2023<sup>64</sup> will support local biodiversity by rolling out Nature Recovery Strategies, enhancing habitats through the Species Survival Fund, and creating, restoring, and extend around 70 areas for wildlife through projects including new NNRs, and the next rounds of the Landscape Recovery Projects. The Green Infrastructure Framework<sup>65</sup> 2023 is also a commitment in the EIP; the multi-functional benefits of GI will help to conserve and enhance local habitats and ecological corridors.

8.1.18 South Staffordshire is in the process of creating a Local Nature Recovery Strategy (LNRS), working with local authorities, partner organisations and communities to identify priority areas for action<sup>66</sup>. The emerging LNRS is supported by Staffordshire Wildlife Trust, producing South Staffordshire District Nature Recovery Mapping<sup>67</sup>, that will identify where habitats may be created or enhanced to contribute to nature recovery.

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<sup>64</sup> Department for Environment, Food & Rural Affairs. Environment Improvement Plan (2023). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1168372/environmental-improvement-plan-2023.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf) [Date accessed: 14/11/23]

<sup>65</sup> Natural England. Green Infrastructure Framework (2023). Available at: <https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework> [Date accessed: 14/11/23]

<sup>66</sup> Staffordshire Newsroom (2023) County council to lead new plan for nature recovery. Available at: <https://www.staffordshire.gov.uk/Newsroom/Articles/2023/06-June/County-council-to-lead-new-plan-for-nature-recovery.aspx> [Date accessed: 29/11/23]

<sup>67</sup> Staffordshire Wildlife Trust (2020) South Staffordshire District Nature Recovery Network Mapping. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-03/biodiversity\\_network\\_recovery\\_mapping\\_2020.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-03/biodiversity_network_recovery_mapping_2020.pdf). [Date accessed: 05/01/24]

## River ecology

8.1.19 South Staffordshire lies within the Humber and the Severn River Basins. The River Basin Management Plans (RBMPs)<sup>68</sup> provide information on the ecological status of the water environment, as summarised in **Table 8.1**, and are aligned with the objectives of the Water Framework Directive.

**Table 8.1:** Ecological status of Humber (2019)<sup>69</sup> and Severn (2022)<sup>70</sup> river basin surface waterbodies

Ecological status or potential	Definition of status	No. of water bodies – Humber	No. of water bodies – Severn
High	Near natural conditions. No restriction on the beneficial uses of the water body. No impacts on amenity, wildlife or fisheries.	0	0
Good	Slight change from natural conditions as a result of human activity. No restriction on the beneficial uses of the water body. No impact on amenity or fisheries. Protects all but the most sensitive wildlife.	150	139
Moderate	Moderate change from natural conditions as a result of human activity. Some restriction on the beneficial uses of the water body. No impact on amenity. Some impact on wildlife and fisheries.	646	458
Poor	Major change from natural conditions as a result of human activity. Some restrictions on the beneficial uses of the water body. Some impact on amenity. Moderate impact on wildlife and fisheries.	159	137
Bad	Severe change from natural conditions as a result of human activity. Significant restriction on the beneficial uses of the water body. Major impact on amenity. Major impact on wildlife and fisheries with many species not present.	27	16

## Geodiversity

8.1.20 Geodiversity is the collective term describing the geological variety of the Earth’s rocks, fossils, minerals, soils and landscapes together with the natural process that form and shape them. Geodiversity underpins biodiversity by providing diversity of habitat and the ecosystem, with the soil being the link between them.

8.1.21 Geology in the district is dominated by the Warwickshire Group of the Carboniferous age, Bridgnorth Sandstone Formation of the Permian age and Sherwood Sandstone Group of the Triassic age<sup>71</sup>. Sites of important geodiversity in the district have either been designated as a SSSI or as a Regionally Important Geological Sites (RIGS). This includes:

<sup>68</sup> Environment Agency (2022). River basin management plans updated 2022. Available at: <https://www.gov.uk/guidance/river-basin-management-plans-updated-2022#accessing-the-rbmps> [Date accessed: 29/11/23]

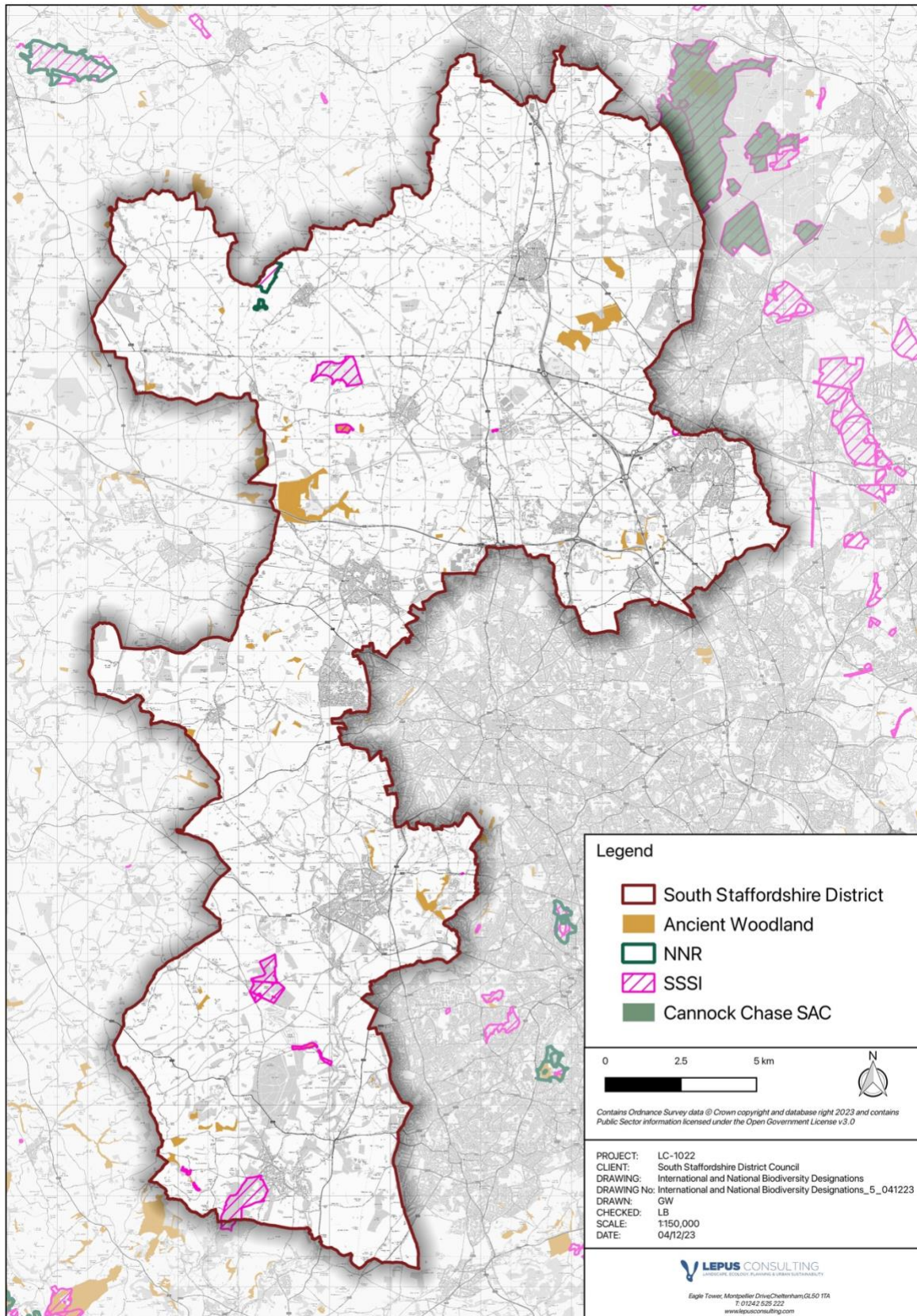
<sup>69</sup> Environment Agency (2019) Humber River Basin District: 2019 Cycle 3 data. Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/4/print> [Date accessed: 20/12/23]

<sup>70</sup> Environment Agency (2022). Severn River Basin Management Plan summary and cross border catchments (England and Wales). Available at: <https://www.gov.uk/government/publications/severn-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales/severn-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales> [Date accessed: 29/11/23]

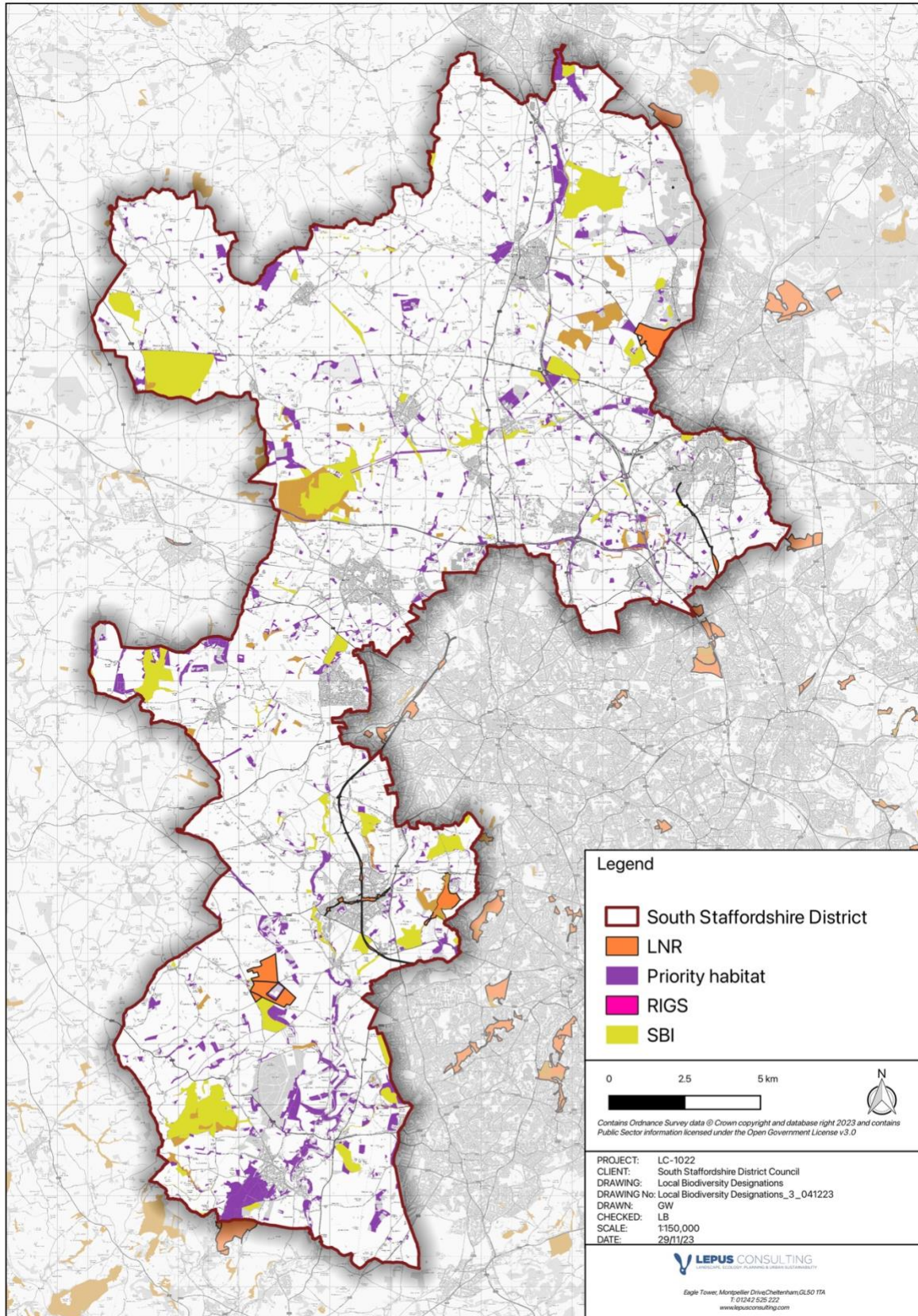
<sup>71</sup> Geodiversity Staffordshire, Staffordshire Geodiversity Action Plan, 2010. Available online at: <http://staffs-ecology.org.uk/geodiversity-action-plan/> [Date accessed: 03/11/23]



- Dark Slade Wood, Teddesley Hay RIGS;
- Lydiates Hill, Baggeridge Country Park, Himley RIGS;
- Orton Hill Quarry, Wombourne RIGS;
- Four Ashes Pit SSSI;
- Gospel End Road Cutting SSSI;
- Kinver Edge SSSI; and
- Wollaston Ridge Quarry SSSI.



**Figure 8.1:** International and national designations for biodiversity in South Staffordshire



**Figure 8.2:** Local biodiversity designations in South Staffordshire

- 8.1.22 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 IRZs of one or more SSSIs.
- ⇒ It is essential that there is a coherent ecological network of habitats that enable the free movement of species and gene exchange.
- ⇒ It will be necessary to ensure there will be no adverse impact on the site integrity of Habitats sites, either alone or in-combination, as a result of the LPR via the emerging HRA.

### **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


## **8.2 Impacts on biodiversity, flora and fauna**

- 8.2.1 **Box 8.1** presents a plan-wide summary of the adverse impacts on biodiversity, flora and fauna that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. **Box 8.2** lists the policies within the LPR which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on biodiversity, flora and fauna. Where there are no mitigating policies, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 8.3** explores the nature of these residual effects.

**Box 8.1: Summary of identified impacts on biodiversity, flora and fauna**

Impact on biodiversity	Summary of identified effect
 <p><b>Threats or pressures to Habitats sites</b></p>	<p>No allocated sites are located within or immediately adjacent to Habitats sites. The potential for Likely Significant Effects on Habitats sites (including Motte Meadows SAC within the Plan area, and Cannock Chase SAC which has an identified ZOI partially within the Plan area) arising as a result of all site allocations has been considered in further detail within the emerging HRA<sup>72</sup>. The Appropriate Assessment includes consideration of hydrological considerations (water quantity and quality and hydrological linkages), air quality impacts and recreational pressures.</p>
 <p><b>Threats or pressures to nationally designated biodiversity sites</b></p>	<p>No allocated sites are located within or immediately adjacent to SSSIs or NNRs.</p> <p>30 allocated sites are located within an IRZ which states that development proposals in these zones should be consulted upon with Natural England.</p> <p>One allocated site, SAD379, is identified as having potential to adversely affect Motte Meadows NNR which is located approximately 900m from the site.</p> <p>Potential impacts on SSSIs and NNRs include increased recreational disturbance caused by residents visiting the designated sites (including direct effects such as trampling and indirect effects of disturbance to ground nesting birds from dog walking), and poor air quality due to an increase in vehicular movements on roads near to sensitive habitats.</p>
 <p><b>Threats or pressures to locally designated and non-statutory biodiversity or geodiversity sites</b></p>	<p>Adverse impacts due to development on locally designated sites could potentially include direct impacts on habitats and / or indirect impacts such as increased recreational disturbance caused by local residents visiting these sites.</p> <p>Three allocated sites have been identified as having potential to result in adverse impacts on LNRs. This relates to Site 536a which is located adjacent to 'Wyrley and Essington Canal' LNR, and Sites 523 and GT17 which are located in close proximity to this LNR.</p> <p>Four allocated sites are located adjacent to SBIs: Sites SAD139, 536a, E33 and GT32.</p> <p>No adverse impacts have been identified with regard to RIGS and geology.</p>
 <p><b>Impacts on habitats of principal importance (priority habitats) and ancient woodland</b></p>	<p>Four allocated sites coincide with habitats of principal importance (priority habitats); Sites 010 285, E18 and E33 coincide with deciduous woodland, and Site 010 also coincides with coastal and floodplain grazing marsh. These habitats can support a range of species of principal importance.</p> <p>Three allocated sites are located in close proximity to ancient woodlands: GT14 to Essington Wood, 416 to Ladywell Wood and E44 to Ash Coppice.</p> <p>Potential impacts associated with loss of habitats includes:</p> <ul style="list-style-type: none"> <li>• Direct Impacts: Permanent loss of priority habitat in short term.</li> </ul>


<sup>72</sup> Footprint Ecology (2022) Habitats Regulations Assessment of the South Staffordshire Local Plan Review 2018-2038 (Publication Plan, Regulation 19) – Publication Draft, 10<sup>th</sup> October 2022

Impact on biodiversity	Summary of identified effect
 <p><b>Impacts on ecological networks and multi-functional green infrastructure</b></p>	<ul style="list-style-type: none"> <li>Secondary impacts of habitat loss such as reduced habitat connectivity and increased fragmentation, with increased fragility of habitats.</li> <li>Indirect effects: Reduced ecological coherence.</li> </ul> <p>The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur. The assessment recognises these impacts at all receptor types at the landscape scale. Impacts include:</p> <ul style="list-style-type: none"> <li>Direct and cumulative effects associated with fragmentation of the habitat mosaic.</li> <li>Indirect impacts of reduction of genetic diversity.</li> <li>Secondary effects of loss of species richness and diversity.</li> </ul> <p>It should also be acknowledged that previously developed land and urban areas can also provide biodiversity value, in some cases to a greater extent than undeveloped locations such as intensively farmed agricultural land. Developments in urban areas may also result in losses to the GI network, and should consider ways to accommodate and retain ecological links amongst the built form.</p>

### 8.3 Local Plan mitigation

8.3.1 Several policies within the LPR aim to protect and enhance biodiversity within the Plan area. The policies discussed in **Box 8.2** would be expected to provide effective protection for biodiversity assets, and therefore, would be expected mitigate some of the adverse impacts identified in **Box 8.1**.

*Box 8.2: Mitigating effects of the LPR planning policies on biodiversity*

Policy mitigation for biodiversity	Summary of mitigating effect
 <p><b>Threats or pressures to Habitats sites</b></p>	<p>Policy NB3 'Cannock Chase SAC' will support the recommendations of the SAC Partnership which has developed a strategy to mitigate the effects of development on Cannock Chase SAC. Alongside other Partner Authorities, SSDC has signed a Memorandum of Understanding (MOU) agreeing to formally support evidence base reports prepared by Footprint Ecology and acknowledge the 15km ZOI relating to recreational pressures on the SAC. Mitigation measures have been agreed in the form of Strategic Access Management and Monitoring Measures (SAMMMs) within South Staffordshire, including monetary payment of £290.58 per dwelling and a single legal administration fee of £100 per agreement<sup>73</sup>.</p> <p>An HRA is being prepared which will identify any likely significant effects as a consequence of the emerging Local Plan on Cannock Chase SAC and other Habitats sites within the influence of the LPR. Potential effects on</p>

<sup>73</sup> 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](https://www.sstaffs.gov.uk/sites/default/files/2023-03/cannock_chase_sac_mitigation_guidance_2022.pdf) [Date accessed: 28/02/24]

Policy mitigation for biodiversity	Summary of mitigating effect
	<p>Habitats sites can relate to increases in recreational pressure, changes in air quality and changes to hydrology, amongst others. The ZOI for effects on a Habitats site can be extensive, for example, as a result of changes to air quality as a consequence of commuting patterns. The ZOI and nature of any effects and the mitigation of those effects are evaluated in the emerging HRA.</p>
 <p><b>Threats or pressures to nationally designated biodiversity sites</b></p>	<p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' states that "<i>Development proposals which directly or indirectly cause harm to sites of national importance (whether individually or in combination with other developments) will not be permitted</i>", which includes SSSIs and NNRS.</p>
 <p><b>Threats or pressures to locally designated and non-statutory biodiversity or geodiversity sites</b></p>	<p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' seeks to safeguard local sites, including SBIs, RIGS and LNRs, from development in line with the mitigation hierarchy. The policy also supports the restoration, creation and enhancement of habitats and linkages between these sites and contributions towards the Nature Recovery Network.</p>
 <p><b>Impacts on habitats of principle importance and ancient woodland</b></p>	<p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' protects habitats and priority species in accordance with the provisions of the relevant statutory and national policy, and states that "<i>loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees will not be acceptable unless there are wholly exceptional reasons and a suitable compensation strategy is agreed</i>".</p> <p>Policy NB4 'Landscape Character' seeks to ensure that development proposals retain and protect all trees, woodland and hedgerows.</p>
 <p><b>Impacts on ecological networks and multi-functional green infrastructure</b></p>	<p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' supports the restoration, creation and enhancement of habitats and linkages between these sites and contributions towards the Nature Recovery Network.</p> <p>Policy NB2 'Biodiversity' will require development proposals to consider biodiversity as part of any proposal and supports the inclusion of features such as green walls, roofs, bat and bird boxes. All new development will be required to deliver a 10% biodiversity net gain, measured in accordance with Defra's biodiversity metric.</p> <p>Policy 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.</p>

Policy mitigation for biodiversity	Summary of mitigating effect
	Policy HC19 states that all development proposals should seek to maximise on-site provisions for GI, with likely benefits for biodiversity and wildlife habitats.

## 8.4 Residual effects on biodiversity, flora and fauna

8.4.1 Following the implementation of LPR policies, mixed effects are identified regarding biodiversity assets. It is likely that impacts on the majority of biodiversity assets would be mitigated through the LPR policies, notably Policy NB1; however, there is some uncertainty at this stage regarding air quality impacts on Habitats sites which can be confirmed when the final HRA is available. The residual effects of the LPR on biodiversity are discussed in **Box 8.3**.

*Box 8.3: Residual effects for biodiversity, flora and fauna*

Residual effects	Further details of the residual effect
<b>Threats or pressures to Habitats sites</b>	<p>Policy NB3 supports the recommendations of the Cannock Chase SAC Partnership which has developed a strategy to mitigate the effects of development on Cannock Chase SAC.</p> <p>The Publication Draft HRA (2022)<sup>74</sup> concluded that adverse effects on integrity from recreation and water issues could be ruled out, alone or in combination. However, adverse effects on integrity relating to air quality could not be ruled out at this stage and ongoing traffic data collection is required in order to complete the HRA. At the time of writing, the HRA has not been completed and so the residual effect on Habitats sites is uncertain.</p>
<b>Threats or pressures to nationally designated biodiversity sites</b>	Policy NB1 would be expected to mitigate adverse impacts arising from development proposals that have potential to adversely affect SSSIs or NNRs, pending consultation with Natural England regarding sites which lie within SSSI IRZs which indicate the proposed use as a threat to nearby SSSIs. Consultation with Natural England will occur through the consultation of the LPR, this SA and the planning application stage, and consequently, the LPR would not be expected to result in a residual adverse impact on SSSIs across the Plan area.
<b>Threats or pressures to locally designated and non-statutory biodiversity or geodiversity sites</b>	<p>The LPR policies would be expected to mitigate adverse impacts arising from development proposals which are situated in close proximity to locally designated and non-statutory biodiversity assets.</p> <p>Following the requirements of the LPR policies for the conservation and enhancement of these biodiversity assets as well as the improvement and maintenance of the wider GI network, it is anticipated that potential adverse impacts would not be significant.</p>
<b>Impacts on habitats of principal</b>	Policy NB1 would be expected to mitigate adverse impacts arising from development proposals which are situated in close proximity to ancient woodland and habitats of principle importance. In addition, many other LPR policies sets out requirements to

<sup>74</sup> Footprint Ecology (2022) Habitats Regulations Assessment of the South Staffordshire Local Plan Review 2018-2038 (Publication Plan, Regulation 19) – Publication Draft, 10<sup>th</sup> October 2022



Residual effects	Further details of the residual effect
<b>importance and ancient woodland</b>	<p>provide GI and biodiversity enhancements which would be expected to help reduce the loss of habitats of principle importance.</p> <p>The provision of buffer zones for ancient woodland and veteran trees could further inform policy provisions. For instance, consideration could be given to specifying minimum and preferred buffers to ancient woodland and veteran trees alongside a requirement for appropriate arboricultural surveys in accordance with Forestry Commission and Natural England Guidance<sup>75</sup>.</p>
<b>Impacts on the ecological network</b>	<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><b>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.</b></p>

<sup>75</sup> Natural England (2022). Ancient woodland, ancient trees and veteran trees: protecting them from development. Available at: <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#:~:text=For%20ancient%20woodlands%2C%20you%20should,metres%20to%20avoid%20root%20damage.&text=A%20buffer%20zone%20around%20an,the%20diameter%20of%20the%20tree> [Date accessed: 03/11/23]

## 9 Climatic factors

### 9.1 Baseline

9.1.1 Anthropogenic climate change is predominantly the result of greenhouse gas (GHG) emissions. GHGs are emitted from a wide variety of sources, including transport, construction, agriculture and waste. A major source of GHGs within the influence of LPAs is vehicle emissions. The majority of residents will have at least one vehicle per household. It is likely that residential development proposed within the Plan would result in more vehicles on the road, and consequently a likely increase in GHG emissions, contributing to the 'greenhouse effect' and exacerbating anthropogenic climate change. Encouraging active travel or use of public transport are effective ways to help reduce vehicle numbers and as a result, reduce GHG emissions.

9.1.2 The Climate Change Act 2008<sup>76</sup> is the basis for the UK's approach to tackling climate change. It requires emissions of carbon dioxide and other GHGs to be reduced and that climate change risks are prepared for, and establishes the framework to deliver these requirements. The Committee on Climate Change report 'Net Zero – The UK's contribution to stopping global warming'<sup>77</sup> recommended new emission targets: reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050. The Net Zero Strategy<sup>78</sup> sets out policies and proposals for decarbonising all sectors of the UK economy to meet this target.

### Renewable energy

9.1.3 One strategy to combat GHG emissions is to reduce the quantity of energy produced via fossil fuel led energy production<sup>79</sup>. In the last two decades, there has been a significant increase in the volume of energy generated through renewable energy sources with approximately 42% of electricity generated in the UK from renewable sources between April and June 2023<sup>80</sup>.

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<sup>76</sup> Climate Change Act 2008. Available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents> [Date accessed: 03/11/23]

<sup>77</sup> Committee on Climate Change (2019) Net Zero – The UK's contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date accessed: 02/11/23]

<sup>78</sup> Department for Energy Security and Net Zero & DBEIS (2022) Net Zero Strategy: Build Back Greener. Available at: <https://www.gov.uk/government/publications/net-zero-strategy> [Date accessed: 20/12/23]

<sup>79</sup> RTPi (2018) Renewable Energy: Planning's role in delivering renewable energy in the new low carbon economy. Available at: <https://www.rtpi.org.uk/research/2018/june/renewable-energy/> [Date accessed: 06/11/23]

<sup>80</sup> Department for Energy Security and Net Zero (2023) Energy trends: UK, April to June 2023: Statistical Release 28 September 2023. Available at: [https://assets.publishing.service.gov.uk/media/6513ffd13d371800146d0c5a/Energy\\_Trends\\_September\\_2023.pdf](https://assets.publishing.service.gov.uk/media/6513ffd13d371800146d0c5a/Energy_Trends_September_2023.pdf) [Date accessed: 03/11/23]

9.1.4 The promotion of on-site renewable or low carbon technologies incorporated with new development in South Staffordshire would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. This would help to reduce the volume of GHGs emitted into the atmosphere and would in turn reduce South Staffordshire’s contributions towards the causes of climate change. South Staffordshire generated 43,121 MWh of renewable energy across 1,340 installations in 2020<sup>81</sup>.

### Carbon emissions

9.1.5 Carbon dioxide (CO<sub>2</sub>) emissions per capita in South Staffordshire were greater than in any other authority in Staffordshire in 2021, apart from Staffordshire Moorlands, primarily because of the energy used for transport purposes<sup>82</sup> (see **Table 9.1**).

**Table 9.1:** Total and per capita territorial carbon dioxide emissions in 2021 in Staffordshire<sup>83</sup>

Local authority	Total emissions (ktCO <sub>2</sub> )	Population estimate	Per capita emissions (tCO <sub>2</sub> )
Cannock Chase	323.8	100,590	3.2
East Staffordshire	656.0	124,477	5.3
Lichfield	643.6	106,909	6.0
Newcastle-under-Lyme	701.4	123,025	5.7
<b>South Staffordshire</b>	<b>816.9</b>	<b>110,793</b>	<b>7.4</b>
Stafford	868.8	137,231	6.3
Staffordshire Moorlands	1,069.6	95,993	11.1
Tamworth	239.9	78,838	3.0
<b>Staffordshire Total</b>	<b>5,319.9</b>	<b>877,856</b>	<b>6.1</b>

9.1.6 The requirement to improve the energy efficiency of homes stems from the legal requirements to reduce CO<sub>2</sub> emissions set out in the Climate Change Act 2008 and the government’s Net Zero Strategy 2021. The Net Zero Strategy sets out to reduce greenhouse gas emissions by 55% by 2025, 68% by 2030, 78% by 2035 and 100% by 2050<sup>84</sup>.

<sup>81</sup> Department for Business, Energy and Industrial Strategy (2021) Regional Renewable Statistics: Renewable electricity by local authority, 2014 to 2020. Available at <https://www.gov.uk/government/statistics/regional-renewable-statistics>. [Date accessed: 03/11/23]

<sup>82</sup> CAMCO (2010) Staffordshire County-wide Renewable / Low Carbon Energy Study. Available at: [https://www.staffsmoorlands.gov.uk/media/1216/CAMCO-Staffordshire-County-Wide-Renewable--Low-Carbon-Energy-Study-June-2010/pdf/Staffordshire\\_LDF\\_Evidence\\_Base\\_Report\\_V6\\_ISSUED\\_FINAL.pdf?m=1480440065920](https://www.staffsmoorlands.gov.uk/media/1216/CAMCO-Staffordshire-County-Wide-Renewable--Low-Carbon-Energy-Study-June-2010/pdf/Staffordshire_LDF_Evidence_Base_Report_V6_ISSUED_FINAL.pdf?m=1480440065920) [Date accessed: 03/11/23]

<sup>83</sup> Department for Energy Security and Net Zero & Department for Business, Energy and Industrial Strategy (2023) UK local authority and regional greenhouse gas emissions and national statistics 2005 – 2021. Available at: <https://www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics> [Date accessed: 20/12/23]

<sup>84</sup> HM Government (2021) Net Zero Strategy: Build Back Greener. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1033990/net-zero-strategy-beis.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf) [Date accessed: 03/11/23]

9.1.7 The significant majority of carbon emissions in South Staffordshire are from the transport sector (see **Table 9.2**). Total carbon emissions in the district have been decreasing slowly between 2011 and 2019. In that time, there has been a slight decrease in industry and commercial carbons emissions, a significant decrease in domestic sourced carbon emissions and a minor increase in transport associated emissions.

**Table 9.2:** CO<sub>2</sub> emissions by sector for each year from 2019-2021<sup>85</sup>

Period	Industry	Commercial	Public Sector	Domestic	Transport	Agriculture	Waste Management	Total
2019	144.7	11.2	20.0	161.2	484.5	17.5	0.2	<b>820.5</b>
2020	125.8	10.0	21.5	158.0	421.9	16.6	0.2	<b>735.2</b>
2021	144.9	16.0	21.0	163.5	472.0	17.8	0.2	<b>816.9</b>

### Adapting to climate change

9.1.8 Climate change has the potential to result in a range of environmental risks within South Staffordshire and nationally, such as those associated with increased heatwaves in the summer months and more frequent storm events in the winter. This can have implications across a range of receptors, such as for sewer capacity due to heavy rainfall and biodiversity in terms of the habitat distribution of species sensitive to local conditions.

9.1.9 Much of South Staffordshire comprises Green Belt and agricultural land, with varying sizes of urbanised areas distributed across the district. Woodland areas are present, but most are fragmented. Local initiatives to plant native broad-leaved trees across South Staffordshire aim to increase awareness of environmental impacts<sup>86</sup>.

9.1.10 Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. Flooding is considered within **Chapter 15 – Water**, and loss of previously undeveloped land has been considered within **Chapter 14 – Soil**.

9.1.11 The Green Infrastructure Framework<sup>87</sup> will ensure that planning authorities and developers meet the requirements in the NPPF to consider GI in local plans and in new development. The LPR area would benefit from GI enhancements to receive the associated benefits.

<sup>85</sup> Department for Energy Security and Net Zero & Department for Business, Energy and Industrial Strategy (2023) UK local authority and regional greenhouse gas emissions and national statistics 2005 – 2021. Available at: <https://www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics> [Date accessed: 20/12/23]

<sup>86</sup> South Staffordshire Council (2022) Local Initiatives. Available at: <https://www.sstaffs.gov.uk/environment/local-initiatives.cfm> [Date accessed: 03/11/23]

<sup>87</sup> Natural England. Green Infrastructure Framework (2023). Available at: <https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework> [Date accessed: 14/11/23]

9.1.12 The layout and design of future development can have benefits to achieving sustainable development and reducing contributions to climate change. Although specific detail of development is outside the scope of a local plan, the LPR could potentially help to encourage the development of more energy efficient homes to help reduce the demand on energy and improve energy efficiency in the home, which can include Eco Houses, Zero Carbon Homes and Passivhaus<sup>88</sup>.

9.1.13 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 CO<sub>2</sub> emissions in South Staffordshire decreasing over time; however, CO<sub>2</sub> 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



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<sup>88</sup> Urbanist Architecture. How to design Eco, Passivhaus and Zero Carbon Homes. Available at: <https://urbanistarchitecture.co.uk/how-to-design-eco-houses-passivhaus-and-zero-carbon-houses/> [Date accessed: 06/11/23]

## 9.2 Impacts on climatic factors

9.2.1 **Box 9.1** presents a plan-wide summary of the adverse impacts on climatic factors that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. **Box 9.2** lists the policies within the LPR which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on climatic factors. Where mitigating policies are silent on climatic factors, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 9.3** explores the nature of these residual effects.


### *Box 9.1: Summary of identified impacts on climatic factors*


Impact on climatic factors	Summary of identified effect
 <p><b>Increased carbon emissions</b></p>	<p>The proposed development of 4,726 dwellings and 107.45ha of employment floorspace within the LPR would be likely to increase carbon and GHG emissions, to some extent, 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.</p>
 <p><b>Loss of multi-functional green infrastructure</b></p>	<p>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. Multi-functional GI is vital in helping to reduce the adverse impacts of climate change.</p>

## 9.3 Local Plan mitigation

9.3.1 The contents of the LPR would be likely to help reduce the adverse impacts of the Plan in relation to climatic factors, with policies focusing on sustainable economic growth, construction and transport, as well as managing flood risk and enhancing Green Infrastructure. Policies which are anticipated to help mitigate the impacts identified in **Box 9.1**, are discussed in **Box 9.2**.

### *Box 9.2: Mitigating effects of the LPR planning policies on climatic factors*

Policy mitigation for climatic factors	Summary of mitigating effect
 <p><b>Increased carbon emissions</b></p>	<p>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.</p> <p>Policy HC13 'Parking Provision' includes requirements for electrical vehicle charging facilities for development proposals to meet.</p>

Policy mitigation for climatic factors	Summary of mitigating effect
	<p>Policies EC8 'Retail' and EC9 'Protecting Community Services and Facilities' seek to maintain the vitality of village centres in existing settlements and in doing so may reduce the need to travel by car to access facilities.</p> <p>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.</p> <p>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.</p> <p>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 BREEAM Excellent standard.</p> <p>Policy MA1 'Master Planning Strategic Sites' sets out various requirements for the development of the two strategic sites, including provision of a "<i>Movement Framework and Access Strategy</i>" which promotes public transport and active travel.</p>
 <p><b>Loss of multi-functional green infrastructure</b></p>	<p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' seeks to conserve and enhance biodiversity features including soils and other non-designated ecological features such as hedgerows and mature trees. Policy NB2 'Biodiversity' will ensure that all new development delivers 10% biodiversity net gain and considers opportunities to incorporate biodiversity features within developments. Vegetation provides several ecosystem services, including carbon storage as well as cooling/shading effects, and will contribute towards the wider multi-functional GI network.</p> <p>Policy EC1 'Sustainable Economic Growth' sets out the broad requirements in relation to economic development, including the creation/enhancement of multifunctional green spaces and the GI network. These measures would contribute to climate change mitigation and adaptation.</p> <p>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> <p>Policy MA1 'Master Planning Strategic Sites' sets out various requirements for the development of the two strategic sites, including provision of a "<i>Green Infrastructure Framework</i>" to set out a hierarchy of open space throughout each site.</p>

## 9.4 Residual effects on climatic factors

9.4.1 The LPR sets out several policies which aim to help mitigate the adverse impacts relating to climatic factors (see **Boxes 9.1** and **9.2**). However, the implementation of these requirements would not be expected to fully mitigate the adverse impacts associated with net increases in greenhouse gases. **Box 9.3** lists the likely residual effects of the LPR in relation to climatic factors.

### *Box 9.3: Residual effects for climatic factors*

Residual effects	Further details of the residual effect
<b>Increased carbon and GHG emissions</b>	<p>Based on an average of 2.3 people per dwelling in South Staffordshire<sup>89</sup>, the proposed development of 4,726 dwellings over the Plan period could increase the local population by approximately 10,869 new residents. These residents would be expected to increase traffic flows and vehicular emissions, as well as increase energy demand in the Plan area. This would, in turn, exacerbate the effects of climate change.</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. However, over time, advances in technologies and alternative solutions would be expected to reduce this adverse impact to some extent.</p> <p><b>An increase in carbon emissions in South Staffordshire would be likely to be a long-term and permanent significant effect. A carbon budgeting exercise for the district could inform further measures to reduce climate change impacts and climate change action plans in South Staffordshire.</b></p>
<b>Loss of multi-functional green infrastructure</b>	<p>Several LPR policies aim to conserve and enhance multi-functional GI across the district and encourage development proposals to seek opportunities to incorporate links and increase connectivity of the wider GI network. Furthermore, the LPR would help to ensure that climate change adaptability measures and 'future-proofing' of developments is considered, through various policies which seek to allow for high quality green and blue infrastructure links to support health and wellbeing, active travel, biodiversity, and enhancements to natural capital.</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 multi-functional GI, resulting in a positive effect on provision of GI in the longer term.</p>

<sup>89</sup> Based on 2021 Census population data (110,500) and 2021 dwelling stock information (48,064).

ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> and DLUHC & MHCLG (2022) Live tables on dwelling stock. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date accessed: 03/11/23]



# 10 Cultural heritage

## 10.1 Baseline

### Designated features

10.1.1 The district has a wide range of designated statutory and non-statutory heritage assets, including Listed Buildings, Registered Parks and Gardens (RPGs), Scheduled Monuments (SMs), conservation areas and archaeological sites (see **Figure 10.1**). Listed buildings are buildings with special architectural or historic interest. RPGs include gardens, grounds and other planned open spaces, such as town squares. SMs comprise a variety of historic features including below-ground remains, archaeological sites and monuments, which are considered to be of national importance. These important heritage assets are protected through the planning system via conditions imposed on developers and other mechanisms.

10.1.2 Local authorities designate conservation areas in any area of 'special architectural or historic interest' whose character or appearance is worth conserving or enhancing. This is judged against local and regional criteria rather than national importance as is the case with listing. Conservation area designations increase the planning authority's control over demolition of buildings and over certain alterations to residential properties that would normally be classed as 'permitted development' and not require planning permission. There are 19 conservation areas located in South Staffordshire<sup>90</sup>.

10.1.3 Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the listed buildings, SMs, conservation areas, wreck sites and RPGs in England deemed to be 'at risk'. In South Staffordshire, this includes<sup>91</sup>:

- Site of Pennocrucium, east of Stretton Bridge, Brewwood and Coven / Lapley, Stretton and Wheaton Aston – a SM on private land, vulnerable to arable ploughing;
- Roman fort west of Eaton House, Brewwood and Coven – a SM on private land, vulnerable to arable ploughing;
- Enclosures and cursus, south east of Efflinch, Barton-under-Needwood – a SM on private land, vulnerable to arable ploughing;
- Bowl Barrow, south west of Merryton Low, Onecote, Staffordshire Moorlands – a SM on government/agency land, vulnerable to natural erosion;
- Roman camp, Kinvaston, Penkridge / Lapley, Stretton and Wheaton Aston – a SM on private land vulnerable to stock erosion;
- Stable Court at Four Ashes Hall, Four Ashes, Enville – a Grade II\* Listed Building owned by a commercial company, in a very bad condition and at immediate risk of further rapid deterioration or loss of fabric with no solution agreed; and

<sup>90</sup> South Staffordshire District Council (2022) List of conservation areas. Available at: <https://www.sstaffs.gov.uk/planning/conservation-areas.cfm> [Date accessed: 03/11/23]

<sup>91</sup> Historic England (2023) Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?searchType=HAR&search=South+Staffordshire> [Date accessed: 20/12/23]

- Sandfields Pumping Station east Building, Chesterfield Road, Lichfield – a Grade II\* Listed Building owned by a commercial company, in poor condition and vacant. At risk of slow decay with no solution agreed.

### **Non-designated features**

- 10.1.4 It should be noted that not all the district's historic environment resource and heritage assets are subject to statutory designations; non-designated features comprise a significant aspect of heritage, which is often experienced on a daily basis by many people – whether at home, work or leisure. Whilst not listed, many buildings and other features are of historic interest. Likewise, not all nationally important archaeological remains are scheduled. There may be unrecorded archaeological artefacts in the area, which have not yet been discovered.
- 10.1.5 The Archaeology Data Service shows 2,438 records of physical archaeological evidence in the county of Staffordshire<sup>92</sup>. This includes records of known features as well as digs and excavations, some of which resulted in archaeological finds.
- 10.1.6 Maintaining local distinctiveness, character and sense of place alongside delivering development can present challenges. However, new development can also stimulate new investment and potentially enhance the local townscape or improve the accessibility of heritage assets for local residents. Historic England advocate seeking opportunities alongside development for delivering heritage-led regeneration<sup>93</sup>, creating a strong sense of place and local distinctiveness, encouraging the use of traditional building skills, and promoting climate change resilience and innovative reuse of historic buildings where appropriate<sup>94</sup>. Engaging with and celebrating cultural heritage also provides a number of opportunities to benefit wellbeing, social inclusion and equality<sup>95</sup>.
- 10.1.7 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.

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<sup>92</sup> Archaeology Data Service (2016) ARCHSEARCH. Available at:

<https://archaeologydataservice.ac.uk/archsearch/browser.xhtml> [Date accessed: 03/11/23]

<sup>93</sup> Deloitte (2017) Heritage Works: A toolkit of best practice in heritage regeneration. Available at:

<https://historicengland.org.uk/images-books/publications/heritage-works/> [Date accessed: 03/11/23]

<sup>94</sup> Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment – Historic England Advice Note 8. Available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> [Date accessed: 06/11/23]

<sup>95</sup> Historic England (2018) Wellbeing and the Historic Environment. Available at: <https://historicengland.org.uk/images-books/publications/wellbeing-and-the-historic-environment/wellbeing-and-historic-environment/> [Date accessed: 06/11/23]

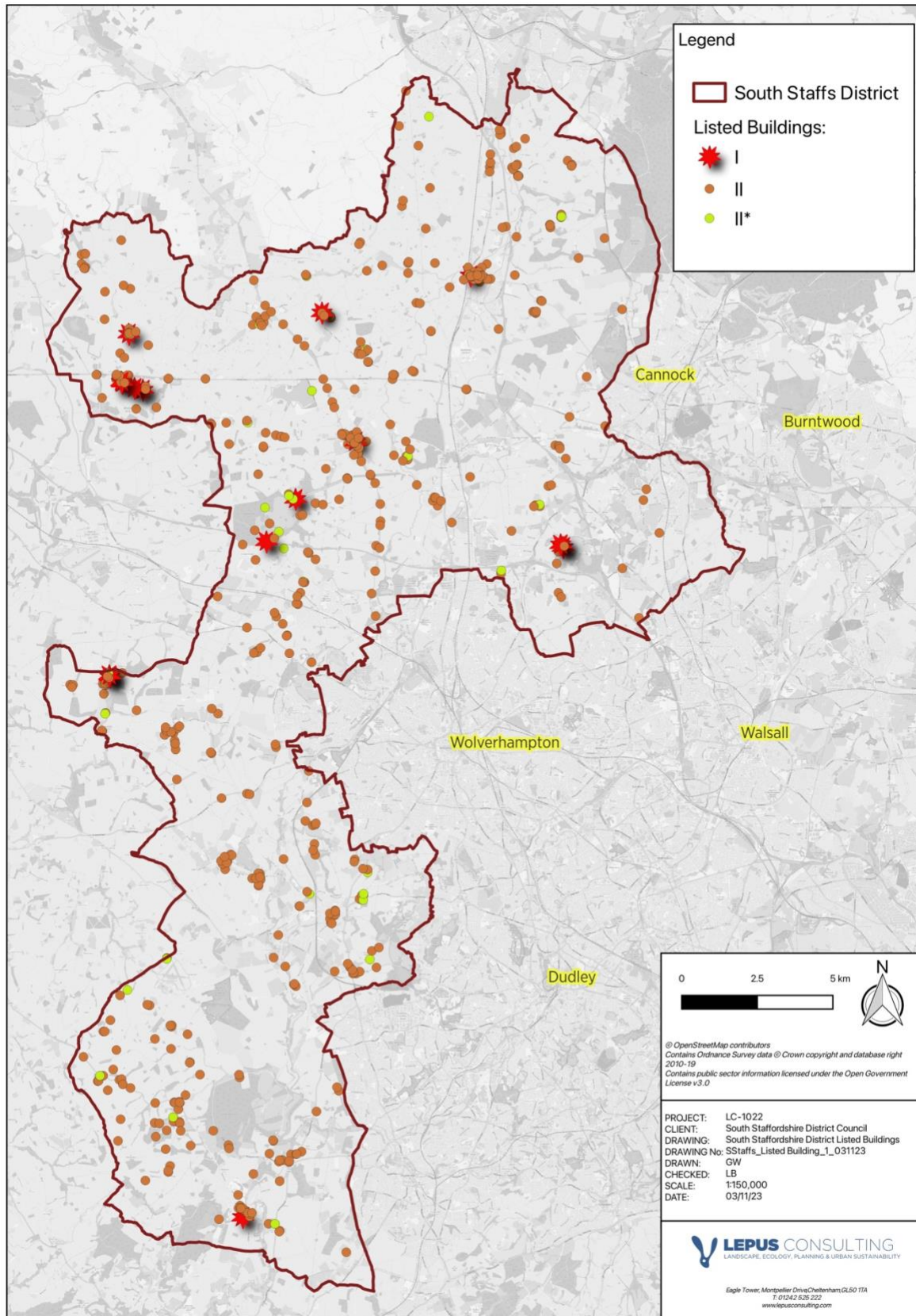


Figure 10.1: Listed Buildings in South Staffordshire



### **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.

## **10.2 Impacts on cultural heritage**

10.2.1 **Box 10.1** presents a plan-wide summary of the adverse impacts on cultural heritage that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations and for cultural heritage relate primarily to the alteration of historic character and setting associated with designated heritage assets. **Box 10.2** lists the policies within the LPR which would be likely to mitigate, either fully or partially, these identified adverse impacts on cultural heritage. Where mitigating policies are silent, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 10.3** explores the nature of these residual effects.

*Box 10.1: Summary of identified impacts on cultural heritage*

Impact on cultural heritage	Summary of identified effect
 <p><b>Alter character and / or setting of designated heritage assets</b></p>	<p>Development which coincides or is located in close proximity to designated heritage assets has the potential to result in harm to the asset and/or its setting. The extent of likely impacts will depend on contextual factors relating to the nature and location of development and factors that contribute to the significance of heritage assets, including its setting.</p> <p>None of the allocated sites coincide with or are located adjacent to SMs; however, one allocation is near an SM with the potential to adversely impact its setting. This relates to Site E33 which is located approximately 550m from 'Roman fort W of Eaton House' SM.</p> <p>No allocated sites are located near to RPGs.</p> <p>No allocated sites coincide with Listed Buildings. However, three allocated sites (224, 536a and E33) are located directly adjacent to Grade II Listed Buildings and seven further allocated sites (420, 519, 584, 010, E30, GT14 and GT23) are located within close proximity to Grade II Listed Buildings with the potential to adversely impact their settings.</p>
 <p><b>Alter character and / or setting of Conservation Areas</b></p>	<p>The SA adopts a precautionary approach to the assessment by presuming that development within or in proximity to a conservation area has the potential to adversely impact the character or setting of the conservation area. It is however acknowledged that the replacement of buildings which currently have a detrimental impact on a conservation area could potentially result in a neutral, mixed or beneficial effect (to be informed by published Conservation Area Appraisals and site-specific assessments).</p>




Impact on cultural heritage	Summary of identified effect
	<p>None of the allocated sites are located within a conservation area; although, Site 224 is located adjacent to Codsall and Oaken Conservation Area and Site 251 is approximately 50m from Pattingham Conservation Area, both of which have potential to affect their settings.</p>
 <p><b>Alter historic environment character</b></p>	<p>The Historic Environment Character Assessment for South Staffordshire<sup>96</sup> provided a detailed assessment of the historic character for 13 project areas identified by SSDC, and evaluated the impact of medium to large scale housing development upon each of the zones.</p> <p>26 allocated sites are located in areas of 'medium' historic value, where <i>"Legible heritage assets are present within the zone, but are not necessarily predominant or have undergone some form of alteration. Their presence, however, may contribute to an understanding of the development of the character zone and/or there are potential associations between assets. Further research may clarify these associations and elucidate the contribution of these assets to the history of the wider area"</i>.</p> <p>12 allocated sites are located in areas of 'high' historic value, where <i>"The legible heritage assets either dominate or significantly contribute to the historic character of each zone. There are strong associations between the heritage assets (both tangible and intangible) within the zone that are potentially demonstrable and/or the heritage assets make an important contribution to the history of the wider area"</i>.</p>
 <p><b>Impact on archaeology</b></p>	<p>There are numerous archaeological features identified in the Historic Environment Record (HER) within South Staffordshire including various structures, buildings, monuments and findspots which may be of historic and archaeological interest.</p> <p>32 allocated sites either coincide with or are adjacent to identified archaeological features and may have the potential to adversely affect the setting or character of these features.</p> <p>There is some uncertainty regarding potential impacts on underground archaeology, as the significance of such features may not be known at this time.</p>


### 10.3 Local Plan mitigation

10.3.1 The LPR includes an over-arching aim to maintain and enhance the natural and historic environment and preserve the local distinctiveness of settlements within South Staffordshire. Various LPR policies which are anticipated to help protect and enhance the historic environment and heritage assets are listed in **Box 10.2**.

<sup>96</sup> 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: 03/11/23]

**Box 10.2: Mitigating effects of the LPR planning policies on cultural heritage**

Policy mitigation for cultural heritage	Summary of mitigating effect
 <p><b>Alter character and / or setting of designated heritage assets</b></p>	<p>Policy NB8 'Protection and Enhancement of the Historic Environment and Heritage Assets' will promote the conservation and enhancement of the historic environment through the safeguarding of heritage assets and their setting through various criteria, in line with the NPPF, and seeking opportunities to better reveal the significance of heritage assets.</p> <p>Policy NB9 'Canal Network' supports development canal-side proposals which meet various criteria including that proposals must conserve and enhance the heritage value of canals and enhance the recreation and tourism value of the canal network.</p> <p>Policy NB4 'Landscape Character' seeks to protect and enhance the intrinsic rural character and local distinctiveness of South Staffordshire, through ensuring that development proposals take into consideration the surrounding environment, views and sensitivities. This includes having regard to heritage assets and especially for any development within Historic Landscape Areas where there may be a greater concentration of designated heritage assets.</p> <p>Policy HC10 'Design Requirements' would help to ensure that development proposals take into account local character and distinctiveness including historic assets.</p> <p>Policy EC5 'Tourism' supports development proposals for tourist accommodation and facilities where they would not adversely affect the character of any nearby heritage assets and their settings.</p>
 <p><b>Alter character and / or setting of conservation areas</b></p>	<p>Policy HC10 'Design Requirements' would help to ensure that development proposals take into account local character and distinctiveness including historic assets. The policy would also ensure that the design of new development reflects the requirements of any Conservation Area Management Plans that are relevant to the site in question.</p>
 <p><b>Alter historic environment character</b></p>	<p>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> <p>Policy HC2 'Housing Density' would help to ensure that the density of development does not result in significant adverse impacts to the surrounding historic environment, settlement pattern or landscape character.</p> <p>Policy HC10 'Design Requirements' promotes the development of "<i>well-designed buildings to reflect local vernacular, including historical building typologies where appropriate</i>".</p>

Policy mitigation for cultural heritage	Summary of mitigating effect
	<p>Policy EC4 'Rural Economy' supports farm diversification, provided there is no adverse impact upon the historic environment and where proposals respond positively to the existing traditional building styles.</p> <p>Policy NB4 'Landscape Character' states that development proposals must have regard to the findings of the Historic Landscape Characterisation, and notes that proposals within the Historic Landscape Areas should conserve and enhance historic character and important landscape features.</p>
 <p><b>Impact on archaeology</b></p>	<p>Policy NB8 'Protection and Enhancement of the Historic Environment and Heritage Assets' requires an archaeological assessment to be prepared where there is potential for adverse effects on areas of archaeological interest, to establish the significance of known or potential heritage assets and inform any required mitigation measures.</p> <p>Policy DS3 'Open Countryside' seeks to protect sensitive countryside areas from inappropriate development, including landscapes and areas with archaeological value.</p>

## 10.4 Residual effects on cultural heritage

10.4.1 The LPR policies seek to mitigate potential adverse impacts on heritage assets due to the proposed development, as well as protect and enhance the intrinsic rural character and local distinctiveness of South Staffordshire, including the historic environment. Potential residual impacts of the proposed allocations on heritage assets are discussed in table **Box 10.3**.

*Box 10.3: Residual effects for cultural heritage*

Residual effects	Further details of the residual effect
<p><b>Impact on heritage assets</b></p>	<p>The LPR policies, primarily NB8, would be expected to mitigate potential adverse impacts on heritage assets which may occur as a consequence of the development proposed within the Plan, including impacts on listed buildings, conservation areas, SMs and RPGs.</p> <p>A range of legislation, the NPPF and published national and local guidance also affords protection to heritage assets in line with their significance.</p> <p>The LPR would be expected to mitigate the potential for significant impacts on the designated heritage assets arising from the proposed development sites, and a negligible impact is predicted overall.</p>

Residual effects	Further details of the residual effect
<b>Alteration of historic environment character</b>	<p>Various LPR policies including HC10 and NB4 encourage development proposals to have regard to the findings of the Historic Landscape Characterisation and seek to conserve and enhance the locally distinctive character within South Staffordshire.</p> <p>The policies would help to mitigate the potential for significant impacts on the historic environment arising from individual development sites; 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. A residual adverse effect would be expected.</p> <p><b>Alteration of the historic environment character is a long-term and permanent significant effect. There is potential for a cumulative adverse effect on historic character resulting from the development proposed in the Plan.</b></p>



# 11 Human health

## 11.1 Baseline

### Health profile

11.1.1 The health and wellbeing of residents in South Staffordshire is generally very good, with the district performing better than the Regional and England average for several key health indicators (see **Table 11.1**), although the district has a slightly higher than average proportion of overweight adults.

**Table 11.1:** Health statistics for South Staffordshire in comparison with the England / Region average (2021/22)<sup>97</sup>

	Deprivation score (IMD 2019)	Male life expectancy (yrs)	Female life expectancy (yrs)	Suicide rate (per 100,000)	Physically active adults (%)	Overweight/obese adults (%)
<b>South Staffordshire</b>	13.1	81.0	84.2	8.7	69.0	68.1
<b>Region</b>	25.3	78.7	82.6	10.7	63.4	67.2
<b>England</b>	21.7	79.3	83.2	10.3	67.3	63.8

### Healthcare facilities

11.1.2 Access to GP surgeries and hospitals is important for residents. Ideally, residents should be within approximately ten minutes' walk from their nearest GP surgery, whilst a hospital within 5km would be considered relatively accessible. Where distances to important healthcare services are long, sustainable transport modes such as frequent and affordable bus routes should be available to residents.

11.1.3 There are no hospitals located within the district and residents therefore rely on services in neighbouring areas. The nearest hospitals providing an Accident and Emergency (A&E) department include the County Hospital in Stafford, New Cross Hospital in Wolverhampton and Russells Hall Hospital in Dudley.

<sup>97</sup> Office for Health Improvement & Disparities (2023) South Staffordshire District Health Profile 2020-2022. Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/ati/501/are/E07000196/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1> [Date accessed: 05/01/24]

- 11.1.4 There are GP surgeries and medical practices throughout the district, including those in Wombourne, Kinver, Penkridge, Codsall, Bilbrook, Brewood and elsewhere. Generally, it is considered that being within 800m or a ten-minute walk of a GP surgery would constitute having good access to your GP<sup>98</sup>. Whilst there are a large number of GP surgeries throughout the district, given the rural nature of the local area and the dispersed pattern of settlements, new residents could potentially have relatively limited access to GP facilities.
- 11.1.5 New housing developments can increase demand on local healthcare services. The government provides guidance for general practice capacity for large scale developments<sup>99</sup> as well as resources for planning and designing healthier places<sup>100</sup>.

### **Greenspaces and natural habitats**

- 11.1.6 In line with the NPPF, LPAs should seek to promote social interaction, create communities which are safe and accessible, and ensure there is good accessibility to a range of GI, sports facilities, local shops, cultural buildings and outdoor space.
- 11.1.7 Within South Staffordshire, there is a rich and diverse range of public open spaces, formal parks, outdoor recreational spaces, as well as the PRow and cycle networks and the Shropshire Union and Staffordshire and Worcestershire canal systems. There are two country parks located in South Staffordshire: Baggeridge Country Park and Highgate Common Country Park. South Staffordshire is also bordered in the north east by Cannock Chase Country Park, with several country parks surrounding the district.
- 11.1.8 All these open spaces positively contribute towards the health and wellbeing of residents, by helping to encourage physical exercise through sports, recreation and active travel. The recreational green spaces combined with the natural green space network would also benefit the mental health and wellbeing of residents.
- 11.1.9 The Open Space Assessment (2019)<sup>101</sup> analysed the quality and value of existing greenspace, as well as future requirements and priorities for the district. This included a number of typologies: parks and gardens; natural and semi-natural greenspace; amenity greenspace; provision for children and young people; allotments; cemeteries; green corridors; and civic space. The study found that 73% of the sites scored above their set threshold for quality, and 82% were above the threshold for value, reflecting the role and importance of open space provision to local communities and environments.

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<sup>98</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>99</sup> UK Parliament (2022) General practice capacity for large-scale housing developments. Available at: <https://commonslibrary.parliament.uk/research-briefings/cdp-2022-0067/> [Date accessed: 28/02/24]

<sup>100</sup> Public Health England (2017) Spatial Planning for Health: An evidence resource for planning and designing healthier places. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729727/spatial\\_planning\\_for\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf) [Date accessed: 28/02/24]

<sup>101</sup> Knight, Kavanagh and Page (2019) South Staffordshire District Council Open Space Audit Assessment Report October 2019. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 28/02/24]

## Air pollution

- 11.1.10 As discussed in **Chapter 7**, air pollution is a significant concern internationally, nationally and locally, with 5.8% of mortality in England and an average of 5.3% of mortality in Staffordshire being attributable to particulate air pollution in 2022<sup>102</sup>.
- 11.1.11 It is assumed that the impacts of road transport associated air pollution primarily occur within 200m of source<sup>103</sup>. AQMAs have been designated to manage local air quality in areas where National Air Quality Objectives are unlikely to be achieved. Residents within 200m of a road or AQMA may therefore expect to have their health adversely impacted by road transport associated air pollution to some extent, in addition to the potential impacts of road transport associated noise and light pollution.
- 11.1.12 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.




## 11.2 Impacts on human health


- 11.2.1 **Box 11.1** presents a plan-wide summary of the adverse impacts on human health that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. **Box 11.2** lists the policies within the LPR which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on human health. Where mitigating policies are silent, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 11.3** explores the nature of these residual effect.

<sup>102</sup> Public Health Profiles (2023) Fraction of mortality attributable to particulate air pollution (new method). Available at: <https://fingertips.phe.org.uk/search/air%20pollution#page/4/gid/1/ati/501/iid/30101/age/230/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1> [Date accessed: 28/02/24]

<sup>103</sup> Department for Transport (2021) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date accessed: 03/11/23]

**Box 11.1:** Summary of identified impacts on human health



Impact on human health	Summary of identified effect
 <p><b>Sustainable access to healthcare / leisure facilities</b></p>	<p>South Staffordshire is a largely rural district, with sparse settlements. There are no NHS hospitals with A&amp;E service in the district, and healthcare 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.</p> <p>44 allocated sites are located outside of the sustainable target distance to NHS hospitals providing an A&amp;E service.</p> <p>35 allocated sites are located outside of the sustainable target distance to GP surgeries.</p> <p>25 allocated sites are located outside of the sustainable target distance to leisure centres.</p>
 <p><b>Exposure to air / noise pollution (from AQMAs / main roads)</b></p>	<p>The long-term health of residents, in particular vulnerable groups including children and the elderly, could be adversely impacted by local reductions in air quality. This impact is discussed further in <b>Chapter 7</b>.</p> <p>Development within 200m of an AQMA or main road could potentially expose site end users to increased levels of traffic related air pollution or noise impacts, with adverse implications for health.</p> <p>At the time of assessment, seven allocated sites were identified to be located within, or within 200m of, an AQMA. This includes three sites within 200m of CCDC AQMA which borders South Staffordshire to the north east, and three sites within 200m of Wolverhampton AQMA which borders the district to the east. One site, 010, was located within 200m of 'AQMA No. 1 (Woodbank)' which has since been revoked.</p> <p>18 allocated sites are located within 200m of a main road, raising the potential for air quality impacts associated with atmospheric pollution from vehicular traffic at these sites.</p>
 <p><b>Limited access to public greenspace</b></p>	<p>Good access to public green or open spaces, a diverse range of 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.</p> <p>None of the site allocations coincide with existing greenspaces, and as such no adverse impacts are anticipated in terms of net loss of existing public greenspaces. In terms of accessibility to greenspaces, the majority of the site allocations would be expected to locate new resident in areas with good access to the surrounding countryside or public greenspaces. However, 11 allocated sites are located over 600m from a greenspace and could potentially restrict the access of new residents to opportunities for outdoor recreation and exercise.</p>

Impact on human health	Summary of identified effect
 <p><b>Limited access to PRow or cycle network</b></p>	<p>The majority of allocated sites are located in areas with good coverage by the PRow and/or cycle networks, providing many site end users with opportunities for active travel and recreation in the countryside. However, three allocated sites are located outside of the 600m target distance to PRowS or cycle paths (Sites 536a, E33 and E18) where site end users may be reliant upon less sustainable modes of transport including private car use.</p>

### 11.3 Local Plan mitigation

11.3.1 Several policies aim to promote healthy and active lifestyles for new and existing residents within the Plan area. Many of these policies would be expected to result in benefits to human health, through the provision of open spaces, improvements to walking and cycling networks and improved sustainable transport and access to healthcare facilities. Mitigation is discussed further in **Box 11.2**.

*Box 11.2: Mitigating effects of the LPR planning policies on human health*

Policy mitigation for human health	Summary of mitigating effect
 <p><b>Sustainable access to healthcare / leisure facilities and services</b></p>	<p>Policy HC14 'Health Infrastructure' seeks to protect existing healthcare infrastructure and states, "proposals for major residential developments or specialist elderly accommodation must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Clinical Commissioning Group (CCG), ensuring that on-site provision or financial contributions are provided.</p> <p>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.</p>
 <p><b>Exposure to air / noise pollution (from AQMA/ main road)</b></p>	<p>Policy HC11 'Protecting Amenity' seeks to protect residential amenity in relation to noise and other sources of pollution.</p> <p>Policy HC13 'Parking Provision' introduces the requirement for electric vehicle charging points and supports infrastructure for electric public transport. This would serve to encourage the use of electric vehicles and reduce noise and air pollution to some extent.</p> <p>Policy HC19 'Green Infrastructure', supported by other policies such as HC10 'Design Requirements', would help to increase the quality of GI in developments and may serve to filter air pollution to some extent.</p> <p>Policy EC1 'Sustainable Economic Growth' seeks to promote the provision of active travel measures and the creation/enhancement of multifunctional green spaces and the enhancement of the GI Network.</p>

**Policy mitigation for human health**

**Summary of mitigating effect**



**Limited access to public greenspace**

Policy HC17 'Open Space' states that existing open spaces will be protected and will require 0.006 hectares of multi-functional, centrally located open space per dwelling, with the threshold for on-site provision being 33 dwellings or above. Below this threshold, financial contributions will be made towards the creation and maintenance of off-site multi-functional open space.

Policy HC18 'Sports Facilities and Playing Pitches' states existing sports facilities and playing pitches will be protected and that the provision required from major developments will be determined using the latest Playing Pitch Calculator and Sports Facilities Calculator. An Open Space, Sport and Recreation SPD is proposed.

Policy HC19 'Green Infrastructure' sets out the need for development proposals provide GI to meet open space, biodiversity, active travel, climate mitigation/adaptation and sustainable drainage in multi-functional open space. A Green Infrastructure SPD is proposed.

Policy HC12 'Space About Dwellings and Internal Space' states that a "*reasonable area of communal open space*" must be provided for flats and specialist housing, which may help to increase accessibility to open spaces for recreation and reflection for residents of these accommodation types.

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*" to set out a hierarchy of open space throughout each site, including play space for children, community gardens, allotments and recreational spaces.



**Limited access to PRow or cycle network**

Policy EC12 'Sustainable Transport' commits to preparing a Local Walking & Cycling Infrastructure Plan to identify strategic opportunities for walking and cycling improvements in the district and seeks to ensure new development is designed to promote high quality walking and cycling routes, both within sites and linking to nearby services and facilities.

Policy HC10 'Design Requirements' seeks to ensure development proposals provide a clear and permeable hierarchy of streets, routes and spaces which may serve to encourage active travel. Similarly, Policy HC19 'Green Infrastructure' supports multi-functional GI schemes including "*attractive cycle and walkways*" and Policy EC1 'Sustainable Economic Growth' promotes the provision of active travel measures and the creation/enhancement of multi-functional green spaces.

Policy MA1 'Master Planning Strategic Sites' sets out various requirements for the development of the two strategic sites, including provision of a "*Movement Framework and Access Strategy*" which promotes public transport and active travel.

## 11.4 Residual effects on human health

11.4.1 Residual adverse effects are those that remain after the application of the mitigating policies within the LPR. Many of the policies would be expected to mitigate and result in positive impacts 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. 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. Residual positive and negative effects of the LPR on human health are discussed in **Box 11.3**.

### *Box 11.3: Residual effects for human health*

Residual effects	Further details of the residual effect
<b>Sustainable access to healthcare/ leisure facilities and services</b>	<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> <p><b>Limited access to healthcare facilities would be expected to be a medium-term and temporary significant effect.</b></p>
<b>Exposure to air/ noise pollution (from AQMA/ main road)</b>	<p>LPR policies would be expected to reduce adverse impacts associated with the exposure of site end users to poor air quality within or adjacent to AQMAs, and impacts associated with reduced air and noise quality alongside main roads. This includes Policy HC11 which states that “<i>All development proposals should take into account the amenity of any nearby residents, particularly with regard to ... noise and disturbance [and] pollution</i>”.</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><b>Adverse impacts on human health resulting from exposure to poor air quality and noise pollution across the Plan area would be expected to be a long-term but potentially temporary significant effect.</b></p>
<b>Limited access to public greenspace</b>	<p>Various LPR policies, as discussed within <b>Box 11.2</b>, 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> <p>An overall positive effect would be likely with regard to the provision of and access to green spaces.</p>

Residual effects	Further details of the residual effect
<b>Limited access to PRoW or cycle network</b>	<p>The majority of allocated sites are located within the 600m sustainable target distance to existing PRoWs and/or cycle paths. 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.</p> <p>An overall positive effect would be likely with regard to pedestrian and cycle access.</p>



# 12 Landscape

## 12.1 Baseline

### Landscape character

12.1.1 Landscape can be described as comprising natural, cultural, social, aesthetic and perceptual elements, this includes flora, fauna, soils, land use, settlement, sight, smells and sound<sup>104</sup>. South Staffordshire has a strong rural character with a high-quality landscape and countryside.

12.1.2 Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs), defined by a unique combination of landscape, biodiversity, geodiversity, history and cultural and economic activity. South Staffordshire falls within three NCAs:

- Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production;
- Mid Severn Sandstone Plateau: with open arable fields and steep wooded gorges of the Severn Valley; and
- Cannock Chase and Cank Wood: ranging from the open heathlands and plantations associated with the AONB to dense urban areas.

12.1.3 South Staffordshire District is dominated by five landscape character types (LCTs) (see **Table 12.1**).

**Table 12.1:** Landscape character types of South Staffordshire<sup>105</sup>

Landscape Character Type	Key features
Settled Plateau Farmland Slopes LCT	Intensive arable and pasture farming, large scale field pattern with well-trimmed hedgerows, rolling landform, well treed stream corridors, red brick farms, narrow winding lanes and small woodlands.
Ancient Redlands LCT	Hedgerow field pattern with mature hedgerow oaks and some ash, broadleaved woodland, rolling landform, narrow and sunken lanes, steep and sandy slopes, well treed stream corridors and field ponds, parkland and pasture farming, red brick farm houses and straight lanes.
Ancient Clay Farmlands LCT	Mature hedgerow oaks and strong hedgerow patterns; narrow winding lanes, often sunken; small broadleaved and conifer woodlands; well treed stream and canal corridors; hedgerow damsons; occasional native black

<sup>104</sup> Natural England (2014) An Approach to Landscape Character Assessment. Available at: <https://www.gov.uk/government/publications/landscape-character-assessments-identify-and-describe-landscape-types> [Date accessed: 03/11/23]

<sup>105</sup> Staffordshire County Council (2000) Planning for Landscape Change, Supplementary planning guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011. Volume 3: Landscape Descriptions. Available at: <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/NaturalEnvironmentLandscape.aspx> [Date accessed: 20/12/23]

Landscape Character Type	Key features
	poplars; numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; dispersed settlement pattern.
Settled Heathlands LCT	Interlocking woodlands and woodland edges; flat landform; straight roads; canal; relic heathland; well-defined hedgerows and numerous hedgerow trees; Staffordshire red brick rural villages.
Sandstone Estatelands LCT	Silver birch woodlands; well treed stream corridors; straight roads; intensive arable agriculture in an open remnant field pattern.

### **Cannock Chase Area of Outstanding Natural Beauty (AONB)**

12.1.4 Cannock Chase AONB (also known as Cannock Chase National Landscape) is located on the north east of the South Staffordshire District boundary. New development in South Staffordshire could potentially lead to adverse impacts on the AONB, such as through increased visitor pressures and potential adverse visual impacts on the AONB as a result of development proposed within the LPR. Potential adverse impacts on Cannock Chase AONB would be due to the distance from the development to the AONB.

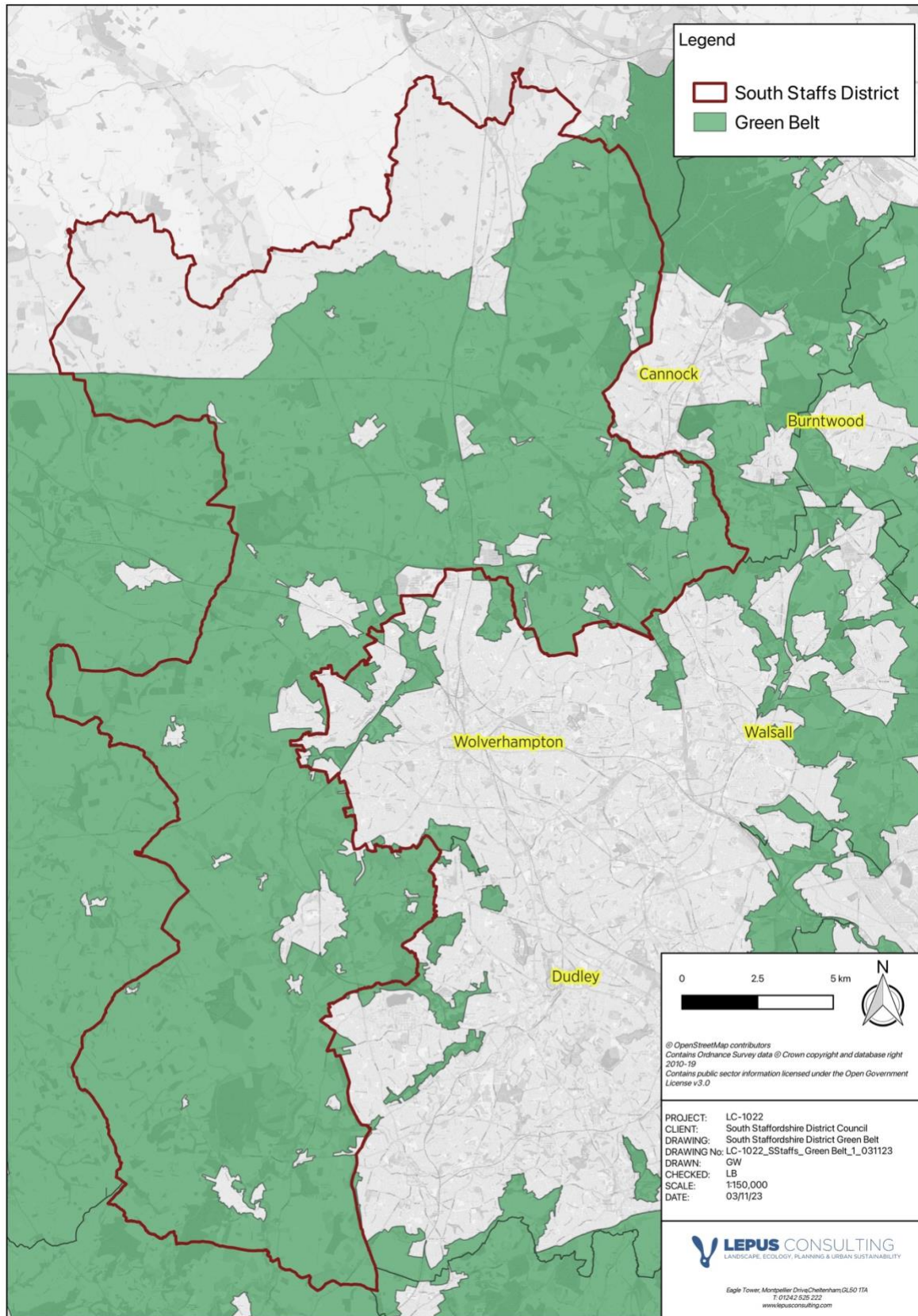
### **Green Belt**

12.1.5 Roughly 80% (32,089 ha) of South Staffordshire District comprises Green Belt (see **Figure 12.1**). South Staffordshire’s Green Belt areas contribute to the distinct rural character and help to distinguish the district from neighbouring areas such as the Black Country. Although Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and support landscape-scale biodiversity networks.

12.1.6 New development could potentially increase noise and light pollution and reduce the perception of tranquillity in some areas. SSDC aims to manage Green Belt areas in order to prevent unrestricted sprawl and coalescence of urban settlements, as well as opting to develop brownfield sites to assist with urban regeneration.

12.1.7 SSDC seek to protect Green Belt areas from ‘inappropriate development’, maintaining the character and openness of the Green Belt. A Green Belt Study<sup>106</sup> has been undertaken to inform the consideration of revisions to Green Belt boundaries in the district as part of the LPR. In Stage 1, the Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt (as set out in the NPPF). In Stage 2, the study sought to identify potential harm as a consequence of releasing land parcels from the Green Belt, resulting in a seven-point scale ranging from ‘Very High’ to ‘Very Low’ harm.

<sup>106</sup> LUC (2019) South Staffordshire Green Belt Study: Stage 1 and 2 Report. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-03/south\\_staffs\\_gb\\_stage\\_1\\_and\\_2\\_report\\_final\\_v1\\_-\\_web\\_copy.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-03/south_staffs_gb_stage_1_and_2_report_final_v1_-_web_copy.pdf)  
 [Date accessed: 28/02/24]



**Figure 12.1:** Green Belt boundaries in South Staffordshire

## Landscape Sensitivity

- 12.1.8 Alongside the Green Belt Study, the South Staffordshire Landscape Sensitivity Assessment<sup>107</sup>, also carried out by LUC, assessed the sensitivity of Green Belt land to housing and commercial development. The aim of the study was to identify the extent to which the character and quality of South Staffordshire's Green Belt land is susceptible to change as a result of future development.
- 12.1.9 It should be noted that although there is a relationship between the Landscape Sensitivity Assessment and the Green Belt Harm Assessment, the Green Belt Study states that "*there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land*".
- 12.1.10 Within the existing urban areas which cover roughly 7.2% of the district<sup>108</sup>, development could potentially impact the surrounding townscapes, and surrounding features of note amongst the built form, such as the canal and waterway networks. Regeneration and development of brownfield sites within the built-up areas may present opportunities to improve the local character, however, the design and layout of potential development is unknown at present. Consideration of the potential impact of development on sensitive townscapes is considered in terms of the historic landscape character within **Chapter 10 – Cultural Heritage**.
- 12.1.11 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.




<sup>107</sup> LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at:  
[https://www.sstaffs.gov.uk/sites/default/files/2023-03/landscape\\_study\\_2019.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-03/landscape_study_2019.pdf) [Date accessed: 03/11/23]

<sup>108</sup> South Staffordshire District Council (2011) Historic Environment Character Assessment. Available at:  
<https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Documents/SouthStaffordshireHEA-FinalReport.pdf>. [Date accessed: 03/11/23]

## 12.2 Impacts on landscape

12.2.1 **Box 12.1** presents a plan-wide summary of the adverse impacts on landscape that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. **Box 12.2** lists the policies within the LPR which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on landscape. Where mitigating policies are silent, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 12.3** explores the nature of these residual effects.



### *Box 12.1: Summary of identified impacts on landscape*

Impact on landscape	Summary of identified effect
 <p><b>Impacts on Cannock Chase AONB and its setting</b></p>	<p>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.</p> <p>Five allocated sites have been identified in the SA as having potential to affect views of/from Cannock Chase AONB owing primarily to their close proximity to the AONB and/or the large scale of the proposed sites. This relates to Site 016 in Huntington approximately 600m from the AONB, Sites 010 and 584 in Penkridge which form part of the strategic allocation approximately 3.5km from the AONB, Site 036c in Stafford approximately 1km from the AONB, and Site E33 which is a large employment site at Four Ashes approximately 3km from the AONB.</p>
 <p><b>Alteration of landscape character</b></p>	<p>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 character.</p> <p>28 site allocations are anticipated to have adverse effects on the distinctive characteristics of the various LCTs that lie across the Plan area. The majority of sites are located within 'Settled Heathlands', 'Sandstone Estatelands', 'Sandstone Hills and Heaths' or 'Ancient Clay Farmlands' where hedgerows, arable and pastureland and rolling fields are often key characteristics.</p>
 <p><b>Impacts on sensitive landscapes and the West Midlands Green Belt</b></p>	<p>The Landscape Sensitivity Study<sup>109</sup> considered the landscape and visual aspects of the land parcels using ten criteria which were considered most likely to be affected by development. Overall landscape sensitivity was assessed on a five-point scale:</p> <ul style="list-style-type: none"> <li>• Two allocated sites (224 and 036c) are located within areas of 'high' sensitivity where "the landscape has strong character and qualities with notable features which are highly sensitive to change as a result of introducing built development".</li> <li>• Five allocated sites (584, 617, 010, GT01 and GT07) are located within areas of 'moderate-high' sensitivity where the landscape is likely to contain some areas with strong character and high sensitivity to change.</li> <li>• Nine allocated sites (251, 420, 519, 005, 006, 536a, 730, E18, E30, GT06 and GT23) are located within areas of 'moderate' sensitivity</li> </ul>

<sup>109</sup> LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 05/03/24]

Impact on landscape	Summary of identified effect
	<p>where <i>“the landscape has some distinctive characteristics and valued qualities, with some sensitivity to change as a result of introducing built development”</i>.</p> <ul style="list-style-type: none"> <li>• Three allocated sites (E33, GT08 and GT18) are located within areas of 'low-moderate' sensitivity where the landscape is likely to contain some areas with distinctive character and sensitivity to change.</li> <li>• One allocated site (GT14) is located within areas of 'low' sensitivity where <i>“the landscape lacks distinct character and qualities and has few notable features, or is robust with regard to introducing built development”</i>.</li> <li>• The remaining 26 allocated sites are located outside of the study area where a negligible effect on sensitive landscapes is likely.</li> </ul> <p>The Green Belt Study<sup>110</sup> assessed land parcels against the contribution they make to the five purposes of the Green Belt and identified potential harm as a consequence of releasing land parcels from the Green Belt on a seven-point scale ranging from 'Very High' to 'Very Low' harm:</p> <ul style="list-style-type: none"> <li>• Two allocated sites (536a and GT08) are located within areas of 'very high' harm where <i>“land makes a strong contribution to multiple Green Belt purposes, or a very strong contribution to a single purpose, and where its release would weaken the adjacent Green Belt”</i>.</li> <li>• Five allocated sites (519, GT06, GT07, GT14 and GT23) are located within areas of 'high' harm where <i>“land makes a strong contribution to one of the Green Belt purposes, and where its release would partially weaken adjacent Green Belt”</i>.</li> <li>• Four allocated sites (224, 617, E33 and GT01) are located within areas of 'moderate-high' harm where <i>“land makes a moderate contribution to one of the Green Belt purposes and a weak contribution to the others, but where its release would significantly weaken the adjacent Green Belt”</i>.</li> <li>• Three allocated sites (251, 730 and GT18) are located within areas of 'moderate' harm where <i>“land makes a relatively weak contribution to two of the Green Belt purposes and a weak contribution to the others, but where its release would partially weaken the adjacent Green Belt”</i>.</li> <li>• Two allocated sites (006 and GT32) are located within areas of 'low-moderate' harm where <i>“land makes a relatively strong contribution to one of the Green Belt purposes, but where its release would create a simplified, more consistent boundary and would not weaken the adjacent Green Belt”</i>.</li> <li>• The remaining 32 allocated sites are located outside of the study area where a negligible effect on the Green Belt purposes is likely.</li> </ul>
 <p><b>Change in views from Public Rights of Way/for local residents</b></p>	<p>The development proposed in the Plan has the potential to adversely impact on informal high-quality viewing experiences that can be gained from the local PRow network around proposed development locations.</p> <p>Development proposed in the Plan predominantly lies in close proximity to existing residential properties and has the potential to adversely impact views from these properties.</p>


<sup>110</sup> 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: 05/03/24]

Impact on landscape	Summary of identified effect
 <p><b>Increased risk of urbanisation of the countryside and coalescence</b></p>	<p>The proposed development at 25 allocated sites were identified as being likely to result in adverse impacts associated with the urbanisation of the countryside, with settlement boundaries extending into the open countryside. The development at two allocated sites could potentially lead to coalescence between settlements: Site 519 which forms part of the strategic allocation at Bilbrook (coalescence between Codsall and Pendeford) and E33 (coalescence between Four Ashes and Gailey). The risk of urban sprawl and coalescence between settlements could potentially have adverse impacts on the landscape character.</p>
 <p><b>Loss of tranquillity</b></p>	<p>Rural landscapes are typically tranquil, a valuable attribute that once lost is often irreversible. Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban. Increased light pollution levels and consequent impacts on dark skies may arise as a consequence of the development proposed in the Plan. The introduction of both noise and night-time lighting is likely to reduce tranquillity at these locations.</p>

### 12.3 Local Plan mitigation




12.3.1 The spatial strategy for development in South Staffordshire to 2041, as set out in the LPR, directs the majority of new development towards higher tier settlements and existing urban areas, in line with the settlement hierarchy. The LPR seeks to direct development towards previously developed land where possible. However, to meet the identified housing requirements, a proportion of growth within the Plan is located on previously undeveloped land. Various LPR policies aim to protect and, where appropriate, enhance the local character and distinctiveness of South Staffordshire’s landscape. These policies are discussed in **Box 12.2**.

*Box 12.2: Mitigating effects of the LPR planning policies on landscape*

Policy mitigation for landscape	Summary of mitigating effect
 <p><b>Impacts on Cannock Chase AONB and its setting</b></p>	<p>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.</p>

Policy mitigation for landscape	Summary of mitigating effect
 <p><b>Threaten or result in the loss of rural and locally distinctive landscape character</b></p>	<p>Policy NB4 'Landscape Character' seeks to maintain and, where possible, improve the rural character and distinctiveness of the South Staffordshire landscape and includes the protection and retention of all trees, woodland and hedgerows to help protect the local landscape. The policy also requires development proposals to have regard to the findings of the Landscape Character Assessment for the county.</p> <p>Policy HC10 'Design Requirements' sets out the requirements to ensure high quality design, including for proposed developments to respond positively to landform and respect existing landscape and settlement character.</p> <p>Policy NB8 'Protection and Enhancement of the Historic Environment and Heritage Assets', although focused primarily on cultural heritage, may also result in the conservation and enhancement of the character of landscapes and townscapes.</p> <p>Policy HC19 'Green Infrastructure' seeks to protect, maintain and enhance greenspaces within the Plan area and strengthen green and blue linkages, which would be expected to contribute towards the creation of a high quality public realm with attractive streets and strong character.</p> <p>Policy DS3 'Open Countryside' seeks to protect the intrinsic character and beauty of the open countryside and will resist any inappropriate development proposals in these locations.</p> <p>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 "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".</p>
 <p><b>Impacts on sensitive landscapes and the West Midlands Green Belt</b></p>	<p>Policy DS1 'Green Belt' sets out the policy protection in relation to the West Midlands Green Belt and notes that a separate Green Belt SPD will be prepared which will set out the specific types of development that may be considered acceptable within the Green Belt and seeks to protect the character of the landscape.</p> <p>Policy DS2 'Green Belt Compensatory Improvements' states that where sites are removed from the Green Belt for development, appropriate compensatory improvements to remaining Green Belt is required via a Section 106 agreement. This may provide opportunities to deliver or contribute towards the emerging Nature Recovery Network and Open Space Strategy.</p> <p>Policy DS3 'Open Countryside' seeks to protect the openness of the countryside and aims to protect the intrinsic character and beauty of the open countryside.</p> <p>Policy NB4 'Landscape Character' will seek to maintain and, where possible, improve the rural character and distinctiveness of the South Staffordshire landscape and includes a requirement to ensure the protection and retention of all trees, woodland and hedgerows to help protect the local landscape. The policy also requires development proposals to have regard to the findings of latest Landscape Sensitivity Study.</p>



Policy mitigation for landscape	Summary of mitigating effect
 <p><b>Change in views from Public Rights of Way/for local residents</b></p>	<p>Policy NB4 'Landscape Character' could help to ensure new development does not have a detrimental effect on medium and long-distance views.</p> <p>The policy also requires proposals within the setting of Cannock Chase AONB to have regard to the Cannock Chase AONB Views and Setting Guide 2020 which would help to ensure that developments in proximity to the AONB consider the effect of development in terms of views, which may serve to protect views from the PRoW network and local residents in certain areas (ie. particularly the north east of the Plan area).</p>
 <p><b>Increase risk of coalescence and/or urban sprawl</b></p>	<p>Policies DS1 'Green Belt' and DS3 'Open Countryside' seek to protect the openness of the countryside and only release land for development when necessary and justified as part of a Local Plan Review.</p> <p>Policy HC2 'Housing Density' seeks to achieve 35 dwellings per hectare in developments adjoining Tier 1 settlements and urban extensions in order to achieve an efficient use of land. This would reduce overall land requirements to deliver housing needs.</p> <p>Policy HC6 'Rural Exception Sites' provides the requirements whereby small housing sites can be delivered in sites lying adjacent to Tier 1-4 settlements.</p> <p>Policy EC1 'Sustainable Economic Growth' states that preference should be given to sustainable previously developed land.</p> <p>Policy DS3 'Open Countryside' would serve to resist development outside of settlement development boundaries, other than in certain circumstances where various other requirements are met.</p>
 <p><b>Loss of tranquillity</b></p>	<p>Policy HC11 'Protecting Amenity' includes requirements to ensure that noise sensitive habitats and locations are protected from harmful development and aims to protect residential amenity with regard to noise, disturbance, light and pollution.</p>

## 12.4 Residual effects on landscape

- 12.4.1 The LPR sets out numerous policies which would be expected to help mitigate potential adverse impacts of the proposed development on the landscape, as set out in **Box 12.2**. Despite these policy provisions, the LPR would be expected to result in residual effects on the landscape to some extent, as discussed in **Box 12.3**.
- 12.4.2 Cumulative effects are summarised in **Chapter 16** of this report.

**Box 12.3: Residual effects for landscape**

Residual effects	Further details of the residual effect
<p><b>Impacts on Cannock Chase AONB and its setting</b></p>	<p>No development is proposed within or directly adjacent to Cannock Chase AONB. Policy NB4 seeks to ensure that development proposals conserve and enhance Cannock Chase AONB and its setting, in accordance with national policy, and with regard to the Cannock Chase AONB Design Guide 2020 and Cannock Chase AONB Views and Setting Guide 2020, or subsequent updates of these documents. This would be expected to minimise potential adverse impacts on the setting or special qualities of the nationally designated landscape arising as a result of the proposed development, with no significant adverse effects anticipated overall assuming the policy is effectively implemented with sensitive design in accordance with other LPR policies and other guidance.</p>
<p><b>Alteration of landscape character</b></p>	<p>Various LPR policies seek to ensure that development proposals maintain and improve the district’s intrinsic rural character and distinctiveness and have regard to the findings of the published LCA, as outlined in <b>Box 12.2</b>, which would be likely to mitigate adverse impacts arising from development proposals in some locations. However, due to the scale of development proposed, with a large proportion in previously undeveloped locations surrounding rural settlements, these policies are not expected to fully mitigate the potential impacts on landscape character across the district and a residual adverse effect is anticipated.</p> <p>It should be noted that the nature of the effects of development on the landscape is highly dependent on local site circumstances and the nature of the development proposals.</p> <p><b>Alteration of the landscape character is a long-term and permanent significant effect. There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan.</b></p>
<p><b>Impacts on sensitive landscapes and the West Midlands Green Belt</b></p>	<p>LPR policies seek to ensure that Green Belt land will only be released for development when necessary and justified. Policy NB4 states that development proposals should “<i>have regard to the findings of the latest Landscape Sensitivity Study</i>”. Various other LPR policies aim to maintain and enhance South Staffordshire’s distinctive landscapes and ensure that development design responds to its surroundings.</p> <p>However, it is unlikely that these impacts could be fully mitigated particularly for allocated sites in areas identified as being of ‘high’ sensitivity or ‘very high’ / ‘high’ harm to the Green Belt, as set out in <b>Box 12.1</b>, where the landscape is likely to be unable to accommodate new development without significant change.</p> <p><b>Alteration of sensitive landscapes is a long-term and permanent significant effect.</b></p>
<p><b>Alteration of views</b></p>	<p>Whilst the LPR policies set out in <b>Box 12.2</b> 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> <p><b>Alteration of views is likely to be a long-term and permanent significant effect.</b></p>

Residual effects	Further details of the residual effect
<p><b>Increase risk of urbanisation of the countryside and coalescence</b></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, as set out in <b>Box 12.2</b>, 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.</p> <p><b>An increased risk of urbanisation of the countryside and coalescence is a long-term and permanent significant effect.</b></p>
<p><b>Loss of tranquillity</b></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. Therefore, a residual adverse effect is anticipated.</p> <p><b>The loss of tranquillity is a long-term and permanent significant effect.</b></p>

# 13 Population and material assets

## 13.1 Baseline

- 13.1.1 '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.
- 13.1.2 '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 (see **Chapter 14 – Soil**).

### Population size

- 13.1.3 The district has an estimated population of 111,527 as of mid-2022<sup>111</sup> which is set to increase. The population is getting older whilst the proportion of residents of working age is reducing, which could have significant impacts on economic output in the district in the future. Those aged 16 – 64 years old currently represent 59.3% of South Staffordshire's population<sup>112</sup>.

### Waste

- 13.1.4 Throughout South Staffordshire and nationally, there is a need to increase the proportion of waste sent for reuse, recycling or compost and move away from the use of landfill for waste disposal. Government guidance documents including the 25 Year Environment Plan<sup>113</sup> and Waste Strategy for England<sup>114</sup> highlight the importance of moving towards sustainable waste management and cutting down on hazardous waste and single-use plastics which lead to adverse implications for the health of people and the environment.

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<sup>111</sup> ONS (2023) Mid-2022 estimates of the population for England and Wales. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales> [Date accessed: 20/12/23]

<sup>112</sup> NOMIS (2020) Labour Market Profile – South Staffordshire. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157177/report.aspx#> [Date accessed: 03/11/23]

<sup>113</sup> Defra (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf). [Date accessed: 03/11/23]

<sup>114</sup> Defra (2018) Our Waste, Our Resources: A Strategy for England. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf). [Date accessed: 03/11/23]

- 13.1.5 The proposed development within South Staffordshire and associated increase in residents would be expected to result in an increase in waste produced.
- 13.1.6 South Staffordshire reported 47,388 tonnes of total household waste in 2021 – 2022<sup>115</sup>. The proportion of local authority collected waste in South Staffordshire which is recycled, reused or composted is 48.4%. As of 2013, no household waste is sent to landfill and is instead delivered to the Energy Recovery Facility at Four Ashes<sup>116</sup>.

### **Transport and accessibility**

- 13.1.7 South Staffordshire's road network comprises minor, primary and A-roads (see **Figure 13.1**). The M6 and M6 Toll in the north east of the district provide access to Stafford, Cannock, Birmingham and the wider motorway network. The M54 in the north of South Staffordshire provides access to areas east and west of the district, including Telford and Walsall.
- 13.1.8 The A449 provides a north – south corridor through the district and the A5, A41, A454 and A458 provide east – west links into the West Midlands. Congestion in Staffordshire is only considered an issue in the main urban areas. Traffic delays are concentrated in the north of the district on motorways, the A5, A460 and A449. Local peak hour delays are also evident at junctions within larger settlements.

### **Public transport**

- 13.1.9 South Staffordshire is served by four railway stations: Bilbrook; Codsall; Landywood and Penkridge (see **Figure 13.1**). Midland Metro serves the district, connecting areas from Birmingham to Wolverhampton. Regular bus links are provided across much of South Staffordshire. For residents who struggle to access public transport, SSDC has produced district integrated transport strategies, presenting transport challenges and opportunities<sup>117</sup>.
- 13.1.10 In terms of onward and international travel, the nearest airport is Birmingham Airport, located in Solihull approximately 30km south east of South Staffordshire.

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<sup>115</sup> Department for Environment Food and Rural Affairs (2024) Local authority collected waste generation 2021/22. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>. [Date accessed: 12/03/24]

<sup>116</sup> South Staffordshire District Council (2022) Recycling Performance. Available at: <https://www.sstaffs.gov.uk/bins-recycling/recycling-performance.cfm>. [Date accessed: 03/11/23]

<sup>117</sup> South Staffordshire District Council (2023) District integrated transport strategy. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-03/south\\_staffordshire\\_integrated\\_transport\\_strategy\\_2017.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-03/south_staffordshire_integrated_transport_strategy_2017.pdf) [Date accessed: 06/03/24]

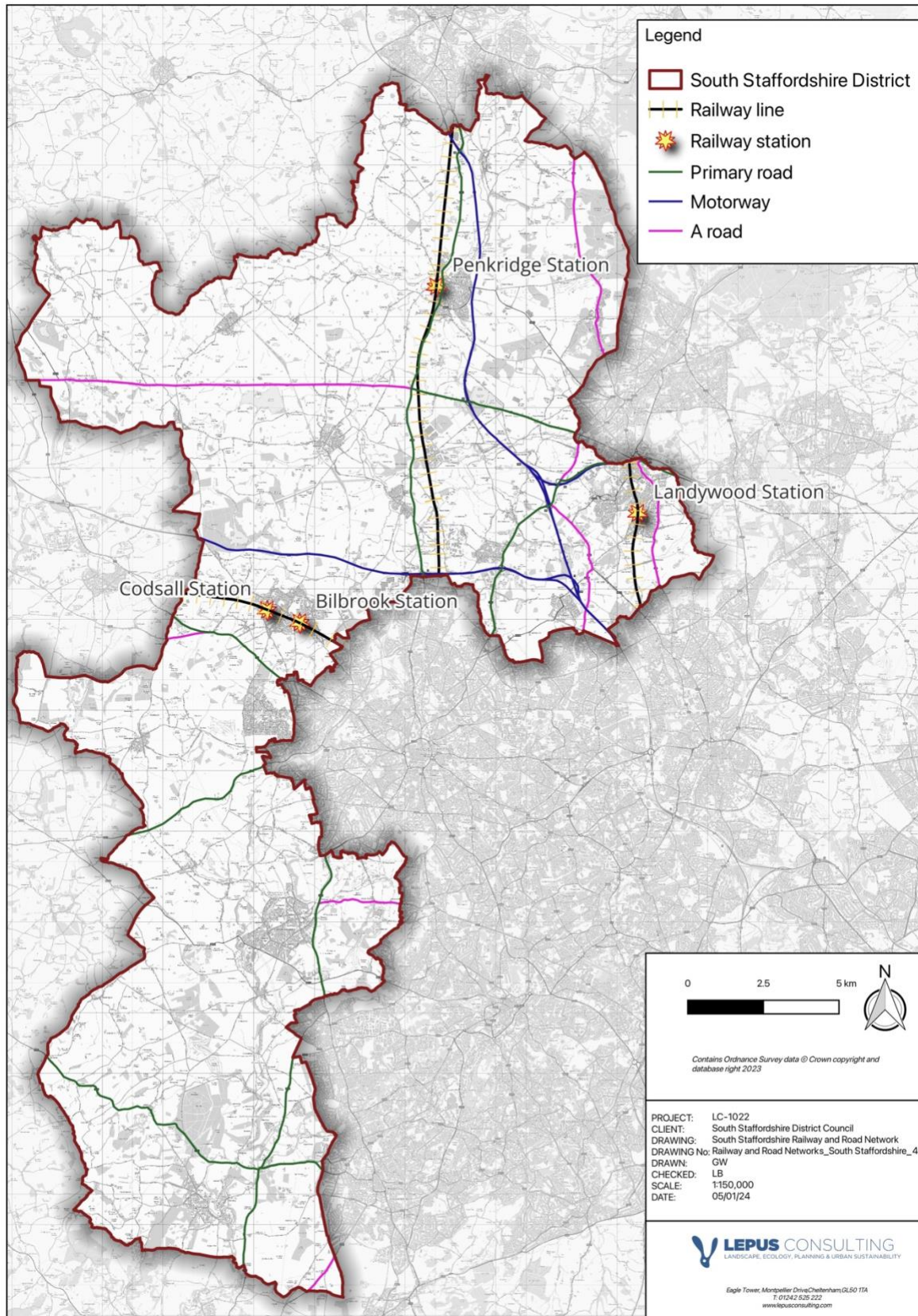
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### **Pedestrian and cycle access**

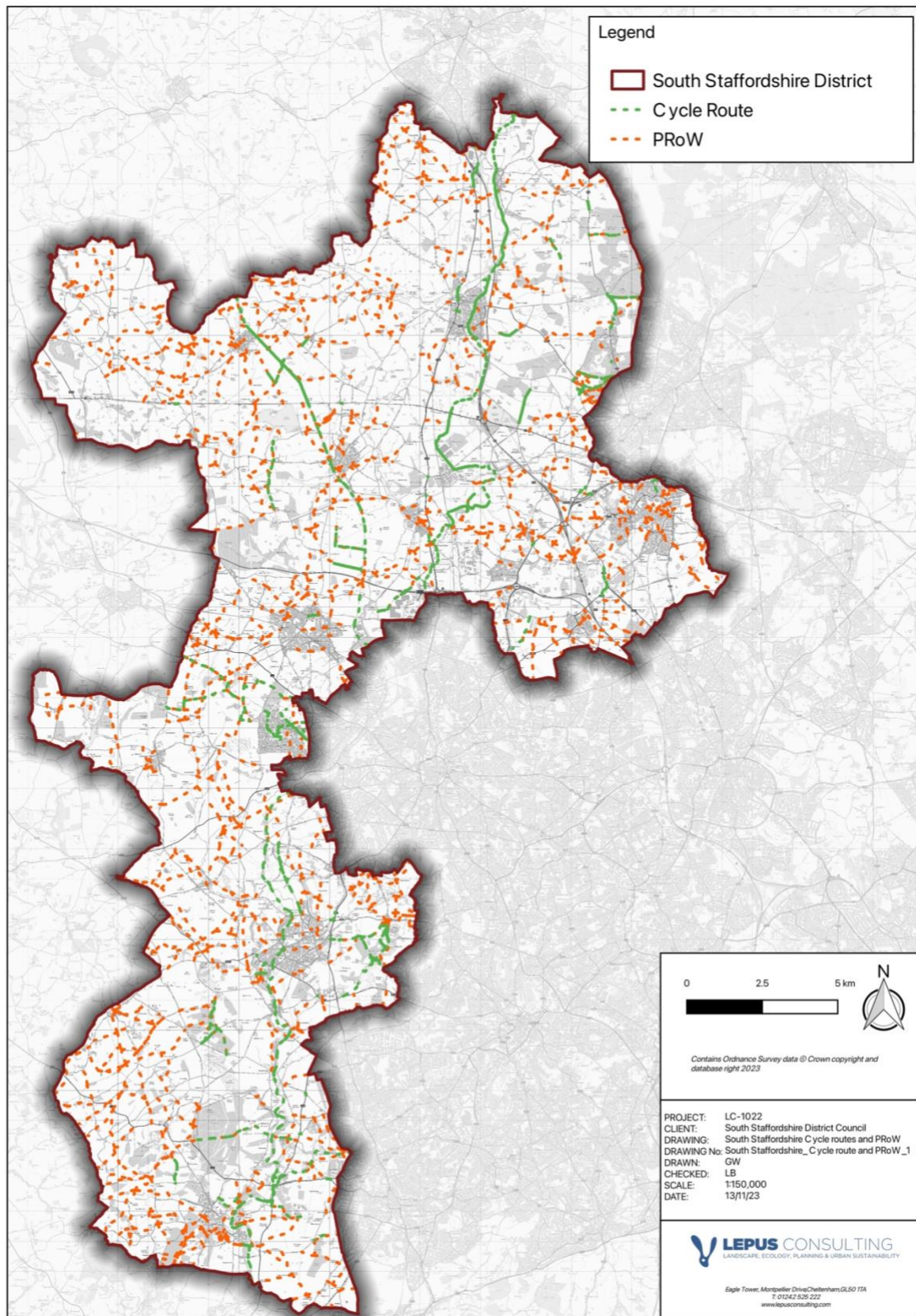
- 13.1.11 South Staffordshire's Public Right of Way (PRoW) and cycle networks (see **Figure 13.2**) include routes along the canal network and other watercourses, which provide a recreational resource as well as links to other modes of transport. Notable routes include Staffordshire Way and the Monarchs Way. Cycling currently contributes a small proportion of journeys in South Staffordshire; however, there are aspirations to continue to promote increased cycle use, as demonstrated by the Staffordshire Cycling and Walking Infrastructure Plan<sup>118</sup>.

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<sup>118</sup> Staffordshire County Council (2021) Local Cycling and Walking Infrastructure Plan 2021-2031. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-03/local\\_cycling\\_and\\_walking\\_infrastructure\\_plan.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-03/local_cycling_and_walking_infrastructure_plan.pdf) [Date accessed: 05/03/24]



**Figure 13.1:** South Staffordshire's railway and road network



**Figure 13.2:** Cycle paths and PRoW within South Staffordshire



### House prices

13.1.12 The average UK house price was £290,000 as of July 2023<sup>119</sup>. House prices in South Staffordshire are on average higher than the average for other LPAs in the region, and the UK average, at £305,776<sup>120</sup>.

13.1.13 Affordable housing is defined as “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)” including affordable housing for rent, starter homes and discounted market sales housing<sup>121</sup>. SSDC reports a lack of affordable housing, particularly for younger people in the district.

### Employment

13.1.14 The improvement and maintenance of high and stable levels of employment alongside economic growth are some of the key aims for growth in the UK. Other objectives include improvements to the education system to increase the skill levels of both children and adults, as well as improved productivity and innovation, particularly with regards to technology.

13.1.15 The percentage of people who are economically active in South Staffordshire is higher than average for Great Britain, whereas unemployment is lower than average (see **Table 13.1**). The proportion of those in South Staffordshire in professional occupations (32.2%) is greater than the proportion seen in Great Britain as a whole (26.8%).

**Table 13.1:** Employment rates for the working population (16-64) (2022-2023)<sup>122</sup>

Area	South Staffordshire (%)	Great Britain (%)
Economically active	89.5	78.6
Employees	79.6	66.0
Self Employed	(sample size too small for reliable estimate)	9.3
Unemployed	2.9	3.8

<sup>119</sup> Office for National Statistics (2023) UK House Price Index: July 2023. Available at: <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/housepriceindex/july2023> [Date accessed: 20/12/23]

<sup>120</sup> South Staffordshire District Council (2022) South Staffordshire Housing Market Assessment Update, October 2022. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-03/housing\\_market\\_assessment\\_update\\_2022.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-03/housing_market_assessment_update_2022.pdf) [Date accessed: 21/12/23]

<sup>121</sup> DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 20/12/23]

<sup>122</sup> ONS (2023) nomis: Labour Market Profile – South Staffordshire. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157177/report.aspx#> [Date accessed: 21/12/23]

### Employment land

- 13.1.16 According to the EDNA, “*South Staffordshire is seen as a key area for investment given its proximity to labour force and strategic transport links, relatively low labour costs compared to larger cities and availability of suitable employment sites including strong demand for the remaining pipeline of identified and allocated sites*”. The EDNA and previous studies, including the Employment Land Study (2012), recognised the cross-boundary significance of the district’s strategic employment sites, including Hilton Cross, Four Ashes, i54 and ROF Featherstone, with i54 in particular being a focus for advanced manufacturing, attracting several large international companies.
- 13.1.17 The EDNA (2022)<sup>123</sup> and 2024 update analysed the socio-economic landscape of the district and identified a total objectively assessed employment land need of 62.4ha for the period 2023 to 2041.

### Education

- 13.1.18 In South Staffordshire, there are 42 primary schools and 13 secondary schools and colleges. The majority have ‘outstanding’ or ‘good’ OFSTED ratings, with four schools listed as ‘requiring improvement’ and one ‘inadequate’<sup>124</sup>.
- 13.1.19 Educational attainment is generally good, with a higher proportion of residents in South Staffordshire than average for Great Britain and the West Midlands having National Vocational Qualifications (NVQs) at level 1, 2 and 3<sup>125</sup>.

### Digital connectivity

- 13.1.20 Digital connectivity includes the availability of fast broadband speeds, such as fibre, as well as mobile connectivity. Good digital connectivity can significantly enhance quality of life for local residents as well as the ability for businesses to operate effectively and to compete in the global market, helping to drive investment and employment opportunities.

### Deprivation

- 13.1.21 Although suburban and rural parts of South Staffordshire are relatively affluent, there are pockets of deprivation. The Index of Multiple Deprivation (IMD) is a nationally recognised measure of deprivation at the Lower Super Output Area (LSOA). The lower IMD average rank number relates to more deprived areas<sup>126</sup> (see **Figure 13.3**). The average rank is calculated by averaging all LSOA ranks in each larger area after they have been population weighted. Out of 317 LPAs in England, South Staffordshire is ranked as 239.

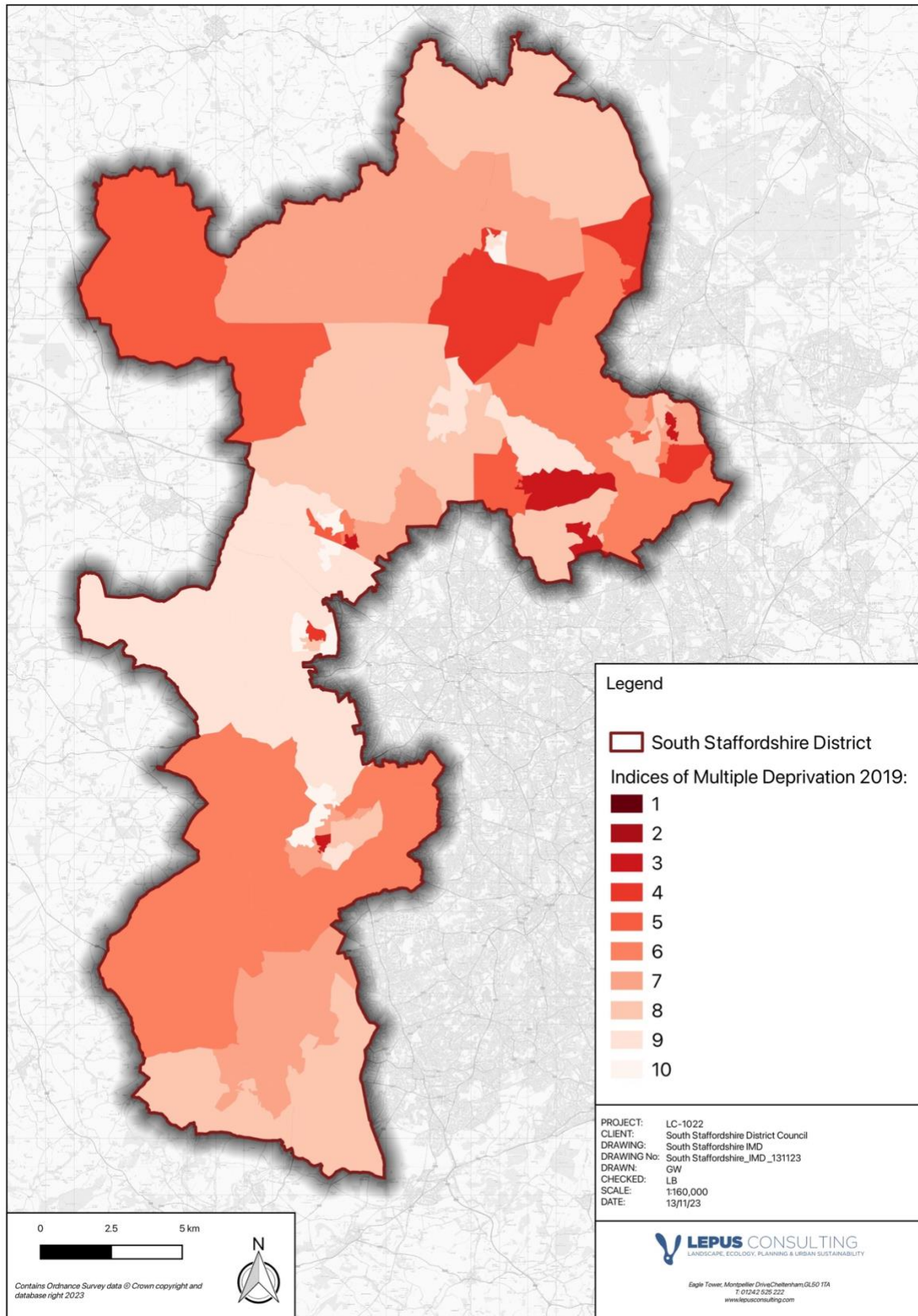
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<sup>123</sup> DLP Planning Ltd (2022) Economic Development Needs Assessment 2020-2040 for and on behalf of South Staffordshire District Council, June 2022. Available at: <https://www.sstaffs.gov.uk/local-plan-review-evidence-base> [Date accessed: 05/03/24]

<sup>124</sup> UK Gov (2023) All schools and colleges in South Staffordshire. Available at: <https://tinyurl.com/3dri5snv> [Date accessed: 03/11/23]

<sup>125</sup> ONS (2023) nomis: Labour Market Profile – South Staffordshire. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157177/report.aspx#> [Date accessed: 21/12/23]

<sup>126</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 06/11/23]



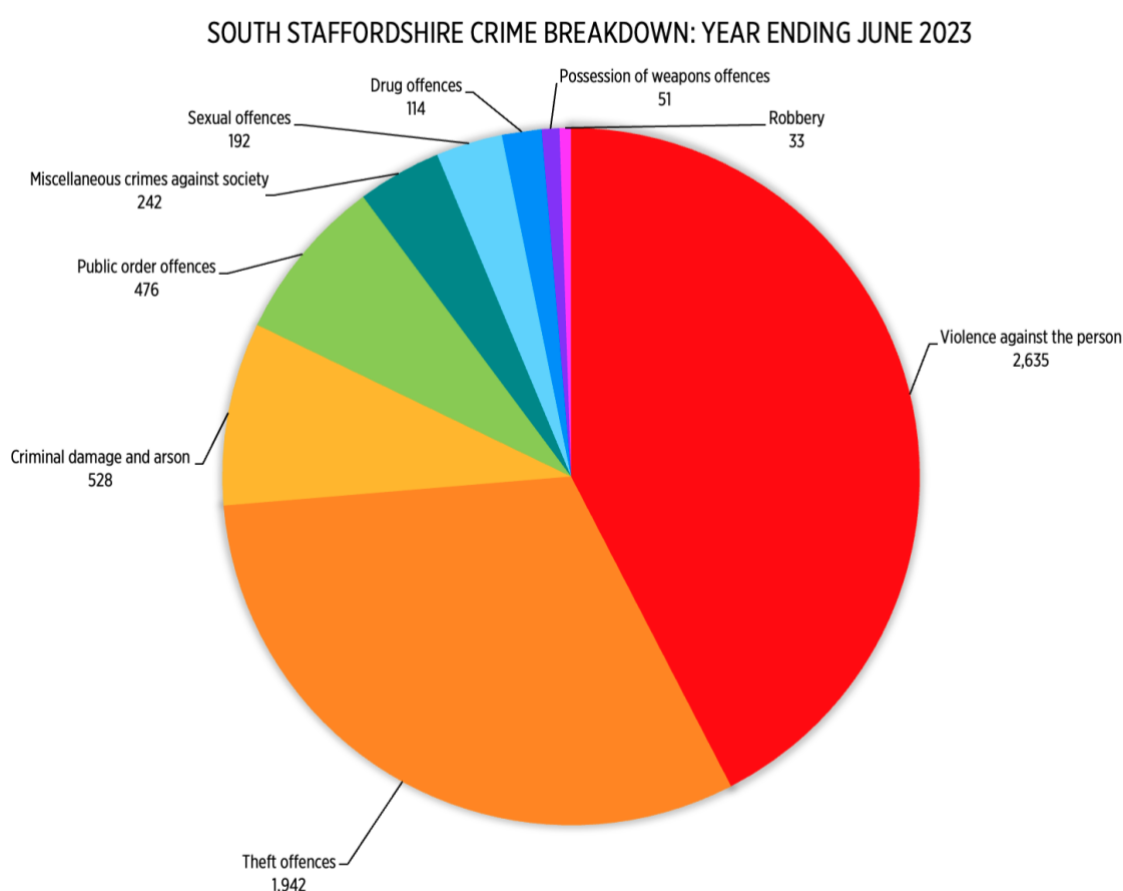
**Figure 13.3:** Indices of Multiple Deprivation rank (2019) for South Staffordshire

## Fuel Poverty

13.1.22 Fuel poverty is defined by the Warm Homes and Energy Conservation Act as being someone living on a lower income in a home which cannot be kept warm at a reasonable cost. The proportion of households in the district which are considered to be fuel poor in 2022 was 12.6%, which is lower than the proportion for Staffordshire County overall at 15.3%<sup>127</sup>.

## Crime

13.1.23 From June 2022 to June 2023, South Staffordshire recorded 6,213 crimes (see **Figure 13.4**). This was the third lowest of all Staffordshire LPAs. The most common crimes within South Staffordshire are violent crimes (particularly stalking and harassment), theft (particularly vehicle offences) and criminal damage.



**Figure 13.4:** Crime breakdown for South Staffordshire from June 2022 to June 2023 (ONS, 2023<sup>128</sup>)

<sup>127</sup> Department for Business, Energy and Industrial Strategy (2022) Sub-regional fuel poverty data 2022. Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2022>. [Date accessed: 06/11/23]

<sup>128</sup> ONS (2023) Recorded crime data by Community Safety Partnership area: Year ending June 2023 edition. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatabycommunitysafetypartnershiparea> [Date accessed: 21/12/23]

## Equality

- 13.1.24 South Staffordshire is home to individuals from many different religions, cultures, communities and backgrounds. According to the 2021 Census, 93.7% of South Staffordshire's population identified as white, 2.8% as Asian, 0.9% as black, 2.0% as mixed and 0.5% as 'other'<sup>129</sup>.
- 13.1.25 The Equality Act 2010<sup>130</sup> provides a legal framework to protect individuals from unfair treatment and promotes a fair and equal society. It seeks to highlight and strengthen the laws which prevent discrimination. Under the Equality Act, there are nine protected characteristics:
- Age;
  - Disability;
  - Gender reassignment;
  - Marriage and civil partnership;
  - Pregnancy and maternity;
  - Race;
  - Religion or belief;
  - Sex; and
  - Sexual orientation.
- 13.1.26 The Equality Act focuses on four main types of discrimination: direct discrimination; indirect discrimination; harassment; and victimisation. SSDC proposes four objectives for equality, diversity and inclusion<sup>131</sup> demonstrating a commitment to providing and promoting equality of opportunity for everybody.

### **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.

<sup>129</sup> ONS (2023) How life has changed in South Staffordshire: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000196/> [Date accessed: 21/12/23]

<sup>130</sup> Equality Act 2010. Available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 06/11/23]




<sup>131</sup> South Staffordshire District Council (2023) Equality, diversity and inclusion objectives. Available at: <https://www.sstaffs.gov.uk/equality-diversity-and-inclusion-objectives> [Date accessed: 03/11/23]

## 13.2 Impacts on population and material assets

13.2.1 **Box 13.1** presents a plan-wide summary of the adverse impacts on population and material assets that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. Consideration of potential pollution impacts on human health and access to health care are considered in **Chapters 7** and **11** respectively. **Box 13.2** lists the policies within the LPR which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on population and material assets. Where mitigating policies are silent, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 13.3** explores the nature of these residual effects.

*Box 13.1: Summary of identified impacts on population and material assets*


Impact on population and material assets	Summary of identified effect
 <p><b>Provision of housing to meet local need</b></p>	<p>The LPR proposes the development of 4,726 dwellings across the Plan period to 2041. This would be expected to meet the identified housing need and have a positive impact on South Staffordshire’s housing provision, and contribute towards the needs of neighbouring authorities within the HMA. The degree to which residents from vulnerable groups, such as those on low incomes and the elderly, would benefit from the increased housing provision would be dependent upon the size, type and tenure of housing provided.</p>
 <p><b>Provision of employment opportunities</b></p>	<p>The LPR proposes the development of 107.45ha of employment floorspace. The Plan would be likely to have a positive impact on the local economy, as well as the wellbeing of residents. The proposals in the LPR would be expected to satisfy the identified requirements for the district, as set out in the latest EDNA (2022 and 2024 update) in addition to contributing towards the employment land needs of the Black Country authorities.</p> <p>The degree to which residents from vulnerable groups would benefit from increase employment floorspace would be dependent on the use class and locations of the development.</p>
 <p><b>Sustainable access to services and facilities</b></p>	<p>Some site allocations would be situated outside of the sustainable distance to essential services, such as schools, local convenience stores, publicly accessible open space as well as the local PRoW or cycle networks. Good access to these services is essential to reduce reliance on private car use, encourage healthy and active lifestyles and provide accessibility to spaces which could potentially have benefits to mental wellbeing and community cohesion.</p> <p>19 site allocations are located outside of the sustainable distance to primary schools, and 20 sites are located outside of the sustainable distance to secondary schools.</p> <p>31 site allocations are located outside of sustainable distances to local convenience stores.</p> <p>30 residential-led site allocations are located in areas with ‘poor’ or ‘unreasonable’ access to employment opportunities, or in areas not assessed in the Rural Services and Facilities Audit.</p> <p>Sustainable access to healthcare services is considered under <b>Chapter 11: Human Health</b>.</p>

Impact on population and material assets	Summary of identified effect
 <p><b>Increased pressure on local services and facilities</b></p>	<p>The proposed development within the LPR would be expected to increase population density across South Staffordshire. This would be likely to apply greater pressures on the capacity of services within the Plan area, including schools, GP surgeries, leisure centres and open spaces.</p>
 <p><b>Effects on community cohesion</b></p>	<p>Community cohesion is important to help ensure residents are living happy and healthy lifestyles. Interactive and vibrant communities often benefit from a strong sense of place, a reduced fear of crime and have economic benefits.</p> <p>The LPR would be likely to have a positive effect with regard to establishing and maintaining cohesive communities, through seeking to provide a range of housing, employment opportunities and supporting infrastructure to meet the varied needs of the local population.</p>
 <p><b>Increased household waste generation</b></p>	<p>Waste management is jointly coordinated by the Staffordshire Joint Waste Management Board (JWMB) which incorporates Staffordshire County Council, Stoke-on-Trent City Council and the eight districts and boroughs within Staffordshire, including SSDC. SSDC has responsibility for the provision of collection and recycling services for households as part of the management of waste in the county. It is likely that development of 4,726 dwellings as proposed within the LPR will increase household waste generation in the district.</p>

### 13.3 Local Plan mitigation

13.3.1 The proposed development within the LPR aims to meet the identified housing and employment needs of the Plan area, as well as contribute towards the identified needs in the wider Greater Birmingham and Black Country HMA. The spatial strategy for the LPR seeks to ensure that most residents are located in close proximity to essential services and facilities and have adequate access to employment opportunities. Policies which would be expected to mitigate or enhance the impact of development on the local population and material assets are discussed in **Box 13.2**.

*Box 13.2: Mitigating effects of the LPR planning policies on populations and material assets*

Policy mitigation for population and material assets	Summary of mitigating effect
 <p><b>Provision of housing to meet local need</b></p>	<p>Policy DS4 'Development Needs' sets out the delivery of 4,726 homes over the Plan period to 2041, which will provide enough homes to meet South Staffordshire's housing requirement as well as contributing towards the unmet housing needs of the HMA, in line with the Duty to Cooperate. Policy DS5 sets out the Spatial Strategy to 2041, including the distribution of new development in line with the settlement hierarchy.</p> <p>Allocation policies SA1 and SA2 and the over-arching master planning policy MA1 set out specific requirements for the two strategic development locations, and Policy SA5 sets out other housing allocations.</p>

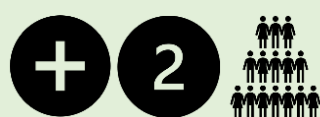
**Policy mitigation for population and material assets**

**Summary of mitigating effect**

Allocation Policy SA6 sets out the Gypsy and Traveller allocations, supported by Policy HC9 'Gypsy, Traveller and Travelling Showpeople' which sets out requirements for the provision of high quality pitches and plots for the GTTS communities to ensure that their needs can be addressed in terms of access to essential services and well-designed locations.

Policies HC1 and HC2 seek to ensure that an appropriate housing mix and density is delivered to meet needs, and Policy HC3 sets out the requirements for major development proposals to provide 30% affordable housing.

Policy HC4 supports the provision of accommodation for older residents, and Policy HC5 for those with specialist needs within South Staffordshire. Policy EC6 sets out requirements for the development of dwellings for rural workers. Policy HC8 sets out SSDC's support for the provision of self-build and custom housebuilding schemes to meet needs of those wishing to build and customise their own homes.



**Provision of employment opportunities**

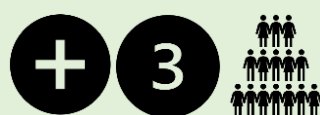
Policy DS4 'Development Needs' sets out the delivery of 107.45ha of employment land over the Plan period to 2041, which will provide enough land to meet South Staffordshire's employment requirement as well as contributing towards the unmet needs of the Black Country Authorities, in line with the Duty to Cooperate. Allocation policy SA7 sets out specific requirements for the employment allocations, including the strategic allocation at the West Midlands Interchange (WMI).

Policy EC1 'Sustainable Economic Growth' will seek to support the delivery of the strategic employment areas including the WMI, support opportunities for employment development in Tier 1 and Tier 2 villages and promote diversification of the rural economy.

Policy EC2 'Retention of Employment Sites' seeks to protect existing designated employment areas.

Policy EC4 'Rural Economy' supports rural diversification subject to certain measures.

Policy EC5 'Tourism' supports development proposals for tourist accommodation, Policy EC6 'Rural Working Dwellings' supports accommodation for agricultural and equine workers, and Policy EC7 supports equine related development in certain circumstances. These policies would help to maintain the diversity of employment opportunities in the Plan area, particularly in rural countryside areas.



**Sustainable access to services and facilities**

Policy EC8 'Retail' supports the vitality of village centres and will limit residential development within village centres if it results in the loss of existing facilities.

Policy EC9 'Protecting Community Services and Facilities' seeks to protect and enhance essential communities and facilities, including small local shops and pubs.

Policy EC12 'Sustainable Transport' supports a range of measures to encourage more sustainable modes of transport, including public transport and active travel, and seeks to ensure new development is designed to



**Policy mitigation for population and material assets**

**Summary of mitigating effect**

promote high quality walking and cycling routes, both within sites and linking to nearby services and facilities.

Policy HC14 'Health Infrastructure' seeks to protect existing healthcare infrastructure.

Policy HC15 'Education' seeks 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.

Policies EC1 'Sustainable Economic Growth', EC2 'Retention of Employment Sites', EC4 'Rural Economy', EC8 'Retail' and EC9 'Protecting Community Services and Facilities' seek to protect existing employment areas and provide opportunities for small-scale employment development in more rural areas. These policies encourage a greater number of local residents to seek local employment opportunities.

Policy HC10 'Design Requirements' requires new development to various accessibility and transport related criteria for proposals to meet in order to be supported, including providing "access to local services and facilities via sustainable modes of transport".

Policy EC9 'Protecting Community Services and Facilities' seeks to protect and enhance essential communities and facilities within the Plan area and resist the loss or relocation of community services and facilities unless alternative provisions are made to serve local residents.

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' aims to ensure that major residential development proposals and proposals for specialist elderly accommodation are assessed against the capacity of existing healthcare facilities, and that financial contributions are made where it is demonstrated that existing facilities do not have capacity.

Policy HC15 'Education' will seek to protect existing education infrastructure and states that new education infrastructure required as a consequence of the delivery of the housing need would be calculated in line with the Staffordshire Education Infrastructure Contributions Policy.

Policy MA1 'Master Planning Strategic Sites' sets out various requirements for the development of the two strategic sites, including provision of a "Development Phasing, Planning and Infrastructure Delivery Strategy" which should ensure that different aspects of the development including on and off-site supporting infrastructure and new community facilities are delivered alongside the residential growth.



**Increased pressure on local services and facilities**

Policy mitigation for population and material assets	Summary of mitigating effect
 <p><b>Impacts on community cohesion</b></p>	<p>Policy HC10 'Design Requirements' sets out various criteria to ensure that development design reflects the local character and positively responds to the existing landform, layout and landscaping, and seeks to deliver a high quality and well-managed public realm. This could help to strengthen sense of place with benefits to the quality of life for residents.</p> <p>Policy HC15 'Education' aims to co-locate new facilities with local centres and will support the delivery of compatible community facilities alongside school provision, which could help to create more cohesive communities.</p> <p>Policy EC9 'Protecting Community Services and Facilities' sets out SSDC's support for the retention of existing services and facilities to promote social interaction and support healthy inclusive communities.</p> <p>Policy HC5 'Specialist Housing' aims to ensure that accommodation for those with specialist needs includes measures to integrate the development within existing communities in order to encourage social interaction, which would help to improve community cohesion especially for more vulnerable residents.</p>
 <p><b>Increased household waste generation</b></p>	<p>There are no specific policy provisions proposed within the LPR with respect to reducing waste or promoting recycling. However, in line with the Joint Municipal Waste Management Strategy, SSDC is committed to increasing household recycling rates and minimising all forms of waste to landfill<sup>132</sup>.</p>

### 13.4 Residual effects on population and material assets

13.4.1 Residual effects are those that remain after the application of the LPR mitigating policies. Many of the policies would be expected to have positive residual effects in relation to population, in particular for housing and employment floorspace provision. There is potential for a residual adverse effect in relation to population, in terms of access to and provision of local services and facilities, particularly in the more rural settlements, as well as 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. Residual effects in relation to population and material assets are discussed further in **Box 13.3**.

<sup>132</sup> Staffordshire Waste Partnership (2013) 2013 Refresh of the Joint Municipal Waste Management Strategy for Staffordshire & Stoke-on-Trent (2007-2020). Available at: <https://www.staffordshire.gov.uk/Waste-and-recycling/wastestrategy/Documents/2013-Refresh-Headline-Strategy.pdf> [Date accessed: 02/11/23]

**Box 13.3:** *Residual effects for population and material assets*

Residual effects	Further details of the residual effect
<p><b>Provision of housing to meet local need</b></p>	<p>In order to meet the identified housing need, and contribute towards the needs of the wider HMA, the LPR proposes to deliver 4,726 new dwellings within the Plan period. Policies set out in the Plan, as discussed within <b>Box 13.2</b>, 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 GTTS community. A major positive residual effect on housing is anticipated.</p>
<p><b>Provision of employment opportunities</b></p>	<p>The Plan seeks to deliver 107.45ha of employment land, meeting the need identified in the latest EDNA and contributing towards the unmet needs of the Black Country Authorities. 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. A major positive residual effect on employment provision is anticipated.</p>
<p><b>Access to, and demand on, local services and facilities</b></p>	<p>Various LPR policies outlined in <b>Box 13.2</b> would be expected to improve access to local facilities by promoting sustainable transport options including public transport and active travel. In particular, Policy EC11 aims to secure appropriate and proportionate infrastructure from developers and landowners to support the proposed development, helping to ensure that there are adequate services to meet the day to day needs of residents within the local area.</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> <p><b>Reduced access to services and facilities is likely to be a medium-term and temporary significant effect.</b></p>
<p><b>Improved community cohesion</b></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.</p> <p>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. A minor positive residual effect on community cohesion is anticipated.</p>

Residual effects	Further details of the residual effect
<p><b>Increased household waste generation</b></p>	<p>The role of the Local Plan in waste management can be to set guidance or requirements for the reduction of construction waste in new development and to ensure design guidance requires new development to accommodate suitable spaces for recycling and waste storage and collection.</p> <p>There are no specific policy provisions proposed within the LPR with respect to reducing waste or promoting recycling. However, in line with the Joint Municipal Waste Management Strategy, SSDC is committed to increasing household recycling rates and minimising all forms of waste to landfill<sup>133</sup>.</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> <p><b>An increase in household waste generation could potentially be a long-term and permanent significant effect.</b></p>

<sup>133</sup> Staffordshire Waste Partnership (2013) 2013 Refresh of the Joint Municipal Waste Management Strategy for Staffordshire & Stoke-on-Trent (2007-2020). Available at: <https://www.staffordshire.gov.uk/Waste-and-recycling/wastestrategy/Documents/2013-Refresh-Headline-Strategy.pdf> [Date accessed: 02/11/23]

# 14 Soil

## 14.1 Baseline

- 14.1.1 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services. It filters air, stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines<sup>134</sup>. Soil is also one of the most important natural carbon sinks globally and its protection is vital in efforts to mitigate anthropogenic climate change. It can reduce flood risk, alleviate flood damage and improve local water and air quality to the benefit of ecosystem and human health.
- 14.1.2 In accordance with the core planning principles of the NPPF<sup>135</sup>, development on previously developed land is recognised as an efficient use of land. Development on previously undeveloped land is not considered to be an efficient use of land.
- 14.1.3 For development to be sustainable, decision makers must make best efforts to conserve soil resources. Development such as that proposed in the LPR can potentially adversely impact soil stocks, such as by direct loss of soil (e.g. excavation during construction), contamination, increased erosion and breakdown of structure and loss of nutrients. In recent years, soils in the UK have rapidly degraded, predominantly due to intensive agricultural production and industrial pollution. The UK’s soil continues to face three main threats, each of which will be exacerbated by climate change<sup>136</sup>: soil erosion by wind and rain; compaction; and organic matter decline.
- 14.1.4 Soils across South Staffordshire are varied (see **Table 14.1**). The soil across the Plan area ranges between low and high fertile soils and low and high carbon storage.

**Table 14.1:** Most prominent/common soils in the district<sup>137</sup>

Soil	Texture	Permeability	Fertility	Carbon storage	Ground cover
Freely draining slightly acid sandy soils	Sandy	Freely draining	Low	Low	Neutral and acid pastures, woodland, bracken and gorse
Freely draining slightly acid loamy soils	Loamy	Freely draining	Low	Low	Acid dry pastures, arable, deciduous and coniferous woodland
Slightly acid but base-rich loamy clayey soils	Loamy and clayey	Slowly permeable	Moderate	Low	Seasonally wet pastures, woodland, grassland, arable

<sup>134</sup> Food and Agriculture Organization of the United Nations (2020) Soil ecosystem services. Available at: <http://www.fao.org/agriculture/crops/thematic-sitemap/theme/spi/soil-biodiversity/soil-ecosystems-services/en/> [Date accessed: 06/11/23]

<sup>135</sup> DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 20/12/23]

<sup>136</sup> Department for Environment, Food & Rural Affairs (2009) Safeguarding our soils – A strategy for England. Available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>. [Date accessed: 20/12/23]

<sup>137</sup> Cranfield University (2017) Soilscales, Available at: <http://www.landis.org.uk/soilscales/> [Date accessed: 06/11/23]

Soil	Texture	Permeability	Fertility	Carbon storage	Ground cover
Slightly acid loamy and clayey soils	Loamy and clayey	Impeded drainage	Moderate to high	Low	Arable and grassland

### Agricultural Land Classification

14.1.5 The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and Subgrade 3a, are referred to as the 'best and most versatile' (BMV) land. Where site-specific ALC studies have not been completed, it is not possible to identify Subgrade 3a and 3b land. Therefore, for the purposes of the SA a precautionary approach is taken, and potential BMV land is assessed as Grades 1, 2 and 3. The grades are as follows:

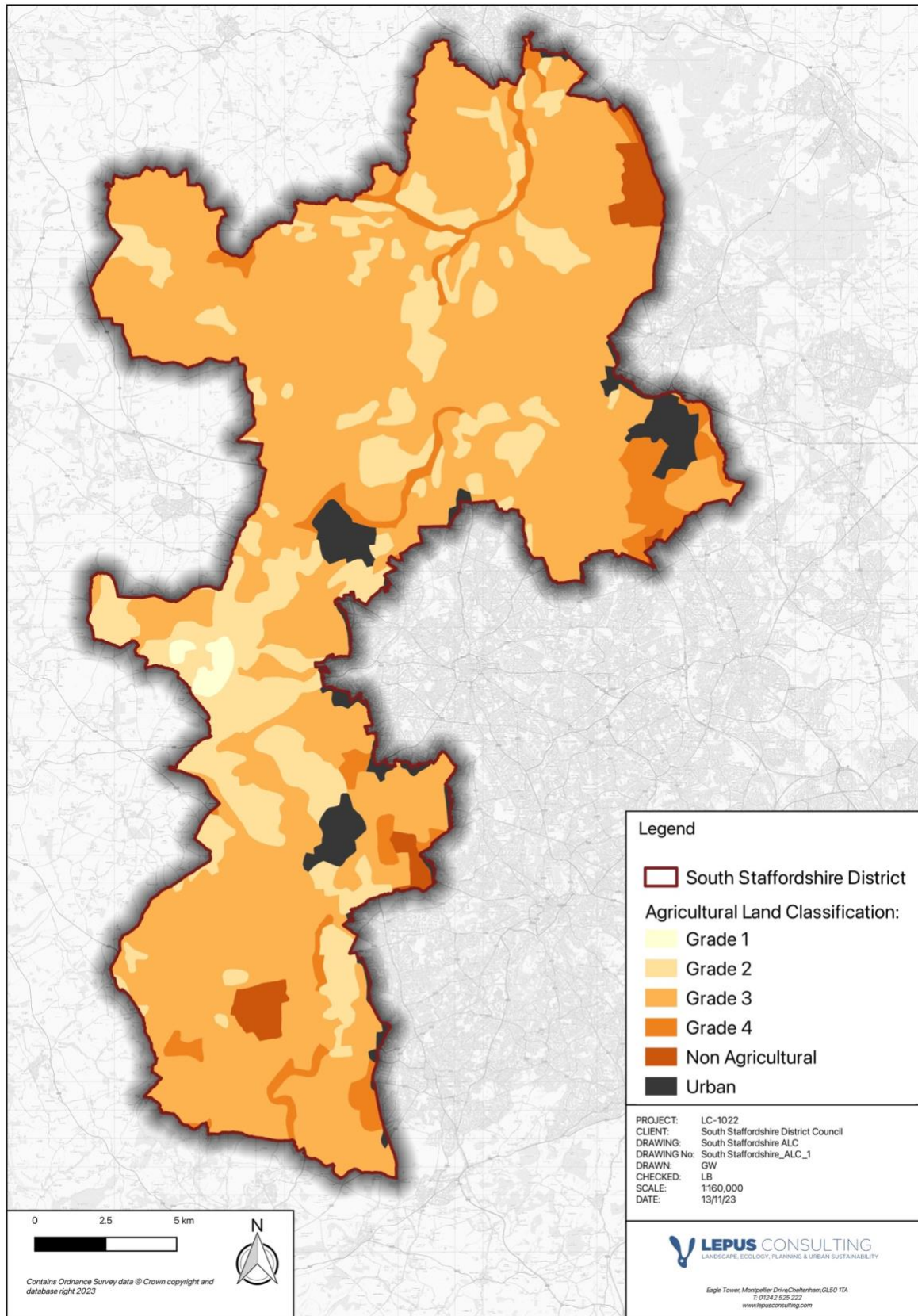
- **Grade 1** – excellent quality agricultural land
- **Grade 2** – very good quality agricultural land
- **Grade 3** – good to moderate quality agricultural land
  - **Subgrade 3a** – good quality agricultural land
  - **Subgrade 3b** – moderate quality agricultural land
- **Grade 4** – poor quality agricultural land
- **Grade 5** – very poor quality agricultural land

14.1.6 The majority of South Staffordshire's land is classified as Grade 2 and 3 ALC (see **Figure 14.1**). A small area of Grade 1 land is located in the west of the district, near to Pattingham.

14.1.7 Paragraph 180 of the NPPF<sup>138</sup> states "*planning policies and decisions should contribute to and enhance the natural and local environment by ... recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land*".

14.1.8 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'.

<sup>138</sup> DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 20/12/23]



**Figure 14.1:** Agricultural Land Classification (ALC) across South Staffordshire



### **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.

## **14.2 Impacts on soil**

14.2.1 **Box 14.1** sets out a plan-wide summary of the likely impacts on soil that have been identified through the SA process. These impacts are those identified prior to the consideration of mitigation in the form of LPR policies. **Box 14.2** lists the LPR policies which would be likely to mitigate, either fully or partially, the identified impacts. Where mitigating policies are silent, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 14.3** explores the nature of these residual effects.

*Box 14.1: Summary of identified impacts on soil*

Impact on soil	Summary of identified effect
 <p><b>Direct loss of soil resources and BMV land</b></p>	<p>The LPR proposes development at 48 allocated sites. Of these 48 sites, 36 allocations are wholly or partially located on previously undeveloped land. Based on the indicative areas of these 36 sites, the LPR could result in the loss of up to approximately 603ha of previously undeveloped land<sup>139</sup>. The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation.</p> <p>BMV land is defined through the ALC system as Grades 1, 2 and 3a (soil which is most flexible, productive and efficient in response to inputs, and which can best deliver food and non-food crops for future generations). 28 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 575ha of BMV land to be lost as a result of the development proposed in the LPR.</p>
 <p><b>Impact on ecosystem services</b></p>	<p>Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, carbon storage and providing the basis for vegetation to flourish. In order for soil to continue providing each service, careful consideration should be given to its structure and stability. Where construction occurs, soil could potentially be compacted by heavy vehicles on-site. During the occupation or operation phase of development, soil, in some circumstances, could potentially be paved over, become subject to increased footfall or be subject to increased volumes of fertilisers and other chemicals.</p>


<sup>139</sup> 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.



### 14.3 Local Plan mitigation

14.3.1 The LPR seeks to promote an efficient use of natural resources and encourages new development to protect and enhance valued soils including BMV land, where possible. These policies are discussed in **Box 14.2**.

**Box 14.2:** Mitigating effects of the LPR planning policies on soil

Policy mitigation for soil	Summary of mitigating effect
 <p><b>Policy mitigation for direct loss of the soil resources and BMV land</b></p>	<p>Policy DS3 'Open Countryside' states "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".</p> <p>Policy HC2 'Housing Density' may help to reduce the overall land-take to deliver housing needs across the Plan area and may serve to reduce negative effects on soil loss and loss of BMV agricultural land, although this effect is uncertain as it would be dependent on the locations for development.</p> <p>Policy EC1 'Sustainable Economic Growth' gives preference to the "use of sustainable previously developed land for employment development" and could potentially prevent the loss of some local soils.</p> <p>Policy EC5 'Tourist Accommodation' only supports expansion of such facilities outside development boundaries where it would not use BMV land.</p> <p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' seeks to ensure that valued soils, including BMV agricultural land, are protected and enhanced.</p>
 <p><b>Policy mitigation for impact on ecosystem services</b></p>	<p>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.</p> <p>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> <p>Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' encourages the restoration, enhancement and creation of habitats and linkages, particularly where these contribute to the Nature Recovery Network. This would be expected to help mitigate negative ecological impacts associated with development.</p>

### 14.4 Residual effects on soil

14.4.1 Policies within the LPR seek to mitigate some of the adverse impacts identified with regard to soils. 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. However, some site allocations are situated on previously undeveloped land. The policies within the LPR cannot fully mitigate the adverse impacts of development on ecologically and agriculturally important soils. **Box 14.3** sets out the residual adverse effects of the LPR on soil.

**Box 14.3: Residual effects for soil**

Residual effects	Further details of the residual effect
<p><b>Loss of soil resources and BMV land</b></p>	<p>The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land. 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. Therefore, a residual adverse effect would be expected.</p> <p><b>The loss of approximately 603ha of previously undeveloped land, approximately 575ha of which could include BMV land, would be expected to be a long-term and permanent significant effect.</b></p>
<p><b>Impact on ecosystem services</b></p>	<p>Paragraph 180(b) of the NPPF requires planning policies and decisions to enhance the natural environment by “<i>recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services</i>”.</p> <p>Several Local Plan policies aim to increase provision and connectivity of GI across the Plan area, which would be expected to mitigate potential adverse impacts due to the proposed development; however, the proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. A residual adverse effect would be expected.</p> <p><b>The loss of ecosystem services would be likely to be a long-term and permanent significant effect.</b></p>

# 15 Water

## 15.1 Baseline

### Flood risk

- 15.1.1 The main watercourses that pass through South Staffordshire include the River Penk, River Stour, Moat Brook, Wom Brook, Saredon Brook, and Smestow Brook. The district is positioned within the Severn and Humber catchments.
- 15.1.2 Areas of Flood Zone 2 and 3 can be found particularly within the centre and north of the district (see **Figure 15.1**), coinciding with the River Stour, River Penk, Smestow Brook and Saredon Brook, as well as other subsidiary watercourses which branch from these larger channels. These areas have a risk of fluvial flooding which is greater than 3.3% each year. Approximately 1,540ha of the Plan area is in Flood Zone 3. In line with the NPPF, careful consideration should be given to the level of flood risk new residents are exposed to, as well as the impacts of development on risk.
- 15.1.3 In addition to river flooding, other potential sources of flooding within South Staffordshire include groundwater flooding, sewer flooding, and surface water flooding<sup>140</sup>. Areas of high, medium and low surface water flood risk are present across the Plan area (see **Figure 15.2**). Surface water flood risk typically follows roads and natural watercourses.
- 15.1.4 Flood risk is exacerbated by loss of vegetation, soil erosion, climate change, extreme weather and urbanisation.
- 15.1.5 It is good practice to make allowances for climate change in flood risk assessments<sup>141</sup>. Allowing for the impacts of climate change helps to minimise vulnerability whilst providing greater resilience to flooding by anticipating changes to peak river flows, peak rainfall intensities, sea level rise and offshore wind speeds. Climate change allowances are based on climate change projections under different CO<sub>2</sub> scenarios.

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<sup>140</sup> Environment Agency (2009) Flooding in England; national assessment of flood risk. Available at: <https://www.gov.uk/government/publications/flooding-in-england-national-assessment-of-flood-risk> [Date accessed: 06/11/23]

<sup>141</sup> Environment Agency (2022) Flood risk assessments: climate change allowances. Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> [Date accessed: 06/11/23]

## Green infrastructure

15.1.6 Green Infrastructure (GI) is a network of multi-functional green space, which is capable of delivering a wide range of environmental and quality of life benefits for local communities<sup>142</sup>. 'Blue Infrastructure' is also a term used to refer to rivers, canals, wetlands and other water-based assets that can integrate and link with GI. GI has many benefits including human health, climate change adaptation and wildlife value<sup>143</sup>, and can play an important role in helping urban areas adapt to climate change by filtering airborne pollutants, providing shade and cooling and reducing surface water runoff<sup>144</sup>. GI provision or enhancement within South Staffordshire should seek to integrate with any existing or potential GI networks in neighbouring authorities such as Wolverhampton<sup>145</sup>.

## Water resources

15.1.7 The main water service provider for South Staffordshire is 'South Staffs Water', who provide water to around 1.7 million people. South Staffs Water's Water Resources Management Plan (WRMP)<sup>146</sup> sets out the long-term management of water resources for the 25-year period between 2020 and 2045 and how the needs of the population will be met. Likely challenges identified in the WRMP include:

- Significant investment is required in the two major water treatment works to ensure water availability to meet growing demands;
- Without intervention, there is increasing risk of deterioration of the environment as a result of water abstractions; and
- There is a need to reduce leakage in the water network.

15.1.8 The Southern Staffordshire Water Cycle Scoping Study (WCS)<sup>147</sup> assesses development proposals in South Staffordshire in regard to water supply capacity, wastewater capacity and environmental capacity. The study then seeks to inform future demonstratable solutions to the key constraints, including policy recommendations.

15.1.9 The WCS identifies that there is likely to be a supply-demand deficit in South Staffordshire between 2024-2026, based on current development projections.

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<sup>142</sup> DLUHC (2023) National Planning Policy Framework. Available at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 02/11/23]

<sup>143</sup> Forest Research (2010) Benefits of green infrastructure. Available at:

[https://cdn.forestresearch.gov.uk/2010/10/urgp\\_benefits\\_of\\_green\\_infrastructure.pdf](https://cdn.forestresearch.gov.uk/2010/10/urgp_benefits_of_green_infrastructure.pdf) [Date accessed: 06/11/23]

<sup>144</sup> Landscape Institute (no date) Green Infrastructure (GI). Available at: <https://www.landscapeinstitute.org/policy/green-infrastructure/>. [Date accessed: 06/11/23]

<sup>145</sup> City of Wolverhampton Council (2021) South Staffordshire Local Plan Preferred Options Consultation. Available at:

<https://wolverhampton.moderngov.co.uk/documents/s193621/South%20Staffordshire%20Local%20Plan%20Preferred%20Options%20Consultation.pdf> [Date accessed: 06/11/23]

<sup>146</sup> South Staffs Water (2019) Water Resources Management Plan 2019. Available at: <https://www.south-staffs-water.co.uk/media/2676/final-wrmp-2019-south-staffs-water.pdf> [Date accessed: 02/11/23]

<sup>147</sup> JBA Consulting (2020) Southern Staffordshire Councils Water Cycle Study – Phase 1 Scoping Study. Available at:

<https://tinyurl.com/2p88kscz> [Date accessed: 02/11/23]

15.1.10 The WCS also states that *"Policies to reduce water demand from new developments, or to go further and achieve water neutrality in certain areas, could be defined to reduce the potential environmental impact of additional water abstractions in Southern Staffordshire, and also help to achieve reductions in carbon emissions"*.

15.1.11 SSDC produced a Surface Water Management Programme (SWMP) report, providing recommendations for 'red zones' in areas like Penkrige, as well as recommendation improvements to data sharing and SuDS<sup>148</sup>.

### **Groundwater**

15.1.12 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks. The Environment Agency (EA) has published details about how they manage and protect groundwater<sup>149</sup>. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants.

15.1.13 There are three SPZs<sup>150</sup> in the Plan area:

- SPZ 1 – Inner Protection Zone: the 50-day travel time from any point below the water table to the source;
- SPZ 2 – Outer Protection Zone: the 400-day travel time from a point below the water table, with a minimum radius of 250-500m; and
- SPZ 3 – Source Catchment Protection Zone: area around source within which all groundwater recharge is discharged at the source.

15.1.14 The majority of South Staffordshire is located within SPZ 3, with smaller areas also covered by SPZ 1 and 2 such as around Smestow Brook and the River Stour (see **Figure 15.3**).

15.1.15 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'.

15.1.16 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.

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<sup>148</sup> Royal Haskoning (2010) Southern Staffordshire Surface Water Management Plan. Available at: <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Forward%20Planning/Examination%20Library%202013/D42--SOUTHERN-STAFFORDSHIRE-SURFACE-WATER-MANAGEMENT-PLAN-PHASE-1.pdf> [Date accessed: 02/11/23]

<sup>149</sup> Environment Agency (2018) The Environment Agency's approach to groundwater protection, February 2018, Version 1.2. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf) [Date accessed: 06/11/23]

<sup>150</sup> Environment Agency (2019) Groundwater Source Protection Zones. Available at: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs> [Date accessed: 06/11/23]

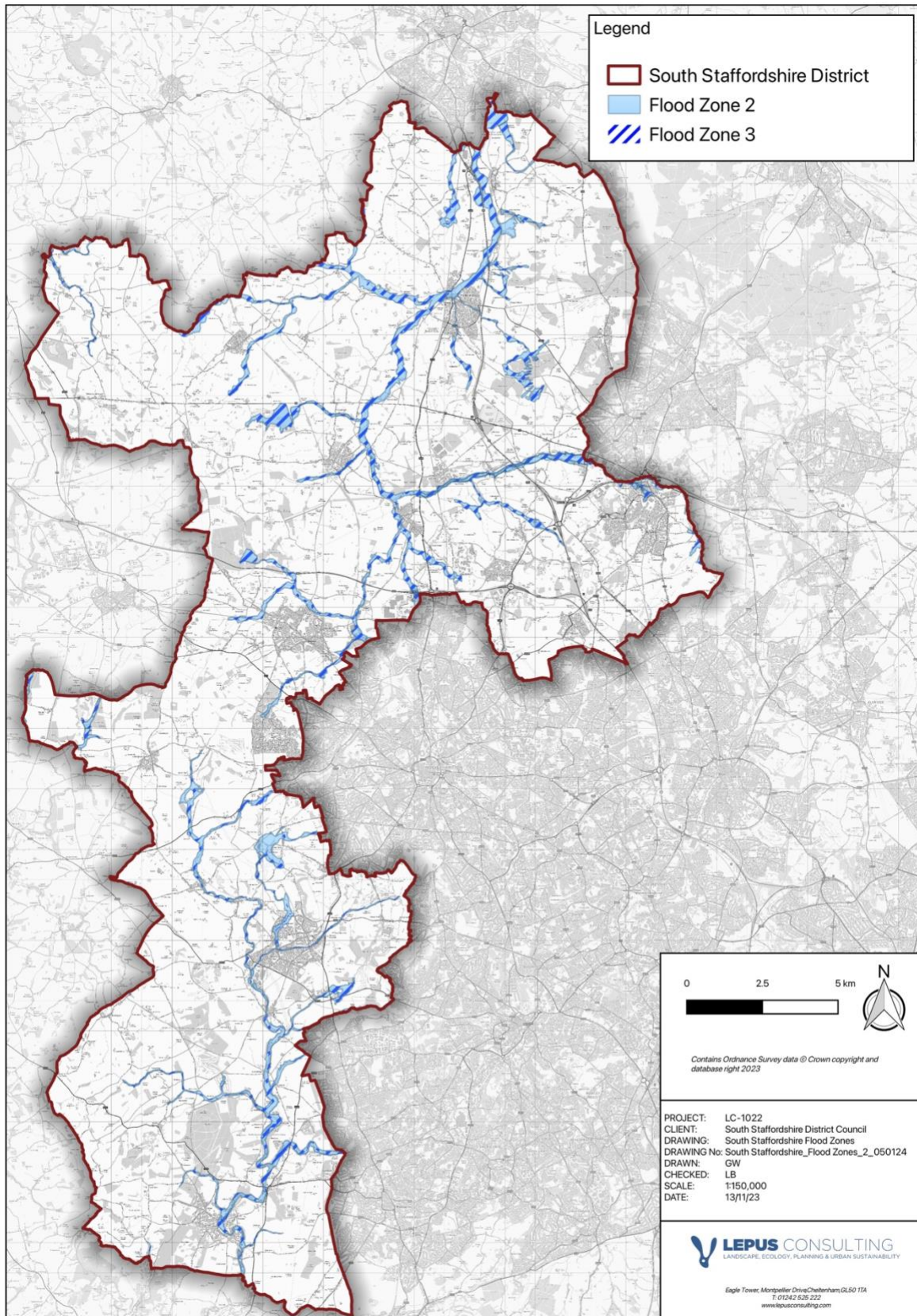
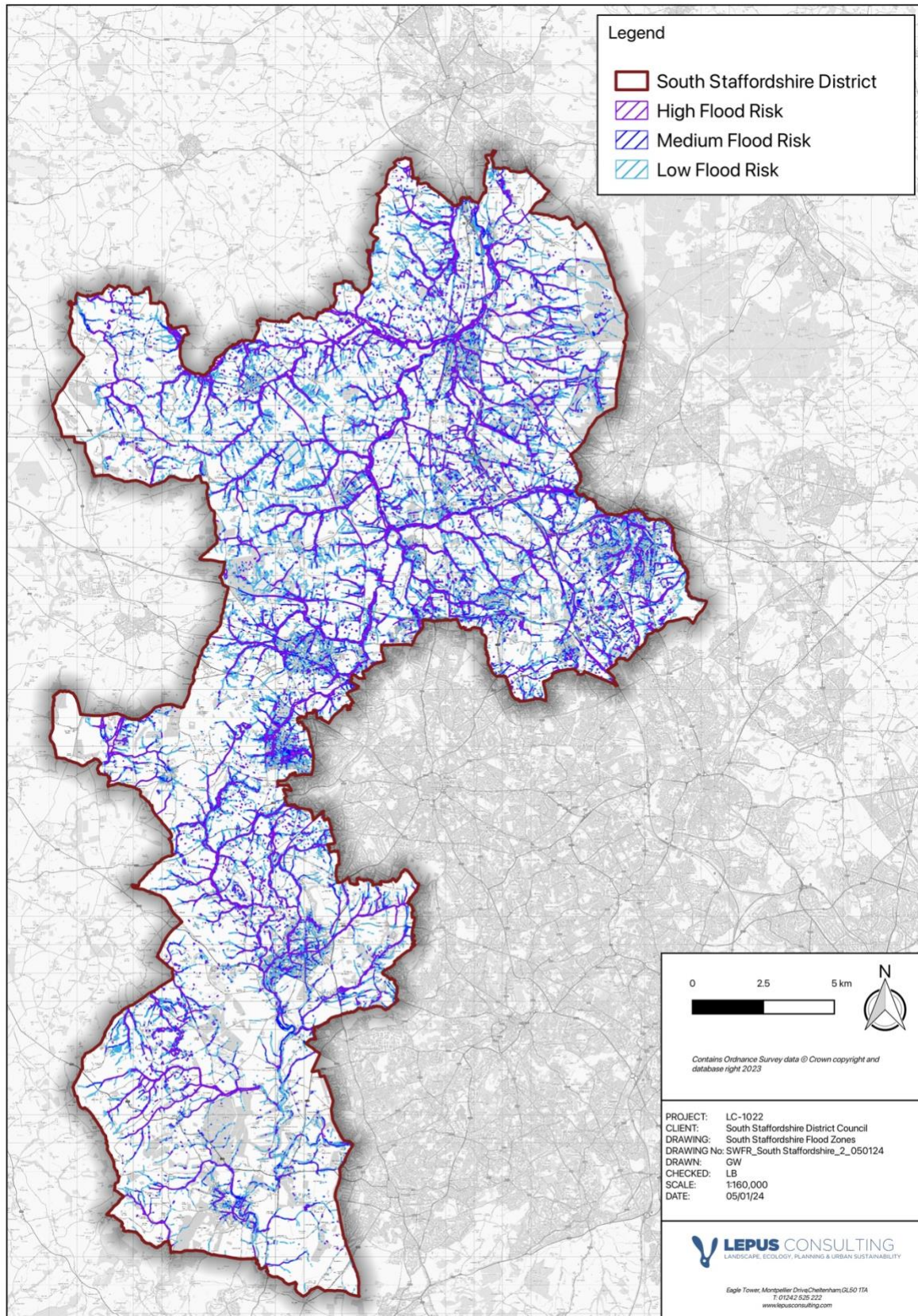
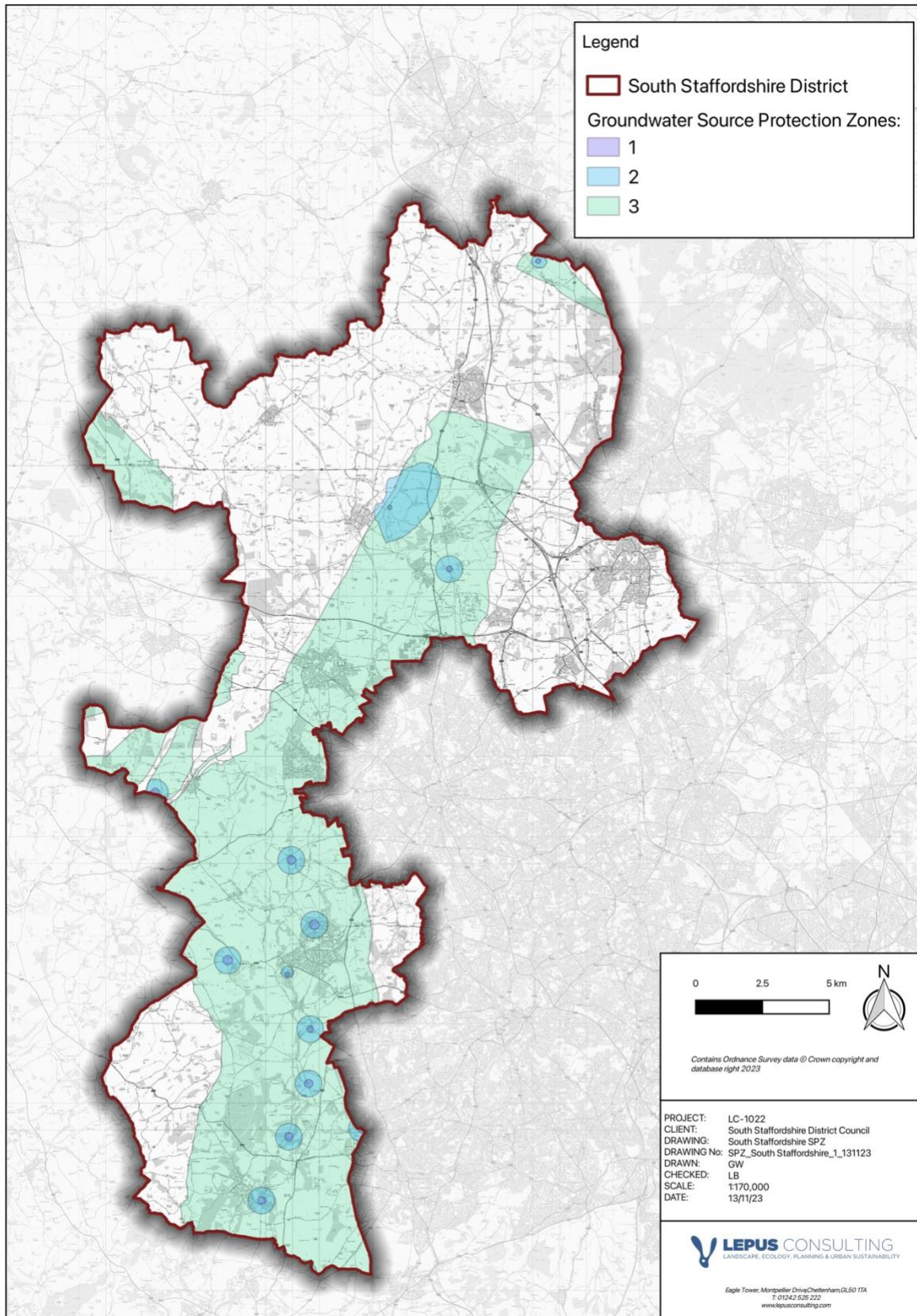


Figure 15.1: Flood Zones in South Staffordshire



**Figure 15.2:** Extent of surface water flood risk in South Staffordshire



**Figure 15.3:** Groundwater Source Protection Zones across South Staffordshire






### **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.



## **15.2 Impacts on water**

15.2.1 **Box 15.1** presents a plan-wide summary of the adverse impacts on water that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. **Box 15.2** lists the policies within the LPR which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on water. Where mitigating policies are silent, or the contents of the LPR only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 15.3** explores the nature of these residual effects.

*Box 15.1: Summary of identified impacts on water*

Impact on water	Summary of identified effect
 <p><b>Fluvial flood risk</b></p>	<p>Development within Flood Zones 2 or 3 (including 3a and 3b) has the potential to locate site end users at risk of fluvial 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.</p> <p>The majority of allocated sites are located in Flood Zone 1; however, eight of the allocated sites coincide with some areas of Flood Zones 2 and 3. This includes: residential-led Sites 420, 519, 584, 617 and 010; employment-led Sites E18 and E24; and Gypsy and Traveller Site GT32.</p>
 <p><b>Surface water flood risk</b></p>	<p>Development in areas of surface water flood risk may locate site end users in areas at risk of flooding, with safety implications, and further exacerbate flood risk in the surrounding area.</p> <p>A total of 24 allocated sites coincide with varying extents of surface water flood risk, including 12 sites with some land identified as high risk.</p>
 <p><b>Reduction in water quality and ecosystem services</b></p>	<p>Water provides a range of essential ecosystem services, including providing the basis for vegetation to flourish and supporting biodiversity. Development and urbanisation can be associated with adverse impacts on water quality, including risks of water pollution associated with runoff from roads, and from water outflows during storm conditions. The WCS Scoping Study<sup>151</sup> states that “<i>The increased wastewater discharges at the WwTWs serving growth in Southern Staffordshire have the potential to impact downstream water quality in the receiving watercourses, with ammonia being the water quality indicator that appears to be the most sensitive to increased effluent flows</i>”.</p> <p>The majority of the allocated sites (39 sites) are located either wholly or partially on previously undeveloped land. The construction and occupation</p>

<sup>151</sup> JBA Consulting (2020) Southern Staffordshire Councils Water Cycle Study – Phase 1 Scoping Study. Available at: <https://tinyurl.com/2p88kscz>. [Date accessed: 06/11/23]

Impact on water	Summary of identified effect
	<p>of these developments has the potential to increase the risk of contamination and pollution of waterways, primarily due to the potential loss of soil and surface water / pollutant runoff.</p> <p>25 allocated sites are located within an SPZ, and therefore, there could potentially be an overall increase in the risk of groundwater contamination or pollution upon development.</p>
 <p><b>Increased water demand</b></p>	<p>Based on an average of 2.3 people per dwelling in South Staffordshire<sup>152</sup>, the proposed development of 4,726 dwellings over the Plan period could increase the local population by approximately 10,869 new residents. Subsequently, this growth would be likely to increase water demand across the Plan area.</p> <p>The South Staffs Water WRMP identified a supply-demand deficit under the baseline scenario if no action is taken. The WRMP also identified a range of actions to take over a 25-year period to address this supply-demand deficit, including infrastructure improvements and encouraging behavioural change of consumers, to ensure that there are adequate water resources for all proposed development sites. With regard to water resources, the WCS Scoping Study concluded that <i>“On the basis that there is a plan to address the supply-demand deficit, and sufficient time to adapt the long-term plan to include emerging trends in population, no further assessment is recommended as part of a Phase 2 Outline study”</i>.</p>
 <p><b>Increased pressure on wastewater treatment</b></p>	<p>The proposed development of 4,726 new dwellings within South Staffordshire would be expected to increase the local population, and subsequently, increase the demand for wastewater treatment across the Plan area.</p> <p>The Phase 1 WCS found that significant new infrastructure and upgrades to existing network and wastewater treatment works will be required to accommodate growth and recommends early engagement with water companies and that more detailed study is undertaken with regard to the wastewater network.</p>




## 15.3 Local Plan mitigation

15.3.1 Policies within the LPR, primarily Policy NB7, aim to reduce flood risk, prevent the decrease of water quality and improve water efficiency in new developments within the Plan area. The provision of GI and open spaces through various other Local Plan policies would also be expected to slow infiltration and help alleviate flood risk to some extent. The policies are discussed in detail in **Box 15.2**.

<sup>152</sup> Based on 2021 Census population data (110,500) and 2021 dwelling stock information (48,064).

ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> and DLUHC & MHCLG (2022) Live tables on dwelling stock. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date accessed: 03/11/23]

**Box 15.2: Mitigating effects of the LPR planning policies on water**

Policy mitigation for water	Summary of mitigating effect
 <p><b>Fluvial and surface water flood risk</b></p>	<p>Policy NB7 'Managing Flood Risk, Sustainable Drainage Systems &amp; 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. The policy also promotes Sustainable urban Drainage Systems (SuDS) as an integral part of development design, seeking opportunities for dual use with open spaces.</p> <p>Policy HC19 'Green Infrastructure', Policy EC1 'Sustainable Economic Growth' and Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' seek to protect and create 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.</p> <p>Policy HC9 'Gypsy, Traveller and Travelling Showpeople' seeks to locate new plots and pitches in locations which avoid areas of high flood risk.</p>
 <p><b>Reduction in water quality and ecosystem services</b></p>	<p>Policy NB7 'Managing Flood Risk, Sustainable Drainage Systems &amp; Water Quality' requires major development proposals to incorporate SuDS and new development proposals located within Flood Zones 2 and 3 to provide a site-specific flood risk assessment and surface water drainage strategy. The policy states that development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water or indirectly through the treatments of wastewater.</p> <p>Policy HC19 'Green Infrastructure', Policy EC1 'Sustainable Economic Growth' and Policy NB1 'Protecting, Enhancing and Expanding Natural Assets' seek to increase GI provision in developments which may help to control water runoff quality to some extent, through natural filtration.</p>
 <p><b>Increased demand for water and wastewater treatment</b></p>	<p>Policy NB7 'Managing Flood Risk, Sustainable Drainage Systems &amp; Water' states that all development proposals must demonstrate "<i>adequate water supply, sewerage and land drainage systems (including water sources, water and wastewater infrastructure) to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development</i>".</p>

**15.4 Residual effects on water**

15.4.1 Residual adverse effects would be expected to remain in terms of demand for wastewater management following the implementation of the LPR policies. Further details are presented in **Box 15.3**.

**Box 15.3: Residual effects for water**

Residual effects	Further details of the residual effect
<p><b>Fluvial and surface water flood risk</b></p>	<p>A Strategic Flood Risk Assessment (SFRA) has been prepared, and SSDC has been consulting with the Environment Agency through the Local Plan’s preparation to ensure the sequential test is properly followed. Furthermore, SSDC will aim to avoid placing vulnerable uses in Flood Zones 2 and 3, allocating sites with areas within these zones for water-compatible uses, such as GI, as outlined in LPR policies.</p> <p>The Level 2 SFRA<sup>153</sup> includes detailed assessments of seven proposed site options with identified areas of flood risk and sets out a range of requirements and guidance to ensure that site end users will not be placed in danger from flood hazards throughout its lifetime. Recommendations for planning policies and guidance for windfall sites are also set out.</p> <p>The WCS states that “<i>The impact of increased effluent flows is unlikely to have a significant impact on the flood risk of the receiving watercourses of WwTW serving growth in Southern Staffordshire, with the exception of Little Aston WwTW. This is, however, assuming 100% of proposed sites will come forward which is unlikely, therefore the flood risk impact for the final sites should be considered as part of a Phase 2 study</i>”.</p> <p>The SFRA process combined with LPR policies, specifically Policy NB7, would be expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial or surface water flooding. Subject to achieving the mitigation recommendations set out in the Level 2 SFRA and WCS, a residual negligible impact on fluvial flooding would be expected.</p>
<p><b>Reduction in water quality and ecosystem services</b></p>	<p>As outlined in <b>Box 15.2</b>, several LPR policies (and particularly NB7) would be expected to help protect and enhance water quality either directly or indirectly, by ensuring that development proposals incorporate sustainable drainage systems and increase the provision of multi-functional GI.</p> <p>With regard to environmental constraints, the WCS Scoping Study stated that “<i>A number of Sites of Special Scientific Interest (SSSIs) exist within Southern Staffordshire and there is a possibility of point source pollution (from WwTW) or diffuse pollution (for example from surface runoff from development) to impact these sites. Opportunities exist to mitigate this through implementation of SuDS schemes to manage surface runoff. The impact of WwTW on water quality should be assessed in a Phase 2 Study</i>”.</p> <p>The Publication Draft HRA (2022)<sup>154</sup> explored the likely significant effects and required mitigation measures in further depth, including the potential for specific policy wording to ensure that requirements regarding water quality at Habitats sites (and underpinning SSSIs) are being met. At the appropriate assessment stage adverse effects on integrity from water issues, including water quality and quantity, were ruled out both alone and in-combination. As such, a residual negligible impact would be expected.</p>

<sup>153</sup> JBA Consulting (2022) South Staffordshire Council Level 2 Strategic Flood Risk Assessment. Final Report, November 2022. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-02/sfra\\_2022\\_report.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-02/sfra_2022_report.pdf) [Date accessed: 29/11/23]

<sup>154</sup> Footprint Ecology (2022) Habitats Regulations Assessment of the South Staffordshire Local Plan Review 2018-2038 (Publication Plan, Regulation 19) – Publication Draft, 10<sup>th</sup> October 2022. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-02/03\\_hra\\_october\\_2022.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-02/03_hra_october_2022.pdf) [Date accessed: 29/11/23]

Residual effects	Further details of the residual effect
<b>Increased demand for water and wastewater management</b>	<p>The increased population within the Plan area would be expected to increase water demand, such as for drinking water supply and wastewater treatment, despite measures within national policies and the LPR policies to improve water efficiency.</p> <p>The WCS indicates that Severn Trent Water and South Staffs Water do not expect water supply infrastructure to be a constraint to development within South Staffordshire. However, 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.</p> <p><b>Increased pressure on wastewater treatment has the potential to be a long-term and potentially permanent significant effect.</b></p>

# 16 Cumulative effects assessment

## 16.1 About this chapter

16.1.1 Cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the LPR and assessed alongside known existing underlying trends and other plan and programmes.

16.1.2 Cumulative effects are different from effects that occur alone. 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.

16.1.3 **Table 16.1** summarises the residual effects identified for each of the SEA topics (as set out in **Chapters 7-15**) and presents the likely cumulative effects of the LPR when considering these alongside other plans and programmes as well as national trends.

*Table 16.1: Cumulative effects assessment of the LPR*

Summary of impacts identified in the SA process	Further details of the cumulative effect	Cumulative effect
<b>Air</b> <ul style="list-style-type: none"> <li>Reduction in air quality</li> <li>Increased pollutant emissions</li> </ul>	<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>	-
<b>Biodiversity, flora and fauna</b> <ul style="list-style-type: none"> <li>Threats or pressures to designated biodiversity sites</li> <li>Impacts on habitats of principal importance and ancient woodland</li> <li>Impacts on the ecological network</li> </ul>	<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 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>	+/-
<b>Climatic factors</b> <ul style="list-style-type: none"> <li>Increased carbon and GHG emissions</li> </ul>	<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 GHG emissions, to some extent. This</p>	-

Summary of impacts identified in the SA process	Further details of the cumulative effect	Cumulative effect
<ul style="list-style-type: none"> <li>Loss of multi-functional GI</li> </ul>	<p>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 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>	
<p><b>Cultural heritage</b></p> <ul style="list-style-type: none"> <li>Impacts on the character or setting of heritage assets</li> <li>Alteration of historic environment character</li> <li>Impacts on archaeology</li> </ul>	<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><b>Human health</b></p> <ul style="list-style-type: none"> <li>Sustainable access to healthcare and leisure facilities</li> <li>Exposure to air/noise pollution (from AQMAs and main roads)</li> <li>Access to green spaces</li> <li>Access to PRoW or cycle network</li> </ul>	<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>	-

Summary of impacts identified in the SA process	Further details of the cumulative effect	Cumulative effect
	Furthermore, air and noise pollution associated with road traffic and AQMAs can have adverse implications for health (see 'air' section above).	
<b>Landscape</b> <ul style="list-style-type: none"> <li>• Impacts on the character or setting of Cannock Chase AONB</li> <li>• Alteration of landscape character</li> <li>• Impacts on sensitive landscapes and the West Midlands Green Belt</li> <li>• Alteration of views</li> <li>• Increased risk of urbanisation of the countryside and coalescence</li> <li>• Loss of tranquility</li> </ul>	<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 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>	--
<b>Population and material assets</b> <ul style="list-style-type: none"> <li>• Provision of housing to meet local need</li> <li>• Provision of employment opportunities</li> <li>• Sustainable access to, and increased pressure on, services and facilities</li> <li>• Impacts on community cohesion</li> <li>• Increased household waste generation</li> </ul>	<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>	-
<b>Soil</b> <ul style="list-style-type: none"> <li>• Loss of soil resource and BMV land</li> <li>• Impact on ecosystem services</li> </ul>	<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</p>	--



Summary of impacts identified in the SA process	Further details of the cumulative effect	Cumulative effect
	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><b>Water</b></p> <ul style="list-style-type: none"> <li>• Fluvial and surface water flood risk</li> <li>• Reduction in water quality and ecosystem services</li> <li>• Increased water demand</li> <li>• Increased pressure on wastewater treatment</li> </ul>	<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 WCS<sup>155</sup> 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>	-

<sup>155</sup> JBA Consulting (2020) Southern Staffordshire Councils Water Cycle Study – Phase 1 Scoping Study. Available at: <https://tinyurl.com/2p88kscz>. [Date accessed: 29/02/24]

# 17 Monitoring

## 17.1 Context

17.1.1 Regulation 17 of the SEA Regulations states *"The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"*.

17.1.2 The purpose of monitoring is to measure the environmental effects of the Plan as well as its success against its objectives. However, monitoring can place a heavy burden on financial and human resources, and it may therefore be practical to focus on monitoring residual adverse effects and to build on existing monitoring systems.

17.1.3 Monitoring the impacts of the Local Plan should seek to answer:

- Was the likelihood of sustainability impacts identified in the SA process accurate?
- Is the Local Plan successful in achieving its desired sustainability objectives?
- Are mitigation measures performing as expected?
- Are there any unforeseen adverse impacts of the Local Plan, and if so, are these within acceptable limits or is remedial action required?

## 17.2 Monitoring proposals

17.2.1 Monitoring proposals are set out in **Table 17.1** for SSDC to consider in the implementation of the LPR.

**Table 17.1:** Proposals for monitoring adverse sustainability impacts of the LPR

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO <sub>2</sub> and PM <sub>10</sub>	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 <sub>2</sub> emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Renewable energy generation	Annually, Plan area wide	Increase

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 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

## 18 How the SA has influenced the Plan

### 18.1 The role of the SA

- 18.1.1 The SA has been an influential tool throughout the plan making process to date. It works on an iterative basis. The plan makers identify various options at different stages of the plan making process which are subsequently appraised through the SA process using the methodology in **Chapter 4**.
- 18.1.2 As stated in the Publication Version of the LPR, the SA findings have been used to help refine policy choices and site options through to the final proposals set out in the Local Plan.
- 18.1.3 The process of appraisal is sequential in nature: an assessment of impacts is made, the mitigation hierarchy is applied, and the assessment of effects is revisited, leading to the identification of residual effects. The mitigation hierarchy is an important element of the assessment process. It considers firstly if the identified adverse effect can be avoided and if not, if it can be adequately mitigated to reduce the effect.
- 18.1.4 SA is necessarily a high-level assessment process, often using secondary data at a scale which is plan-based to make assessments about smaller-scale sites. This can introduce uncertainty to the process (see assumptions and limitations in **Appendix D**). The application of the precautionary principle means that when doubt prevails, a worst-case scenario is identified.
- 18.1.5 The likely evolution of the baseline without the Plan (see **Table 3.1**) shows that there are already a number of important trends, some of which are negative in nature. These include matters such as air quality, GHG emissions and flood risk; events associated with a changing climate. The table suggests that these are likely to continue without the LPR.

### 18.2 Recommendations

- 18.2.1 Recommendations made throughout the SA process have been fed back to SSDC to assist their decision making as the LPR has been developed. This includes a wide range of recommendations set out within Chapter 7 of the Regulation 18 (III) SA Report<sup>156</sup>.
- 18.2.2 The recommendations set out measures to mitigate some of the potential adverse effects that had been identified during the SA process. In many cases, recommendations or suggested enhancements to policies within the LPR were incorporated into the final versions of the policies.
- 18.2.3 Most notably, the outcomes of the SA in terms of reasonable alternative site options have been considered in the Council's site assessment processes, ensuring that the sustainability outcomes for individual sites have been considered prior to allocations being made.

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<sup>156</sup> 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/local-plan-review-evidence-base> [Date accessed: 03/11/23]

# 19 Conclusions

## 19.1 Residual effects following mitigation

- 19.1.1 The SA has assessed the site allocations and policies proposed in the LPR using the methodology in **Chapter 4** and assumptions as set out in **Appendix D**. A range of sustainability effects have been identified, which are highlighted throughout the policy and site assessments in **Appendices G, H and J**, with residual positive, negligible and negative effects summarised and discussed in **Chapters 7 to 15**.
- 19.1.2 Proposals in the LPR vary in terms of their sustainability performance with likely positive effects expected on some SA Objectives and adverse effects on others. The SA has identified likely sustainability effects of LPR proposals alone and in-combination.
- 19.1.3 The LPR is anticipated to result in a range of positive effects on sustainability, which are summarised in **Table 19.1**. 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.
- 19.1.4 The mitigation proposals presented in the LPR provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends, such as increased frequency of storm events associated with climate change.
- 19.1.5 The identified residual adverse effects (see **Table 19.2**) are generally minor, but some are associated with greater levels of uncertainty. In some cases, for example residual effects associated with household waste, landscape and biodiversity; these have been derived through the application of the precautionary principle owing to this uncertainty and in some cases lack of information to inform the assessments.
- 19.1.6 Some identified effects are greater in magnitude, for example residual adverse effects associated with air quality and climate change. These require careful attention outside of and beyond the LPR; notwithstanding such uncertainties, these aspects are included in the recommendations for monitoring. Whilst the LPR includes positive mitigation measures, the Plan alone cannot address these matters in their entirety as these are effects that are predicted to happen with or without the Plan. The Plan includes measures to reduce these effects, however, when considered cumulatively, a residual adverse effect would still be likely to occur.

**Table 19.1:** Likely residual positive sustainability effects of the LPR

Summary of residual positive effects	
1	<p><b>Multi-functional green infrastructure network</b></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><b>Access to public greenspace</b></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><b>Access to the PRoW and cycle networks</b></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>
4	<p><b>Provision of housing to meet local need</b></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><b>Provision of employment opportunities</b></p> <p>The Plan seeks to deliver 107.45ha of employment land, meeting the need identified in the latest 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><b>Community cohesion</b></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>

**Table 19.2: Likely residual adverse sustainability effects of the LPR**

<b>Summary of residual adverse effects</b>	
<b>1</b>	<p><b>Reduction in air quality and increased pollutant emissions</b></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>
<b>2</b>	<p><b>Fragmentation of the ecological network</b></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>
<b>3</b>	<p><b>Increased greenhouse gas emissions</b></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>
<b>4</b>	<p><b>Alteration of historic environment and landscape character</b></p> <p>Various LPR policies seek to ensure that development proposals maintain and improve the district's intrinsic rural character and distinctiveness and have regard to the findings of the published LCA and HLC. However, due to the scale of development proposed with a large proportion in previously undeveloped locations surrounding rural settlements with historic value, cumulatively the development set out in the LPR could have the potential to alter South Staffordshire's distinctive historic character to some extent.</p>
<b>5</b>	<p><b>Limited access to healthcare / leisure facilities and services</b></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>
<b>6</b>	<p><b>Impacts on sensitive landscapes and the West Midlands Green Belt</b></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>

<b>Summary of residual adverse effects</b>	
<b>7</b>	<p><b>Alteration of views</b></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>
<b>8</b>	<p><b>Urbanisation of the countryside and coalescence</b></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>
<b>9</b>	<p><b>Loss of tranquillity</b></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>
<b>10</b>	<p><b>Access to, and demand on, local services and facilities</b></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>
<b>11</b>	<p><b>Increased household waste generation</b></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>
<b>12</b>	<p><b>Loss of soil resources and BMV land</b></p> <p>The proposed allocations would cumulatively result in the loss of up to approximately 603ha of previously undeveloped land<sup>157</sup>, 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>
<b>13</b>	<p><b>Increased demand for water and wastewater management</b></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>

<sup>157</sup> 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.



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## **19.2 Consultation and next steps**

- 19.2.1 This report represents the latest stage of the SA process. As per Regulation 13 of 'The Environmental Assessment of Plans and Programmes Regulations 2004'<sup>158</sup>, this Regulation 19 SA Report will be published alongside the Publication Version of the Plan. Consultation findings will be used to inform subsequent stages of the SA process.
- 19.2.2 A six-week period of consultation under the Town and Country Planning Act will be undertaken by SSDC to offer individuals, businesses and other organisations an opportunity to submit representations regarding the South Staffordshire LPR.
- 19.2.3 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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<sup>158</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 13: Consultation procedures. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/regulation/13/made> [Date accessed: 01/11/23]

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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